

Code of Conduct

At OCBC ("the Bank"), our management values high ethical standards that drive the **OCBC core values** – Lasting Value, Integrity, Forward-looking, Respect and Responsibility ("**LIFRR**"). What we do, what we say and the decisions we make, must reflect these values.

The OCBC Code of Conduct ("The Code") helps our employees to understand these high ethical standards that we expect from them. The Code sets out the principles, policies and guidelines we must observe as we aim to do the right thing every day.

Violations of law, regulation, rule, or breaches of policy, standard, procedure, or this Code may result in disciplinary action up to and including termination of employment.

Policies covered under The Code

Acceptable Use

The Acceptable Use Sub-Policy defines the proper conduct and use of the Bank's technology ("facilities") and information assets. These requirements are in place to protect users and the Bank. This sub-policy should be read in line with the Bank's Information Risk Policy, Information Classification and Handling Sub-Policy, Social Media Policy & Guidelines and Personal Data Protection Policy.

Anti-bribery and Corruption

We take a **zero-tolerance approach** to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

Anti-criminal Facilitation of Tax Evasion

All forms of facilitation or assistance of tax evasion are strictly prohibited and not tolerated.

Anti-gambling

The workplace can be a way for employees with gambling problems to get cash illegally to finance their gambling habit. This policy is to protect the interests of our customers and shareholders, and to avoid placing our staff members in a position of risk.

Anti-Slavery and Human Trafficking

We uphold human rights principles to ensure that slavery and human trafficking are not taking place within our directly employed workforce as well as any other third-party service providers and vendors.

Anti-Workplace Harassment, Bullying & Inappropriate Conduct

We are committed to providing our staff members with a work environment where we treat each other fairly and with respect. We do not accept harassment and bullying under any circumstances.

Behaviours @ Work

We expect all staff members to behave in a respectable and appropriate way towards their colleagues in the workplace.

- **Alcohol and food**

They must not drink or be under the influence of alcohol while working on our property or while using a company vehicle. They should eat at the designated workplace only.

- **Attendance and punctuality**

We expect them to be on time for work and business meetings. They are also expected to be regular in their work attendance and to be punctual in reporting for work and returning from break-times during scheduled work hours.

- **Visits from family members and friends**

If their family members or friends visit their workplace, they should stay in the reception or the guest-waiting area.

- **Cleanliness**

They must keep their work area and office clean and tidy, and handle confidential documents properly.

- **Dress code**

They are expected to comply with our dress code to uphold a professional image.

- **Gaming in public**

They are prohibited from instigating, promoting or intentionally facilitating any gaming activity.

- **Smoking in our premises**

Smoking is prohibited in any office grounds or in any enclosed area on our premises.

- **Working Remotely**

They are required to adhere to the Bank's policies when working remotely.

Block Leave

As part of good corporate governance and control, staff members will have to take a continuous period of leave each year ('block leave').

Conduct when Obtaining Business

Staff members must have an adequate understanding of the Prevention of Bribery Ordinance and follow related guidance issued by the Independent Commission Against Corruption (ICAC) so as to avoid the pitfalls of corruption in carrying out the business.

Conflicts of Interest

Staff members must maintain our core values of integrity and fair dealing by acting honestly, fairly and ethically. They should avoid placing themselves in a position where the personal interests may clash with the Bank's interests or the interests of any of our partners or customers.

Employee Declarations

Staff members will need to make certain declarations, which are part of regulatory or internal requirements, as and when they become relevant to them during their employment with us. Including but not limited to:-

- Employment and involvement with other organisations
- Gift and Entertainment Disclosure
- Working with Relatives

Financial Soundness

Staff members must make a declaration immediately if any of the following applies.

- declared bankruptcy
- suspended or compounded payments to your creditors
- convicted in any country of an offence involving dishonesty or fraud
- have been a director of, or have been directly involved in managing a bank which is being or has been wound up, or whose licence has been revoked.

Fraud Risk Management Policy

Our Bank will not tolerate fraud. The purpose of this policy is to emphasize the need for all staff members to:

- display the highest standard of personal and corporate integrity and ethics;
- comply with all laws and regulations; and
- be open and honest in our dealings both inside and outside the Bank.

Granting Credit

No staff member should grant credit or loans to himself/herself, his/her relatives or companies in which he/she or his/her relatives have a private interest.

Insider Trading

This policy emphasizes and supplements the relevant laws and regulations that prohibit insider trading. All staff members must also familiarize themselves with the applicable laws against insider trading. The Bank has set a zero-tolerance policy with respect to insider trading and expects all its staff members to comply with the principles and standards.

Outside Employment

No staff member should take up any directorship, employment or part-time commercial or honorary duties, whether paid or unpaid, outside the Bank except with the prior approval of the Chief Executive Officer, his/her alternate, or the Code of Conduct Officer.

Personal Benefits

No staff member should solicit, accept and retain personal benefits from any customer of the Bank or any individual or organization doing or seeking to do business with the Bank.

Private Investment

No staff member should deal in the shares or other securities of any listed company or any other assets of which privileged or price-sensitive information they possess that is not generally known to the market. Staff should not disclose such information to any third party.

Police Investigations and Court Appearances

Staff members must inform their Department Head or Human Resources immediately if they are under police investigation or are served with a notice or summons to appear in any court.

Receiving Credit

Staff members and their relatives should not borrow or receive credit from third parties on a favoured basis or on terms other than at arm's length unless previously approved in accordance with the Code of Conduct.

Reporting Responsibility

Staff members should report promptly once becoming aware that they are in breach of the Code or when they are in doubt of a potential breach. It is the responsibility of all staff members to contribute to the good reputation of the Bank.

Social Media

These guidelines will explain how the staff members should use social media platforms (for example, Facebook, Twitter or blogs) in their professional and personal life.

Treasury Dealing

Staff members with treasury dealing authorities must comply with the prescribed authorities and approved trading limits and act in accordance with the policies and procedures laid down in relevant manuals including the Treasury Mandate.

Use of Information

All staff members should handle carefully information relating to customers in compliance with relevant statutory requirements, e.g., the Personal Data (Privacy) Ordinance ("PDPO"), and common law customer confidentiality. No staff member should release customer information to a third party without written consent from the relevant customer, unless the release complies with the PDPO or he/she is required or permitted to do so by law.

Whistleblowing

This policy sets out the policies and guidelines if the staff members want to report misconduct. We want to create a safe environment where they can make such reports without fear of punishment.

Work Ethics

This policy sets out the responsible and professional behaviour we expect from the staff members at work and outside work. Including but not limited to:-

- **Compensation arrangements**

Staff members are not allowed to use any personal hedging strategies or compensation- or liability-related insurance to reduce their exposure to the future value of unvested OCBC shares which are granted to them as part of their compensation.

- **Duties and responsibilities**

Staff members should carry out their duties responsibly and effectively.

- **Personal finances**

Staff members should manage their personal financial matters wisely. If they don't, this could weaken their professional credibility and affect their job.

- **Professional integrity**

Staff members must always exercise professional integrity in the course of their employment with the Bank. They should not knowingly take advantage of a situation arising as a result of any error or omission made.

- **Relationship with external parties**

Staff members must not allow their external/personal relationships or interests to compromise their duties, obligations and responsibilities to the Bank.

- **Solicitation**

No staff member is permitted to conduct any type of personal solicitation during working hours.

- **Use of given authority**

Staff members must only act within the limits of their authority when they sign any document, make representations or make a decision on behalf of any part of the OCBC Group.