

Speak Up Policy

Scope: DBS Bank India Limited

Issuer: Prabhat Gupta, Head Legal, Compliance & Secretariat

ID: Will be updated

1. Guiding Principle

- 1.1. DBS Bank India Limited ('DBIL') is a Wholly Owned Subsidiary ('WOS') of DBS Bank Limited ('DBS') headquartered in Singapore. As a matter of sharing best practices, DBIL will draw on experience and expertise of DBS when dealing with complex, long tenor, large or important transactions to ensure that the minimum acceptance criteria of the group are met. Further, DBIL will reckon or consider certain policies and standards prescribed by DBS and adopt to Indian regulations, if any, to ensure that the operations meet the minimum acceptance criteria of the Group. The Policy should be read in conjunction with DBS Speak-Up Standard.
- 1.2. DBIL is committed to a culture of ethical behaviour, transparency and corporate compliance. In line with this culture, this Policy provides a framework to promote responsible disclosure of actual or suspected reportable conduct in good faith, without fear of reprisal or recrimination.
- 1.3. The Policy applies to anyone who works for DBIL, including employees (full time, part time, temporary), and any other persons who have been permitted by DBIL to perform duties or functions (including but not limited to contractors, secondees, interns, industrial attachments, agency staff, remisiers and vendors; collectively referred as 'staff')

2. Policy

- 2.1. DBIL will:
 - a. promote and maintain high standards of corporate governance through a corporate governance structure comprising of the India Audit Committee of the Board and India Chief Executive Officer to oversee the implementation of the Policy to promote transparency, fairness and accountability throughout the organization.
 - b. implement Policy and Standards to ensure arrangements are in place for concerns to be raised about possible improprieties or misdeeds and independently investigated, and for appropriate follow-up action to be taken.
 - c. ensure that the Policy offers the Reporting Persons anonymity and protection from negative consequences if they have made any disclosure in good faith.

3. Key Responsibilities

- 3.1. Staff are expected to be aware of and comply with this Policy and related Standard.
- 3.2. The Reporting Person is responsible for reporting concerns when he/she has in good faith reasonable grounds to believe impropriety or misdeeds have or are taking place.
- 3.3. The Subject is responsible for being honest and cooperative in the course of an investigation.
- 3.4. The India Audit Committee of the Board is responsible for reviewing the adequacy and effectiveness of the DBIL's "Speak Up" program. It is also responsible for evaluating the quarterly/annual reports and providing recommendations for any follow-up action.
- 3.5. The India Chief Executive Officer is responsible for reinforcing the tone at the top for a strong ethical culture and supporting the DBIL's "Speak Up" program.

- 3.6. The Head of Legal, Compliance & Secretariat or his/her delegate, will be the DBS Speak Up Officer and is responsible for oversight of the DBIL's "Speak Up" program and reporting. This includes ensuring a process is in place to receive and review disclosures whilst assuring protection of the Reporting Person.
- 3.7. The disclosures can be made internally through Human Resources, Line Management, Compliance, Internal Audit, DBS speak up portal (<https://ethicslinesingapore.kpmg.com.sg/DBSSpeakUp>). The DBIL's Speak Up Officer has the authority to retain outside legal counsel, accountants, private investigators, or any other resources deemed necessary to conduct a full, complete and independent investigation of the allegations.
- 3.8. The Head of Financial Crime & Security Services ('FCSS'), or his/her delegate, will be the Investigation Officer and is responsible for investigation. If there is any actual, potential or perceived conflict of interest in a disclosure being investigated and reviewed by FCSS, the Speak Up Officer will determine an appropriate individual to review and investigate the disclosure.
- 3.9. Parties (e.g. BU/SU etc.) to whom a disclosure is made must refer such disclosure to Head of FCSS for further investigation.
- 3.10. In the case of a disclosure, every effort will be made to maintain the confidentiality of the Reporting Person's and Subject's identity, and the confidentiality of the case.
- 3.11. DBIL does not tolerate any reprisal, discrimination, harassment, or victimization against the Reporting Person. Disciplinary action may be taken against any DBIL staff who engages in such behaviour.
- 3.12. Any investigation of disclosures will be conducted in accordance with the Group Investigation Standard.

4. Governance

4.1. Approving Authority and Ownership

- This Policy will be owned by Head of Legal, Compliance and Secretariat.
- This Policy will be placed before the India Management Committee for recommendation to India Audit Committee of the Board for approval.
- Any changes that are not substantive, but incidental or administrative in nature, do not require a sign-off by the approving authority.

4.2. Deviations

Any deviations, including any addendums, from this Policy, if any, shall be on an exceptional basis and must be documented and approved by the issuer or delegate. The review of deviations shall be aligned to biennial review.

4.3. Review

The Policy should be reviewed on a biennial, unless otherwise required.

Appendix 1 Glossary

<https://go.mydbs.net/web/grp-lcs-sg/Information?articleId=47336277#section2>

Appendix 2 Related Policies and Standards

- Group Speak Up Standard
- Group Code of Conduct
- Group Anti-Fraud Policy
- Group Anti-Fraud Standard
- Group Investigation Standard
- India Gifts, Entertainment & Sponsorships Standard
- Group Incident Management Policy

Appendix 3 Any Additional Information or Materials

[FCSS Intranet on Speak UP](#)

Speak Up Website → (<https://ethicslinesingapore.kpmg.com.sg/DBSSpeakUp>)

Appendix 4 Deviations

Not Applicable

Appendix 5 Version History

Version	Date of Issue	Summary of Key Changes
1.0	September 2019	Policy Issued
2.0	July 2023	• Section 1.3: Added “collectively referred to as staff”. • Section 3.1: “Employees are expected to be aware of and comply with this Policy and related Standard.” changed to “Staff are expected to be aware of and comply with this Policy and related Standard.” • Section 3.7: “The disclosures can be made internally through Human Resources, Line Management, Compliance, Internal Audit or through DBS speak up portal (www.dbsspeakup.com). The DBIL’s Speak Up Officer has the authority to retain outside legal counsel, accountants, private investigators or any other resources deemed necessary to conduct a full, complete and independent investigation of the allegations.” Changed to “The disclosures can be made internally through Human Resources, Line Management, Compliance, Internal Audit, DBS speak up portal (www.dbsspeakup.com), email (report@dbsspeakup.com) or through toll free number 000 800 0502 111. The DBIL’s Speak Up Officer has the authority to retain outside legal counsel, accountants, private investigators, or any other resources deemed necessary to conduct a full, complete and independent investigation of the allegations.” • Section 4.1: “This Policy will be placed before the India Management Committee for recommendation to Audit

		Committee of the Board for approval." Changed to "This Policy will be placed before the India Management Committee for recommendation to India Audit Committee of the Board for approval." • Section 4.1: Added "Any changes that are not substantive, but incidental or administrative in nature, do not require a sign-off by the approving authority." • Section 4.2: "Any deviations, including any addendums, from this Policy, if any, shall be on an exceptional basis and must be documented and approved by the issuer." Changed to "Any deviations, including any addendums, from this Policy, if any, shall be on an exceptional basis and must be documented and approved by the issuer or delegate. The review of deviations shall be aligned to biennial review".
3.0	August 2025	• Policy updated in line with Group Speak Up Policy. • Speak Up website links updated.