

HATTON NATIONAL BANK PLC

POLICY ON CONTROL AND MANAGEMENT OF COMPANY ASSETS AND SHAREHOLDER INVESTMENTS

1. OVERVIEW

The Board of Directors of the Bank has adopted the Policy on the Control and Management of Company Assets and Shareholder Investments (the "**Policy**") to provide for the use by the Bank of its assets in its operations in an efficient manner to increase competitiveness of its business and protect shareholder investments. This document sets forth a summary of such Policy.

Any capitalized term not specifically defined in this Summary will have the meaning therefor set forth in the Policy.

2. PURPOSE

The purpose of the Policy is to establish guidelines and procedures aimed at safeguarding and protecting Bank's Assets and shareholder investments, ensuring responsible and ethical management practices for sustained corporate growth and stakeholder confidence.

3. SCOPE

The Policy applies to the Bank and covers all Directors, Key Management Personnel and other employees of the Bank involved in the decision-making process in relation to the Bank's Assets and shareholder investments.

The Policy covers physical, intellectual and financial assets including but not limited to real estate, technology, proprietary and confidential information and monetary investments.

4. PROTECTION AND PROPER USE OF BANK ASSETS

- 4.1 All individuals are responsible for safeguarding the Bank's tangible and intangible assets, including software systems, to prevent loss or damage that could impact the Bank's financial health.
- 4.2 Bank assets should be used solely for business purposes.
- 4.3 The Bank's assets will be logged in an assets register, with security measures in place to prevent theft or damage. Assets may also be insured based on their value and risk.
- 4.4 The obligation to protect confidential and proprietary information, including intellectual property created during employment, is mandatory. Unauthorized use or distribution of such information may lead to severe penalties.

- 4.5 In cases of suspected fraud or theft, the Bank will follow internal guidelines for investigation.
- 4.6 The Bank aims to foster a culture that prioritizes the awareness and importance of asset protection and proper usage.
- 4.7 The Policy will be supported by additional guidelines issued by the Bank regarding asset utilization and protection.

5. IT EQUIPMENT AND INFORMATION SYSTEMS

- 5.1 Employees may not use Bank-provided IT equipment for personal interests without prior approval from their immediate supervisor and must comply with relevant usage guidelines.
- 5.2 Employees must not disclose passwords or any stored information to external parties, except when legally required by regulatory bodies or law enforcement.
- 5.3 The use of illegal software on Bank equipment is strictly prohibited.
- 5.4 Employees must respect intellectual property rights and cannot duplicate or share copyrighted material without permission.
- 5.5 Altering IT equipment or installing unauthorized features is not allowed without the necessary approvals.
- 5.6 Employees must follow all security protocols and are prohibited from bypassing security measures or engaging in any activities that could expose the Bank to cybercrime.
- 5.7 The Bank's email system and internet connectivity must only be used for business-related purposes and in accordance with applicable laws.

6. RESERVES AND INVESTMENT

- 6.1 The Bank aims to distribute profits to shareholders while considering capital expenditure, growth opportunities, and market conditions, in compliance with its Articles and applicable laws.
- 6.2 The Bank will develop prudent investment strategies that align with its financial goals and risk tolerance, conducting thorough due diligence to maximize shareholder returns.
- 6.3 Effective monitoring mechanisms will be established to assess investment performance, with the Board addressing any deviations from expected results promptly.