



Revised March 2025

Code of Ethics & Guidelines for Business Conduct



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INTRODUCTION

The Code of Ethics and Guidelines for Business Conduct ("the Code") outlines the expectations for the conduct of our team at Access Financial Services Limited ("AFS", "the Company", or "we"). This Code represents the core principles and values that define who we are, our commitment to one another, the customers we serve, and the partners we engage with.

At AFS, we are dedicated to upholding the highest standards of ethical conduct and business practices. To further strengthen this commitment, we will provide regular training to all team members, ensuring they understand the ethical standards and core values outlined in the Code. This training will empower everyone to act in accordance with the Code and make ethically sound decisions throughout their work.

It is important to note that any behaviour or conduct inconsistent with the ethical standards in this Code is considered unacceptable and will be treated as a violation. Breaches of the Code will be addressed according to AFS's policies and procedures and may result in disciplinary action, including dismissal if necessary.

At AFS, we are committed to fostering an environment of accountability, respect, and ethical conduct. By upholding this Code, we collectively contribute to the long-term success and integrity of the Company, building lasting trust with all those we serve.

MISSION

To offer exceptional value to stakeholders by providing financial services to microentrepreneurs and individuals underserved by traditional providers. This will be achieved by a customer-centric, highly competent, and committed team delivering superior services tailored to our customers' needs.

VISION

Access Financial Services Limited, the leading financial services provider, is a highly profitable employer of choice, serving exceptionally satisfied customers while being focused, innovative and prudent.

CORE VALUES

- Customer First
- Integrity
- Accountability
- Respect

- Caring Environment
- Continuous Improvement

CEO'S MESSAGE

Since our establishment in September 2000, **Access Financial Services Limited** has been committed to upholding our core values of Customer First, Integrity, Accountability, Respect, a Caring Environment, and Continuous Improvement. These principles form the foundation of our Code of Ethics and Business Conduct and are integral to everything we do.

As we continue to grow and evolve, we remain steadfast in our commitment to uphold the highest standards of ethical conduct, ensuring that our actions align with our values and our mission to provide financial services to those underserved by traditional providers.

Our Code serves as a roadmap for how we operate, both individually and as a company, providing the framework within which we make decisions, engage with customers, and interact with one another. It reflects our ongoing commitment to maintaining a culture of respect, transparency, and excellence across all levels of the organization.

The success of our company is built on the trust and respect of our customers, employees, shareholders, and the communities we serve. This trust is earned through professionalism and ethical behaviour in all business dealings. Our continued success depends on each member of the Access Financial Services team embracing these standards and working together to achieve our collective mission.

As we look toward the future, we are committed to ensuring that the highest ethical principles continue to guide our actions. We will keep developing and delivering solutions that meet our customers' needs, operate with integrity, and contribute positively to the communities we serve.

I am proud to lead such a dedicated team and am confident that by adhering to this Code, we will continue to build on our legacy of trust, excellence, and innovation. Thank you for your commitment to these principles.

Chief Executive Officer
Access Financial Services Limited

BASIC PRINCIPLES

At Access Financial Services Limited, we are driven by the values of Customer First, Integrity, Accountability, Respect, a Caring Environment, and Continuous Improvement. These values guide our approach to business and shape how we achieve success. We are committed to upholding the

highest ethical standards and promoting responsible practices across Environmental, Social, and Governance (ESG) matters.

We pledge to create a safe, diverse, and respectful workplace. Through these principles, we strive to make a positive impact on all those we serve.

In line with our commitment to ethical conduct, we actively support the fair treatment of all individuals, including our team members, customers, business partners, and the communities we serve. At AFS, every individual is treated with dignity, compassion, and respect. We reject all forms of discrimination and work to cultivate a diverse, equitable, and inclusive workplace.

To Our Team Members

We are dedicated to fostering an environment where team members can grow, develop, and thrive.

AFS guarantees equal opportunities in employment, recruitment, development, and retention based on merit, ability, and performance. We are committed to helping our team reach their full potential by providing the tools and resources for growth.

As part of our commitment to career development, we:

- Guide our team in understanding how their contributions impact the achievement of our vision.
- Facilitate career development conversations to help team members reach their full potential.
- Provide opportunities for team members to grow and develop their skills.
- Understand what motivates our team and recognize and reward them in ways that are meaningful to them.

We are also committed to the health and well-being of our team members. To support this, we create a positive and supportive work environment that encourages mutually beneficial relationships and overall job satisfaction. AFS supports the quality of life for our team members by offering wellness programs and benefits to support both physical and mental health.

To Our Customers

At AFS, our customers are the driving force behind our success. We are committed to not only meeting but exceeding their expectations by:

- Doing the right thing the first time, and every time.

- Being responsive to their needs and concerns.
- Delivering on our promises.
- Never taking their loyalty for granted.
- Being polite and respectful.

To Our Company

We are deeply committed to the success of Access Financial Services Limited and strive to perform at the highest possible standards. As AFS team members, we:

- Demonstrate professional behavior and take pride in our work.
- Perform our duties diligently and with dedication.
- Act in the best interest of our Company at all times.
- Avoid situations that may harm or undermine the Company's image or reputation.
- Treat sensitive information with confidentiality and share it only when authorized.
- Maintain trustworthiness and integrity in all our actions.
- Show respect for others and foster positive relationships within the Company.
- Collaborate effectively and work together to achieve our shared goals.

To the Communities We Serve

As a responsible corporate entity, we recognize the importance of playing an active role in the communities where we operate. We contribute to nation-building by supporting education, creating lasting, meaningful impacts on future generations. As part of our ESG commitment, we aim to ensure that our contributions are not only charitable but lead to real, sustainable change within the communities where we operate.

In our dedication to creating positive social change, we are committed to maintaining a solid ESG framework across the organization. This framework underpins our efforts to advance the wellbeing of all, ensuring our contributions lead to the creation of vibrant, sustainable communities.

PUTTING THE CODE INTO PRACTICE

We believe that ethical behaviour is the cornerstone of our success. Our commitment to integrity, accountability, and fairness extends beyond mere compliance with the law, it is an integral part of who we are. By living these principles daily, we maintain the trust of our customers, team members, shareholders, and the communities we serve. We pledge to uphold this Code of Ethics

in every aspect of our business operations, guiding our actions and decisions with transparency, fairness, and respect for others.

THE IMPORTANCE OF HONESTY

Honesty is essential in everything we do at AFS. We understand that our reputation is built on the trust of our customers, employees, partners, and communities. Therefore, we are committed to being truthful and transparent in all our communications and actions. This includes:

- Providing accurate information to customers, investors, and regulators.
- Honouring our promises and commitments.
- Addressing issues openly and constructively, even when it might be uncomfortable.
- Avoiding any form of deception, misrepresentation, or fraudulent activity.

In all our dealings, we ensure that honesty remains at the heart of our business. By doing so, we create lasting relationships based on trust and integrity.

RELATIONSHIP WITH COMPETITORS

At AFS, we respect our competitors and their contributions to the industry. We believe in fair and ethical competition, which is key to driving innovation, improving customer service, and advancing the financial services industry.

We foster a business environment that upholds the integrity of the industry while respecting the rights of our competitors, ensuring that we compete in ways that benefit both customers and the market as a whole.

FAIR DEALING – WE ALWAYS PLAY BY THE RULES

At AFS, we are committed to conducting our business with the highest standards of fairness. This means that we engage in business dealings based on mutual respect, honesty, and fairness, ensuring accountability for our actions. We adhere to all applicable laws, regulations, and standards governing our industry, including those concerning consumer protection, fair competition, and financial services.

To ensure fair dealings, we pledge to:

- Always act with transparency and fairness in our relationships with customers, employees, partners, and other stakeholders.
- Treat all individuals with respect, never taking advantage of their trust or vulnerabilities.

- Avoid conflicts of interest and disclose any situations where personal interests may conflict with professional duties.
- Follow all relevant laws and regulations to prevent unethical or illegal practices.
- Ensure that contracts, agreements, and financial terms are clear, honest, and fair.

By committing to fair dealings, we maintain the trust and confidence of all stakeholders, ensuring that our business practices align with the highest ethical standards.

HANDLING TRANSACTIONS WITHIN THE COMPANY

When team members conduct business within AFS, all transactions must be handled with the same level of integrity, transparency, and fairness as any other customer transaction. Team members should not receive special treatment or benefits unless there is a specific, documented concession or benefit that aligns with Company policy.

It is essential that all business dealings within the Company are conducted ethically to preserve mutual trust and respect. Any form of misconduct, such as manipulating transactions or exploiting personal relationships for gain, undermines the trust that is fundamental to our success.

The integrity of our internal transactions is paramount, and any violations of this standard will be taken seriously. This includes the improper use of Company resources, benefits, or facilities. Any such behaviour will be addressed in accordance with our policies and procedures, and may lead to disciplinary action.

RECEIVING OR GIVING GIFTS

At AFS, we recognize that building relationships is an important aspect of doing business. However, we are committed to ensuring that all business dealings are conducted transparently and without any undue influence. We have clear guidelines around the receiving or giving of gifts to prevent any conflict of interest or appearance of favouritism.

Guidelines for receiving and giving gifts:

- Gifts or favours should never be given or received in a manner that could influence business decisions or create an obligation to a party.
- Gifts should be of modest value and appropriate to the nature of the business relationship.
- Team members are encouraged to avoid accepting gifts that could be perceived as influencing their objectivity or impartiality.

We strive to maintain transparency and integrity in our relationships with customers, suppliers, and other stakeholders. The giving or receiving of gifts should never interfere with our professional judgment or create a conflict of interest.

CORRUPTION AND BRIBERY

AFS is committed to maintaining the highest standards of integrity and is firmly opposed to any form of corruption or bribery. We prohibit any actions that could be perceived as offering or accepting bribes or engaging in corrupt practices, whether directly or indirectly.

Key Principles:

- **Bribery:** Team members must not offer, promise, give, or accept any bribe, kickback, or other improper payment or favor in any form, including cash, gifts, services, or other valuables. This includes payments made to influence business decisions or gain a business advantage.
- **Corruption:** Any act of corruption, whether involving public officials, customers, or any other party, is strictly prohibited. This includes offering anything of value to induce any party to act improperly or influence their decisions in ways that contravene legal or ethical standards.
- **Zero Tolerance:** We shall not engage in or tolerate any conduct that could be considered corrupt or unethical, whether it occurs within our own organization or involves external parties.
- **Reporting:** Any instances of suspected bribery or corruption should be reported immediately through the appropriate channels. We have implemented a reporting mechanism to ensure concerns regarding potential corrupt or unethical conduct can be raised and addressed without fear of retaliation.

We recognize that corruption and bribery undermine the trust of our stakeholders and damage the reputation of the company. We will comply with all applicable laws, including the Corruption Prevention Act and other anti-bribery regulations, both locally and internationally.

THEFT

At Access Financial Services Limited, we uphold a strict policy against theft. Stealing from the company, colleagues, or customers is a severe violation of our trust and ethics, and it undermines the integrity of our organization.

When conducting business or managing resources, team members are expected to act responsibly and with the highest level of honesty. Any form of theft, whether involving financial resources, property, or information is considered a breach of trust and will not be tolerated.

Types of Theft:

- **Theft of Company Assets:** Stealing money, property, information, or any other resources belonging to AFS.
- **Theft from Colleagues or Customers:** Taking personal or business-related property without consent.
- **Misuse of Company Resources:** Using company resources, including benefits or facilities, for personal gain inappropriately.

Any employee caught stealing or assisting others in committing theft will face immediate disciplinary action, including potential dismissal. Legal action may also be pursued, and criminal prosecution may be filed.

AFS is committed to maintaining a work environment based on integrity and trust. We encourage all team members to report any suspected theft or fraudulent activity through our established reporting channels. Ensuring the safety and security of the company's resources is the responsibility of every team member.

COMPANY REPUTATION

The reputation of AFS is one of our most valuable assets. Every team member plays a critical role in maintaining and enhancing the company's reputation through their actions, both inside and outside of the workplace.

We must conduct ourselves in a manner that reflects positively on AFS and adheres to the highest standards of integrity, professionalism, and respect. Any actions that could harm the company's reputation, whether through dishonesty, unethical behavior, or neglect, are strictly prohibited.

Protecting the reputation of AFS is a responsibility shared by all team members. We must avoid actions that could damage our standing with customers, partners, or the broader community.

RECORDKEEPING

Accurate and reliable recordkeeping is essential for ensuring the integrity of our business operations and complying with legal, regulatory, and financial requirements. All team members are responsible for maintaining accurate records, including, but not limited to, financial documents, contracts, and communications.

Records must be:

- **Complete:** All records should reflect the full and accurate details of a transaction or business activity.
- **Timely:** Documents and data must be recorded as soon as possible after the transaction or activity occurs.
- **Secure:** All records must be stored securely to protect against loss, tampering, or unauthorized access.
- **Compliant:** Team members must adhere to relevant laws, regulations, and company policies when handling records.

Tampering with, falsifying, or neglecting to maintain proper records is strictly prohibited and may lead to disciplinary action.

USING AFS' FACILITIES

AFS provides its team members with various assets, facilities, and resources to support their job functions. These include office equipment, technology, and other tools necessary for conducting business. As stewards of these resources, we must treat them responsibly and ensure they are used solely for company business and purposes aligned with AFS' mission and objectives.

Team members should:

- **Use Company Property Appropriately:** Company resources, such as equipment, time, and facilities, should only be used for official business unless otherwise authorized by a supervisor or manager. Minimal personal use may be allowed in circumstances deemed insignificant or nominal.
- **Protect Company Assets:** We are entrusted with company resources and must avoid loss, damage, waste, or misuse. Any damage or loss of AFS property should be reported immediately to a manager or supervisor.
- **Ensure Accountability:** If AFS property is entrusted to third parties, team members remain responsible for the care and safeguarding of those assets.

We are all responsible for taking care of the company's assets and must act with integrity and caution when using any resources provided by AFS.

CONFLICT OF INTEREST

At Access Financial Services Limited, we must always act in the best interests of the company, aligning our actions with AFS's core values: **Customer First, Integrity, Accountability, Respect, Caring Environment, and Continuous Improvement.**

When faced with a decision or opportunity, ask yourself the following questions to determine whether you are acting in the company's best interest:

- Am I acting in keeping with AFS' core values?
- Am I feeling obligated to someone else, either personally or professionally?
- Is there any chance that my independent judgment might be compromised, even slightly?
- Does this situation give the appearance of bias or a conflict of interest?
- Will AFS, its shareholders, or its customers be disadvantaged without legitimate reason if I participate in the activity or transaction?
- If the activity involves an outside commitment, will the time required interfere with my ability to effectively carry out my job responsibilities to AFS, its shareholders, or its customers?

A conflict of interest arises when personal, financial, or other interests interfere or could be perceived to interfere with your ability to make objective and unbiased decisions for the company. It's important to avoid situations where your duties to the company and personal interests could clash or appear to clash.

If a conflict of interest arises, you are responsible for disclosing it immediately to your manager or supervisor so that an appropriate course of action can be taken. Transparency is key in preserving the integrity of both individual and company decisions.

CONFIDENTIALITY

As AFS team members, we may have access to confidential information that is vital to the company's operations. This information, whether written, spoken, or stored digitally must always be treated with the highest level of care and discretion.

Confidential Information refers to any data or information that is not publicly available and could cause harm to the company, its stakeholders, or its competitive position if disclosed. Examples include, but are not limited to:

- Trade secrets
- Financial information
- Strategic plans
- Customer data
- Marketing plans

- Employee data
- Potential acquisitions and mergers
- Competitor data

It is our collective responsibility to protect such information from unauthorized disclosure or misuse, both during our employment and after we leave the company. This includes:

- Access to confidential information should be limited to those who need it for conducting company business.
- Confidential information should only be used for AFS business purposes.
- We must not disclose confidential information unless authorized or required by law.
- Team members should take all reasonable measures to safeguard this information against unauthorized access or leaks.

The protection of confidential information is critical to maintaining the integrity, competitive advantage, and reputation of AFS. Disclosing sensitive information without proper authorization may result in disciplinary action, including termination or legal consequences.

ANTI-MONEY LAUNDERING AND ANTI-TERRORISM COMPLIANCE

At AFS, we are committed to maintaining the highest standards of ethics and governance, with a strong focus on preventing money laundering, terrorist financing, and other illegal activities. We recognize that compliance with anti-money laundering (AML) and anti-terrorism laws and regulations is a shared responsibility, not only for AFS as a company but also for each team member.

Our objective is to ensure that all business conducted by AFS is with legitimate customers and partners. This requires strict adherence to the company's **Know Your Customer (KYC)** due diligence processes. All team members are responsible for being vigilant and ensuring compliance with relevant laws and regulations, and for adhering to our company's policies and governance framework, which are designed to prevent fraud and money laundering.

If you become aware of any suspicious transactions or activities that could indicate money laundering or terrorist financing, you are required to report these immediately in accordance with AFS' procedures. Failure to do so could compromise the safety and integrity of the business and expose us to legal and regulatory risks.

INSIDER TRADING

Under the **Securities Act of Jamaica**, it is illegal for individuals with access to **Price-Sensitive Information** related to a publicly listed company to engage in transactions involving that

company's securities. As AFS team members, we have both a legal and ethical responsibility to prevent insider trading and avoid situations where our access to such information could influence our decisions unfairly.

If you possess **Price-Sensitive Information** about the Company, you are classified as an "insider." You must not engage in any transactions involving the company's securities based on that non-public information. Additionally, you must not share this insider information with others who may then use it to make decisions regarding the company's securities.

The consequences of insider trading are severe. It can result in disciplinary action, including immediate termination of employment, as well as potential criminal prosecution. It is critical that we all uphold the law, act with integrity, and prioritize the interests of the company and its stakeholders.

WHISTLEBLOWING

At Access Financial Services Limited, all team members have a duty to report any discrepancies, violations of laws, policies, or breaches of the Code of Ethics. Reporting such issues is essential to maintaining the integrity of our organization and demonstrates our collective commitment to upholding the core values and ethical standards of the company.

AFS is committed to ensuring that team members can report misconduct or violations without fear of retaliation. This protection is guaranteed under the Company's **Whistleblowing Policy**, which ensures confidentiality and safeguards whistleblowers from any adverse actions.

We aim to foster a culture where open and honest communication is both expected and encouraged. If you believe that policies, procedures, or ethical standards have been violated, you are encouraged to approach your supervisor or management to report the issue. You are encouraged to report any matter of concern to your immediate supervisor. However, if at any time you believe you have an Ethical concern that you do not wish to report to your immediate supervisor, please feel free to report it directly to the **Human Resources Manager, who is also the Ethics Officer for AFS**:

Contact Information-Ethics Manager:

The Human Resource Manager
Access Financial Services Limited
41 B Half Way Tree Road
Kingston 10
Telephone: 929-9253

RESPONSIBILITIES OF THE ETHICS OFFICER

The Human Resource Manager is responsible for ensuring that each member of staff receives and reads a copy of the **Code of Ethics and Guidelines for Business Conduct**. Additional responsibilities include:

- **Conducting Code of Ethics Orientation and Refresher Training:** Ensuring that all staff members are properly introduced to the Code of Ethics and participate in periodic training sessions to reinforce its importance and application.
- **Documenting and Tracking Ethics Violations:** Maintaining a record of any reported violations of the Code of Ethics and ensuring that appropriate actions are taken to address these issues.
- **Benchmarking and Evaluating Ethical Compliance:** Regularly assessing the organization's ethical practices and compliance, identifying areas for improvement, and ensuring adherence to ethical standards across all levels of the company.

REPORTING BREACHES OF THE CODE

At AFS, it's everyone's responsibility to speak up if something doesn't seem right or if we see a breach of the Code or company policies. Doing so keeps us accountable and ensures we maintain the integrity that defines our company.

If you notice any issues, your first step should be to talk to your immediate supervisor. We want you to feel comfortable reaching out to them with any concerns.

However, if you're not sure about going to your supervisor, or you're uncomfortable doing so, there are other ways to report a problem. You can reach out to the relevant department overseeing the area in question, speak with a senior manager or director, or use the Whistleblowing mechanism.

We take all concerns seriously. By speaking up, you help us preserve the trust and integrity AFS is built on.

CHANGES, ADDITIONS OR DELETIONS

Changes, additions or deletions to this document may only be made with written agreement by the Chief Executive Officer.

APPROVAL

Accepted and Approved by:



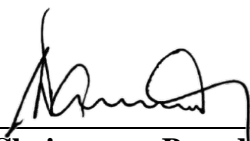
Chief Executive Officer

March 18, 2025
Date



**Chairman – Audit & Risk
Management Committee**

March 18, 2025
Date



Chairman – Board of Directors

March 18, 2025
Date



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