Code of Conduct



Principle 1 - Professional Integrity

You are a representative of DBS and are expected to demonstrate behaviour consistent with the highest standards of professional conduct. This means you must conduct yourself with integrity, taking responsibility for your actions and act in a way that promotes trust.

You should also treat DBS assets with care and only use these assets for legitimate purposes. This includes email and internet services which may be monitored.

DBS should be promoted as a workplace where employees feel safe, respected and valued. You should stand against workplace harassment behaviours, including but not limited to bullying, insulting, stalking, sexual harassment and discrimination.

You Should

- a) Carry out your duties with honesty, fairness, integrity, professionalism and in line with ethical principles.
- b) Treat fellow staff with respect and dignity.
- c) Avoid behaviours that may cause fellow staff to feel harassed, alarmed or distressed, which may pose a risk to their health and safety. Examples of workplace harassment include but are not limited to:
 - Using threatening, abusive or insulting language or non-verbal gestures
 - Making discriminatory remarks about age, race, gender, nationality or religion
 - Sexual harassment
 - Stalking
 - Cyber bullying
- d) Comply with DBS Policies, Standards and Guidelines.
- e) Maintain all business transactions and records accurately and in a timely manner, including staff related records e.g. travel, leave.
- f) Treat DBS assets with care and only use it for legitimate DBS business purposes.
- g) Do not promote or evangelise religious activities within Bank's premises.
- h) Manage your finances in a responsible manner and notify your manager if you are in financial distress.
- i) Comply with applicable requirements on personal trading activity including any locationspecific regulatory prohibition to engage in any personal hedging strategies or remuneration and liability related insurance or other measures to hedge any exposures in respect of your unvested DBSH shares that you have been awarded.
- j) Report immediately to your line manager if you are involved in any criminal, civil or bankruptcy proceedings. Line manager to assess and communicate to LCS and HR of any such proceedings reported by staff accordingly.

Principle 2 - Confidentiality

In the course of performing your duties, you may have access to bank proprietary information, confidential and secret information (collectively known as "DBS information"). It may be in various forms, including in oral, written or electronic formats and can include confidential information or personal data relating to DBS, our business associates (including vendors, service providers customers), our customers or our staff.

You should only use, share, disclose or transfer DBS information according to its purpose and intent, in compliance with relevant Bank Policies and Standards.

You Should

- a) Use DBS information according to its purpose and intent, in compliance with the relevant laws and applicable DBS Policies and Standards (such as the Information Classification and Handling Standard). This includes sharing, disclosure or transfer of DBS information to third parties as well as within DBS Group.
- b) Refer any media enquiries to Group Strategic Marketing & Communications.
- c) Remember your obligation to protect the confidentiality of information received during your employment continues even after you cease employment with DBS.

Principle 3 – Conflicts of Interest

A conflict of interest arises when you have competing professional or personal interests making it difficult to fulfil your duties properly, or creates an appearance of impropriety that could undermine customer or public confidence. Conflicts of interest could arise in dealings among DBS staff, and also between you and DBS Group, or others (e.g. customers, business associates, etc).

You should recognise and avoid situations which may result in a conflict of interest.

You Should

- a) Avoid all situations that could result in conflicts of interest.
- b) Seek approval in writing from the relevant approvers set out under the Outside Appointment Guide (OA Guide) before accepting any outside employment (including self employment).
- c) Exercise good judgement when offering or accepting gifts from customers (existing or potential), business associates, brokers or members of the public.
- d) Avoid any personal investment in the business of a customer, supplier, competitor or business introduced by or affiliated with a customer or supplier. You may undertake personal investments in listed securities subject to compliance with relevant policies and standards.
- e) Comply with reporting and disclosure requirements of potential or actual conflicts of interest, including requirements imposed by law.
- f) Consult LCS, HR and/or your line manager as soon as you are aware of any actual or potential conflicts.

Principle 4 - Fair Dealings

We aim to serve the financial needs of our customers within the boundaries of fair, ethical and legal business practices. DBS strives to be an organisation strongly supporting vigorous but fair competition.

We aim to promote a competitive marketplace that is free to provide consumers with high quality goods and services at fair prices, and to prevent conduct interfering with this outcome. Failure to comply can have serious consequences for DBS, including long and expensive regulatory investigations, substantial fines or damages, and publicity damaging to our brand and reputation.

You Should

- a) Comply with DBS Policies, Standards and Guidelines.
- b) Comply with applicable laws, rules and regulations.
- c) Disclose to customers the terms and conditions of services provided, the risks of any transaction entered into by customers, and our charges and fees.
- d) Respond promptly to customers' needs, requests and enquiries e.g. terms and conditions of banking services, bank charges.
- e) Act with honesty and integrity when dealing with our customers.
- f) Treat our customers with dignity and respect.
- g) Offer products and services that are suitable for our customers.
- h) Be competent to undertake proper fact-find, risk profiling and know your customer analysis, provide our customers with quality advice, appropriate recommendations, clear and timely information.
- i) Execute customers order promptly, efficiently and accurately.

Principle 5 - Speak Up

It is important to report behaviour or activity which may potentially breach the Code of Conduct Policy and Standard to help protect the reputation of DBS, our staff and customers from harm.

If you observe any actual or potential breach of the Law, Code, irregularity, impropriety, or other inappropriate activity by staff, customer, vendor or third party relating to DBS, you should escalate the matter. Any report you make will be treated with the strictest confidence and every effort will be made to maintain confidentiality of your report and identity.

You Should

- a) Report activity which is dishonest, fraudulent, illegal or unethical that has or is taking place to your line manager, LCS, HR, Internal Audit or via the Speak Up service
- b) Report bullying, harassment, discrimination or threatening behaviour to your line manager, HR or via the Speak Up service.

The link to the Speak Up website is: https://dbsspeakup.com/website.aspx (Note: Please copy and paste the link into browser to load the webpage)

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