Code of Conduct

Conduct Policy | Global

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Replace all references to “the Company” with your organisation’s name.

Document Control

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Contents

1. Purpose

Banking runs on trust. Customers deposit their savings with the Company, borrow from it at significant moments in their lives, and share sensitive personal and financial information with it, because they trust the people who work here to act honestly, fairly and competently. This Code of Conduct exists to protect that trust. It describes the standards of behaviour the Company expects of every person who works for it, in plain terms, so that each of us knows what is required and what will not be tolerated.

The Code is addressed to you personally. It applies whenever you are acting in connection with your role: at your workplace, working remotely, travelling on Company business, attending work-related functions, representing the Company in the community, and when your conduct online or in public could reasonably be connected to the Company.

The Code does not attempt to anticipate every situation. Where it is silent, you must apply its principles: act honestly, treat others with respect, protect customers and the Company, and ask before you act if you are unsure. Complying with the letter of a rule while defeating its purpose is a breach of this Code.

This Code is approved by the Board of Directors and owned by the Chief People Officer. It forms part of the Company's conduct risk and non-financial risk management arrangements, gives effect to the culture and ethics expectations of the G20/OECD Principles of Corporate Governance and the BCBS Corporate Governance Principles for Banks, and supports any individual accountability and remuneration regimes applicable in the Company's operating jurisdiction(s).

2. Scope

This Code applies to all Staff of the Company and its subsidiaries in every country in which the Company operates: directors, employees (permanent, fixed-term and casual), secondees, contractors, consultants, agency workers and volunteers. Where a person is engaged through a third party, the engaging manager must ensure the contract requires compliance with this Code.

The Code applies to conduct in all channels and settings connected with your role, including in person, by telephone, in writing, on Company systems, on personal devices used for work, at off-site work events, and on social media where the conduct is connected to the Company or to colleagues or customers.

- For employees, this Code forms part of the conditions of your employment to the extent permitted by [applicable local employment law] and operates alongside your contract and Company policies.
- For contractors, consultants and other non-employees, compliance with this Code is a condition of your engagement.
- For directors and Accountable Executives, this Code operates in addition to, and does not limit, your legal duties and any statutory accountability obligations in the Company's jurisdiction(s).

This Code sets minimum standards. Where another Company policy (for example the Conflicts of Interest Policy, Anti-Bribery and Corruption Policy, Whistleblower Protection Policy or [Trading Policy]) imposes a stricter or more detailed requirement, the stricter requirement applies. Nothing in this Code prevents, or should be read as discouraging, any person from making a Protected Disclosure to a competent authority or exercising workplace rights under applicable law.

Jurisdictional application. This Code states international best practice drawn from the frameworks listed in the Regulatory Framework section. The Company must map the requirements of this Code to the law of each jurisdiction in which it operates, including employment, whistleblower-protection, privacy and anti-corruption law, and document that mapping. Where the law of an operating jurisdiction imposes a stricter or additional requirement, local law prevails; where local law would prevent a requirement of this Code from being applied as written, the Company must adopt the closest lawful equivalent and record the departure. The Chief People Officer owns that mapping and the [Code Departures Register] in which each departure is recorded, and must report any departure that materially weakens this Code to the [Board People / Remuneration Committee] at its next scheduled meeting.

3. Definitions

Term	Definition
Accountable Executive	A director or member of senior management to whom the Board or Chief Executive Officer has assigned named, documented individual accountability for a business line, function or material risk class of the Company, including any person registered, certified or designated under the senior manager accountability regime applicable in the Company's jurisdiction(s).
Bribe	Money, a benefit or anything of value offered, promised, given, requested or received with the intention of improperly influencing a person in the performance of their duties, whether directly or through an intermediary.
Bullying	Repeated unreasonable behaviour directed towards a person or group of workers that a reasonable person would regard as humiliating, intimidating, threatening or demeaning, and that creates a risk to physical or psychological health, safety or dignity at work. Reasonable management action carried out in a reasonable manner is not bullying.
Confidential Information	Any non-public information relating to the

	Company, its customers, suppliers or staff, including customer records, financial data, strategies, pricing, credit decisions and system credentials.
Conflict of Interest	A situation in which a person's private interests, relationships, financial or family interests, or duties owed to another person or entity, could improperly influence, or could reasonably be perceived to influence, the performance of their duties to the Company or its customers. Conflicts may be actual, potential or perceived.
Consequence Management Policy	The Company's framework, aligned with the FSB Principles for Sound Compensation Practices, for applying proportionate remuneration and disciplinary consequences to conduct and risk outcomes, including in-year adjustment, malus and clawback where available.
Facilitation Payment	A minor, unofficial payment made to a public official to secure or expedite a routine governmental action to which the payer is already entitled. Facilitation payments are prohibited by the Company in all circumstances, consistent with ISO 37001 and the OECD Anti-Bribery Recommendation, even where local law provides an exception or defence.
Gift	Any item, benefit, service, discount, prize, favour, loyalty upgrade or other thing of value given or received in connection with a person's role at the Company for which the recipient does not pay fair market value, other than remuneration paid by the Company or items exchanged in a purely personal capacity.
Harassment	Unacceptable behaviour, whether a single occurrence or repeated, that aims at, results in, or is likely to result in physical, psychological, sexual or economic harm, consistent with the concept of violence and harassment in ILO Convention No. 190.
Hospitality and Entertainment	Meals, refreshments, event tickets, travel, accommodation or attendance at functions provided or received in connection with a person's role at the Company.
Information Barrier	A combination of physical, system and

	procedural controls that restricts the flow of Confidential Information or Inside Information between business areas whose interests may conflict.
Inside Information	Information relating to the Company, its securities or other financial products that is not generally available and that, if it were generally available, a reasonable person would expect to have a material effect on the price or value of those securities or products.
Personal Trading	Dealing in securities, derivatives or other financial products by a staff member, or by an account or entity the staff member controls or from which they benefit, for their own account rather than for the Company or a customer.
Protected Disclosure	A report of suspected wrongdoing made through a channel described in the Company's whistleblowing arrangements, or otherwise qualifying for protection under applicable local law, which attracts the confidentiality, non-retaliation and support commitments of those arrangements or of the law, whichever affords the greater protection.
Public Official	Any person holding a legislative, administrative or judicial position, whether appointed or elected; any employee, officer, agent or contractor of a government, government agency, regulator, central bank, state-owned or state-controlled enterprise or public international organisation; any official of a political party; and any candidate for public office, in any jurisdiction.
Sexual Harassment	An unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person would anticipate the possibility that the person harassed would be offended, humiliated or intimidated.
Staff	All directors, employees (permanent, fixed-term and casual), secondees, contractors, consultants, agency workers and volunteers performing work for the Company.
Whistleblower	A person who reports, or is entitled to report, suspected wrongdoing concerning the Company — including fraud,

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.