CIMB

Code of Ethics & Conduct

2025

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1.0 Objective Of The Code Of Ethics And Conduct

1.1 The CIMB Group Code of Ethics and Conduct ("the Code") sets out the responsibilities of the Group's Employees and Associated Persons working for and on behalf of the Group in observing the principles and upholding the corresponding conduct to achieve a high standard of professionalism and ethics in the conduct of our business and professional activities. The Code is an integral part of good corporate governance and all employees must adhere to the Code, both in letter and spirit, and on which they can rely for guidance in decision making and their conduct.

1.2 The Code of Ethics outlines the Group's set of principles that guides decision making. It provides the statement of overarching principle informing all employees what is right and what is wrong and helps us navigate an increasingly complex regulatory environment.

1.3 The Code of Conduct outlines specific behaviours and conduct that are required or prohibited within the Group as a condition of ongoing employment and also the expected conduct in our interaction with our various key stakeholders.

2.0 Definition

2.1 **Employees**
All individuals working at all levels, grades and capacity including permanent, part time, fixed-term, temporary employees, trainees, probationers, contract and agency employees, industrial attachments and employees on secondment within the Group and regardless of the jurisdiction or legal entity through which the Group operates.

2.2 **Associated Person**
A person who performs services for or on behalf of CIMB Group under a Contract for Service (e.g. a remisier, agent, vendors, suppliers and service providers). Unless specifically excluded, the use of the word "Employee" shall also include Associated Person in the Code. The question as to whether a person is performing services for an organisation is to be determined by reference to all the relevant circumstances. The person can be an individual or an incorporated or unincorporated body.

2.3 **CIMB Group**
CIMB Group Holdings Berhad and its group of companies where CIMB Group has management control.

2.4 **Group Human Resource**
The Group Human Resource Division of CIMB Group

2.5 **Country Human Resource**
The Human Resource Department or such other name as may be applicable in the various countries managing the human resource functions in respective locations.

2.6 **Interpretation**
Unless the context otherwise requires, words imparting the singular shall include the plural and vice versa, words imparting the masculine gender shall include the feminine and neuter genders and vice versa and the present tense will include the past and the future tense, and vice versa.

3.0 Application Of The Code Of Ethics & Conduct

3.1 The Code is applicable to all Employees of CIMB Group.

3.2 Adherence to the Code is a condition of employment with the Group. You are required to acknowledge this Code on an annual basis as directed by Group Human Resource or Country Human Resource and thereby confirm you will be bound and abide by it, in addition to other Group's policies and procedures.

3.3 The Code will be deemed to be an implied terms and conditions of employment for Employees who failed to acknowledge the Code. If you are in violation of the Code and related policies or any applicable laws or regulations, you will be subject to disciplinary action, which may include termination of service.

3.4 This Code sets the minimum standard that the Group expects of all Employees. Where necessary, due to specific requirements of the business or local regulatory requirements in any country, the Code may be supplemented by additional specific requirements of the country, entity or business unit. These additional requirements may be incorporated by way of a Country or Unit Supplement to the Code, subject to approval from Group Human Resource.

3.5 It is not the intention of this Code to provide details of the applicable policies and procedures, regulations and legislations. As such, the Code must be read in conjunction with the Group's other applicable internal policy and procedures, manuals, applicable legislation and regulatory guidelines.

3.6 Where there is a discrepancy or conflict between the Code, the Group's policy and procedures, legislation and/or regulatory guidelines, the stricter requirement applies.

3.7 Group Human Resource shall be the custodian of this Code. This Code may be revised from time to time. Notice of any such revision will be published in Sync-Up and/or by such other means of communication deemed suitable by Group Human Resource or Country Human Resource. Should you have any queries as to the interpretation or applicability of the Code, please seek guidance from Group Human Resource or your Country Human Resource.



4.0 Dispensation

4.1 Approval for any dispensation request must be obtained from Group Chief Operating & People Officer (GCOPO) or Group Chief Human Resource Officer (GCHRO). The request shall be reviewed and evaluated before final approval is granted.

5.0 Code Of Ethics

The Group is committed to the observance and practice of the highest ethical standards and therefore all Employees shall continuously uphold and abide by the following 6 guiding ethical principles which are the foundation of our professional dealings.

5.1 Integrity

5.1.1 Integrity is the founding value of the Group where we agreed that we will be honest, respectful and professional in everything we do. We act in an ethical and trustworthy manner and must always take ownership of all of our actions. The Group's reputation for integrity is its most valuable asset, and the conduct of its employees must protect this asset at all times.

5.1.2 All Employees shall be honest and open in all their dealings. This includes behaving in an accountable and trustworthy manner, and avoiding any acts that might damage the reputation of, or bring discredit to the Group at any time.

5.2 Confidentiality

5.2.1 The confidentiality of relations and dealings between the Group and our customers is paramount in maintaining the Group's reputation. All information regarding the business or affairs of the Group or of a customer of the Group which was acquired in the performance

of duties shall be treated as confidential. All Employees shall protect the confidentiality and sensitivity of information provided to them. This includes using it for its intended purposes only and not divulging information to any unauthorised persons without consent from those involved unless disclosure is required by law and regulation. This requirement shall continue to exist even after your employment with the Group.

5.2.2 All employees must comply with the Group's policies and applicable laws concerning the protection of personal privacy, including the protection of personal data.

5.2.3 The duty of confidentiality extends beyond an Employee's employment with the Group who is required to preserve strict confidence on all matters relating to the Group and its customers. The Group also reserves the right to take appropriate legal redress in the event an Employee who has left employment is found to have committed any improprieties during the course of his employment with the Group.

5.3 Competence

5.3.1 All Employees shall develop and maintain the relevant knowledge, skills and behaviour to ensure that their activities are conducted professionally and proficiently. This includes acting with diligence, as well as obtaining, and regularly updating, the appropriate qualifications, training, expertise and practical experience.

5.4 Conflict of Interest

5.4.1 Professional independence is a concept fundamental to all Employees of the Group. Employees shall not allow any conflict of interest, bias or influence from others to override their business and professional judgement.

5.4.2 A conflict of interest arises when personal interest in a transaction, or an obligation owed to someone else, comes into conflict with the obligation to the Group, customers, shareholders etc. This includes the use of position to advance personal gain or advantage on the basis of information, assets and other resources gained during employment.

5.4.3 An objective approach to any assignment should not be at risk as a consequence of any personal relationship. All matters which could impair objectivity should be declared to those concerned.

5.5 Fairness

5.5.1 All Employees must act responsibly and embrace a culture of fairness and transparency in all our dealings with all stakeholders.

5.5.2 Actions, at all times, must reflect fair and proper business practices and are in compliance with the laws and regulations governing free and fair competition and monopolies.

5.5.3 Employees should never take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice.

5.6 Respect

5.6.1 We embrace diversity and treat all people within and outside the Group – with fairness, dignity, and respect.
Behaviours and actions that promote collaboration and respect for differences shall be the guiding principle in our interaction with fellow CIMBians ***where the values of mutual and reciprocal respect, trust and confidence are upheld and actively promoted.***

5.6.2 Good relations with our stakeholders are one of the keys to our success. All employees can help build good relationships by behaving and conducting themselves with honesty, integrity and respect. Failure to do so erodes trust and undermines the foundations on which we build our lives and our business.



6.0 Code Of Conduct

6.1 The Group, being a leading financial services provider, is involved in a people-driven business. Everyone has a role in serving our clients and customers, or supporting people who serve our clients and customers directly.

6.2 In pursuit of our vision, we have established a set of standards that reflect exemplary conduct and our obligation towards the Group, fellow employees, customers, regulators, business associates and last but not least, our society. The Group's ethical principles define us and are a core part of our values which is a reflection of our standards of behaviour. All Employees have an important responsibility to ensure that their own conduct meets the highest standards of personal and corporate integrity. The Code should be viewed as an essential guide on how we are expected to conduct ourselves with the various key stakeholders but it should not restrict or replace judgement in conducting day-to-day business, by acting responsibly and within authority.



7.0 Relationship With Our Stakeholders

7.1 Company

7.1.1 The basic rule

Upholding the interest and integrity of the Group at all times and ensuring no conflict, appearance of conflict, between the self-interest of any employee and the responsibility of that employee to the Group.

7.1.2 Preserving the reputation of the Group

It is the duty of all Employees to conduct their business on behalf of the Group in accordance with high ethical standards. Activities which could represent conflict of interest with respect to the Group's business, adversely affect the Group's reputation, or cause regulatory breach shall not be permitted. No Employee shall present himself an as employee of the Group for any purpose other than in connection with the Group's business. The Group's interests must always prevail.

7.1.3 Anti-bribery and corruption

The Group promotes a zero tolerance policy against all forms of bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in all jurisdictions in which it operates. The Group is committed to implementing and enforcing effective measures to counter bribery and corruption which are punishable offences in accordance to the anti bribery and corruption laws.

All Employees must avoid any activity that might lead to, or suggest, bribery and other forms of corruption. This includes the giving or taking of bribes or making of facilitation payments, in whatever form including in kind, which is corrupt or potentially corrupt in nature. The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all Employees or those under the Group's control. Please refer to the Group Anti-Bribery and Corruption Policy for details.

Employees are encouraged to raise concerns (if any which are valid) about any issue or suspicion concerning bribery and corruption to their respective HODs or by following the procedures set out in the Whistleblowing Policy under Section 2.2.3 (Reporting Procedures).

7.1.4 Integrity and accuracy of records and reports

Accounting and other records and reports must accurately, completely and properly describe the transactions they record. All transactions, contracts, assets, liabilities, revenues and expenses of the Group must be recorded in its regular books of account and records, and all commitments must be accurately, completely and properly reported. Employees shall never make entries or allow entries to be made, altered or deleted, for any account, record or document of the Group that would obscure the true nature of the transaction, as well as to mislead the true authorisation limits or approval by the relevant authority of such transactions. Disposal or destruction of the Group's records shall only be done in accordance with the Group's record retention policy.

This includes claims Employees make under the Group's employee benefit plans. False, fictitious or misleading entries regarding any transaction or account are prohibited.

7.1.5 Proprietary information

The Group's trade secrets and know-how, financial information concerning the Group, its customers, and its employees, lists of customers, prepared in the course of an individual's employment with the Group, and specifications, programmes, materials and documentation relating to all financial models and products, computer and telecommunications systems, software, hardware and applications developed or used by the Group are confidential and proprietary to the Group. Employees are prohibited from using, keeping, transferring, copying, downloading or divulging such information except as permitted or required in connection with their work on behalf of the Group, and they may not use it for their personal benefit, or for the benefit of any other person or entity, during or after their employment with the Group unless such information is disclosed to the public by the Group or as required by law.

All such proprietary information must be returned to the Group or deleted from the Employees' computer or laptop or whatever electronic access prior to leaving the unit where the Employee is attached upon transfer to another unit or prior to leaving the Group.

7.1.6 Insider trading/personal investments

Dealing with any securities or other financial instruments while in possession of price sensitive non-public information about or affecting them, or improperly disclosing such price sensitive non-public information directly or indirectly to others, including family members, is prohibited. This prohibition applies to personal transactions including those done by family members as well as transactions effected in the course of employment with the Group. All Employees shall comply with all applicable laws in relation to insider trading, apart from the Group's policies and procedures.

An Employee who possesses such insider information is also prohibited from influencing any other person to deal in the securities concerned or communicating such information to any other person, including other members of Employees who do not require such information in discharging their duties.

7.1.7 Fraudulent activities

Employees shall not engage in any conduct involving fraud or dishonesty in whatever form or commit any act which reflects lack of integrity and professionalism. Employees are expected to cooperate fully in all investigations, which may be conducted by internal, external or any regulatory bodies. Employees shall also not provide misleading, deceptive or alse information, statements or representations.

Any employee that engages in such activities can be subject to disciplinary action, which may include dismissal. In the event of dismissal, the Group reserves its right to report to the relevant authorities in the event the employee(s) involved are found to have violated any regulations and/or institute any legal proceedings against the employee(s) if they are found to have breached any terms and conditions of service whilst in employment with the Group.

7.1 Company *(con't)*

7.1.8 Managing conflict of interest

All Employees must always act with integrity in their dealings. As such, all Employees must not place themselves in a situation where their personal interest in a transaction, or an obligation they owe to someone else, comes into conflict or appearance of conflict, with their obligation to the Group, its customers, and any other relevant stakeholders. This includes using their position to advance their own personal gain or advantage on the basis of information, assets and other resources gained during their employment, whether or not they obtained this gain or advantage at the Group's expense or at the expense of any entity of the Group or its customers or relevant stakeholders. This shall include gains obtained for their family or persons connected to them and also any solicitation for corporate directorship or trusteeships.

When a conflict of interest, whether actual or potential, does confront the Employee in the performance of his duties, the Employee must disclose its existence promptly to the Group fully describing the facts giving rise to the conflict, and excuse himself from participation in any aspect or decision made or to be made with respect to the transaction.

All employees are therefore also required to promptly disclose to Group Human Resource or Country Human Resource any close personal relationship with their immediate supervisor, subordinate or fellow employee to ensure objectivity in your conduct and/or decision making and avoid any personal conflict of interest.

Employees must not engage in any dealing or act for the Group in any transaction or business relationship that involves yourself, members of your family or other people where you or your family have a significant personal relationship or financial interest.

7.1 Company *(con't)*

7.1.9 No gift policy

All employees and their immediate family members (defined as the staff's spouse, parents, siblings, children, and their respective spouses) are not allowed to accept personal gifts from the Group's customers or business associates, and the same will also apply in the giving of gifts, unless otherwise permitted under the Group's policy. This is to avoid any situation of conflict of interest or appearance of such in our business dealings with our customers or business associates. The same will also apply in the giving of gifts, and any exceptions must strictly adhere to the approved guidelines.

All employees are also prohibited from joining "sponsored trips" organised by the Group's vendors or other business associates, whether they are currently providing products and/or services to the Group or where there is a bidding in progress, or otherwise, unless otherwise permitted under the Group's policy.

Please note that the No Gift Policy also applies to gifting amongst Employees, particularly where there is an actual or potential conflict of interest such as manager/subordinate relationships, or cross functional dependent relationships e.g. between Credit Approvers and Sales where gifts might be perceived as influencing favourable decisions. Employees are prohibited from soliciting, directly or indirectly, any form of sales incentive, commission, or bonus from subordinates or colleagues. Employees who are approached by a superior or colleague to solicit sales incentives or any forms of gifts should report the incident immediately to their immediate supervisor or Group Human Resource. In the event of situations whereby employees are to accept gifts due to certain situations as stipulated in the Group Anti Bribery and Corruption Policy Section 2.2.3 (d) (No Gift Policy), employees are to take note of the following principles:

i. Value of the gift;
ii. Purpose for the giving/receipt of the gift;
iii. Nature of the gift;
iv. Transparency in the giving/receipt of the gift;
v. Perception in the giving/receipt of the gift.

If in doubt, employees should refer to the relevant provisions stipulated in the Group Anti Bribery and Corruption Policy and all the relevant policy(s).

7.1.10 Entertainment

Entertainment which is of reasonable value, consistent with normal business practice and appropriate to the occasion is allowed for the purpose of business networking,fostering relationships with external parties or showing hospitality and occur sparingly, except where it is prohibited in certain circumstances under the Group's policy. This includes both receiving and giving of entertainment. Proper care and judgement must be exercised when providing entertainment to third parties, especially public officials, or receiving entertainment, to ensure compliance with local anti-bribery and corruption laws. If in doubt, please refer to Head of Department or Country Head who could seek guidance from Group Human Resource or Group Marketing and Communications Division or all the relevant policy(s).

7.1.11 Outside financial interest

Where an Employee, either directly or indirectly, has a financial interest in a company/ entity, whether as a sole proprietor, partner or shareholder, unless prior approval of the Group Human Resource or Country Human Resource had been obtained, such an interest must be disclosed immediately to the Group Human Resource or Country Human Resource. This does not apply in cases where the Employee has holdings in any company/entity unless the interest is deemed to be substantial, i.e. holdings of 5% or more of the voting rights of the company/entity or where the company/entity is dormant.

7.1.12 Outside employment/external business interest

All Employees must devote their time and attention to the fulfilment of their obligations to the Group. Employees must not take up other employment or gainful activity, whether part-time or full-time, or be involved in any outside business activities, in whatever capacity (including being involved in the management, direction or conduct of another enterprise) without the written permission of the Group Human Resource or Country Human Resource.

Employees may engage on a voluntary basis in lawful non-profit public service organisations, such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions, provided the participation does not interfere with the Employee's ability to perform their duties for the Group and there is no conflict of interest, or appearance of a conflict, resulting from any relationship between the organisation and the Group.

7.1.13 Confidentiality

All Employees must take every precaution to protect the confidentiality of customer information and transactions. Employees who have access to any document or information relating to the affairs or account of any customer/business associates of the Group shall not, during, or after the termination of their employment with the Group, disclose the same to a third party except in the proper course of their duties or when disclosure is required by law and/or with the appropriate written consent from the Group and/or customer.

No Employee shall in any way use such confidential information so obtained for the benefit of himself, his family or any third party or use such information to influence any customer or third party in dealing in any transaction or communicate such information to any customer or any other party.

Employees shall undertake not to save, keep, transfer or download any customer information for purposes other than the performance of his duties and to destroy or return to the Group any customer information which is saved, kept or downloaded for purposes of performing his duties. It is a legal requirement that all records and the relationships between the Group and its customers and/or business associates are kept confidential and not saved, transferred or downloaded other that for its intended purpose.

7.1 Company *(con't)*

All Employees are to handle confidential information on a need-to-know basis and are not to disclose such information except to those Employee(s) who require such information to discharge their duties provided that the provision of such information does not give rise to misuse or conflict of interest or potential conflict of interest.

All personal data obtained during the course of employment in the Group are also deemed confidential information and shall only be used in accordance with the provisions of the relevant personal data protection regulations.

7.1.14 Use of the Group's assets

All Employees are responsible for the safekeeping of all assets, facilities, resources and records belonging to the Group that are provided for the performance of their duties. Employees are expected to treat the Group's property with care and are not allowed to remove any property from the premises without prior approval from the Group, unless for the purposes of performing their duties. The Group's assets shall only be used for legitimate business purposes.
The Group's email facilities shall only be used for business purposes and Employees must ensure its usage does not expose the Group to any legal or business risks.

7.1.15 Acting responsibly and within authority

All Employees are expected to perform their duties diligently and responsibly taking into consideration the risk of each set of activities and ensuring the interest of the Group is protected at all time.

Employees who are granted any delegated authority must act within their limits and relevant policies and are not allowed to make any decisions or commit the Group into any transactions or contractual commitment which exceeds their authority.

7.1 Company *(con't)*

7.1.16 Special regulatory matters involving customers

The Group, may from time to time, receive notification that a customer is under investigation by regulatory or law enforcement authorities, describing certain information, account blockages or other actions that may be required. An Employee should not inform the customer of such regulatory action, or of any response submitted by the Group, without the prior specific permission of the relevant parties of the Group.

7.1.17 Compliance with the Group's policy and procedures

All Employees are required to maintain ongoing compliance with all statements of policies, procedures and standards of the Group and with lawful and ethical business practices, whether or not they are specifically mentioned in the Code. Such compliance shall not just be by form only but the substance of the requirement of each policy and procedures.

7.1.18 Whistle blowing

It is imperative that all Employees be vigilant about the on-goings of the Group's immediate operating environment. An Employee who becomes aware of any wrongdoings, malpractices, non-compliances or irregularities, whether such activity involves Employees or external parties, should promptly and in good faith, report the matter to the appointed Non-Executive Director or such appointed person responsible for the whistle blowing policy (refer to Section 2.2.3 of the Whistleblowing Policy). The Group will not condone and thereby not allow any form of retaliation against Employee who reports in good faith about a possible violation of the Code.

7.1.19 Use of social media

All Employees must not post any content that is likely to provoke, attack, defame or offend any fellow colleagues, managers, the Group and its customers and/or business associates/competitor on any channels including social media. Employees are also reminded not to respond to or make comments on rumours related to the Group. Employees are also not allowed to upload any confidential information obtained during the course of employment with the Group in any social media channels.

7.1.20 Speaking on behalf of the Group

All requests for speeches, interviews or comments for use in broadcasts, newspapers, magazines or other media relating to the affairs of the Group should be referred to Group Corporate Communications or such similar department in the respective countries. Appropriate regulatory status disclosures and other standard disclaimer language must be attached to all written materials before release.

Further, all Employees, irrespective of whether in their personal or professional capacity, must not make any public statements, orally or in writing (including on social media websites) on the Group's policies and decisions, without approval of the Group. Only spokespeople authorised in the Group Communications Policy are allowed to speak on the company's behalf, and the said authority is specific to topic and audience.

7.1.21 Respectful workplace

Every employee, client and associated person has the right to be treated fairly and with dignity. This includes their right to have their privacy respected.

No employee is permitted to make any clandestine/secret audio or video recordings or take any photographs of other employees, clients and associated persons without first ensuring the other party is made aware and consented to it.

If an employee intends to make any audio and/or video recording of any conversation and/or discussion with a fellow employee, subordinate, superior, client and associated persons; he/she should inform the other the other party ahead of that intention to make such recording and to obtain the other party's consent prior to recording the conversation/discussion.

Given this, the Group takes the general view that any unauthorised recordings and/or photographs of other employees, clients and associated persons (other than in situations where a major misconduct is being committed) are deemed a privacy violation and considered a misconduct and is subject to serious disciplinary action.

However, the Group also recognize that there may arise circumstances where it is to the welfare of our employees to have certain negative events recorded; such as where a major misconduct where an act of harassment, theft, sabotage, bribery, sexual harassment, or workplace bullying is being committed.

7.1.22 Anti-Harassment, Intimidation and Discrimination

The Group does not condone any forms of harassment, intimidation and discrimination towards our customers, fellow employees and any other person. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. These actions or behaviours include but are not limited to derogatory gender, racial or ethnic comments, bullying and unwelcomed sexual advances either verbal or otherwise. All employee must treat others with respect and avoid situations that may be perceived as inappropriate.

All employees should recognise the value of diversity and must not discriminate in any way based on race, colour, religion, age, gender, sexual orientation, gender identity, marital status, disability, ethnic origin or nationality.

The Group expressly prohibits any acts of violence or threats of violence by any Employees against any other person in or about the Group's facilities, or in connection with the conduct of the Group's business and action will be taken under the Group's Disciplinary Action and Misconduct Policy.

Employees can report any form of harassment, intimidation and discrimination under the Whistleblowing Policy or to their HOD, Group Human Resource.

7.1.23 Sexual Harassment

The Group is committed to providing a conducive working environment where all of our employees' right to protection from all forms of sexual harassment and unsolicited or unwarranted sexual overtures and advances is accorded due recognition.

Any unwanted conduct of sexual in nature having the effect of verbal, non-verbal, visual, psychological and/or physical harassment, which is reasonably offensive or humiliating or is a threat to one's well-being will be treated as misconduct both in the workplace and outside the workplace where such harassment is the result of employment responsibilities or employment relationships.

All employees must report any incidents or suspicions of sexual harassment that they experience or witness to Group Human Resource or any other available channels without fear of retaliation. All employees must cooperate with any investigations or inquiries into sexual harassment complaints, and to respect the confidentiality and privacy of the parties involved. The Group views sexual harassment as a serious offence and appropriate action will be taken against any staff found guilty of committing the offence. Please refer to the Sexual Harassment Policy for details.

7.1.24 Employee discipline

All Employees are expected to abide by the Group's standards in terms of attendance, performance and conduct to ensure a high standard of work ethics is maintained. Employees are also expected to abide by the Group's dress code to reflect high level of professionalism. Please refer to the Group or respective countries Disciplinary Action and Misconduct Policy for details.

7.1.25 Escalation of misconduct

It is crucial to ensure proper reporting and handling of misconduct within the Group. Line managers are required to promptly address any reported misconduct by taking appropriate action. Failure to escalate and/or any attempt to conceal such incidents to and/from higher-ups may result in disciplinary action. Please refer to the Group or respective countries Disciplinary Action and Misconduct Policy for details.

7.1.26 Workplace safety

The Group is committed to ensure all safety, health and environmental regulations stipulated by the authorities are compiled. All Employees are jointly responsible with the management of the Group to ensure the workplace is a safe place for work and shall report to the relevant parties of the Group in the event of any discovery of breach in safety standards.

7.1.27 Remote Work Expectations

At CIMB, we understand that modern work environments often include remote work options to accommodate various needs and circumstances. While working remotely, all Employees are expected to adhere to the same high standards of conduct and performance as they would in a traditional office setting. Remote working should be from the registered home address of the employee unless otherwise approved by the GHR or the Head of Division/ Department.

All Employees are expected to maintain professionalism by upholding the company's values and ethics in all remote work interactions, including communications and meetings. It is imperative for all Employees to safeguard the Group's assets and data by following security protocols, adhering to relevant policies and procedures, securing sensitive information, utilizing secure networks and devices, and promptly reporting any security incidents or concerns.

Please refer to the Group or respective countries Flexible Work Arrangement Policy for details.

7.1 Company *(con't)*

7.1.28 Financial conduct

All Employees are expected to manage their personal finances to ensure that their financial conduct does not cause pecuniary embarrassment to themselves which may affect their suitability for continued employment in the Group. All Employees must immediately report to the Group if they are subject to any bankruptcy actions by their creditors. The Group reserves the right to determine the suitability of the Employee for continued employment and this includes cases of such bankruptcy being made known to the Group through other sources.

Employees should only seek financing from a licensed financial institution and avoid any forms of borrowings amongst colleagues.

7.1.29 Personal conduct

Employees are also expected to maintain proper personal conduct to avoid bringing any disrepute or causing any action which may tarnish or undermine the Group's reputation or affect their suitability for continued employment in the Group.

7.1.30 Unlawful conduct

The Group's policy prohibits Employees from engaging in unlawful conduct that may represent a threat to the Group or to the safety of any other Employee or agent of the Group. Any Employee convicted of such crime will be subject to disciplinary action, including dismissal.

7.1.31 Substance Misuse

The Group adopts a zero tolerance policy towards illegal drugs/substance or any forms of substance abuse.

All Employees are strictly prohibited from any consumption, possession, sale, purchase, manufacturing, distribution, or being under the influence of illegal drugs or illegal substances at any time, whether within the workplace or outside of it.

7.1 Company *(con't)*

The Group will not tolerate any form of substance abuse, such as alcohol consumption, while an Employee is on official duty or attending company events. Any such behaviour that renders the employee unfit for duty or reflects negatively on the Group's image or reputation will result in serious disciplinary action.

Engaging in any form of gambling, whether legal or illegal, including online e-gaming, that involves gambling related activities, during work hours and/or within the workplace, is strictly forbidden.

The Group may direct or perform unannounced drug or substance testing, and when such instruction is given, the Employee must make themselves available to undergo the drug or substance test within the stipulated timeframe. Failure to follow this directive will be considered an act of insubordination, and serious disciplinary action can be taken.

7.1.32 Necessary skill and competence

All Employees must strive continually to improve their skills and competence and to ensure that their knowledge is up-to-date.

All Employees have to attend any mandatory training programmes, whether via classroom, e-learning or briefing session, as determined by the Group from time to time and within the required timeframe.

7.1.33 Licensing and Registrations

Employees who are not licensed must not conduct any regulated activity or hold themselves out as doing so unless he is properly licensed for that regulated activity.

7.1.34 Abuse of employee benefits

Any benefits provided to the Employees arising from his employment in the Group are to be used strictly in accordance with the terms of such benefits. This includes banking account or credit facilities, preferential interest or waiver of charges for various products and services provided by the Group.

Employees must not misuse such benefits provided to them or conduct the operations of such benefits in violation of any relevant internal policies and procedures or regulatory requirements. This shall include not defaulting in their payment towards any credit facilities extended to them as an Employee of the Group.

The Group reserves the right to withdrawal such benefits or facility in addition to taking appropriate disciplinary actions against any Employee who are in breach of this.

7.1.35 External training/guest speaker/author

An Employee may accept invitation(s) to conduct external training, give talks or participate in seminars, symposiums or events of similar nature provided prior written approval from the Head of Department and Group Human Resource is obtained where the topics relates to matters involving the Group and/or the function performed by the Employee.

Any fee or emoluments received for such services must be paid to the Group.

7.1.36 Political activities

The Group respects the rights of our Employees to be engaged in political activities provided such activities comply with all applicable laws and that it is done in their personal capacity and not as a representative of the Group, including ensuring that their activities are not viewed as connected with their position in the Group. Participation in such political activities must also not involve the use of the time or resources of the Group, including any facilities, equipment or assets. Employees are also required to respect the rights and views of other Employees and are not allowed to solicit participation in such political activities in any office premises or functions of the Group.

7.2 Fellow employes

7.2.1 The basic rule

All dealings with fellow Employees must be consistent with the Group's culture and values to deliver impact together the right way. In dealings with fellow Employees and colleagues, all Employees are expected to act professionally and treat fellow Employees and colleagues with the utmost respect and ensure our communication with each other are appropriate.

7.2.2 Recognise each other's efforts and always back each other up

Employees shall encourage each other to fully demonstrate their capabilities and participate in setting directions and solving problems, and pay attention to opinions and suggestions on a fair basis without discrimination. We should all leverage on our collective strengths and assets to win against the competition.

7.2.3 Supervision

All business activities in the Group must be subject to appropriate supervision by the Group's supervisory personnel. The supervisor should delegate responsibilities to other Employees only if satisfied that such other Employees possess the necessary skills and experience to properly fulfill the responsibilities assigned.

The supervisor should also provide adequate training and guidance regarding the objectives of the responsibilities delegated, and the manner in which they are to be carried out in accordance with applicable policies and procedures.

The supervisor should understand how the Employees are performing the responsibilities delegated to them. This monitoring should be sufficient in the particular circumstances to reasonably ensure that errors or improper work related activities will be promptly identified by the supervisor.

7.2 Fellow employes *(con't)*

7.2.4 Executing legitimate instructions by a supervisor

Employees shall diligently perform and execute legitimate instructions given by their Head of Department/Superiors at all times. Legitimate instruction refers to order/ request/assignment to perform tasks/jobs which are not in contravention or in violation of any existing policy and established rules and regulations.

7.2.5 Preferential treatment

No Employee should give or receive any preferred conditions of employment because of family or personal relationships. Personnel related decisions must be based on sound management practices and not on personal concerns.

7.2.6 No smoking policy

The Group operates a "no smoking" policy in all its buildings and Employees shall not smoke in or on the immediate perimeter of any of the Group's buildings apart from the designated areas. Smoking includes the use of all simulated smoking devices such as electronic cigarettes, etc. Failure to comply with the smoking policy may lead to disciplinary action.

7.3 Customers

7.3.1 The basic rule

The Group is committed to offer and deliver quality and efficient products and services to our customers. All dealings with existing and prospective customers of the Group and with others must be handled fairly, with honesty, integrity and high ethical standards. We put customers at the heart of everything we do and always do right by them.

7.3.2 All Employees must conduct themselves with due care, fidelity, skill and diligence whilst discharging their duties towards customers.

All Employees must seek to know and understand the Group's customers, their needs, financial circumstances and risk profile.

All Employees must ensure that the customers understand the products and services they propose to purchase and the alternatives, and all costs and downside risks related to the products or services. Transparency in the fees, charges, early withdrawal penalties, salient terms and conditions to the customers must be employed to avoid taking unfair advantage of the customers.

Communication with customers and others must be fair, balanced and honest. Misleading, exaggerated or false claims or information about the Group's products, services or their characteristics should never be made to customers or others. Omitting to state material facts would also make any statement misleading. All Employees are prohibited from acts or conduct which may constitute mis-selling and misrepresentation.

7.3 Customers *(con't)*

7.3.3 Dealings or transactions on customers' accounts or monies

Any dealings or transactions on customers' behalf or accounts may only be conducted based on proper instruction from the customers based on the requirements stipulated in the respective policies and procedures. No Employees may perform any such dealing or transaction without the consent or authorisation of the customer.

Misappropriation of customers' monies is a serious misconduct and a violation of the trust and confidence placed by our customers as custodian of their monies.

7.3.4 Personal dealings with customers

For purpose of upholding our integrity and professionalism, all Employees must not have any personal dealing (including borrowing or lending) with our customers if it may cause an actual or potential conflict of interest in discharging the duties of the Employee. Employees should also conduct themselves with proper decorum in our dealings with the customers to avoid any situation which may bring disrepute to the reputation of the Group.

7.3 Customers *(con't)*

7.3.5 Handling customer complaints

Customer complaints, disputes or dissatisfaction with the products or services of the Group must be addressed fairly and promptly. A person of sufficient experience must handle a complaint provided that he is not the subject of the complaint. All complaints should be investigated and replied to as soon as possible. Customer complaints of a severe or unusual nature that may affect the overall reputation of the Group should be immediately brought to the attention of the Business Units or Customer Resolution Unit, and escalated to Division Head, Head of Customer Experience Team and relevant Subject Matter Expert to ensure that a fair and appropriate treatment is taken collectively.

Any complaint received, either written or verbal, must be recorded on a complaint log (or the complaint tracking system, where available), which will be maintained by each Branch/Department. The log should record the date of receipt; sources of complaint; account name; account number; nature of complaint; person handling the complaint, action taken; date of response, whether the complaint has been settled. The log must be properly maintained and kept for inspection by Audit/Compliance Department.

7.4 Regulators

7.4.1 The basic rule

The Group shall deal with regulators in a responsive, open and cooperative manner.

7.4.2 Compliance

All Employees are responsible to understand and adhere to all applicable laws, rules and regulations in letter and in spirit. The Group is determined to operate its business with sincerity and in conformity to the laws and regulatory rules, criteria and standards, code of conduct and best practice for employees, to ensure optimum benefits to customers and service users.

7.4.3 Regulatory licences

It is the duty of all Employees to ensure, where necessary, that they are licensed, registered, certified or hold appropriate licenses to legally perform their job functions.

7.4.4 Regulatory reporting

The Group will disclose, on a timely basis, information required to evaluate the fairness of its financial presentation, soundness of its financial condition and the propriety of its operation.

All Employees must fully cooperate with relevant regulators by reporting news and information on an accurate, timely and regular basis to ensure its business operations are in line with the principle of good governance and concealment, inappropriate alteration or withholding information is prohibited, unless otherwise required by the Group due to among others legal privilege and confidentiality reasons.

7.4 Regulators *(con't)*

7.4.5 Money laundering activities

Money laundering refers to the act of concealing proceeds from any criminal activities and making them appear legitimate. Employees should not engage, directly or indirectly in any transactions that may involve proceeds from any unlawful activity. Any person who engages in or attempts to engage in money-laundering commits an offence under the respective legislation and may be liable to a fine and/or to imprisonment. All Employees must conduct appropriate due diligence to understand the business and background of the Group's prospective business counterparties and to determine the origin and destination of money, property, and services. Any suspicious transactions or suspected incidents of money laundering or bribery must be reported to the Head of Department and Group Chief Compliance Officer.

All Employees must also ensure they do not allow their personal banking accounts to be used in facilitating similar money laundering activities.

7.5 Business Associates

7.5.1 The basic rule

The Group adheres to operating its business with integrity on the basis of contractual compliances and under business conditions which are fair and equitable.

7.5.2 Anti-Competitive Conduct

All businesses of the Group must be conducted in fair and open competition. Under no circumstances should an Employee discuss or commit the Group to any arrangement with any competitors or other counterparties (whether affecting pricing or marketing policies or otherwise) or behave in any way which results in a breach of any competition laws. Violation of a competition law could subject the Group and employee to substantial financial, civil and criminal penalties.

7.6 Society

7.6.1 The basic rule

We have a duty to society to uphold and maintain a high level of integrity and professionalism.

7.6.2 Act in the interest of the public

All Employees must consider the impact of their decisions, products and services on society and the environment.

7.6.3 Corporate Social Responsibility (CSR) culture

Corporate social responsibility (CSR) is a part of the Group's policy of giving back to the society and reinforces the Group's role as a responsible corporate citizen in relation to stakeholders – our employees, the marketplace, the communities we serve as well as the environment as a whole. All Employees are strongly encouraged to assist and support social activities which are continuously held by the Group.