# **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.

#### 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) Comply with DBS Policies and Standards and Guidelines.
- d) Maintain all business transactions and records accurately and in a timely manner, including employee related records e.g. travel, leave.
- e) Treat DBS assets with care and only use it for legitimate DBS business purposes.
- f) Manage your finances in a responsible manner and notify your manager if you are in financial distress.
- g) Comply with applicable requirements on personal trading activity.
- h) Report immediately to your supervisor, LCS or HR if you are involved in any criminal, civil or bankruptcy proceedings.

## Principle 2 - Confidentiality

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

You should use such information according to its purpose and intent, in compliance with relevant Bank Policies and Standards.

# You Should

- a) Use information according to its purpose and intent, in compliance with the relevant laws and DBS Policies and Standards.
- b) Obtain clearance from LCS prior to sharing any confidential information.
- c) Refer any media enquiries to Group Strategic Marketing & Communications.
- d) 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 employees, 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 your Group BU/SU Head and/or Country Head and Compliance before accepting any outside employment (including self employment), unless they are being undertaken in connection with your duties at DBS.
- 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 supervisor 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.

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- f) Treat our customers with dignity and respect.
- g) Offer products and services that are suitable for our customers.
- 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 Supervisor, LCS, HR, Internal Audit or via the Speak Up service.
- b) Report bullying, harassment, discrimination or threatening behaviour to your Supervisor, HR or via the Speak Up service.