

Code of Conduct

1. We comply with laws and regulations

The Bank and employees must comply with the applicable laws and regulations and be responsible for all of their actions. Attitudes and actions related to this case:

- a. Understanding the rules, policies and procedures.
- b. Actively studying new regulations.
- c. Consulted when any regulations are not clear.
- d. Remind fellow employees to comply with the rules, policies and procedures.
- e. Reject the invitation, request or instruction to do violations of the rules, policies and procedures.
- f. Report to management when aware of any violation of the rules, policies and procedures.

2. We Avoid Conflicts of Interest

Conflict of interest is all action or decision making conducted by a person that creates interests outside the interests of the Company. Attitudes and actions related to this case:

- a. Not involved and avoid situations that could potentially cause a conflict of interest, among others in actions, develop policies, take decisions and in dealings with third parties.
- b. In the event the above conditions are unavoidable, immediately consult with the Supervisor.
- c. Keeping the business relationship not affected by personal relationships with other parties outside the Bank.

3. We reject Money Laundering and Financing of Terrorism

Bank and employees are obliged to prevent and combat money laundering and financing of terrorism. Attitudes and actions related to this case:

- a. Understanding Anti-Money Laundering and Combating the Financing of Terrorism (AML-CFT) policies .
- b. Understand and implementing Know Your Customer (KYC) and Know Your Employee (KYE) procedures.
- c. In any doubts to the potential or events related to AML-CFT, immediately reported to the supervisor or Internal Audit.

4. We Do Recording and Reporting Correctly

Bank is a financial institution that is required to record and report its business activities accurately and correctly. Attitudes and actions related to this case:

- a. Do and be responsible for recording and reporting of all transactions, data, and information.
- b. Save and document all records, data and information in accordance with the applicable procedures.

5. We Maintain the Confidentiality of Customer and Bank Data and Information

Maintaining the confidentiality of Bank data is regulated by the law, thus the Bank and the employees must not give Customer and Bank data to unauthorized parties.

Attitudes and actions related to this case:

- a. Ensure data and information regarding the Customer and Bank not given to the unauthorized person, including to co-workers.
- b. Keep the entire device-related data and information, among others, by following the applicable procedures and the use of passwords.

- c. Do not talk about/discuss the Bank's Customers data and information which is confidential at public area such as lift, cafeteria, public transportation.

6. We Should Not Conduct "Insider Trading"

Insider trading is conducting transactions using the insider information.

Attitudes and actions related to this case:

- a. All employees of Bank OCBC NISP prohibited to do insider trading
- b. If having possession of insider information:
 - 1) Do not make any transactions for themselves nor influencing other parties to do so.
 - 2) Do not forward or give such, information to other parties.

7. We May Not Accept Gifts

The Bank and employees may not accept gifts, including presents, souvenirs, benefits from other parties that may affect attitudes or decisions.

Attitudes and actions related to this case:

- a. Explain to external parties, including the family that company policy prohibits employees to accept gifts.
- b. In principle, employees are not allowed to accept gifts or any kind of gifts from external parties including vendors, suppliers, and customers. When this happens, employees are obliged to refuse the gift politely and inform external parties regarding the Bank's policy on the acceptance of gifts. When the gift can not be rejected or returned, then the gift should be reported and handed over to the supervisor or the Human Capital Group.