

Bank of Singapore – Code of Conduct

At Bank of Singapore ("BOS"), we value high ethical standards that drive the **BOS Values** – Lasting Value, Integrity, Forward-looking, Respect and Responsibility. What we do, what we say and the decisions we make, must reflect these values.

The BOS Code of Conduct ("The Code") helps our employees understand these high ethical standards that we expect from them, in addition to observing and complying with all laws and regulations. The Code sets out the principles, policies, and guidelines our employees must observe as they aim to do the right thing every day, guided by the following questions: -

- Is it consistent with LIFRR?
- Is it in our customers', shareholders', and colleagues' best interest?
- Will it avoid harm to BOS or myself if exposed to the public?

Any non-compliance with The Code may result in disciplinary action, including termination of employment.

Safeguarding our customers and our business

Anti-Bribery and Corruption

It is our policy to conduct all our business in an honest and ethical manner. The Bank takes 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. We expect all employees, outsourced service providers and vendors to comply with this principle in their undertaking of services for, on behalf of, or with BOS. Employees should understand tax risks in their business activities, be able to identify red flags and know when to report suspicious transactions.

Anti-Fraud

Where fraud is concerned, the Bank adopts a zero-tolerance stance. All instances of fraud will be treated seriously and dealt with swiftly.

Conflicts of Interest

When employees deal with people and organisations outside the Bank, we expect them to maintain our values of integrity and fair dealing by acting honestly, fairly and ethically. They must not place themselves in a position where their personal interests may clash with our interests or the interests of any of our partners or customers.

Fair Dealing

Treating customers fairly is our priority as fair dealing is the basis of our business. The Fair Dealing Framework sets out the policies, processes and programmes that we expect our employees to follow in order to deliver the five Fair Dealing Outcomes to customers according to the MAS Fair Dealing Guidelines.

Insider Trading

To safeguard the integrity and reputation of BOS and to preserve public confidence in the Bank, we expect all employees to not trade in, or have another person trade in, any securities of a company at any point in time when in possession of inside information concerning that company. During the blackout periods specified by the Bank, all employees shall not trade the securities of OCBC Bank and Great Eastern Holdings.

Privacy of Customer Information

The reputation of our Bank owes much to the trust of our customers. Hence, we expect our employees to safeguard the confidentiality of our customers, unless they have the customer's written permission or unless permitted by the Third Schedule of the Banking Act.

Safeguarding our employees

Acceptable use

There are policy requirements in-place to protect users and the BOS Group of Companies. The Bank expects

employees to observe proper conduct and use of the Group's information assets (encompassing technology equipment, information and software services) and communication services regardless of whether working in office or remotely.

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 employees with a work environment where we treat each other fairly and with respect. We do not tolerate discrimination, harassment or bullying under any circumstances.

Behaviours at work

We expect our employees to behave in a respectable and appropriate way towards their colleagues in the workplace.

Employee Declarations

We expect employees to make certain declarations, in situations that may give rise to actual, potential or perceived conflict of interest. These include external employment or engagement, financial soundness, gift and entertainment, or personal relationships that may conflict with their role in the Bank.

Social Media

We expect employees to adhere to the Bank's guidelines when using social media platforms in their professional and personal lives.

Whistleblowing

The Bank is committed to promote a culture for employees to safely escalate concerns or observation of fraud or misconduct without fear of reprisal. We will investigate fairly and firmly any such reports by employees.

Work Ethics

We expect our employees to behave responsibly and professionally at work and outside work.