

DE NEDERLANDSCHE BANK N.V.

Regulation on the Use of Corporate Resources

Article 1 Definitions

For the purposes of this Regulation the following definitions shall apply:

- a. *corporate resources*: resources and facilities of DNB that are used by the employee in the performance of his/her duties, as well as other property available at DNB;
- b. *current practice*: that which is considered accepted behaviour in society and, more in particular, at DNB;
- c. *digital resources*: resources made available by DNB to the employee on which digital information can be stored, and facilities for the exchange of information via digital media;
- d. *DNB*: De Nederlandsche Bank N.V.;
- e. *employee*: the person who works for DNB;
- f. *security token*: an object containing unique features and serving to verify a person's identity;
- g. *password*: a secret personal code which serves to verify the identity of the user on his/her gaining access to DNB's automated systems.

Article 2 Scope

This Regulation shall apply to all employees of DNB.

Article 3 Use of corporate resources

1. Employees shall handle the corporate resources made available to them with care, respect and honesty.
2. In their use of corporate resources, employees shall not jeopardise the name and reputation of DNB or of the employees of DNB.
3. Employees shall adhere to the guidelines and instructions of DNB that apply to the use of the corporate resources.
4. Employees shall use the corporate resources in an efficient manner, and shall take reasonable and appropriate measures to limit any costs or loss to DNB.
5. Employees shall prevent unauthorised use of corporate resources.

Article 4 Business and personal use

1. Corporate resources shall be destined for business use.
2. Unless an internal regulation of DNB stipulates otherwise, limited personal use of corporate resources shall be permitted provided that:
 - a. it is accepted based on current practice; and
 - b. it does not interfere with the performance of tasks and activities by the employee or others; and
 - c. it does not cause any inconvenience or disproportional costs to DNB or other employees; and

- d. the corporate resources are not used for commercial purposes.

Article 5 Use of digital resources

1. In using digital resources, the employee shall always be aware of the security risks involved and shall act accordingly. The employee shall at all times comply with DNB's security measures and shall not circumvent them.
2. The employee shall be responsible for carefully guarding his/her passwords and security tokens.

Article 6 Recording the use of digital resources

1. The use of digital resources may be monitored by DNB.
2. The 'Regulation on Privacy in Monitoring the Use of Digital Resources' describes which data shall be recorded, on which grounds such recording shall take place and in which manner and to whom access shall be provided.

Article 7 Reporting loss or theft

Employees shall report the loss or theft of a corporate resource immediately to the Security and Transport Department.

Explanatory Notes to the Regulation on the Use of Corporate Resources

General

This Regulation is a more detailed elaboration of an Article from DNB's Code of Conduct about interests and resources that reads: "*We handle the interests and means entrusted to DNB, as well as the interests and means of DNB itself, with care, respect and honesty.*"

The objective of the Regulation is to set rules, supplementary to those in DNB's Code of Code, on how to handle corporate resources.

The Regulation contains principle-based provisions, and operates on the assumption that employees have their own responsibility in using corporate resources. The objective of the Regulation is to create a frame of reference within which the employee must make his/her own judgment. In case of doubt, the employee should consult his/her senior officer.

Explanatory Notes to the Individual Articles

Article 1

Employee

Employees within the meaning of this Regulation are understood to be any and all persons who perform activities for DNB, irrespective of the manner of their relationship with DNB. The definition of employee covers, in any case, employees on permanent or temporary contract, insourced employees, temporary workers, trainees and secondees. The only condition is the existence of some relationship of authority between DNB and the employee. It thus concerns staff members and similar employees. Therefore, independent external consultants, but also service providers such as window cleaners do not fall within the scope of this Regulation.

Corporate resources

The term 'corporate resources' is to be interpreted widely; it covers any and all resources that are made available by DNB for use by the employee in his/her work. Examples are mobile or landline phones, Blackberries and computers, photocopiers and printers, paper, books and magazines, tables and chairs and company cars. Facilities such as digital filing systems and access to the Internet also fall under the general definition of corporate resources.

Article 5 of the Regulation provides for a few special rules on the use of digital resources, due to their special nature. The term 'digital resources' currently covers in any case Internet in the workplace, e-mail, document system ('rondo'), telephone in the workplace, digital filing system, browser, mobile phones, Blackberries and network directories. This list is not exhaustive.

Article 4

Although corporate resources are made available for business purposes, limited personal use may be permitted under Article 4(2) under (a) to (d). The requirements mentioned in Article 4(2) are cumulative.

Sometimes, a specific internal regulation includes provisions about private use. In that case, the provisions of that specific internal regulation take precedence over the provisions of this present Regulation. At the moment of drawing up this Regulation, provisions about private use are to be found in regulations on car expenses, company cars and business trips.

In daily practice, the question will often arise as to where the boundary lies between acceptable and unacceptable use. A single specific rule cannot be given; to be able to answer the question fairly, one should look at the nature of the corporate resource and the nature of the personal use. For instance, making a few photocopies for one's personal use is generally accepted. But photocopying large quantities of a football club bulletin would exceed the boundaries of acceptability. Internal guidelines have been established for specific corporate resources, such as the Internet and e-mail, which include provisions about private use and thus give substance to Article 4(2).

Article 5

Digital resources entail specific security risks. To limit these risks, DNB is constantly taking measures such as installing virus scanners and firewalls, blocking or not allowing the use of specific services and Internet sites. The employee will comply with these measures and will not circumvent them.

Article 7

This provision not only refers to reporting a loss or theft of an employee's 'own' corporate resources. If, for instance, an employee uses a conference room and finds that the laptop, a normal fixture of that room, is missing, the employee should report this to Security & Transport. Immediate reporting is especially important where corporate resources are concerned that may contain confidential information, such as Blackberries and memory sticks.