



CORPORATE SOCIAL RESPONSIBILITY POLICY
"CSR"



Corporate Social Responsibility Statement

At the National Commercial Bank of Anguilla Ltd (NCBA), we take our corporate social responsibilities (“CSR”) seriously and are committed to advancing our policies and systems across the Bank to ensure we address and monitor all aspects of CSR that are relevant to our business. These include good ethical behavior, concern for employee health and safety, care for the environment and community involvement. We recognize that our social, environmental and ethical conduct has an impact on our reputation, therefore we commit to continual improvement in our performance.

Corporate Social Responsibility Policy

Engaging, learning from, respecting and supporting the Community within which we operate is of extreme importance to NCBA. This policy is therefore crafted to ensure that all matters of CSR are considered and supported in NCBA’s operations, and are consistent with our stakeholders’ best interests. NCBA is committed to being a leader in the field of Corporate Social Responsibility (CSR) and is of the view that in doing so, we will add significant value to our shareholders and fulfill our promise of “maintaining a strong brand”.

Operating in a responsible and sustainable manner is important to the NCBA. We see corporate responsibility as a discipline that helps us to manage risks and maximise on the opportunities available to us in a changing world. Our governance polices are intended to provide a framework for the overall prudent operations of NCBA, and adherence to our policies and related procedures is the responsibility of every NCBA Director, Officer, and Employee.

We are committed to understanding, monitoring and managing our social, environmental and economic impact, to enable us to contribute to society’s wider goal of sustainable development. This commitment is highlighted in our core values, mission and vision statements; and we aim to demonstrate these responsibilities through our actions, as guided by our corporate policies.

Our aim is to ensure that we contribute to the economic and social development of Anguilla. We view this policy as the blueprint for a structured approach towards the development of our people and by extension our country.

At NCBA we define Corporate Social Responsibility as follows:

- Customer Service
- Educational Development
- Community Outreach and Social Services
- Sports
- Environmental Awareness
- Cultural Development
- Financial Education and Empowerment

All of NCBA's employees and suppliers, where applicable, are required to adopt the CSR considerations outlined in this policy in their day to day activities. NCBA's Managers and Supervisors are to ensure that appropriate organizational structures are in place to effectively identify, monitor and manage CSR issues and performance relevant to the business. It is NCBA's obligation to consider the interests of its Customers, Employees, Shareholders, Community and the ecology to determine the social and environmental consequences of its business activities. NCBA has adopted the guidelines set out in the International Standard Operations (ISO)¹ 26000 on Social Responsibility.

This policy is built on the following areas that reflect emerging standards of Corporate Social Responsibility:

Business Ethics and Transparency

- NCBA is committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in its daily operations and to promote confidence in its governance systems.
- NCBA shall conduct its business in an open, honest and ethical manner.
- NCBA recognizes the importance of protecting all our human, financial, physical, social, environmental and reputational assets.
- NCBA is committed to measuring and tracking the performance of its CSR programs. (Appendix A).

Environment Health and Safety

NCBA is committed to protecting the health and safety of all individuals such as employees, contractors and the public in general. The Bank shall provide a safe and healthy working environment and shall not compromise on same. Our goal is to have no accidents.

All employees and contractors are responsible and accountable for contributing to a safe working environment by fostering safe working attitudes.

NCBA is also embarking on a number of "Go Green" initiatives bank-wide.

ISO¹ 26000 is the international standard developed to help organizations effectively assess and address those social responsibilities that are relevant and significant to their mission and vision; operations and processes; customers, employees, communities, and other stakeholders; and environmental impact.

Stakeholder Relations

NCBA shall engage stakeholders transparently, honestly, and respectfully, and by adhering to due process.

NCBA is committed to timely and meaningful dialogue with all stakeholders, including shareholders, customers, employees, government, regulators, among others.

Employee Relations

NCBA shall ensure that employees are treated fairly and with respect and consideration for their goals and aspirations and that diversity in the workplace is embraced.

Fair labour practices shall be exercised, in adherence with the local laws of the country, Bank policies, international best practices, and any other applicable external regulations.

NCBA is committed to providing equal opportunity in all aspects of employment and shall not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.

Community Investment

At NCBA we strive to actively support local initiatives on the island. This commitment is visible in our contributions of financial support, and presence. Additionally, we encourage our employees to contribute time and energy by participating in community organisations and/or projects.

NCBA stresses collaborative, consultative, and partnership approaches in our community investment programs.

Community Investment opportunities shall be considered during decision-making and business practices, and the Bank shall assist in local capacity building to develop mutually beneficial relationships with the community.

NCBA shall contribute to our communities' quality of life by supporting innovative programs in health, education, social services and the environment, as well as cultural and civic projects.

NCBA shall strive to provide employment and economic opportunities on the island.

NCBA shall continue to be the forerunner in community initiatives such as, but not limited to:

- Annual Primary Schools Football Association
- Vector Awareness Month
- The Anguilla Summer Festival
- Anguilla Day Activities
- Miriam Gumbs Senior Citizens Home annual exchange event.

APPENDIX A

EDUCATIONAL DEVELOPMENT

- Scholarship assistance offered to citizens, support of adult education programmes.
 - Comprehensive and affordable student loan programmes, promotion of computer literacy.
 - Infrastructural and other contributions/ donations to the Anguillian Education Systems.
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SPORTS

- Support of local athletes through sponsorships of individuals, teams and leagues.
 - Enhancing talents and skills of athletes through training and technical support.
 - Participation as a team in sports leagues.
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ENVIRONMENT, HEALTH AND SAFETY

- Participation in recycling, beautification or clean-ups of the community.
 - Assistance in disaster preparedness and response.
 - Preservation of historic landmarks and artifacts and green areas.
 - Company policies and practices ensure ethical and responsible conduct of business.
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FINANCIAL EDUCATION AND EMPOWERMENT

- Initiatives to promote better understanding of products/services offered by the financial sector.
 - Offering financial management tips to customers.
 - Outreach programmes promoting entrepreneurship, savings and investments.
 - Provision of small business credit facilities.
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CULTURAL DEVELOPMENT

- Sponsorship of cultural events that are in line with the Bank's policies.
 - Support of programmes to promote cultural development and preservation of cultural heritage
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COMMUNITY OUTREACH AND SOCIAL SERVICES

- Donations to church, civic groups and community organisations.
 - Assistance to social welfare institutions such as, nursing homes etc.
 - Programmes for the disabled and physical accessibility (e.g. ramps).
 - Initiating or participating in programmes for the youth, elderly and other vulnerable persons.
 - Programmes to promote health and wellness.
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CUSTOMER SERVICE

- Clearly stated policies and best practices promoting customer service excellence.
- Customer feedback programmes/customer satisfaction surveys.
- Maintaining a Code of business ethics.
- Customer appreciation programmes, giveaways, special rates etc.
- Commitment to customer service excellence via the continued development of staff through on-going training.
- Improvement of facilities and services including Internet banking, ATM services and senior citizens services among others.