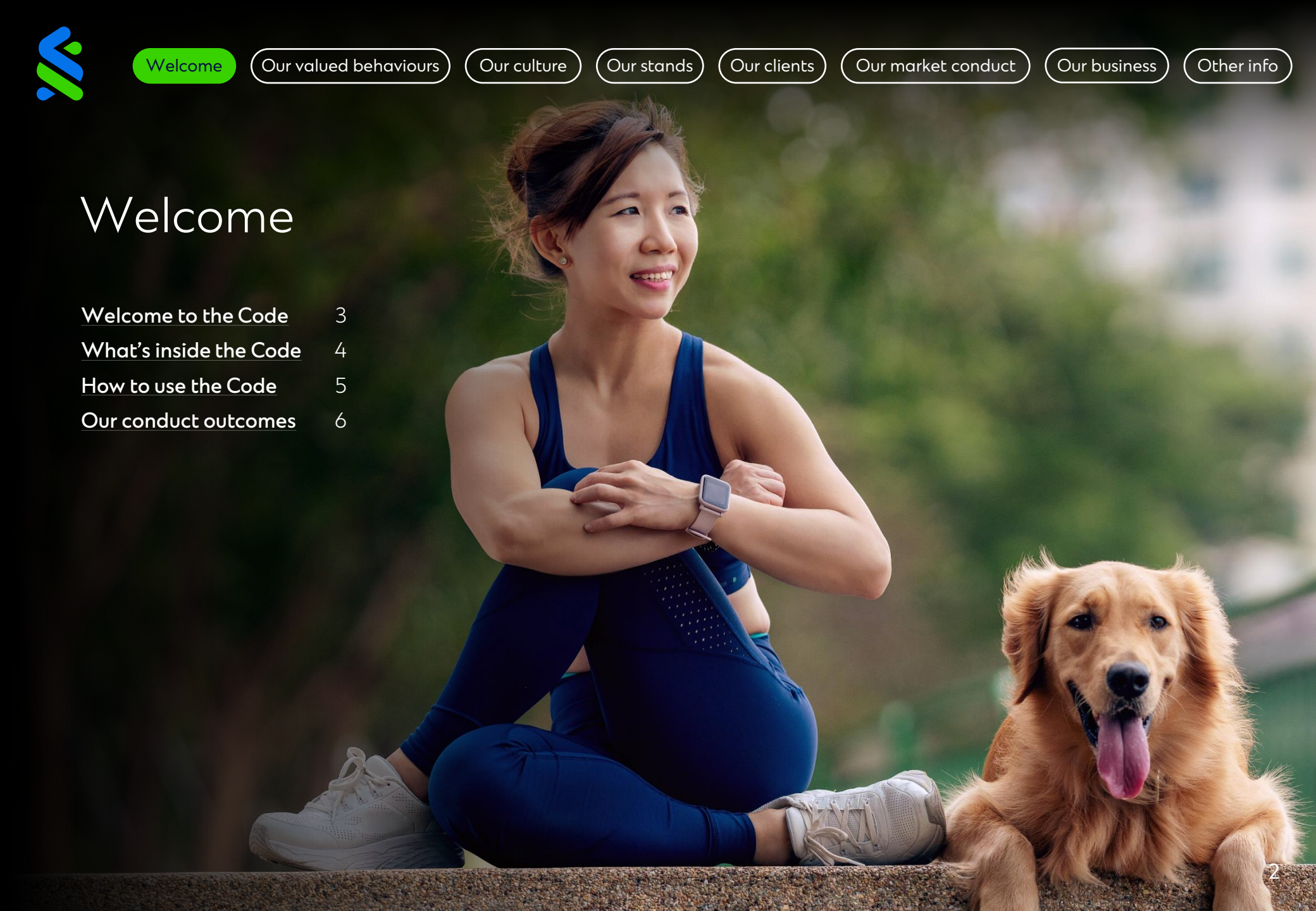
Standard Chartered Code of Conduct and Ethics



January 2026

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Welcome to the Code

Welcome to your Standard Chartered Code of Conduct and Ethics. This is more than a document, it's what we aspire to be—it's an embodiment of our valued behaviours and our promise to be here for good.

We were thrilled to see so many of our teams across the globe working together to create the Code and leaving their mark. Can you spot your team's contribution?

I encourage you to review each page, reflect on what it means for you and your role, and make a habit of revisiting this document throughout your time at Standard Chartered.

The information and guidance inside sets the stage for us to work hand in hand, supporting and empowering one another to deliver success: for ourselves, for the Bank, for our clients, and for the communities we serve.

The Code brings to life our commitment towards building and maintaining trusted relationships, not only with our clients and communities, but also within the Bank.

It reminds us that each interaction, big or small, plays a crucial role in shaping our reputation and impact on the world.

Our Code of Conduct and Ethics also unites us in our dedication to diversity, equity, inclusion and sustainability. It's a celebration of our differences, as we recognise that our strength lies in our unique perspectives and experiences. Together, we cultivate an environment that champions equality and creates opportunities for all.

Let's be better together and hold each other accountable for our progress and strive to do the right thing every step of the way.

Bill Winters

Group Chief Executive, Standard Chartered

What's inside the Code

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Our clients
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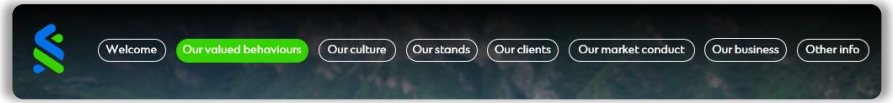
Our market conduct
- Regulatory confidence
- Effective markets
- Anti-money laundering
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Our business
- Effective governance
- Transparent business model
- Sustainability
- Robust infrastructure, safe premises and capacity planning (operational resilience)

Other important information
- Additional codes that may apply
- Questions, contact information, and quick help guide

How to use the Code

The Code is designed to be interactive and inclusive—a living tool to guide your journey at Standard Chartered. We've built it with your experience and success in mind, so you'll find tools like links, icons and navigation features throughout. These include:



Navigation menu – The navigation menu at the top of each page helps you move between the sections. You can click on any of the transparent background buttons to go to the relevant section, and the section highlighted in green indicates your current location.

better together

do the right thing

Links – To facilitate your journey through the Code, we've incorporated internal links throughout. You can easily identify these links by underlined text.



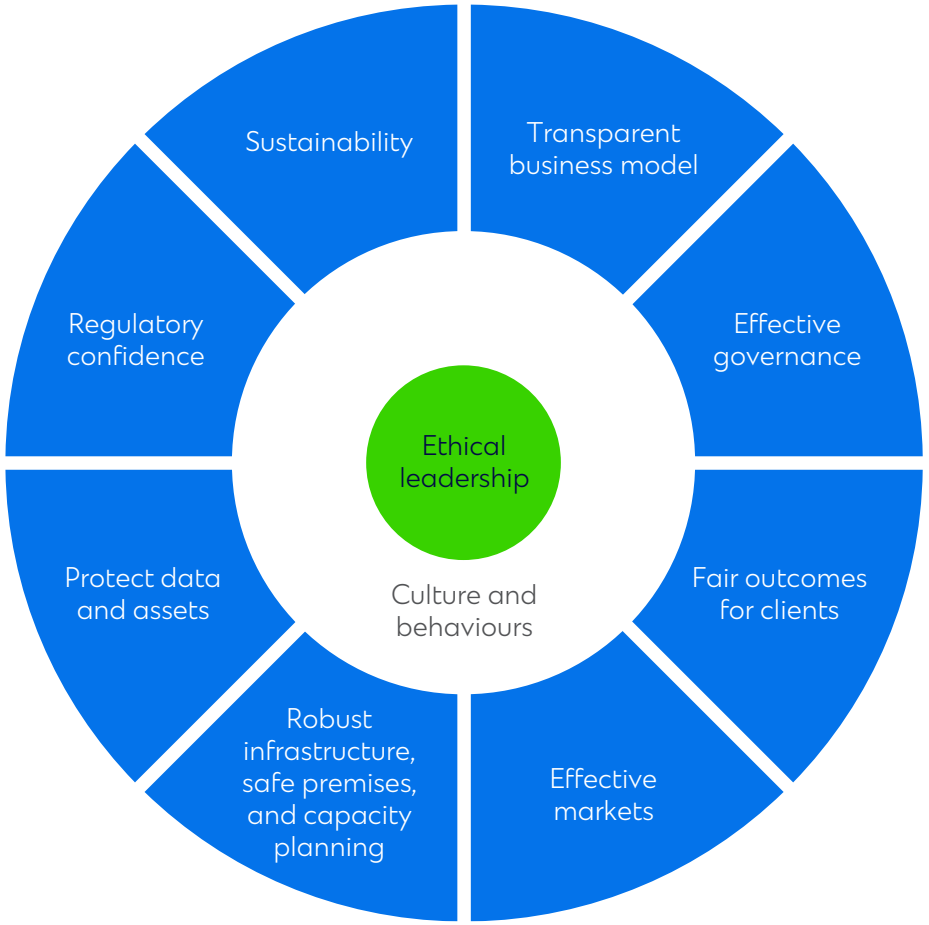
Icons – We've interwoven our conduct outcomes, and they're indicated by special icons throughout the Code.

Our conduct outcomes

We take actions and make decisions every day that, together, make up our conduct. Our conduct impacts our people, our communities and our Bank.

- To guide us in living conduct of the highest standards, we have set out the 10 conduct outcomes we all strive to deliver.
- The conduct outcomes appear throughout this Code and are indicated by special icons.

We know that understanding and living conduct of the highest standards is at the heart of being here for good, and critical to enabling us to build a successful and sustainable business.

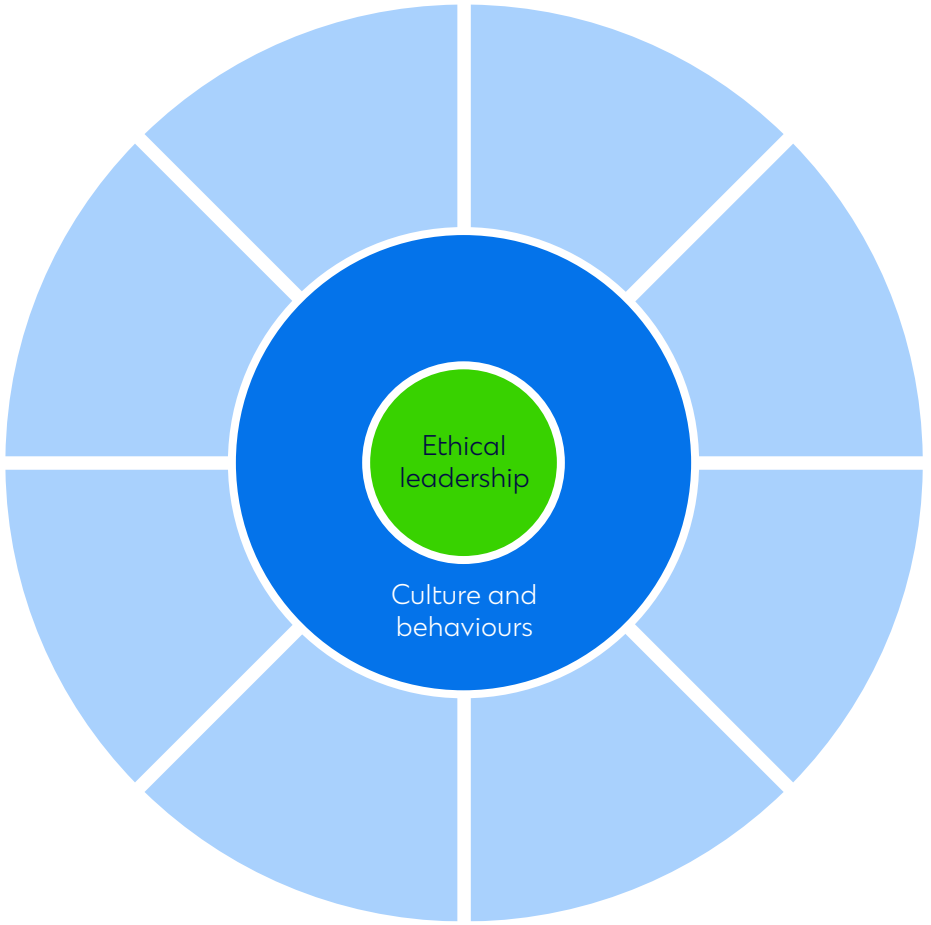


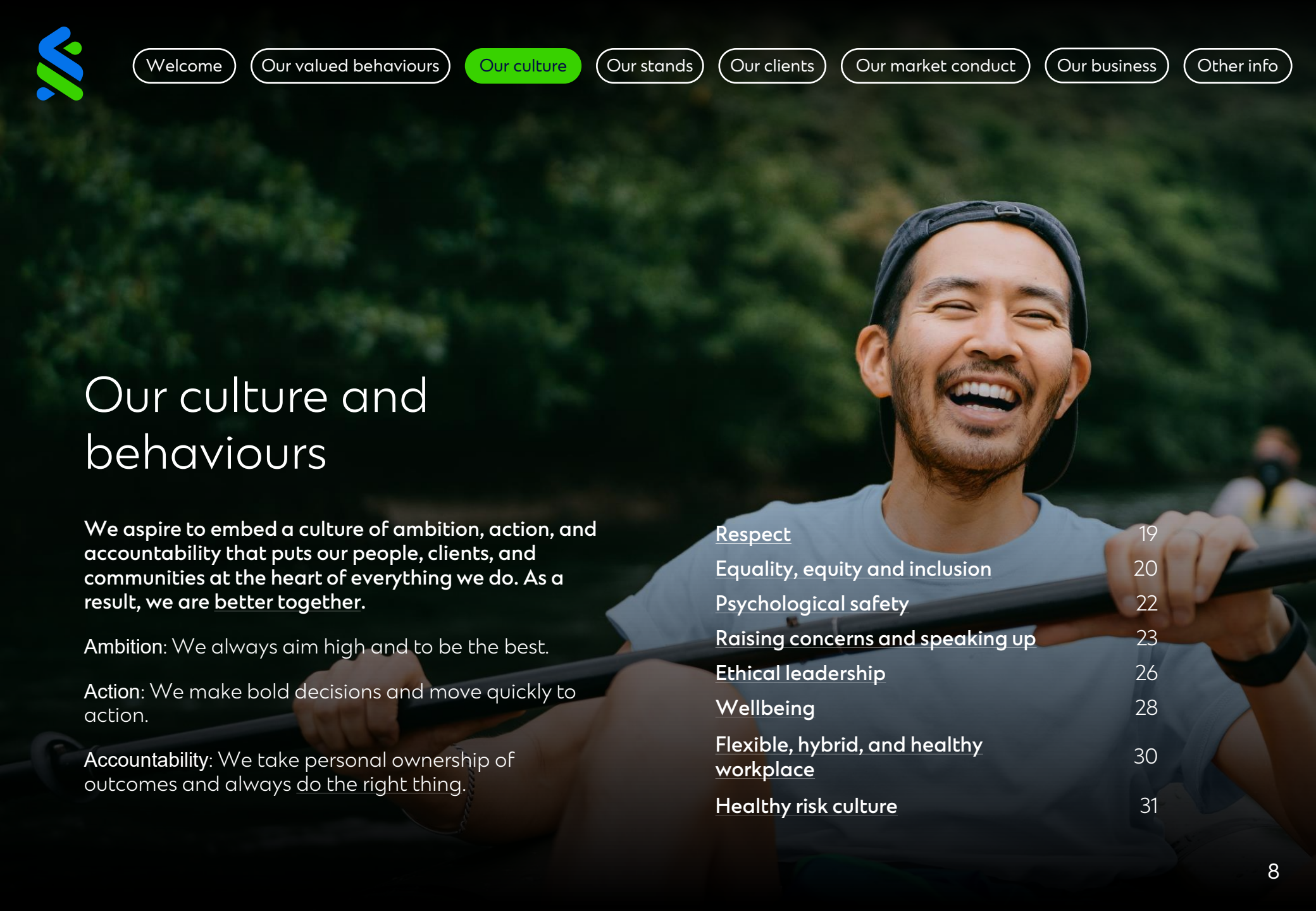
Ethical leadership

- We effectively supervise our people, make fair, transparent and ethical decisions, and set the right conduct expectations
- We communicate conduct expectations clearly, consistently and regularly

Culture and behaviours

- We support and empower our people to deliver the Bank's purpose and brand promise, and to do the right thing for our clients and for the markets in which we operate
- We define the behaviours that we expect our people to display
- We train our people to deliver the capabilities, judgements and behaviours required to support the delivery of our strategy, business model and product offering





Our culture and behaviours

We aspire to embed a culture of ambition, action, and accountability that puts our people, clients, and communities at the heart of everything we do. As a result, we are better together.

Ambition: We always aim high and to be the best.

Action: We make bold decisions and move quickly to action.

Accountability: We take personal ownership of outcomes and always do the right thing.

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Regulatory confidence

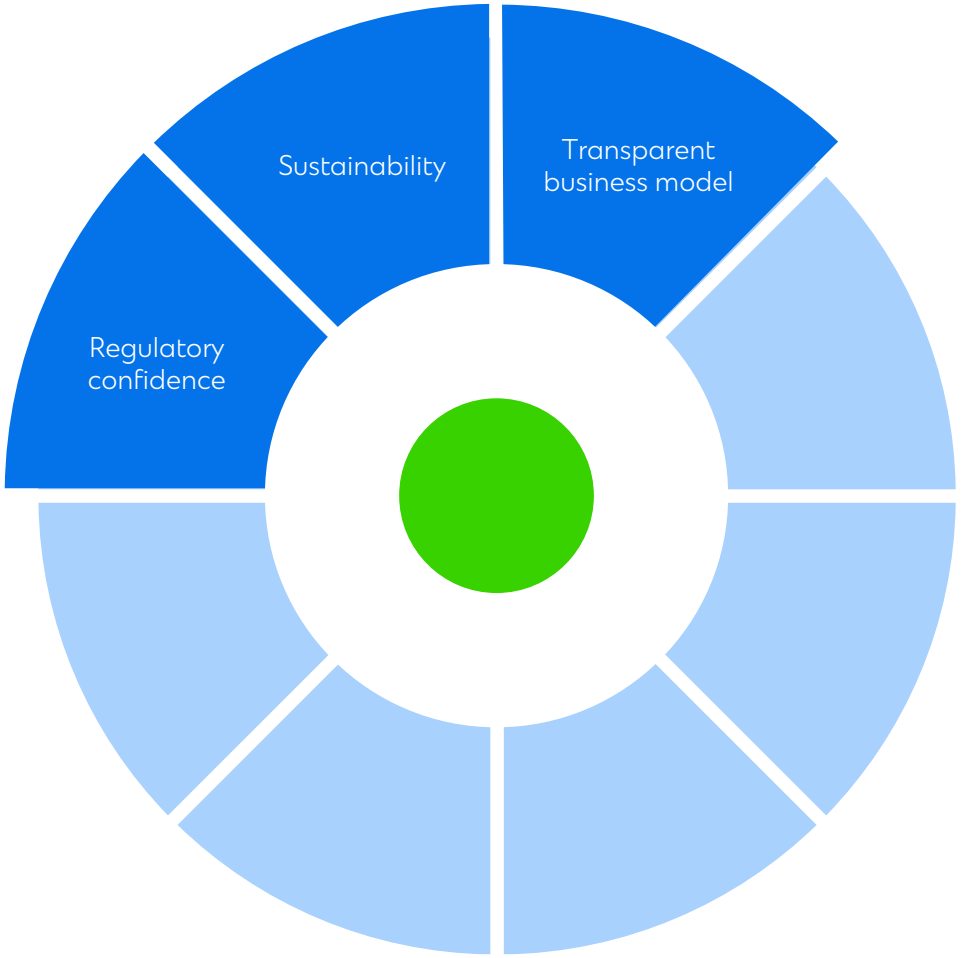
- We comply with the spirit and letter of laws and regulations, build constructive relationships with our regulators, and communicate with them openly, timely and cooperatively
- We partner with the authorities to lead in the fight against financial crime

Sustainability

- We contribute to sustainable social and economic development through our business, operations and communities

Transparent business model

- We ensure that the design and implementation of our strategy and business model align to the Bank's purpose and brand promise
- We establish a clear and transparent budget planning process to support our strategy and business model

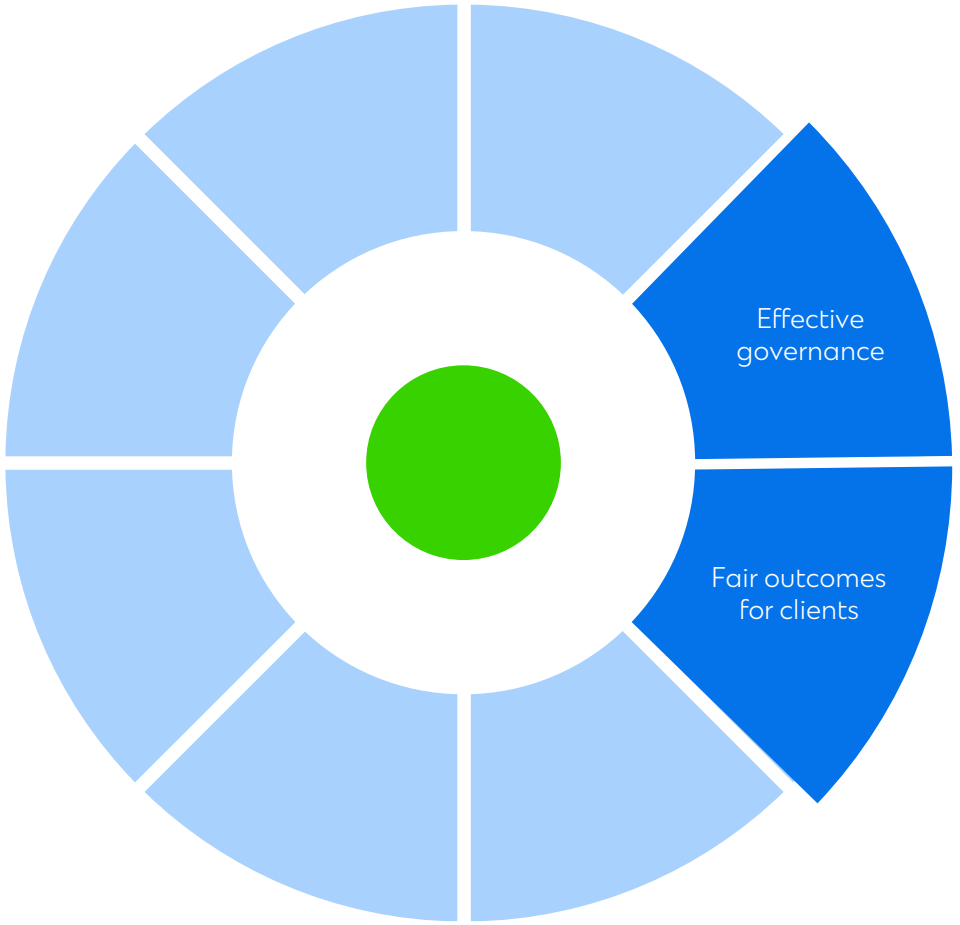


Effective governance

- We ensure we have the right governance to identify, manage and monitor risk
- We design and apply a clear set of rules, procedures and processes

Fair outcomes for clients

- We provide a client value proposition that suits and is designed to benefit clients across our global network, in compliance with all relevant cross-border requirements
- We provide clients with clear information and ensure that they are kept appropriately informed before, during and after the point of sale
- We ensure clients do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint



Effective markets

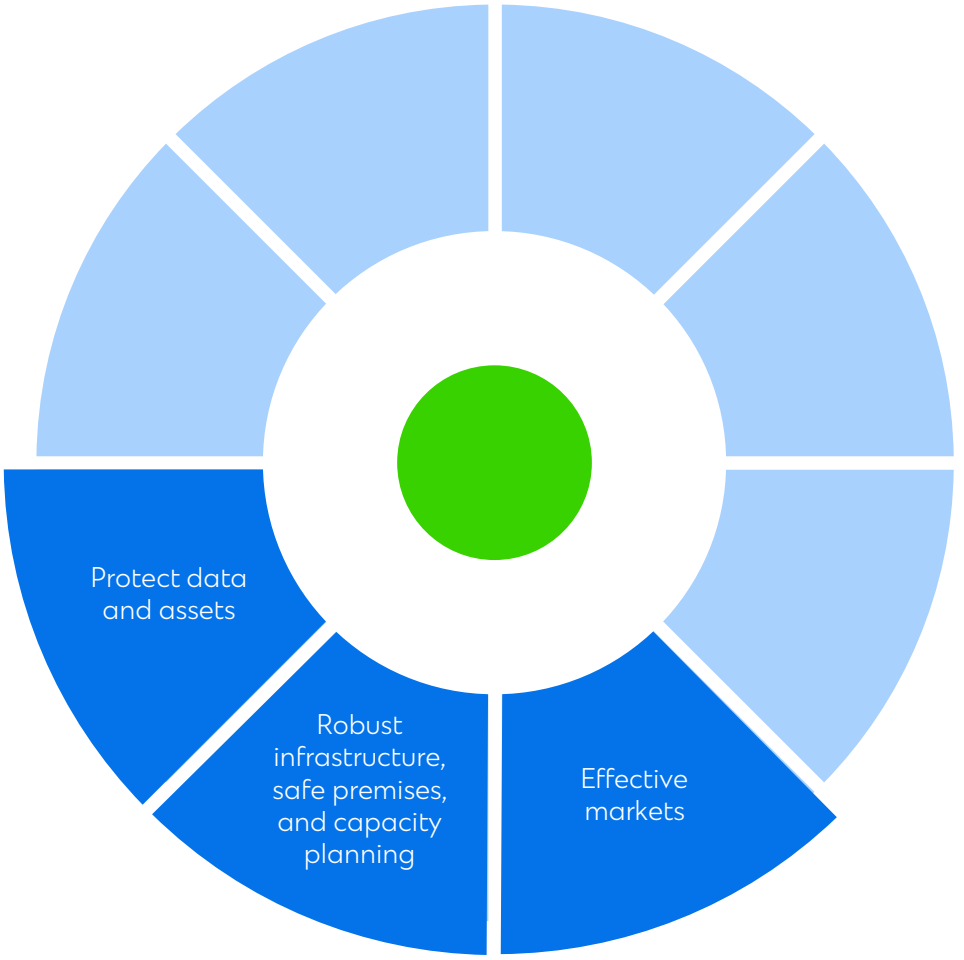
- We operate our market activities with honesty, transparency and integrity
- We identify, manage and appropriately escalate conflicts of interest to ensure our judgement is not, or cannot be perceived as, compromised

Robust infrastructure, safe premises and capacity planning

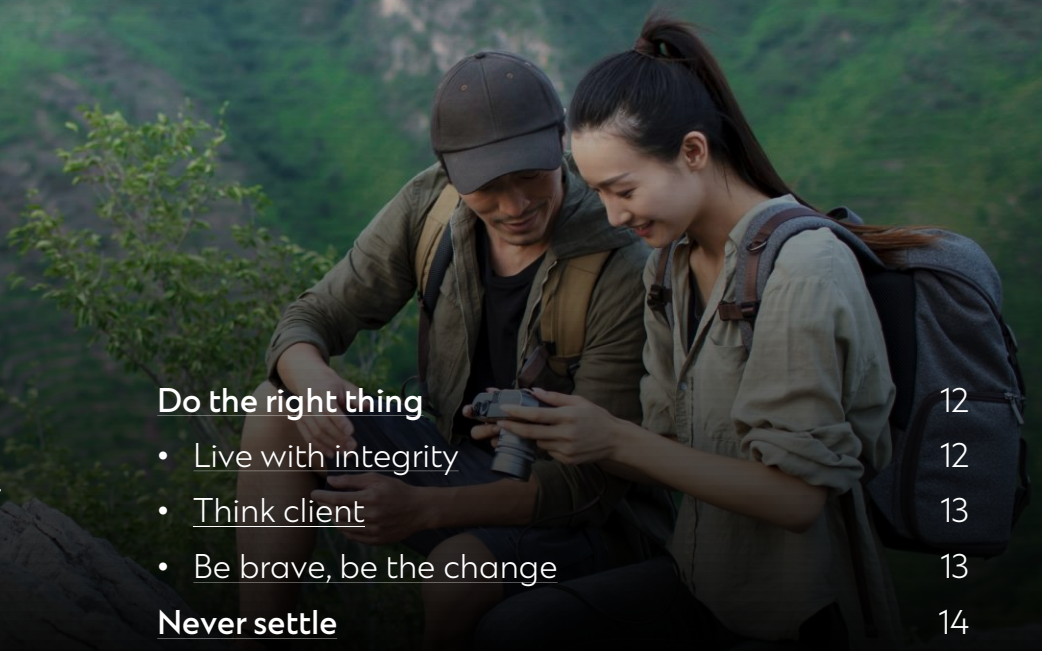
- We assess and provide the resources, technology, infrastructure and premises needed to support the safe delivery of our strategy, business model and product offering

Protect data and assets

- We create accurate records, data, and reports and ensure they are protected, stored and disposed of appropriately
- We do not release or share confidential information, either externally or internally, unless authorised to do so
- We use infrastructure, Group and client assets, money, and resources (including data and intellectual property) as intended



Our valued behaviours



We are building a culture of ambition, action and accountability. Through this culture, we deliver our purpose: to drive commerce and prosperity through our unique diversity.

To do this, we constantly live our valued behaviours, which support our actions, decisions and interactions with colleagues, clients and the markets we serve. Our valued behaviours are:

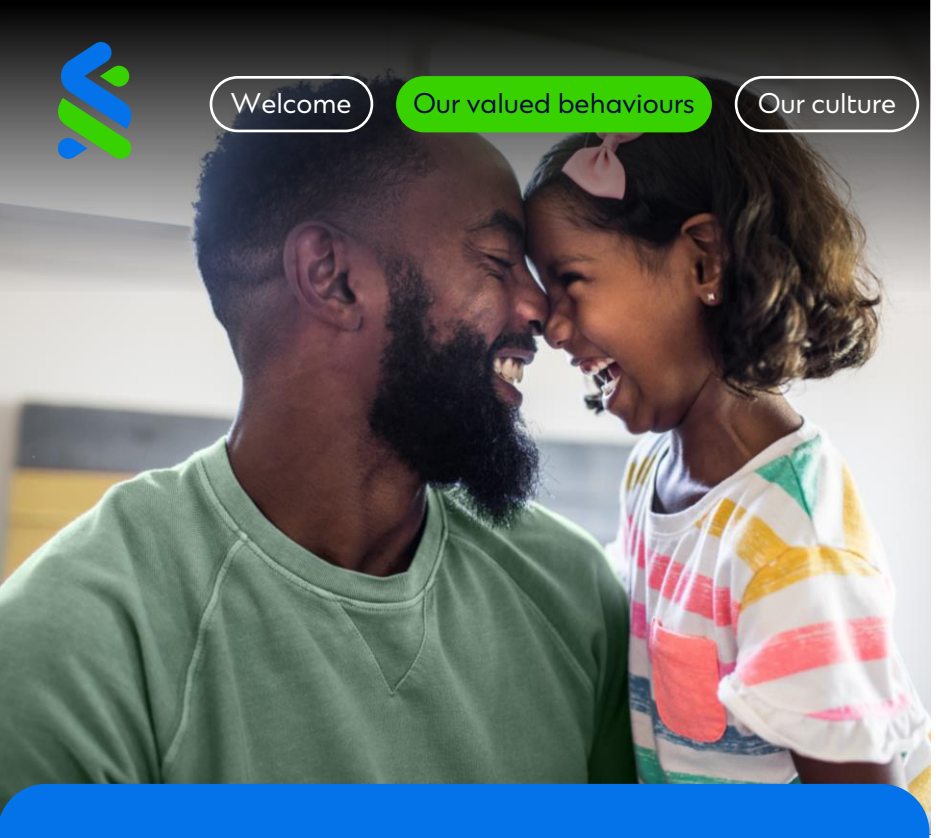
- **Do the right thing**
- **Never settle**
- **Better together**

Living our valued behaviours day-to-day enables us to deliver on our purpose and goals, while creating a safe, healthy, high-performing and inclusive workplace where colleagues can be themselves, share diverse points of view, and nurture their wellbeing. Our valued behaviours enable us to live our purpose and fulfil our promise to be here for good.

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- See more in others 16
- Ask ‘How can I help?’ 17
- Build for the long-term 17



Social media ethics are a key part of doing the right thing.

Our online behaviour is a reflection of who we are and what we represent. Even outside of work, our social media activity reflects ourselves and the Bank, and impacts the trust and credibility we have with each other, our clients, and the communities we serve.

Do the right thing

By doing the right thing, we always reinforce the trust of our clients, colleagues, regulators, shareholders and communities. This is at the heart of our brand promise to be here for good.

Live with integrity

We demonstrate the highest standards of integrity and ethical behaviour in everything we do.

We commit to making ethical choices, and the right decision at the right time.

We live what we say—with clients, colleagues, communities, investors, regulators and the market.

We are accountable by complying with laws, regulations, policies, this Code, the best market standards, and the practices that we follow.

Think client

We believe that clients are at the heart of our business, and they trust us to do the right thing.

We do this by proactively identifying their needs, market trends, regulatory expectations, and opportunities for improvement so we can effectively meet our clients' objectives.

We support clients in making ethical decisions.

Be brave, be the change

We are brave and role model the change we want to see in the Bank.

We aim to grow, question, innovate, and advocate for compelling suggestions and ideas.

We prioritise timely actions and bold decisions.

We have the courage to seek help and to raise concerns, including by Speaking Up, if we or someone around us thinks that something is wrong.



Never settle

The world around us is changing fast. We are ambitious. We never settle in our constant pursuit of excellence and market-leading innovation.

Continuously improve and innovate

We feel safe in challenging the status quo and always seek better ways of doing things.

We encourage our colleagues to share their unique qualities, creativity, and ideas for where we can be better together.

We believe all improvements—big and small—add up over time.

We embrace continuous education because expanding and upgrading our professional skills helps us realise our full potential.





Learn from successes and failures

We embrace success and failure, because our success relies on pushing boundaries, sharing feedback, learning from experience, and having a willingness to experiment.

Simplify

We focus on being easy to work for and with. We are committed to identifying and challenging unnecessary and overly complex processes, and to make it easier for us and our clients to get things done.

We design our processes so that they are appropriate to the task, risk, and regulation. We apply them with judgement and common sense.



Better together

In being better together, we value collaboration and create respectful and trusted relationships. We see more in others, ask "How can I help?", and build for the long term.

See more in others

We know good things happen when we empower each other with tasks that support our capability, attitude, and appetite to grow. In doing so, we empower our people to explore their potential and accomplish more for themselves, our Bank, and our communities.

The end result? We all feel more supported and enthusiastic about what we do and the positive impact we can collectively make.



Ask “How can I help?”

We believe that great teamwork always starts with us. Asking “How can I help?” means going above and beyond everyday responsibilities. It reflects our active commitment to be better together.

We offer our help to share our unique capabilities for the benefit of our colleagues, clients, communities, and the Bank.

Build for the long term

We prioritise long-term objectives and relationships over short-term benefits.

We build confidence in clients, shareholders, stakeholders, and the market by creating long-standing relationships.

We demonstrate our care for communities and sustainable outcomes by being forward-thinking.

We work collaboratively with colleagues to anticipate the far-reaching effects of our decisions and manage risks robustly.

Respect

We do not support behaviours or attitudes that create a negative working environment, including discrimination, bullying, harassment (including sexual harassment), and victimisation.

If you experience or witness anything inappropriate, we encourage you to speak to your People Leader or contact the Employee Relations team.



We believe that respect at work is essential. Respect should be at the heart of all our decisions, actions, and communication in the workplace and beyond.

We are here for good and believe that when we treat others with dignity and respect and we do the right thing, everyone benefits.

We believe that all our people are entitled to a safe, positive, and enjoyable physical and virtual working environment where everyone feels able to bring their best selves and fully participate, especially colleagues who have been historically underrepresented and those who are within one or more of the protected categories outlined in our Group Diversity and Inclusion Standard.

We understand that the principles in our Group Diversity and Inclusion Standard apply to all of our people, regardless of location or jurisdiction, and that anyone who does not follow these principles will be subject to disciplinary action.

We are committed to respect in the workplace, and expect all our people in every market to contribute towards an inclusive environment where individuality and different skills, capabilities, and lived experiences are appreciated and valued. This is essential to creating collaborative teams across our diverse footprint.

Equality, equity and inclusion

We are committed to maintaining a diverse and inclusive workplace, where everyone is entitled to be treated fairly.

We believe that equality, equity and inclusion are key to our commercial success, realising our purpose, and delivering on our promise to be here for good.

We foster an inclusive culture where individuality and diverse skills, capabilities, and experiences are understood, respected, and valued. In doing so, we create an environment that supports innovation. This allows us to be the best place to work, as well as the best place to bank.

We are committed to equality of opportunity, as well as equity and fairness. We recognise that our colleagues should be provided with the tailored tools and resources they need to succeed.

We aim to deliver products and services that meet the needs of our diverse clients and communities.

We encourage our vendors and suppliers to use this Code as an ethical and legal compass that guides their values and business.

We support a diverse and responsible supply chain and support investment in our communities.



What is equality?

This means offering everyone the same opportunities, regardless of differences (including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, ethnic origin, religion or belief, sex and sexual orientation, and/or other protected categories).

What is equity?

This means recognising that everyone doesn't begin in the same place in society, and that everyone should be provided with what they need to succeed. We offer our people the same opportunities while taking into account their individual needs for specific support or resources and their different circumstances to reach an equal outcome.

We strive to provide equality of opportunity for all, protect the dignity of colleagues, and promote respect at work. Attitudes and behaviours that detract from our positive working environment are harmful to everyone, and will not be tolerated.

If you see or experience something you think is unacceptable, you can speak to your People Leader, contact the Employee Relations team in HR, or Speak Up.

What is inclusion?

Inclusion is creating an environment where everyone with the capability to excel can do so. It is about creating a work environment where each person feels safe, respected and valued for their distinct skills, capabilities and individual experiences, and has the opportunity to participate fully and reach their full potential.



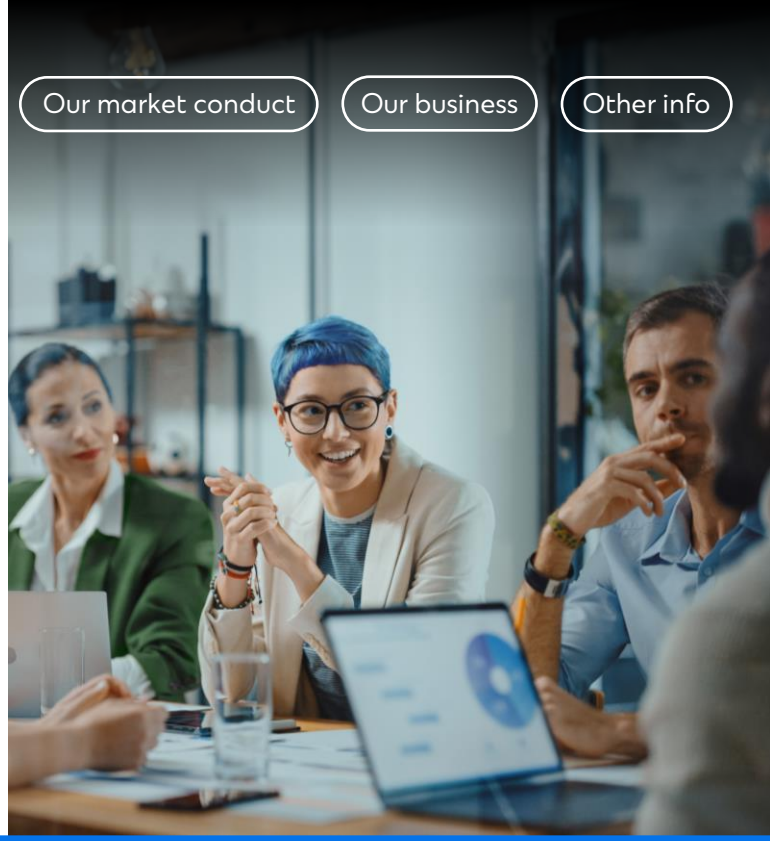
Psychological safety

A psychologically safe environment is essential to our growth and success.

We expect everyone to strive to do their best for themselves, the Bank, their team, our clients, and the communities we serve. When things don't go to plan, we expect each other to be open about where things haven't worked and seek to learn from them. For this to happen, the Bank must be a place where people never settle by taking measured risks, expressing ideas and concerns, and calling attention to things which don't seem right, without fear of punishment or retaliation.

We are committed to creating an environment of psychological safety—built on trust, inclusion, respect, and an understanding that people can speak openly about who they are, what they think, and how they feel. We encourage our people to be comfortable with giving and receiving candid feedback.

We know that when honest mistakes are made, we need to be clear, transparent and fair about accountability. Our focus should be on learning and improvement. We're solutions-orientated and see failures as opportunities to learn.



A psychologically safe environment is one where we feel comfortable and valued when voicing views, ideas, and concerns, without fear of punishment or mistreatment.

The freedom and security to share ideas, experiment, and give and receive feedback is important for our collaboration, innovation, and promise to be better together.

Raising concerns and Speaking Up

Raising concerns and Speaking Up is brave, enables us to be better together, and is a living example of doing the right thing.

We recognise that there may be times when we see or experience something in the workplace that doesn't feel right. If this happens, what should we do?

We are all encouraged to do the right thing and raise our concerns so that the Bank can review and address the underlying issues. In doing so, we contribute to our strong ethical culture and making the Bank a better place to work.



How to raise a concern

1. By contacting Employee Relations in HR for advice, or to raise a Grievance.
2. Through the Speaking Up channels.
3. By raising concerns to the relevant business or function.

We also recognise the value of sharing concerns and feedback with team members, peers, and more senior colleagues in the appropriate business function, both informally and on-the-spot. Providing constructive feedback in a timely way can stop small issues from becoming big ones and prevent conflict from arising later down the line.

When to speak to HR or raise a Grievance

We should speak to Employee Relations in HR for advice or to raise a Grievance when we have an employment-related concern that impacts us personally (for example, a concern about bullying, harassment, discrimination, victimisation, work relations, or our working environment).

When to Speak Up

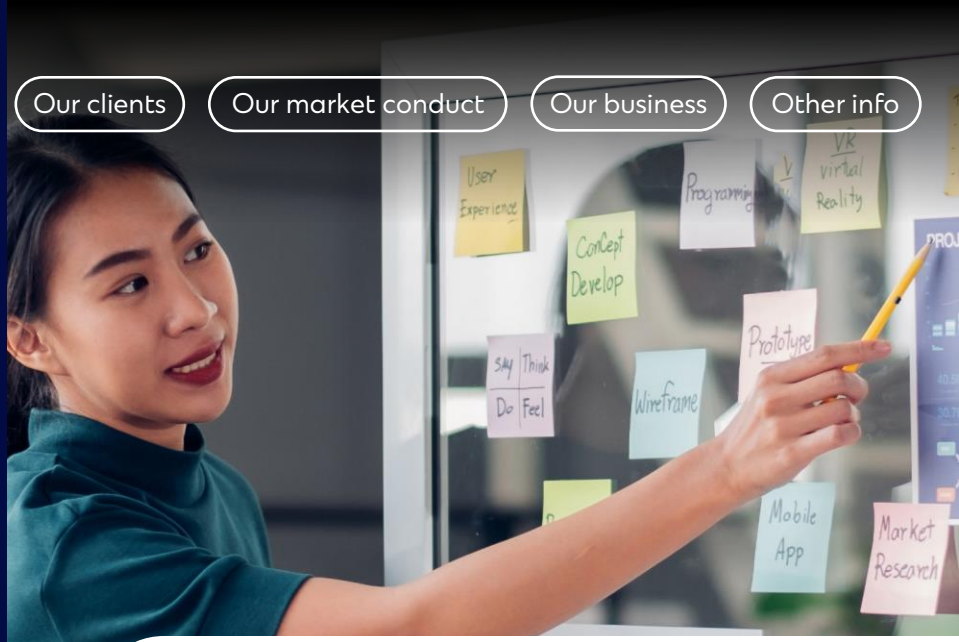
We encourage you to raise a concern via the Speaking Up channels when you believe someone has, might have, or is about to:

- Breach any of our policies, standards, or processes
- Breach laws or regulatory requirements
- Conceal or deliberately fail to report misconduct or breaches
- Put the health and safety of a person in danger
- Act in a way that may damage our reputation or financial wellbeing

We don't need to be certain that any of these things have happened before raising a concern. However, any concerns that are fabricated will be treated as a serious breach of this Code.

Who can Speak Up

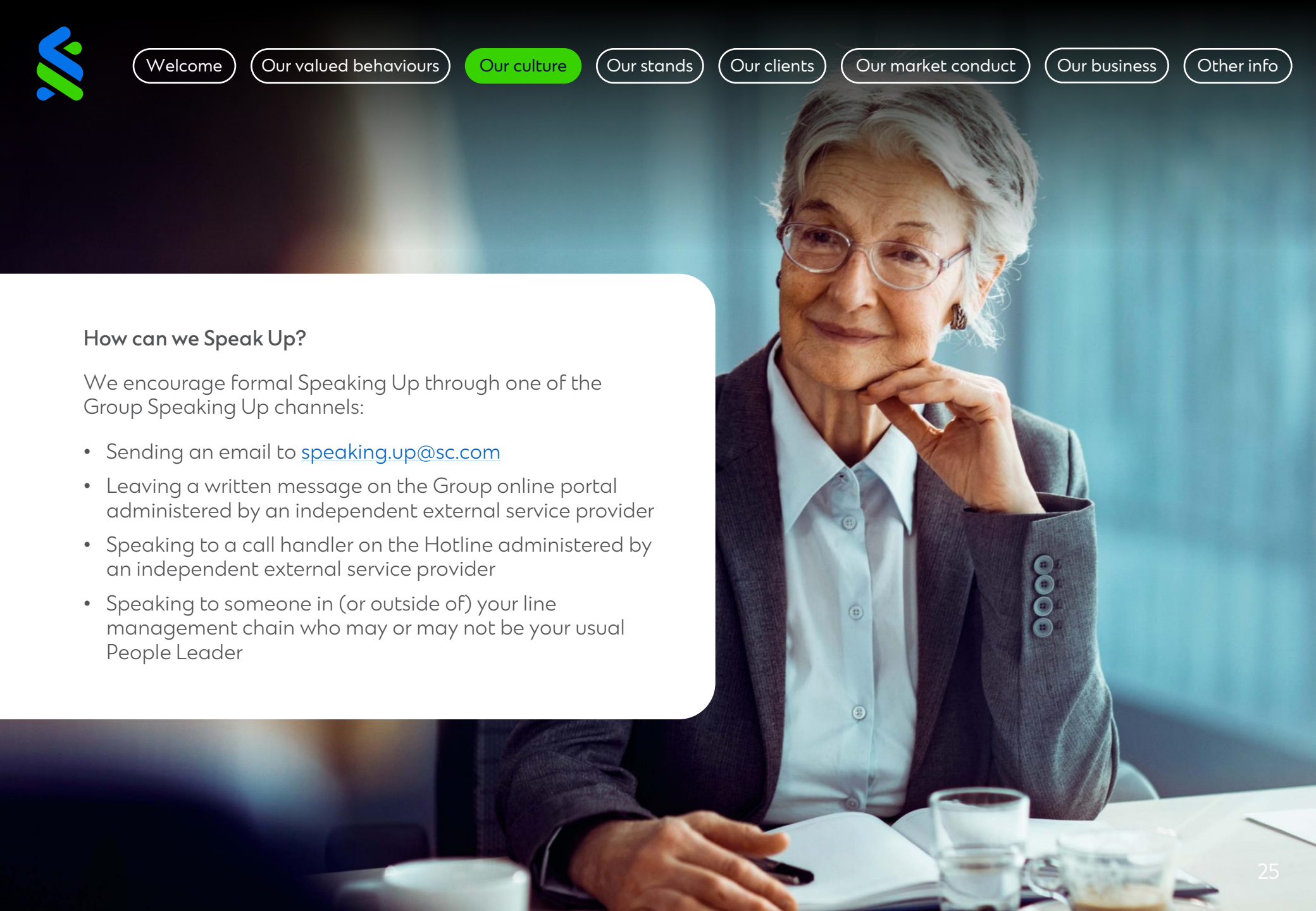
We empower all of our people to Speak Up, as well as clients and third parties.



Are we protected if we raise a Speaking Up disclosure or grievance?

We treat concerns seriously and handle them in confidence. Your identity will only ever be shared on a 'need to know' basis. You can also choose to raise your concern anonymously (although it can be harder for us to investigate anonymous complaints).

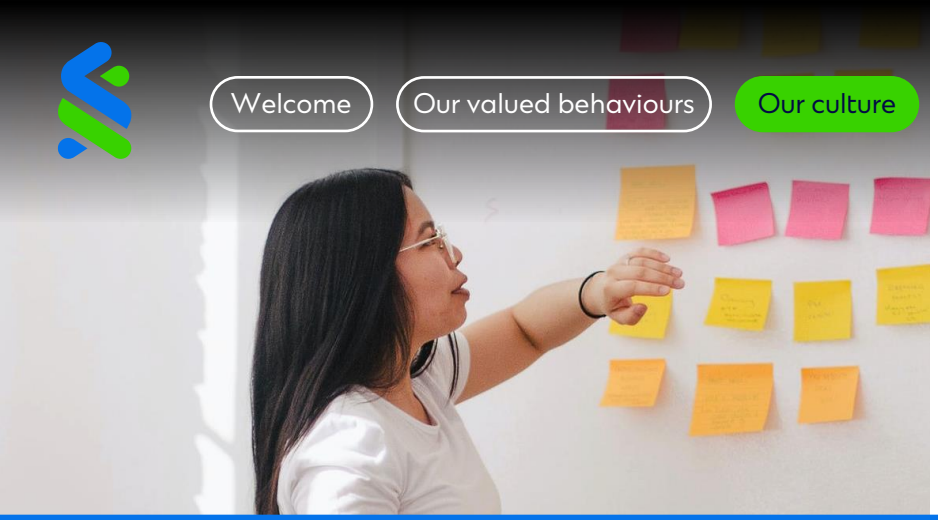
We do not tolerate victimisation for raising concerns (or for being involved in a review). Any retaliation will be dealt with as a disciplinary matter. We also have a robust victimisation prevention framework in place.



How can we Speak Up?

We encourage formal Speaking Up through one of the Group Speaking Up channels:

- Sending an email to speaking.up@sc.com
- Leaving a written message on the Group online portal administered by an independent external service provider
- Speaking to a call handler on the Hotline administered by an independent external service provider
- Speaking to someone in (or outside of) your line management chain who may or may not be your usual People Leader



We encourage everyone to live and role model the actions in our Leadership Agreement.

This is the foundation for leadership in our organisation. The Leadership Agreement helps us all to set clear expectations on what behaviours are acceptable, as well as those that are not.

It's more than words—it is a two-way agreement and understanding with everyone, and it represents the behaviours that are independently proven to drive high performance.



Ethical leadership

The leadership we display drives our culture and our culture drives our conduct.

We all have a responsibility to lead. Our clients and communities rely on us to make the right choices. In doing so, we play our part in embodying the valued behaviours and delivering on our purpose.

We show leadership in the way that we treat ourselves, our colleagues, our clients, our communities, and our partners.

We know that making the right choices about how we choose to lead has the ability to differentiate us. It builds the culture we need to drive the right outcomes. Good leadership is contagious and empowers our individual and collective success. Good leadership defines who we are and where we are going.

We choose to lead by example and champion strong conduct by:

- Committing to learning every day to improve how we lead
- Continuously striving to make the Bank a significantly better place, and asking “How can I help?” to make it easier to get things done
- Listening before we speak, seeking out and valuing the diverse thoughts, viewpoints, and experiences of others
- Coaching and helping others to grow and make the most of their potential
- Building trust by asking for feedback, and really listening
- Making it safe for team members to set ambitious goals, to be brave, and be the change
- Challenging bias or prejudice and encouraging colleagues to bring their whole selves to work
- Taking timely action, making bold decisions, engaging in effective risk management, and seeking solutions that deliver for our clients
- Supporting innovation, experimenting, and learning from failures as part of developing growth mindsets

Discover more examples in our Leadership Agreement.



Wellbeing

We are committed to doing the right thing by supporting our colleagues through four interlinked pillars of mental, physical, social and financial wellbeing.

We acknowledge that positive wellbeing is crucial in terms of ensuring employee engagement. It drives greater productivity, commitment and prosperity at individual, team and organisational levels.

We have a key role to play in supporting and improving the mental and physical health of our people.

We believe in creating sustainable working practices and embedding a positive workplace culture. This enables our people to thrive at work and perform at a high level in the medium and long term, not just the short term.



Mental wellbeing

We support the right to a healthy mind. This means cultivating an environment where people are comfortable to talk about their mental health and to seek help when necessary.

Physical wellbeing

We strive to provide workspaces and working environments that promote positive wellbeing and healthy lifestyle choices.

Financial wellbeing

We're committed to a culture of sustainable high performance where everyone can be at their best and feel their contributions are fairly rewarded and free from unjust bias.

We aim to foster a healthy attitude to money and provide a range of support that can empower colleagues, customers and communities to prosper.

Social wellbeing

We value and actively support the positive impact on wellbeing that comes from interactions with colleagues, families, friends, communities, clients and the wider world.



Flexible, hybrid and healthy workplace

We know that hybrid and flexible working practices help us to recruit and retain the best talent, as well as support our colleagues' health, wellbeing, family needs, and personal commitments. We encourage our people (where the nature of their role permits) to embrace the opportunities of both remote working and face-to-face collaboration, so we can engage in innovative and dynamic conversations and learn from each other as we progress towards our purpose.

We are committed to balancing the needs of our business with those of our colleagues when it comes to our working practices. This enables us to do the right thing by our clients, teams, individual colleagues, and the communities we serve.

We strive to create a healthy workplace with sustainable working practices. This means seeking to allocate work and structuring roles so that colleagues can perform and succeed sustainably in a way that supports their wellbeing and commercial goals.

Healthy risk culture

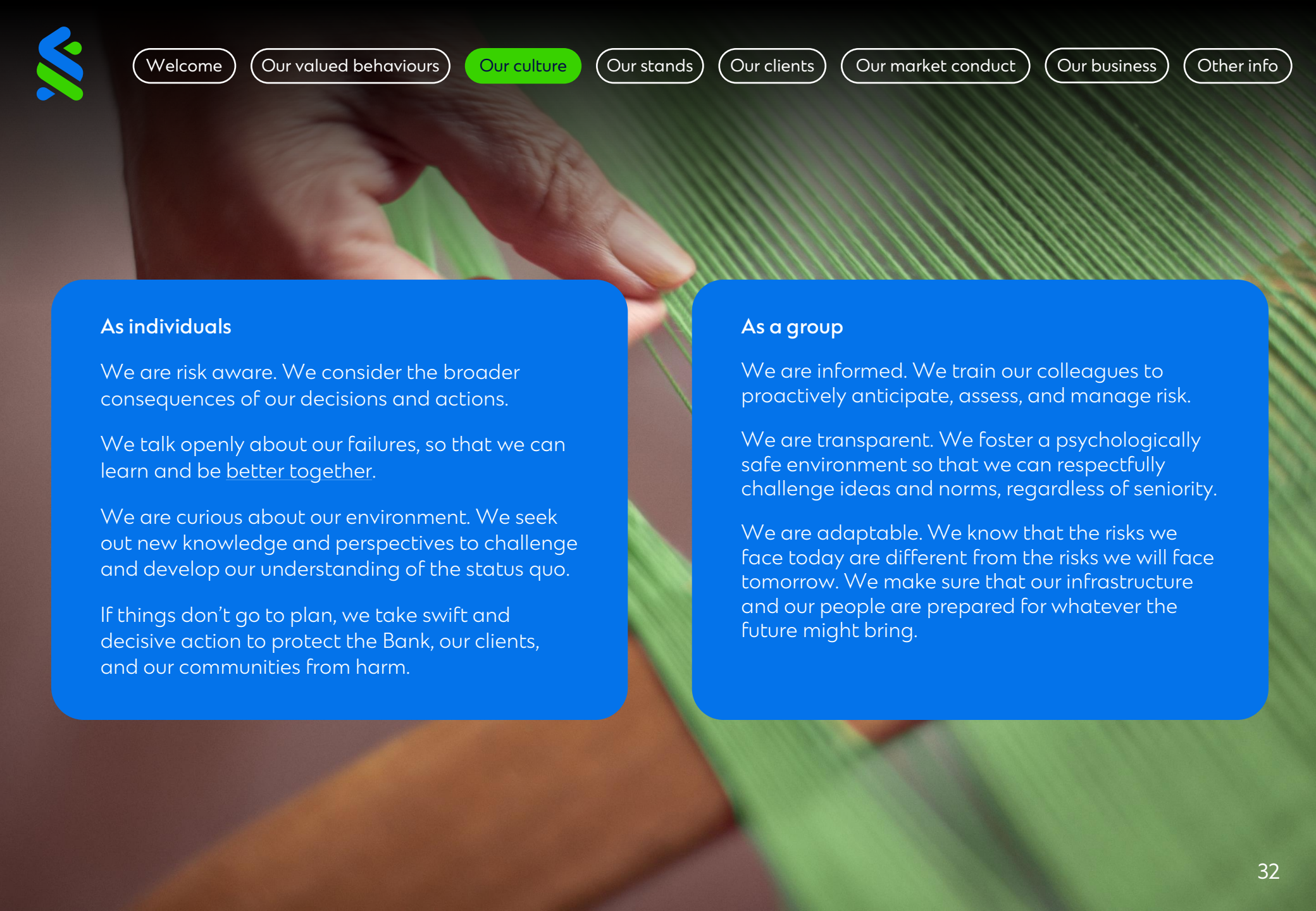
We manage risk responsibly and work together to prevent bad outcomes. We talk openly about what could go wrong and invite others to challenge our views. We plan to succeed, and we make sure we're prepared for every eventuality.

We all play an important role in ensuring a healthy risk culture. Why is this important? A healthy risk culture helps us in creating a safe working environment, strengthening trust, and providing positive outcomes for clients, shareholders and markets.

We can apply a growth mindset when we support a healthy risk culture by acting responsibly and within our authority.

This means we embrace challenge as a way to grow. In doing so, we trust in our individual and collective creativity, resilience, curiosity and ability.





As individuals

We are risk aware. We consider the broader consequences of our decisions and actions.

We talk openly about our failures, so that we can learn and be better together.

We are curious about our environment. We seek out new knowledge and perspectives to challenge and develop our understanding of the status quo.

If things don't go to plan, we take swift and decisive action to protect the Bank, our clients, and our communities from harm.

As a group

We are informed. We train our colleagues to proactively anticipate, assess, and manage risk.

We are transparent. We foster a psychologically safe environment so that we can respectfully challenge ideas and norms, regardless of seniority.

We are adaptable. We know that the risks we face today are different from the risks we will face tomorrow. We make sure that our infrastructure and our people are prepared for whatever the future might bring.

Our stands

Our purpose is to drive commerce and prosperity through our unique diversity. We believe we must lean into this moment and accelerate change, innovation, and our own transformation using creativity, capital investments, financial flows, and collaboration.

To achieve this purpose, we follow three important stands:

- **Accelerating zero**
- **Lifting participation**
- **Resetting globalisation**

These stands are felt strongly in our footprint. The markets we call home are also the most exciting places in the world to drive innovation, catalyse social transformation, and build sustainable economies.

By taking a stand, we challenge ourselves to use our unique abilities of working across boundaries to connect capital, people, ideas and best practices.

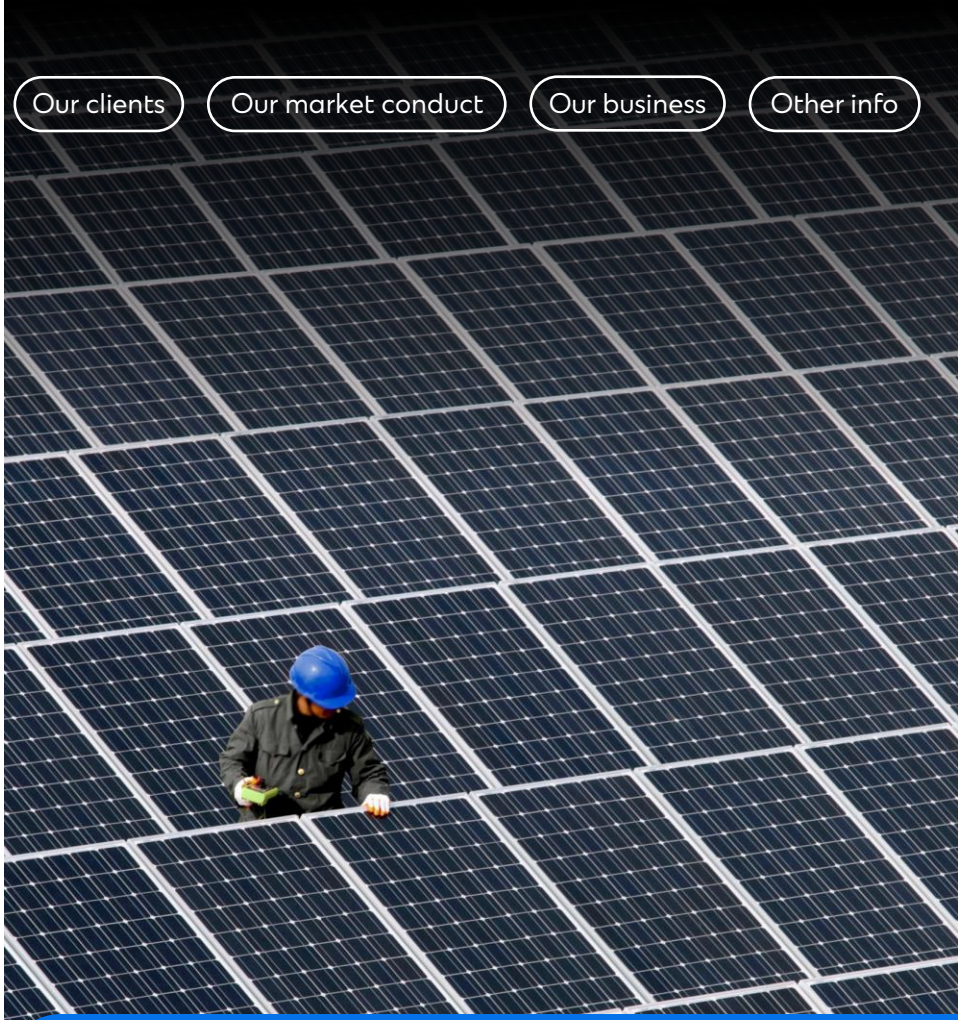
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Accelerating zero

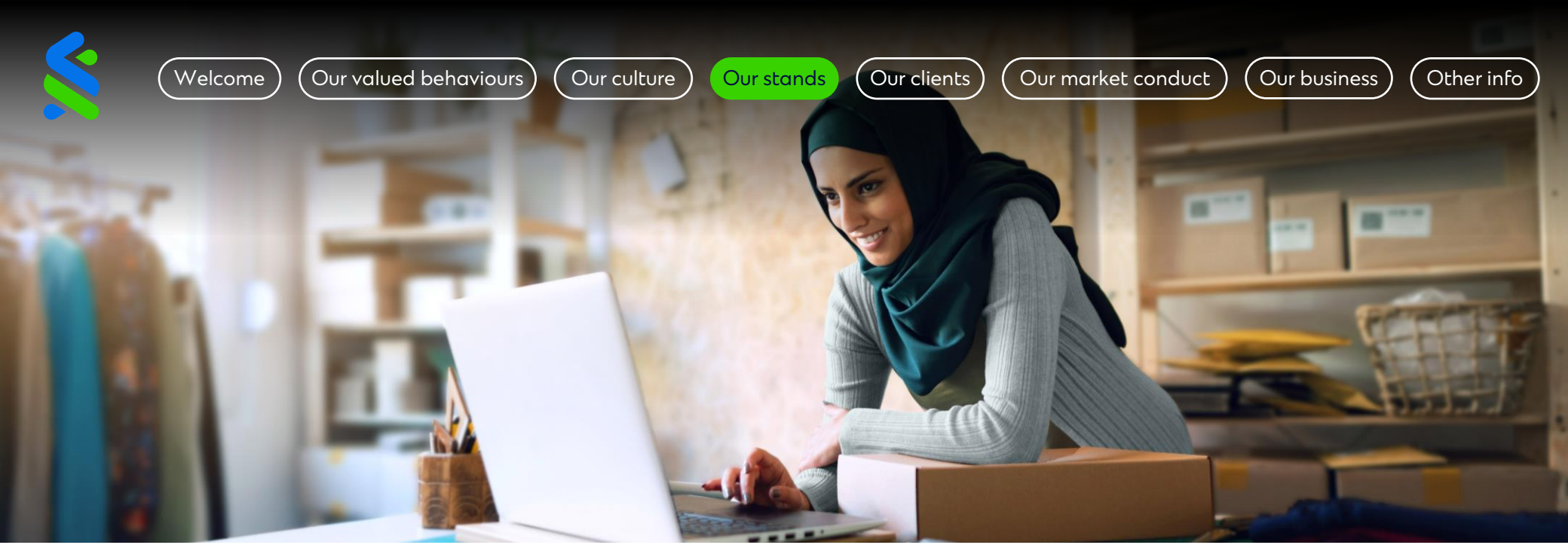
The world must reach net zero carbon emissions by 2050 to stave off the worst effects of climate change. The onus is on governments, corporations and individuals to do their part.

We believe that climate change is one of the greatest challenges facing the world today and that its impact will hit hardest in the communities and markets where we operate, namely Asia, the Middle East and Africa.

The need for a just transition to an inclusive, net zero economy brings with it a huge opportunity for innovation and growth for our clients and our Bank.



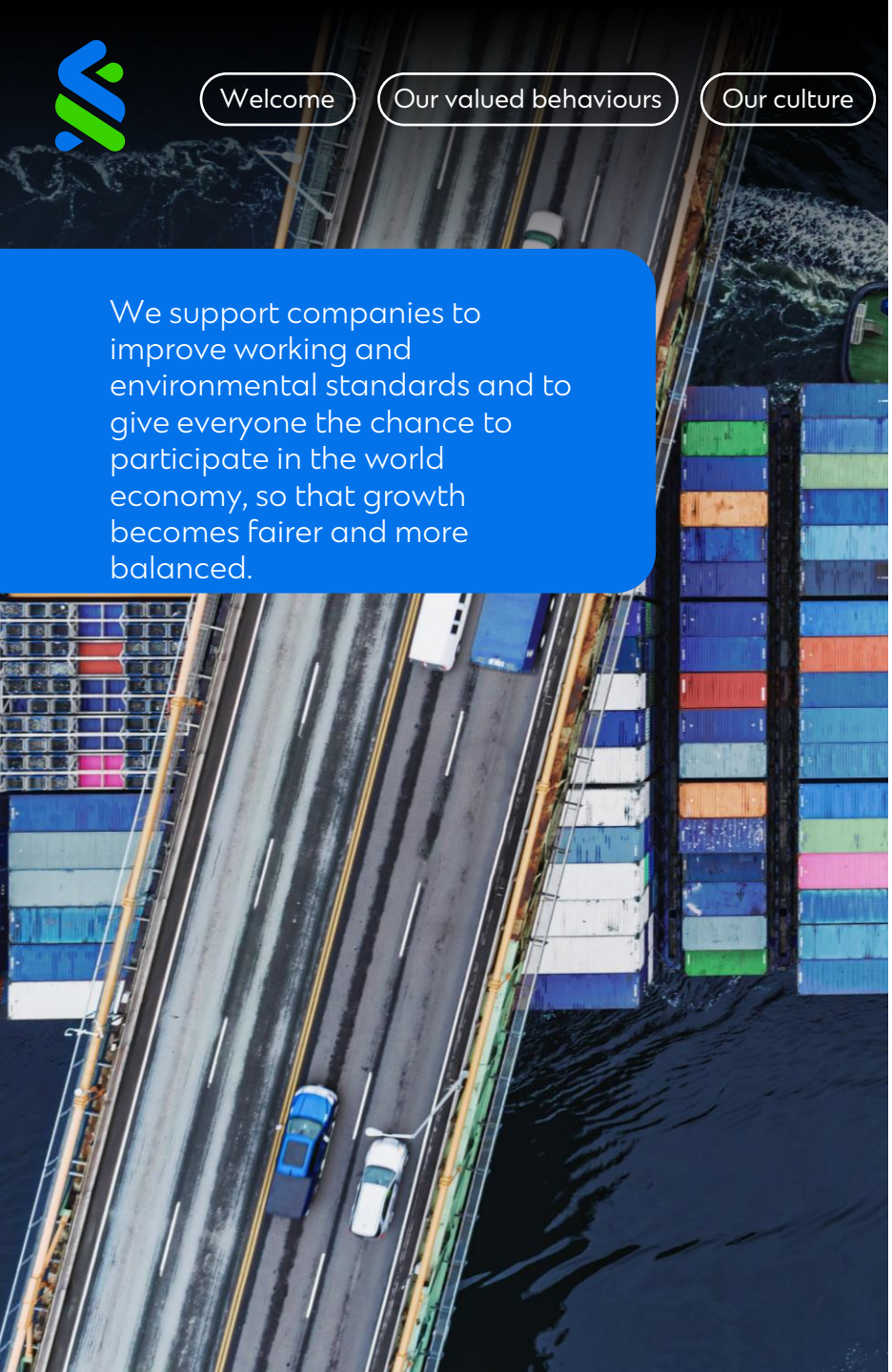
Climate change is the greatest challenge facing the world today. We're committed to reaching net zero carbon emissions in our own operations by 2025, and in our financing activity by 2050.



We strive to expand the reach and scale of financial services—expanding accessible banking and connecting clients to opportunities that promote access to finance and economic inclusion.

Lifting participation

Inequality, along with gaps in economic inclusion, means that many young people, women and small businesses struggle to gain access to the financial system to save for their futures and grow their businesses. We want to democratise wealth management and make it easily accessible at low cost.

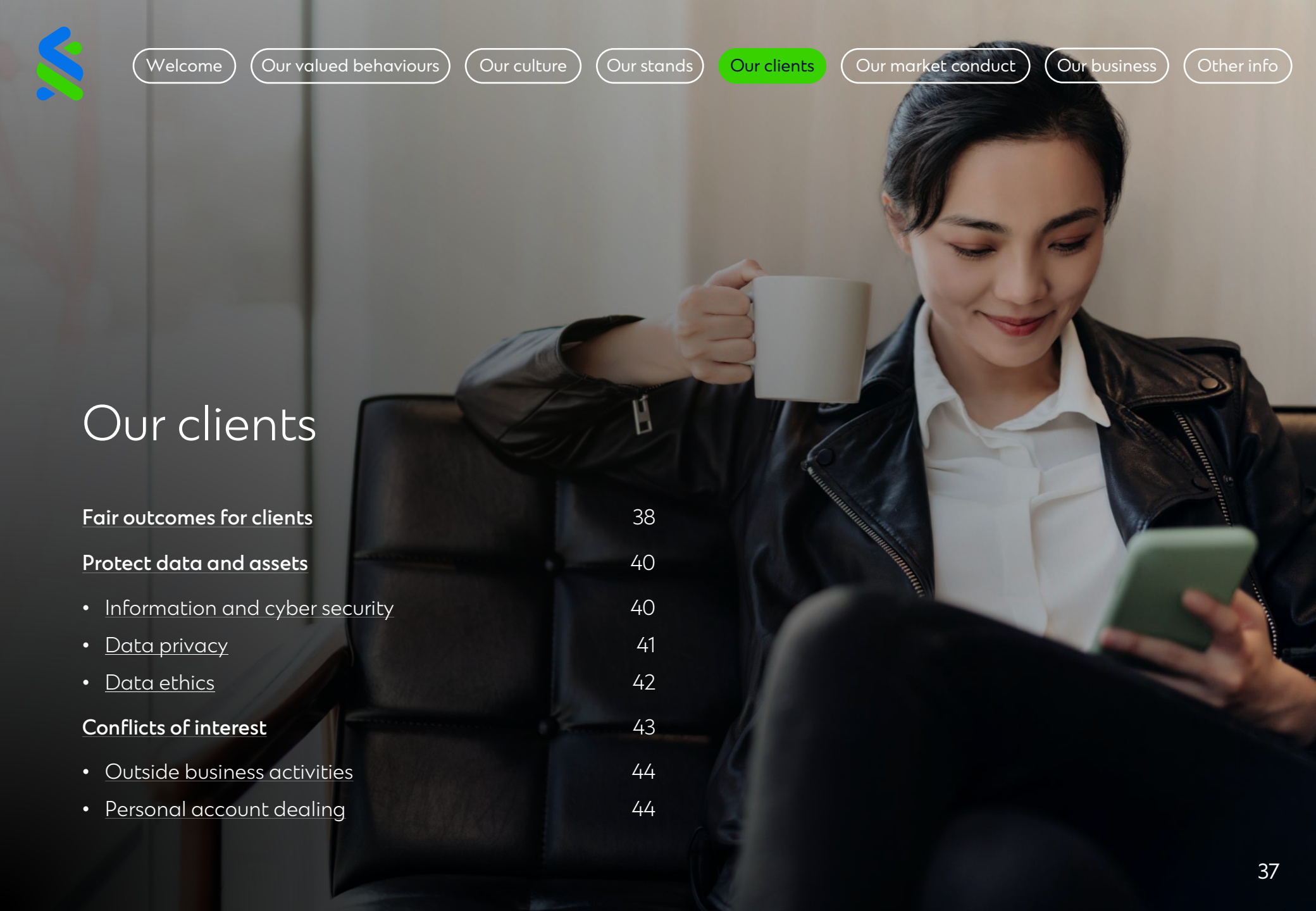


We support companies to improve working and environmental standards and to give everyone the chance to participate in the world economy, so that growth becomes fairer and more balanced.

Resetting globalisation

Globalisation has lifted millions out of poverty, but left too many behind. We advocate a new model of globalisation based on transparency to build trust, and promote dialogue and innovation.

We can connect the capital, expertise and ideas needed to drive new standards and create innovative solutions for sustainable growth.



Our clients

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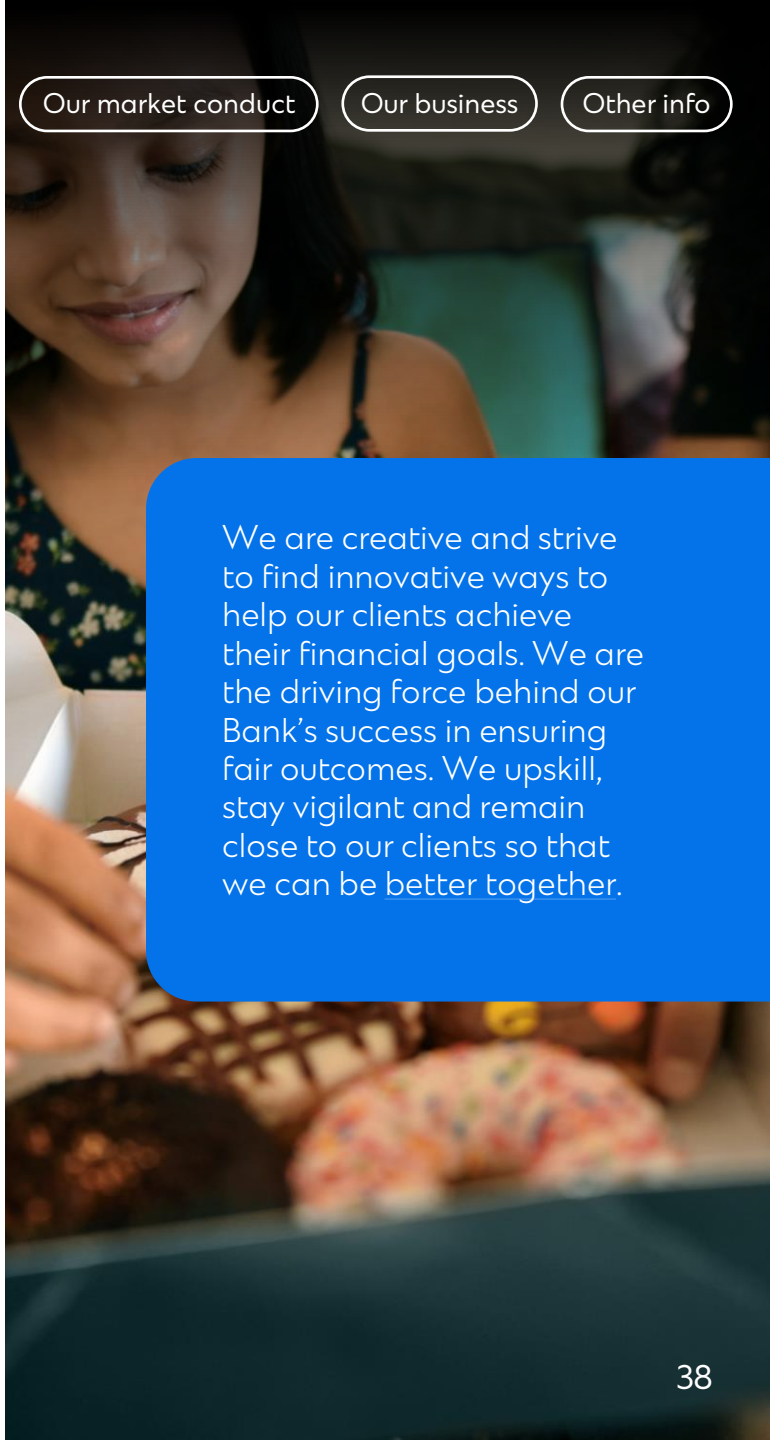
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Fair outcomes for clients

We believe in fair outcomes for clients. This is a continuous process that involves us all, and includes elements like product design, consideration of the client journey, and more. Together, we contribute by:

- Ensuring that our products and services are tailored to meet the unique needs and risk appetite of our clients, and that our advertising, marketing and communication is always clear, accurate and factually correct
- Putting clients first by offering fair value, enabling informed decisions, promoting responsibility, and protecting them from exploitation
- Constantly learning from their experience, and embedding a culture of delivering fair outcomes throughout their relationship with us



We are creative and strive to find innovative ways to help our clients achieve their financial goals. We are the driving force behind our Bank's success in ensuring fair outcomes. We upskill, stay vigilant and remain close to our clients so that we can be better together.

We recognise that ensuring fair outcomes for clients builds long-term relationships, grows business and enhances our reputation. We ensure fair outcomes by:

- Taking client complaints seriously, handling them promptly and fairly, and continuously learning from our experiences
- Following any relevant business procedures
- Using oversight from the relevant committee to look out for any risks and concerns
- Providing training, tools and support to client-facing employees
- Being creative and innovative in finding ways to help our clients

Responsible innovation

We innovate responsibly by:

- Challenging the status quo while also thinking about the consequences our new products will have
- Processing, recording and sharing data ethically
- Designing, developing and deploying AI fairly
- Being proactive in seeking and including diverse perspectives

Together, we can strive to ensure we are doing the right thing when building the future.



Protect data and assets

We understand that information is the lifeblood of commerce. By safeguarding it, we are creating a more fair and trustworthy business environment.



Information and cyber security

We are entrusted by our clients, communities and stakeholders to keep their information safe and secure. While technology is key, we recognise that our people are our greatest defence. That's why each and every one of us has a significant role to play in protecting the information we have.

We have a shared responsibility to protect against cyber threats based on how we identify, assess, mitigate and manage information and risks.

We know the world, our business and technology continue to evolve. To prepare for the new challenges that will come our way as a result, we must be:

- Curious: if something doesn't feel right, it probably isn't
- Up-to-date on new threats by engaging in continuous learning
- Aware of our responsibilities at work (especially when some roles have specific responsibilities)
- Proactive in taking steps to keep our personal data and devices safe and
- Continuously monitor and respond to information security threats
- In doing so, we build a healthy risk culture and adopt habits that keep us informed, prepared and well-equipped to succeed.

Data privacy

We understand the value of data and information. Data belongs to our people, clients and partners who have entrusted us with it, and our use of it can impact their day-to-day lives. We're committed to treating the data we handle with care, and to use this power responsibly and respectfully, and for fair, transparent and intended purposes.

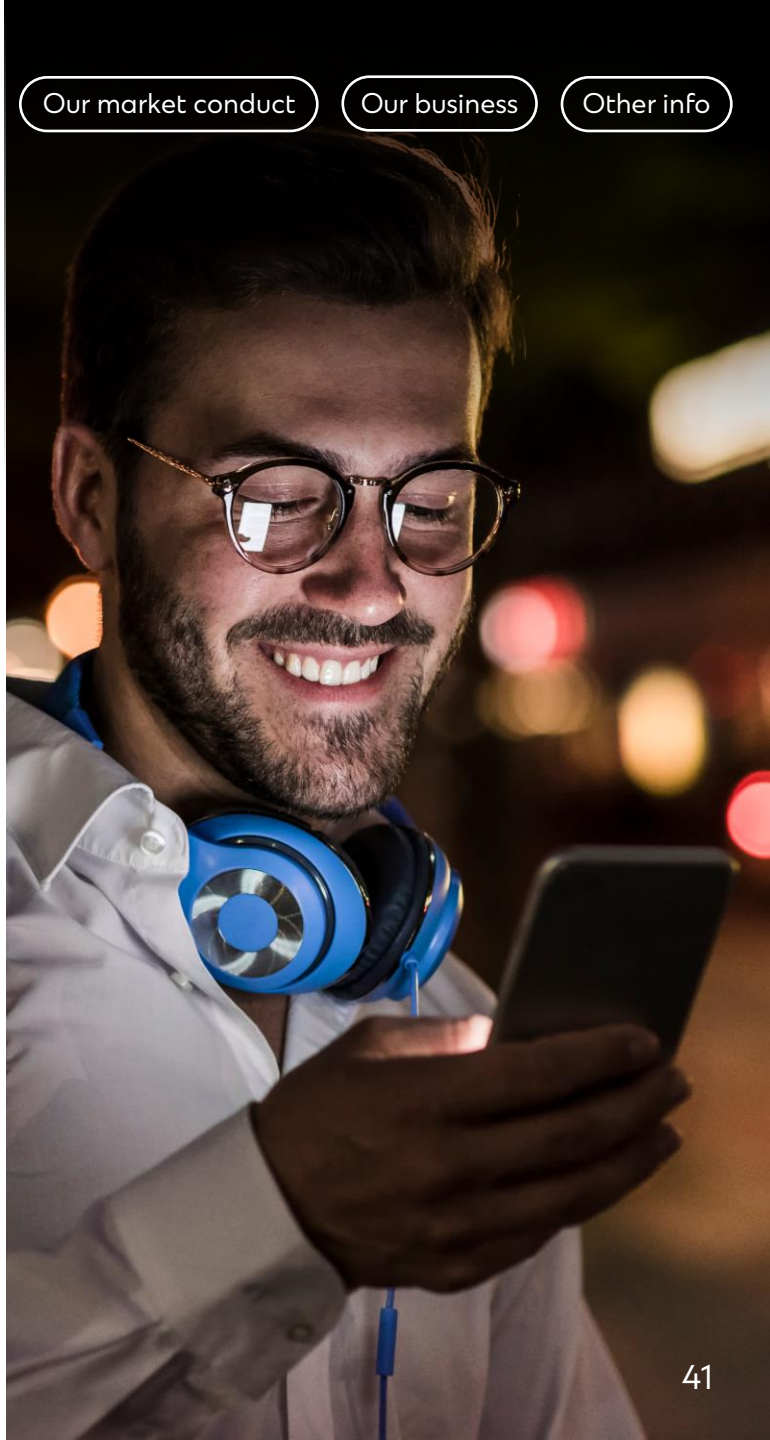
We recognise that privacy is also important, and that we are expected to protect our clients' data with the same level of care as we protect their money and assets. We do the right thing by being responsible and taking measures to safeguard and guide our use of personal data.

We know that our clients, communities and regulators require and rely on us to protect and secure the data we hold. To support this, we continually invest and engage in training on our policies, guidance, processes and infrastructure.

We have regular privacy awareness communications and information security awareness training to ensure all colleagues understand their role in upholding the privacy of every client we serve.

We must protect the personal data and privacy of our employees, clients and partners by:

- Only using personal data where we have a lawful or legitimate reason to do so
- Being transparent in our use of personal data



Data ethics

We strive to uphold high ethical standards when it comes to our use of data. We understand that data can be a powerful tool that supports good outcomes for clients and communities, and that it empowers responsible innovation.

We are mindful that as the amount of data we collect, hold and use grows, we need to increasingly consider the potential for both intended and unintended outcomes. We must use data responsibly, especially when used in systems employing artificial intelligence techniques.

We also need to reduce the likelihood of any misuse of data, which could create an imbalance in the benefits of technology, behaviours and society, as well as an erosion of trust or negative environmental impacts. To do this, we should:

- Mitigate unintended consequences within our control
- Influence decision makers to make responsible choices

Data ethics evaluates data practices that have the potential to adversely impact people and society in data collection, sharing and use.

We strive to use data in ways that minimise harm. Our data ethics principles are accountability, respect, fairness, transparency and shared value.

Data ethics is more than just setting and following regulations or providing a technical fix—it's about challenging the status quo and including our diverse perspectives.



Conflicts of interest

Conflicts of interest arise when entities or people have a difference between personal and professional interests, duties, or responsibilities. Our role and goal is more than avoiding negative impacts—it's about managing conflicts effectively and building trust along the way.

We recognise that conflicts of interest are a reality in the financial industry and can sometimes be really tricky. That's why we have policies and training in place to identify and manage conflicts. It's also why we collaborate to ensure that we act transparently and ethically, and in our clients' best interests.

We value transparency and honesty. Together with subject matter expertise and the use of smart technology, we help to prevent conflicts of interest from becoming an issue.



Conflicts might arise from personal or financial relationships, as well as in situations related to gifts and entertainment.

If you think you notice or experience conflicts of interest, whether perceived or otherwise, that misalign with our ethics, our valued behaviours, or your ability to perform your role, seek guidance from your line manager and the Control Room at controlroom@sc.com.

Outside business activities

We all have interests and activities outside the Bank. This may sometimes trigger conflicts of personal or financial relationships, as well as questions about the appropriateness of gifts and entertainment.

If you are involved (or would like to be involved) in any outside business activities that may, perceived or otherwise, not align with our ethics, valued behaviours, or your ability to perform your role, seek guidance from your line manager and the Control Room at controlroom@sc.com.



Personal account dealing

We like to keep things transparent and honest, especially when it comes to personal account dealing. Our guidelines are designed to manage and mitigate the misuse of insider information that could lead to market abuse or insider trading.

We shouldn't deal in any financial instruments if there is an actual or potential conflict of interests involving the Bank or its clients.

We should prioritise the interest of the Bank and our clients ahead of our personal trading interests.

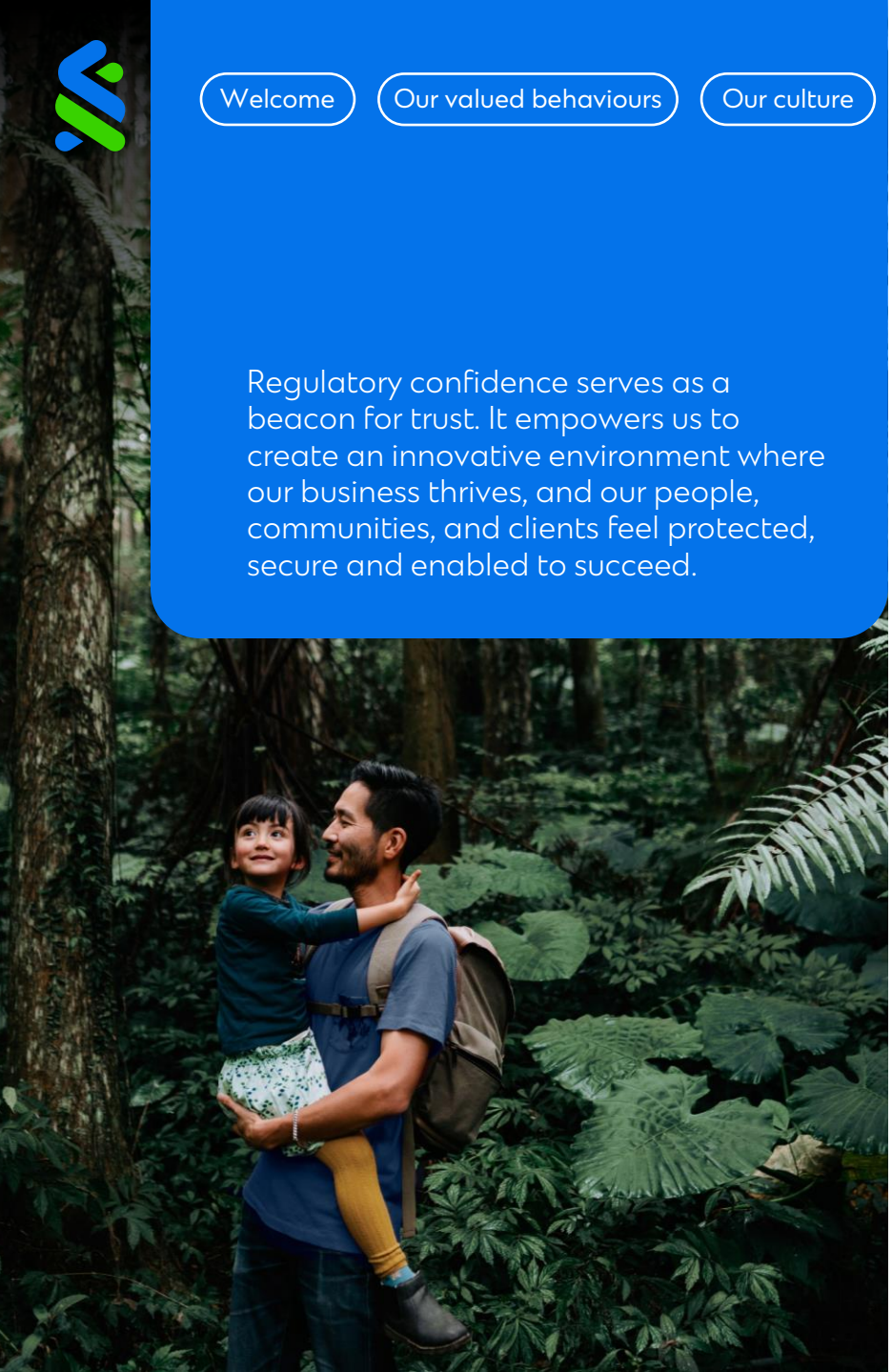
We commit to preclearing and disclosing all dealing activity to the Control Room as set out within the Personal Account Dealing Standard by contacting controlroom@sc.com.

Our market conduct

We recognise that financial markets are the backbone of the global economy, and that the success of our clients depends on the integrity of these markets.

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Regulatory confidence serves as a beacon for trust. It empowers us to create an innovative environment where our business thrives, and our people, communities, and clients feel protected, secure and enabled to succeed.

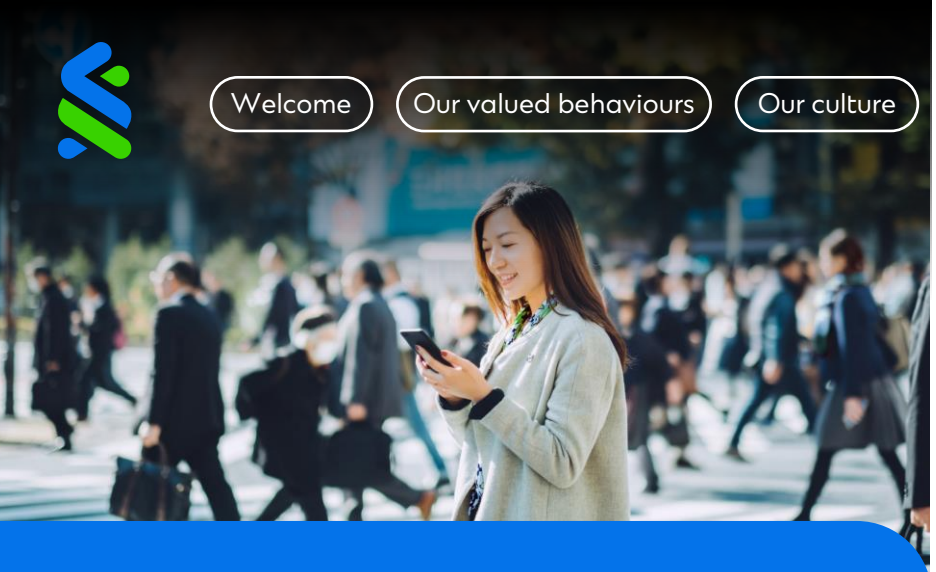


Regulatory confidence

We aim to lead the way in ethical banking and regulatory compliance.

We are dedicated to maintaining the highest standards of regulatory compliance and fostering positive relationships with our regulators. Our ultimate goal is to ensure that regulators have full confidence in our compliance.

We achieve this by following the spirit and letter of the law, communicating with transparency, and working cooperatively. The end result: we establish trust and confidence that supports our ongoing success.



We hold ourselves accountable for our actions and their impact on the markets we serve. We do not support:

- Poor market conduct
- Negligent market activity
- Activity that undermines the integrity of the financial system
- Activity that puts our reputation at risk
- Collusion, misuse of confidential or inside information and creating false or misleading market impressions

If you see any behaviour that goes against our support of maintaining effective markets, Speak Up.

Effective markets

We all contribute to creating effective markets: an environment where our clients can confidently engage in transactions in a predictable, secure and fair manner. Doing so is core to the ongoing success of our clients, our communities and our Bank.

We support effective markets by committing to clear and consistently applied standards of:

- Market practice and conduct
- Transparency
- Open access
- Ethical behaviour
- Healthy competition
- Integrity

We ensure our markets remain vibrant and efficient by recognising that we need a robust trading and post-trade infrastructure. This is supported by our commitments to be here for good and to do the right thing. If we don't, markets can become distorted, inefficient and create negative outcomes.

Anti-money laundering

We have a duty to protect the communities we serve from the consequences of money laundering. That's why we're committed to staying vigilant, staying alert and doing the right thing.

We all have a responsibility to take the fight against financial crime seriously. Money laundering and terrorist financing have severe consequences for our society and the global economy. Financial crime allows drug and human trafficking to take place, and facilitates other criminal acts like the smuggling and counterfeiting of goods, illegal gambling, financing terrorist activity, and tax evasion.

We commit to maintaining the integrity of the financial system, and to using the tools and training available. We recognise that this is a cross-border and cross-function effort that directly supports our promise to be here for good.

We recognise that in doing so, we can create a safer and more stable financial system, maintain trust and confidence in our Bank, and play a role in contributing towards a better society—in short, we can show the world what it means to be better together.

Winning the fight against financial crime helps us, our colleagues, our clients and our communities.

There are more than just regulatory reasons for doing so—there's a positive human impact on us and our societies, too.

If you have any concerns about anti-money laundering, or suspect a possible violation, or to get advice about these topics, refer to Ask Compliance.



Sanctions

We commit to following international sanctions. It's not just about avoiding penalties or maintaining a good reputation, it's about doing the right thing.

We refuse to engage in any activities that could potentially violate international sanctions. Instead, we work with our clients to help them comply with the law and understand the risks associated with certain actions. We believe that following these regulations is crucial in preventing crimes and protecting the communities we serve.

We know that navigating these regulations can be tricky, so we encourage you to ask questions and seek clarification to ensure we stay within the bounds of the law.



We all hold the key to creating a safer world by reporting any suspicious activity that may raise sanctions concerns.

To report a concern, speak to Compliance, Financial Crime & Conduct Risk ("CFCR") or Speak Up.



Fraud

By preventing and detecting fraud, we can earn client trust, improve culture and support the legal and regulatory frameworks that protect our markets.

We're confident that by working together, we can fight fraud and safeguard our colleagues, clients and our Bank.

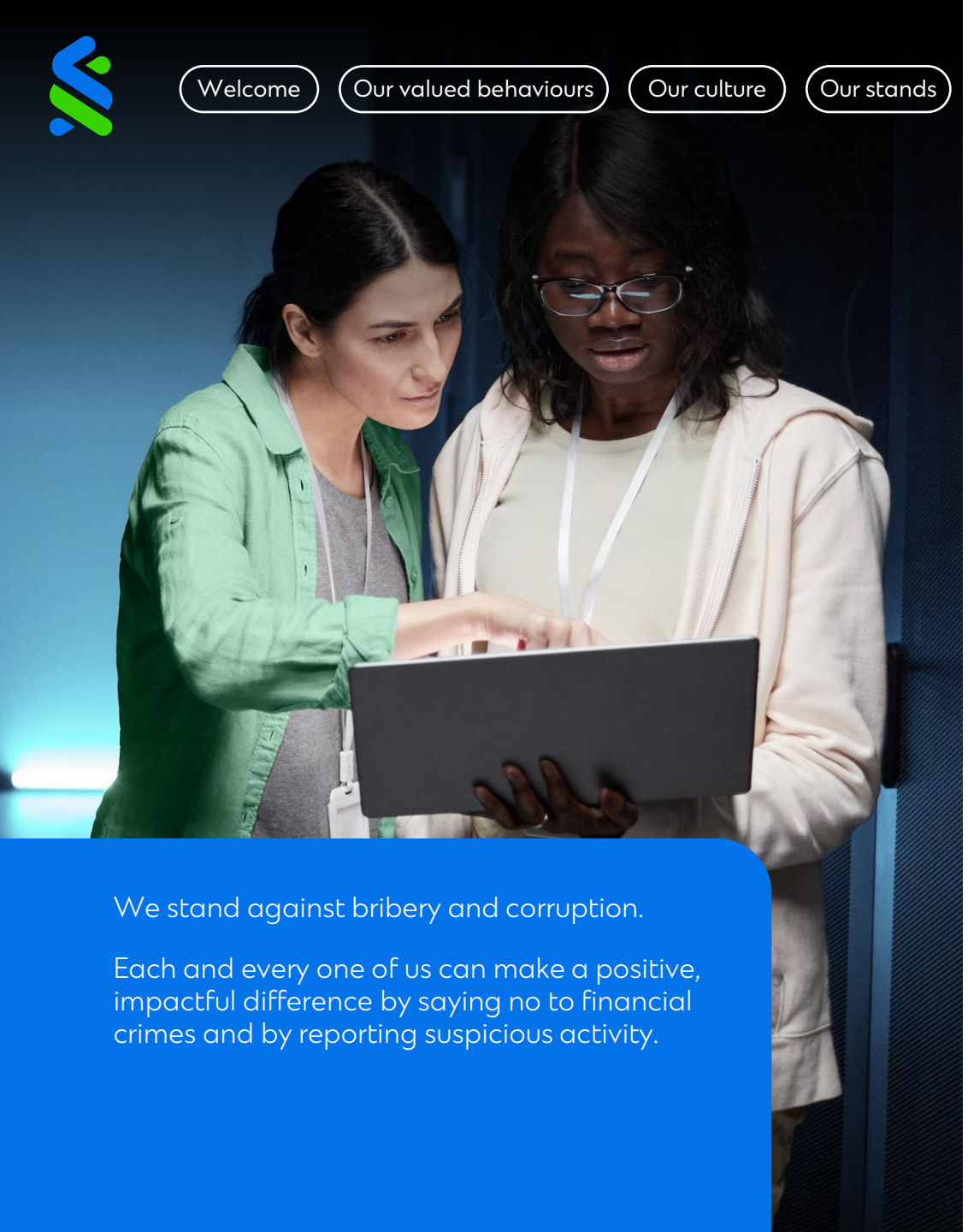
We recognise that fraudsters are persistent, and that awareness, education and continued vigilance will defend against them. We've implemented layered controls to combat fraud, including:

- Process level controls, including monitoring and testing
- Analytic and surveillance systems
- Continuous improvement of control landscapes based on threats
- Employee training
- Client awareness

We can't fight fraud alone—doing so is a collective effort. If you spot anything suspicious, Speak Up. While our primary goal is to prevent fraud from happening in the first place, we can stay ahead of fraudsters by embracing the never settle mindset to develop best practices, innovative technologies, and staying alert.

We stand against fraud.

Fighting fraud is about more than preventing losses; it's about maintaining a good reputation, protecting our clients and resources, driving integrity as a core part of our organisation, encouraging good culture and behaviours, and doing the right thing.



We stand against bribery and corruption.

Each and every one of us can make a positive, impactful difference by saying no to financial crimes and by reporting suspicious activity.

Anti-bribery and corruption

Fighting against bribery and corruption supports our reputation, promotes a culture of ethics, and helps us avoid legal, financial, and reputational consequences.

We believe that bribery and corrupt activities are destructive to our societies and economies. Corruption and bribes aren't just about cash: offering anything of value as a means of influence can be considered a bribe.

We put in place appropriate procedures to prevent, detect, investigate and report any suspicious activities. In doing so, we:

- Actively put our clients, shareholders and communities first
- Take responsibility for the actions of all of our associated people, including third parties and intermediaries acting on our behalf
- Make sure to assess and control any risk of bribery and corruption

We value transparency as a vital part of our mission to fight against bribery and corruption and to conduct business ethically, and in a fair and transparent way. We do this by:

- Supporting our reputation
- Promoting a culture of ethics
- Identifying and preventing legal, financial and reputational consequences to our Bank, our clients, our colleagues, and the communities we serve

Our Compliance team is always available to support and protect you if you have any questions about bribery and corruption.

For advice on various Group and Country CFCR topics refer to Ask Compliance.



Modern slavery and anti-human trafficking

Fighting modern slavery and human trafficking ("MSHT") is more than just a legal obligation; it's a moral imperative that aligns with our values and commitments, and allows us to do the right thing.

We strive to respect human rights across our business. We recognise that the global nature of our work may expose us to the risk of MSHT in our operations, supply chain and client relationships, and we are committed to identifying and mitigating these risks.

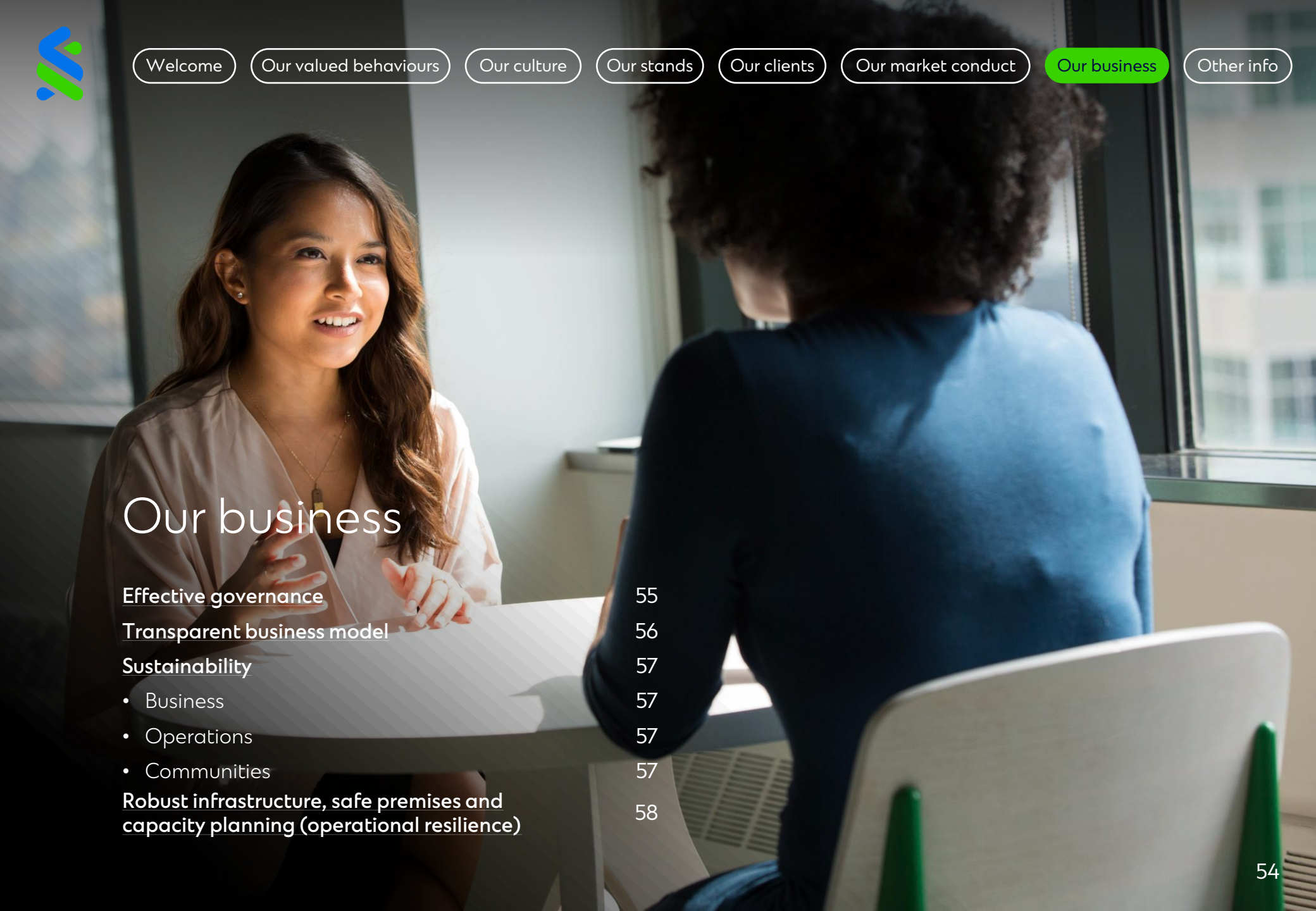
We've adopted an approach guided by policies and frameworks which are informed by the International Bill of Human Rights and the International Labour Organisation Conventions.



We've implemented key measures to mitigate the risk of MSHT across our business, operations and supply chain, including:

- Requiring Corporate & Investment Banking ("CIB") clients to provide evidence of their policies and processes to manage human rights risks in their operations or supply chains
- Enhancing due diligence when onboarding suppliers with heightened Modern Slavery risk
- Conducting routine adverse media screening of suppliers for any potential MSHT risk
- Adhering to our Supplier Charter principles that state zero tolerance on the use of MSHT in our supply chain
- Working with external organisations to advance coordinated industry action against MSHT

We encourage our people and members of the public to Speak Up if something doesn't feel right.



Our business

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Robust infrastructure, safe premises and capacity planning (operational resilience) 58

Effective governance

We view effective governance as doing the right thing, at the right time, by the right people.

We understand the importance of effective governance. We are a multinational organisation with an ambitious strategy, high aspirations, and a truly global impact. So, it's critical that our business operates according to our structure, processes, rules, roles and responsibilities in an efficient way. This supports our strategy while also swiftly addressing challenges and achieving success.

We each make a contribution to fostering effective governance.

Risk: We are vigilant and act within our authority to strengthen risk culture through proactive identification, management and reporting, and monitoring of risks and issues.

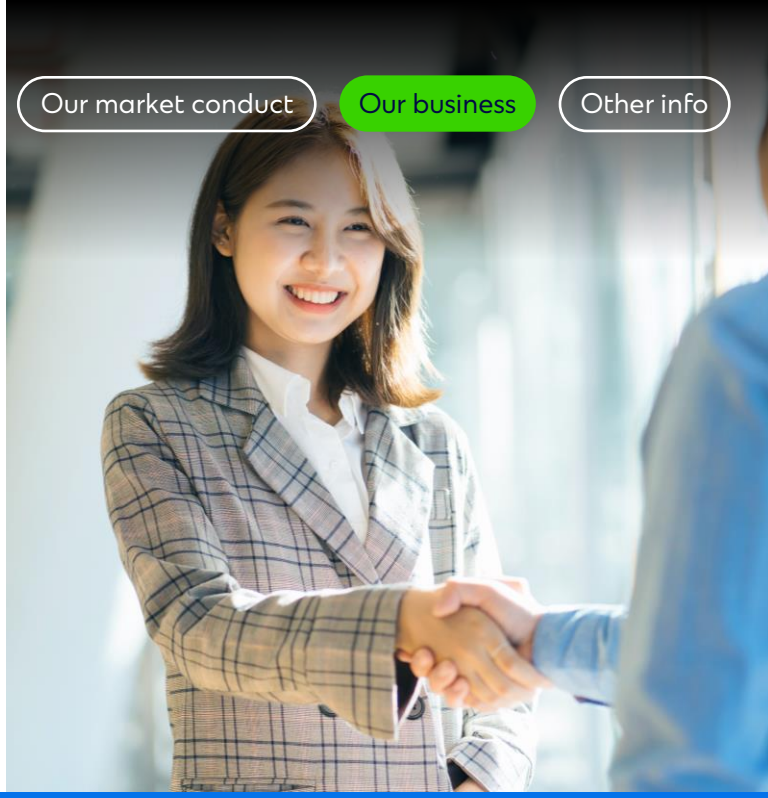
Responsibility: We are familiar with our own responsibilities and are accountable to each other in fulfilling these.

Decision making: We act transparently and use good judgment which enables us and our colleagues to make appropriate and timely decisions.

Policies and standards: We aim for simplification when working on documents and tools to accelerate our business, support our stakeholders, and help our colleagues.



Transparent Business Model



We believe that a transparent business model supports our Bank's valued behaviours, strategy, and promise to be here for good. It also strengthens the trust clients, shareholders, communities and regulators place in us.

We support a transparent business model by always putting clients first, planning carefully, and ensuring the decisions we make align to our Bank strategy and conduct outcomes.

We need to learn lessons from external and internal events and apply them to our business model and strategy accordingly. That's why we are continuing to review how we operate to ensure we remain effective. In doing so, we move closer to achieving our goals.

We commit to deliver clear and accessible information about the Bank (including its products, services and performance) to help our clients and shareholders make the right decisions. Doing so also helps us attract and support high quality, diverse talent and deliver on our purpose.

Sustainability

We are dedicated to our ambitious sustainability objectives, including:

Business:

- Driving innovation while adapting to and supporting a sustainable economy
- Standing for sustainable growth and respect for human rights

Operations:

- Embracing sustainability as a shared responsibility, from conceptualising new products and services, to travel decisions and stakeholder engagement, all the way to choosing our collaborators and suppliers
- Respecting human rights in our sourcing decisions, in providing financial services, and in how we work with each other

Communities:

- Striving for economic inclusion in our markets, because each of us can make a difference through making the right business decisions and by sharing unique skills with local communities while volunteering
- Fostering sustainable economic growth, financial literacy, community development, and diversity and inclusion
- Ensuring our approach to diversity, equity and inclusion is mirrored by our suppliers and the communities in which we operate



Robust infrastructure, safe premises and capacity planning (operational resilience)

Operational resilience is a vital part of our business: to be here for good and do the right thing, we need to build for the long-term today.

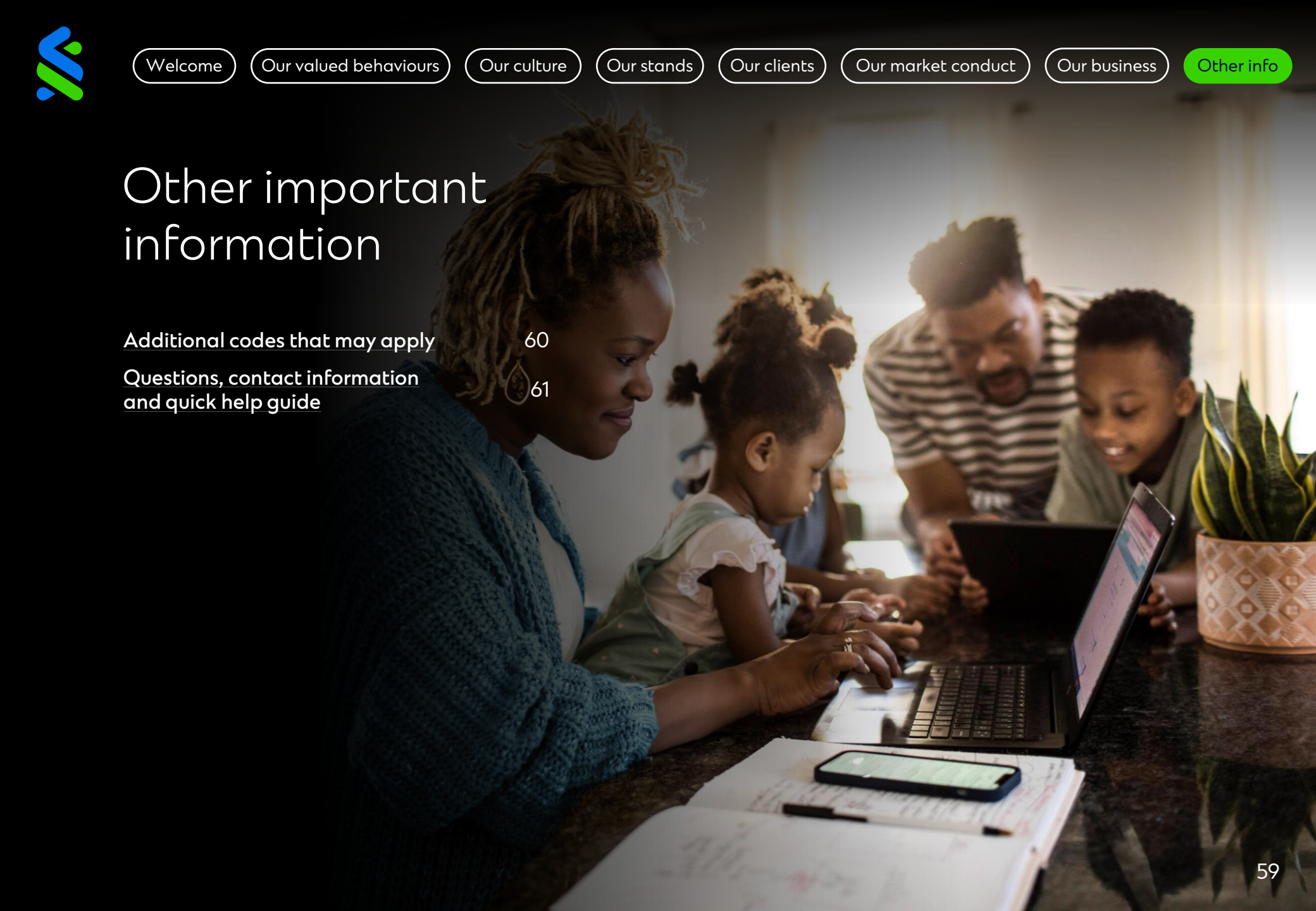
We believe that resilience builds our reliability, enhances our availability, and protects our integrity in the way we conduct our business. Disruptions can come in different shapes and forms, and our ability to respond to and recover from them are key to ensuring client satisfaction.

- Our clients and investors expect it: Resilience supports business continuity. If something goes wrong (for example, a cyber attack, ATM outage, or other blocks to account access), our clients expect us to quickly restore services.
- Our communities and stakeholders rely on it: We play a critical role in our communities, especially where we are one of the few financial services providers and are part of the community ecosystem. Resilience helps us uphold that responsibility.
- Our people never settle: Resilience makes us more trustworthy as an organisation, improves our ability to attract talent, and be a great place to work.
- Our competitive advantage is supported by it: Getting things right sets us apart from the competition. It also makes us more efficient, enabling us to invest more in our future.
- Our regulators require it: Maintaining resilient operations is more than a commitment to regulators. It's key to servicing our clients, markets and sectors. If we get something wrong, consequences that impact our business, our clients and our communities will follow.
- Our reputation relies on it: Another consequence of failure is damage to trust. Trust is foundational and integral to operational resilience.

Other important information

Additional codes that may apply 60

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Additional codes that may apply

Other Group codes

We commit to the Group Code of Conduct. Sometimes, we may also be governed by additional business codes (for example, the Financial Markets Code of Conduct). These business codes provide more detailed and specific requirements.

When these other codes apply to our roles, we must also follow them.

Regulatory codes

We may also be covered by other requirements set by governments and regulators through regulatory codes of conduct and their rules.

When these other codes apply to our roles, we must also follow them, too. If the regulatory codes and this Code give different standards, then the more stringent standard must be followed.

If you have any questions about which codes apply, or which to follow, contact your local country compliance team.



Questions, contact information and quick help guide

For any questions about the Code, contact conduct&ethics@exchange.standardchartered.com.



Thank you for living the Code of Conduct and Ethics

For more information, please reach out to your People Leader or the CFCR Conduct & Ethics team.

January 2026

