GROUP CODE OF CONDUCT
Here for good is central to the culture of Standard Chartered — this is an underlying ethos that we must protect. Our substantial focus on doing the right thing is not a nice to have; it’s a competitive advantage and real differentiator, and promoting our Bank as an ethical organisation is absolutely critical."
Bringing Here for good to life

Standard Chartered is a company for which we can be proud to work. As a global bank, we have the privilege, opportunity and responsibility to be a force for good in the markets in which we operate.

In an environment where the conduct of banking is under increasing scrutiny, our ethical standards must be beyond reproach. We need to understand and follow both the letter and the spirit of the law, to play a robust role in the fight against financial crime, and to be mindful of the reputational consequences of our actions.

Good conduct is built on four key pillars: creating the right environment; a fair outcome for clients; the effective operation of financial markets and the prevention of financial crime. Our success will be measured by our ability to achieve good outcomes for all our stakeholders — clients, investors, regulators, markets, our colleagues and the communities we serve.

Living the Group Code of Conduct is one way in which we can take a step towards achieving these outcomes.

The Group Code of Conduct

The Code of Conduct has been developed to help all of us live our values and deliver our brand promise in everything we do. The Code is supplemented with resources that will support you as you navigate through sometimes tough and unfamiliar situations.

The Code of Conduct is not something to be glanced at just once. It needs to be embedded in how we do business, so all of us need to know and understand it, and commit to it annually.

Of course, no document can spell out what’s right and what’s wrong in every situation, so good personal judgment, integrity and a strong sense of personal accountability should still guide your decisions.

So I’m asking every one of you to take ownership of the Code of Conduct. I’m asking every one of you to own the outcome of that commitment.

Your commitment to the Code of Conduct says: “This is what I stand for. I’m Here for good. I stand for good. I work for Standard Chartered”.

Bill Winters
Group Chief Executive
The Code — a summary

Do the right thing — the importance of the Code  5

Our values and our brand promise are integral to the way we work every day. The Code is important because it outlines how we can make sure that the decisions we make are the right ones.

Act responsibly and within authority  9

Be disciplined, responsible and take accountability for the risks you take and make sure they are appropriate to your business or activity. You must keep to our limits and policies and not make decisions that are beyond your delegated authority.

Use good judgment  10

Recognise when there are situations without simple solutions. Use the Code’s decision making framework to help you make decisions well, appropriately and with care.

Speaking Up  11

You have a responsibility to Speak Up when you see behaviour, a process or system you are not comfortable with at work. This helps to maintain a culture of strong ethics, integrity and transparency.

Comply with laws, regulations and Group standards  14

You are individually responsible for complying with the spirit, not just the letter, of laws, regulations and our Group standards.

Combat financial crime  15

It is critically important to protect the worldwide financial system. You must comply with laws, regulations and Group standards on anti-money laundering (including those on tax evasion), preventing financing for terrorism, fraud or sanctions.

Reject bribery and corruption  16

Bribery is illegal, dishonest and damages the communities where it takes place. You must not give or accept bribes nor take part in any form of corruption.

Treat clients fairly  17

A focus on building long-term relationships helps to increase our business by improving our reputation. This includes having well-designed products and services, which:

- Are clearly sold based on suitable advice
- Perform as expected
- Give clients choice

Manage conflicts of interest  19

It is important not to put yourself in a position where your judgment could be affected. You are responsible for identifying, assessing and managing conflicts of interest (whether actual or issues which could be viewed as conflicts) that arise in your daily working life.
Do not engage in or support insider dealing  

The misuse of inside information undermines the financial system and unfairly disadvantages others in the market. You must keep to the Group Personal Account Dealing Policy to deal with the risk of insider dealing.

Protect confidential information  

Building trust is a basic part of all our relationships with clients. You must not release confidential information unless authorised to do so.

Compete fairly in the market place  

You must understand and comply with the laws which affect how you compete in your markets both locally and abroad.

Treat colleagues fairly and with respect  

All staff are entitled to a safe working environment that is inclusive and free from discrimination, bullying and harassment. Treating your colleagues as partners helps our people to deliver on the brand promise, resulting in a positive effect on our business results.

Be open and co-operate with regulators  

Deal with regulators in a responsive, open and co-operative way and give regulators information they would reasonably expect to be told about.

Respect our communities and the environment  

To contribute to economic stability in our markets, we all have a responsibility to reduce our effect on the environment and give back to our communities.
I commit to the Code.
Do the right thing
— the importance of the Code

Why is this important?

Our brand promise — Here for good — is a reflection of who we are and what we do. It is a simple phrase with many meanings. **It is what makes us unique.**

Here for good is made up of three pillars:

**To be Here for people**

We develop deep and long-term relationships with our communities, clients, and with each other.

**To be Here for progress**

We do the right thing. We commit to being a force for good, making a positive contribution to the economies and societies in which we operate and helping our clients do the same.

**To be Here for the long run**

We recognise the importance of financial performance, longevity and history.

The brand comes alive in the behaviour and values we show. That is why it is so important that we each behave in line with the Code and our values.

At all times we do our best to be:

- **Courageous** – we take measured risks and stand up for what is right
- **Responsive** – we deliver relevant, timely solutions for clients;
- **International** – we value diversity and work as One Bank;
- **Creative** – we innovate and adapt, continuously improving the way we work
- **Trustworthy** – we are reliable, open and honest

Here for good and our values are part of who we are and we continue to include them in our everyday ways of working.

We also create the right environment to adhere to the Code and achieve good conduct. Recruitment and staff training supports our culture and conduct approach. Staff understand their role, responsibilities and the processes that they own. Decisions on performance are based not just on ‘what’ individuals have achieved, but also ‘how’ they have achieved it. Our compensation and professional advancement programs are designed to reward staff integrity and ethical behavior, as well as long-term and sustainable performance. We learn lessons from internal and external events in how we do business.

You must familiarise yourself with the Code and all policies and procedures which apply to your role, keeping the five core values and how we operate in the forefront of your mind at all times.

---

**Remember:**

Opportunities to generate revenue will not take priority over good conduct, protecting our reputation and our Brand.
What does this mean for me?

Your role

We all have a personal responsibility to understand how we can contribute to delivering the brand promise. By following the Code, our commitment to good conduct and our control framework, you will support the Group’s conduct and compliance culture. It is important to understand that just following the rules is not enough, we must all commit to acting with integrity.

Your responsibilities are to:

- Make sure you understand and comply with the requirements outlined in this Code and recommit to it every year
- Use good judgment when dealing with situations where you are unclear on what to do (use the decision-making framework in the Code to help you)
- Identify and follow the policies and procedures relevant to your role and work in the Group
- Complete all mandatory training needed to support your understanding of your role and the Code’s requirements
- Make sure you ask any questions you have about the policies and procedures and how they apply to you, which may mean speaking to your manager or colleagues from the function relevant to the policy
- Speak Up when you see any behaviour, processes or systems which you do not feel comfortable with at work, particularly if you suspect or know of any actual or potential misconduct that breaks or may break any laws, regulations, Group policy or the Code
- Fully co-operate with any inquiry, review or investigation. This includes keeping to instructions from Legal or Compliance for preserving legal privilege or the preservation of documents and information
- Deliver on the Group’s commitment to good conduct in your actions every day

Your role as a manager.

In addition to the above, managers are trusted to set the right tone for the conduct of their teams by creating an open environment and providing clear, effective supervision. As a manager you are expected to take personal accountability and ownership to:

- Guide and maintain your team’s understanding of their responsibilities
- Supervise the team and third parties effectively, following relevant policies and procedures
- Promote the Group Code of Conduct, Speaking Up and Values, guide employees to adhere to policies and to do the right thing
- Ensure team members commit to the Code of Conduct every year
- Help your teams use good judgment and make balanced, and informed decisions
- Ensure team members’ timely completion of mandatory training
- Include conduct related behaviour in performance management and reward decisions
- Identify and manage potential issues arising regarding adherence to the Code using the Fair Accountability Approach
- Exercise due skill, care and diligence when discharging your responsibilities

Disclose certain things about yourself

As part of our commitment to good conduct, you are responsible for disclosing to the Bank potential regulatory restrictions which may have an impact, whether real or perceived, on your role.

Who must follow the Code?

All staff are bound by the Code, whether you are a full-time or fixed-term employee, director, contractor, subcontractor, secondee, temporary employee or voluntary worker, working in any company, in any capacity within the Group.
Failure to follow the Code

When questions arise as to whether you fail to work within the boundaries of the Code, we will use our principles on fair accountability in investigating and making decisions on staff disciplinary matters.

We will treat failure to follow the Code seriously and it may lead to disciplinary action which could result in dismissal. This process may involve other authorities if you have broken any laws or regulations, including the police if you have committed a criminal offence.

Other Group Codes

As well as the Code you may also be governed by certain business codes for example the Financial Markets Code of Conduct. The Code is the overarching document from which business codes are created. These business codes provide more detailed and specific requirements which staff are expected to follow.

Regulatory Codes

Some staff may be subject to additional requirements stipulated by governments or regulators through regulatory codes of conduct and their underlying rules. Staff are expected to follow these codes. Where the regulatory codes and this Code stipulate different standards for a particular requirement, you must comply with the more stringent standard and thus satisfy the obligations set by all relevant codes.

Code oversight

The Board of Standard Chartered PLC exercises oversight of the Code.

Our Conduct Principles

Good conduct is fundamental to the way we run our business and our promise to be Here for good. Good conduct means acting in accordance with our strategic intent, risk management principles, and risk appetite. In practice this means:

• Creating the right environment — we behave in accordance with the Code and the Conduct Principles; we recognise the importance of hiring, training, and rewarding people with good conduct in mind; we help people understand what good conduct means in their roles; we create an open and inclusive working environment where people can raise issues and manage conflicts of interest; we strive to make consistent, fair and transparent decisions, and learn from our mistakes.

• Fair outcomes for clients — we design and offer products based on an understanding of our client needs; we protect client privacy; we manage potential conflicts of interest; and we seek and use client feedback to improve our products and services.

• Effective operation of financial markets — we will not manipulate markets through our actions, transactions or positions, or act in a way that we know will have a detrimental impact on our clients or market participants.

• Financial crime prevention — we actively seek to prevent money laundering, terrorist financing, tax evasion, bribery, sanctions breaches, or facilitation and other forms of corruption.

You support these principles through disciplined adherence to the Group’s systems and controls, by exercising good judgement, and by adhering to the standards of behaviour set out in the Code.

You can read more about our Conduct Principles here.
More information and practical guidance

The Code sets out minimum standards of behaviour we expect all staff to follow. It works alongside our policies and procedures. Your responsibilities for keeping to our requirements begin with the Code and extend to you understanding and complying with the relevant policies and procedures that apply to you.

We have also developed resources to help you use the Code. A set of fact sheets covering important topics give you information on how to ‘live’ the Code day to day. Also you will find specific resources for people managers.

If you have any questions, simply ask. Speak to your manager, Compliance, Human Resources, Corporate Affairs or other relevant colleagues.

Remember:
This Code outlines what we expect of you. The resources provide practical information about how to follow the principles and rules outlined in the Code.
Act responsibly and within authority

Why is this important?

We add value for clients and produce long-term returns for shareholders by taking and managing risk in line with strategy and within risk appetite. Risk management is the set of activities through which we make risk-taking decisions and achieve the best returns possible while taking account of the risks involved. It is a Group-wide activity and starts at the front line. All staff must make sure they effectively manage risks within the scope of their direct organisational responsibilities.

Every aspect of our business must be carried out within a framework of delegated authorities that flows from the Board of Standard Chartered PLC and/or the board of the relevant Group entity.

What does this mean for me?

You must keep within our limits and policies and not make decisions which are beyond your authority.

You must:

- Keep to our limits and policies that apply to you
- Make sure you have appropriate authority before committing us to any transaction or contractual commitment
- Be disciplined, responsible and take accountability for the risks you take and make sure they are appropriate to your business or activity
- Exercise strong financial control by acting within your financial authority and ensuring accurate record keeping
- Exercise due care skill and diligence when discharging your responsibilities

As a manager, you must:

- Take ownership and accountability when discharging your responsibility for effective control of risk, by the appropriate oversight of any delegations of authority and supervision of your team, third party providers and their conduct
- Exercise due skill, care and diligence and take ownership of the outcomes for your decisions when discharging your responsibilities

Remember:

It is important that you understand how the framework of delegated authority applies to you. You must maintain oversight over risks that fall under your authority and make sure you do not take risks that are not appropriate for your role.

Further information can be found in the resources section of the Code.
Use good judgment

Why is this important?

The Code and our policies and procedures provide detailed requirements for you to follow in your day-to-day activities. However, not every situation will be covered by them. You should also use your judgment as long as you are not going beyond your authority.

What does this mean for me?

To help you work through difficult situations, follow this simple decision-making framework.

<table>
<thead>
<tr>
<th>Question</th>
<th>What to consider</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is my decision in line with the Code?</td>
<td>Does the Code deal with this issue directly?</td>
</tr>
<tr>
<td></td>
<td>Is my decision consistent with the values and the brand?</td>
</tr>
<tr>
<td>Have I consulted others and asked for information to help me make an</td>
<td>Do I need to involve others, including my line manager or other relevant colleagues?</td>
</tr>
<tr>
<td>informed decision?</td>
<td>Is this an informed decision? Is there more I need to know?</td>
</tr>
<tr>
<td></td>
<td>Eg., Are there relevant Group policies and procedures which I should consider?</td>
</tr>
<tr>
<td>Is this decision within my authority?</td>
<td>Am I able to make this decision on behalf of the Group?</td>
</tr>
<tr>
<td></td>
<td>Do I need to pass this issue to those who are authorised to make a decision?</td>
</tr>
<tr>
<td>Would I be comfortable if the situation was written about in the press</td>
<td>What are the consequences of this decision or situation?</td>
</tr>
<tr>
<td>or shared in the local community?</td>
<td>How would this play out if it were publicly known?</td>
</tr>
<tr>
<td></td>
<td>Will I take personal ownership for these outcomes?</td>
</tr>
<tr>
<td>Am I setting a good example?</td>
<td>How will this influence others I work with?</td>
</tr>
<tr>
<td></td>
<td>Could my decision or action be misunderstood — is it clear?</td>
</tr>
<tr>
<td>Is this the right thing to do?</td>
<td>Am I confident that my action is permitted by the spirit and the letter of the law, and by the relevant regulator?</td>
</tr>
<tr>
<td></td>
<td>Is this decision consistent with our risk management culture, good conduct and proving Here for good?</td>
</tr>
<tr>
<td></td>
<td>Have I taken all the necessary steps to ensure my decisions will drive fair outcomes for all stakeholders?</td>
</tr>
</tbody>
</table>

If you can answer ‘yes’ to all of these questions, you should feel comfortable that you can support the decisions or actions you take in light of the difficult situations you face. Being methodical and informed in considering solutions will support a strong outcome. Acting hastily, without involving your manager and any other relevant colleagues exposes you to poor decision-making and outcomes.

Further information can be found in the resources section of the Code.
Speaking Up

Why is this important?

To be Here for good, we must maintain a culture of strong ethics, integrity, transparency and openness. By Speaking Up you prove your commitment to some of our core values — to be courageous and trustworthy.

Misconduct undermines our ambition to be the world’s best international bank and can damage our financial performance, reputation and the trust of everyone who has an interest in our business.

Each one of us can play an important role. There may be a time when you see something that is not right at work. So what should you do?

What does this mean for me?

When should I Speak Up?

You must speak up when you see anyone:

- Failing to comply with laws or legal obligations, including committing fraud or other criminal acts
- Miscarrying justice
- Putting the health and safety of an individual in danger
- Damaging the environment
- Breaching rules or regulatory requirements
- Failing to comply with codes of conduct, Group, business or country policies and procedures
- Doing anything which has or is likely to have an adverse effect on our reputation or financial well-being
- Deliberately concealing any of the above

You do not need to be certain of any of the situations above to Speak Up; a reasonable foundation for believing that any of the situations has taken place, is taking place or is about to take place is sufficient. However, when you Speak Up you must do so in good faith.

You should not use this route to deal with general human-resource related matters. Instead you should speak to your line manager or Human Resources, or should raise the issue under the Employee Grievance Procedures.

What do I do if I suspect misconduct?

There are a number of ways you can raise a concern:

- Speak to someone in your line management chain, who may not be your line manager.
- Speak to someone outside of your line management chain, for example your Country Head of Compliance or a member of country senior management.
- Use one of the designated Speaking Up channels:
  - Send an email to speaking.up@sc.com, an email address managed by Group Shared Investigative Services;
  - Leave a written message on the Group Speaking Up website, managed by our independent service provider (People in Touch), who will pass your concern to Group Shared Investigative Services;
Leave a voice message with People in Touch. You can find the contact details for your country on the Group Speaking Up website and in the Code of Conduct resources. If you choose to contact People In Touch, you can find the contact details for your country on our Speaking Up webpage and in the Code of Conduct resources. You can either use the webpage or the confidential telephone hotline. Both methods are available 24 hours a day, seven days a week. There is also the option to report a concern anonymously if you feel this is appropriate. However, by providing contact details we are better able to follow up on your report and keep you informed.

Whichever way you choose to raise your concern, you may choose to do so anonymously. However, by providing contact details we are better able to follow up on your report and keep you informed. You can also raise concerns externally with a relevant organisation such as a whistleblowing charity, regulator or external auditor.

When you raise your concern, it will be passed to Group Shared Investigative Services to manage. An independent, appropriately experienced senior member of staff will consider the report. They will acknowledge that they have received your report and you may receive periodic updates on the progress. You will be told when the matter has been finalised.

**No victimisation**

We do not tolerate victimisation of staff who Speak Up, even if the report turns out to be untrue. However, remember that Speaking Up reports must not be made in bad faith.

Victimisation is not allowed for any reason and is, in some territories, illegal. We will take disciplinary action against those who victimise staff who Speak Up.

**Confidentiality**

We will treat your identity (if known) and report in confidence. Information relating to your identity and report will only be passed to others on a strict ‘need to know’ basis. Anyone involved in considering your report will have no link to your allegations.

**Your role as manager**

Take ownership of Speaking Up by creating an open environment where staff are confident about raising concerns about misconduct free from the fear of victimisation. Familiarise yourself with our Speaking Up materials, including the Speaking Up fact sheet.

**Remember:**

We will take action when we have concerns about actual, planned or potential misconduct. If you have a concern about misconduct, you have a responsibility to Speak Up.

Speak Up channels are available to Staff and any other person.

Further information can be found in the [resources section of the Code](#).
I commit to the Code.
Comply with laws, regulations and Group standards

Why is this important?

We can only operate if we comply with relevant laws, regulations and standards. So, it is very important that we recognise our personal responsibility to make sure the Group operates within these laws, regulations and standards in each state or country.

What does this mean for me?

Our Group standards, and the laws and regulations which apply in each state or country give us a framework of rules within which we must operate.

You must:

- Act ethically, honestly and professionally at all times
- Comply with the spirit as well as the letter of all relevant legal and regulatory requirements. If you fail to do so, it may lead to severe damage to our brand, loss of clients, loss of confidence from our regulators and the public, suspension or withdrawal of the licences we hold, fines or other penalties
- Comply with Group standards unless local laws or regulations are either stricter than, or do not allow, our standards, in which case local laws or regulations will apply
- Make sure that, where necessary, you are licensed, registered, certified or that your business and its individuals hold appropriate licences. Some countries have regulatory requirements for individuals, organisations or certain activities to be licensed, registered, certified and so on
- Make sure you understand the legal and regulatory requirements involved in cross-border activities and keep to all relevant responsibilities

Remember:

You are responsible for keeping to the spirit, and not just the letter of laws, regulations and the Group standards. Factors such as the political environment and the public’s view of our actions, affect the way in which we interpret laws and regulations.

Further information can be found in the resources section of the Code.
Combat financial crime

Why is this important?

Financial crime has a massive impact on people, the health and the proper working of nations and the global economy. It allows drug and human trafficking to occur, supports the smuggling and counterfeiting of goods, underpins illegal gambling and financing of terrorist behaviour. To be the world’s leading international bank, we need to protect the communities that we serve from the damaging effects of financial crime.

We are committed to preventing laundered proceeds of crime (including those from tax evasion), bribery, corruption and the financing of terrorism being a part of the financial system. Our commitment in this area makes sure we will have long-term stability — that we are Here for the long run.

We are also committed to keeping to all legally binding sanctions, including measures against people and organisations and measures against countries or nationals or residents of those countries.

What does this mean for me?

We demonstrate our commitment to responding to these threats as we cooperate with governments, regulators and other financial services providers to protect client accounts from fraud and to help tackle organised financial crime. We also must act with due skill, care and diligence in the ongoing development of financial crime compliance programs and ensuring staff apply the Group’s standards on Financial Crime Compliance as well as any local anti-money laundering laws and regulations.

Stay alert and recognise that we are all part of the fight against financial crime. You must:

- Check the identity of our clients from reliable evidence as described in the Customer/Client Due Diligence (CDD) Procedures and know enough about our clients to identify transactions which are inconsistent with their business or personal status, or do not match the normal pattern of activity for which the account was set up
- Report suspicious activities immediately to your line manager (if you know or suspect money laundering, you must contact your Country Head of Compliance)
- Understand and follow the sanctions restrictions
- Report any suspicion of fraud immediately to your line manager
- Not get in the way of the reporting or investigation of any suspected financial crime
- Complete your financial crime training
- At all times follow the Group’s anti-money laundering/counter terrorist financing, sanctions, anti-bribery and corruption policies and procedures

Remember:

We have a commitment to tackle financial crime and we all have a role to play. You should stay vigilant for suspicious activity and make sure that you report possible issues in a timely way.

Further information can be found in the resources section of the Code.
Reject bribery and corruption

Why is this important?

We will not put up with any acts of bribery or corruption.

We reject all forms of bribery and corruption because they are illegal, dishonest and damage the countries and communities where they take place.

What does this mean for me?

When someone gives a benefit to someone else in order to influence that person’s behaviour, they are giving a bribe. When someone takes improper advantage of their position to make a gain for themselves, they are acting corruptly.

You must not give or accept bribes. Nor should you take part in, or enable, any forms of corruption. You must ensure that your actions do not risk creating the perception of bribery or corruption — whether or not they feel acceptable to you.

Bribery risk can arise in any of the Group’s operations, anytime we are dealing with a third party. It can take many forms: through procurement decisions, expenses, gifts and entertainment, hiring decisions, sponsorships, donations, the actions of our customers and a range of other areas.

You must take care and consider how your day-to-day business activities might encounter or create bribery and corruption risk. You must ensure that the transactions and activities you take part in are not, and cannot be perceived as, an improper inducement for business.

Some important points to highlight:

- Take particular care if your work involves interactions with sovereigns — including anyone working for government departments, regulators and state-owned enterprises. The rules in this area are more complicated, and the risk to yourself and the Group can be higher.
- We can be held legally responsible for the actions of intermediaries and third parties who act on our behalf anywhere in the world. When dealing with third parties, you must make sure that the bribery and corruption risk has been assessed and controlled.
- Some practices that may be considered to be unexceptional or even customary in your jurisdiction may actually create the perception of bribery or corruption in another jurisdiction, and may affect the Group. You must take this into account when deciding on the right thing to do, and seek advice if necessary.
- If you feel that your personal safety or property might be at risk if you do not participate in a bribery or corrupt arrangement, you must report it to Compliance. You should also report the incident to the relevant authorities, where appropriate.
- Know your clients, and use your efforts in building deep relationships to help you identify and detect potentially inappropriate behaviour.
- Follow the Group’s requirements for giving and receiving gifts and entertainment with third parties to ensure they are permitted, properly approved and recorded.

You must follow the guidance set out in our Group Anti-Bribery Policy and Procedures, and other policies which may govern bribery and corruption risk for specific activities. Make sure that the decisions you make to mitigate bribery and corruption risk are properly and honestly documented.

Remember:

We will not tolerate bribery or corruption. Staff will not be disadvantaged for refusing to commit bribery, even if this results in a loss of revenue or increased costs for the Group.

Further information can be found in the resources section of the Code.
Treat clients fairly

Why is this important?

Treating clients fairly is a basic part of living our values and one of the pillars of our brand promise — Here for people. It builds our long-term relationships with clients and helps to increase our business by improving our reputation. Fair outcomes for clients is an important part of the Group’s good conduct commitment.

What does this mean for me?

Keep to the following minimum standards when dealing with all clients:

- Ensure the design of products and services have our client’s needs in mind, including fair and reasonable pricing clearly disclosed.
- Make sure communications are fair, and not misleading.
- Give clients clear and concise information before they enter into financial products and services, so they understand the risks.
- Follow our sales processes. Only market and sell products and services which have been approved for sale.
- Make sure that products and services are appropriate and suitable, meet client needs, and take into account their financial situation, objectives, risk tolerance and profile.
- Handle complaints in a friendly, fast, fair and effective way. Keep to all procedures for handling complaints and to use client feedback to identify the root causes of issues and to improve our products and services.

To make sure that we treat clients fairly, certain factors will vary or have a different emphasis depending on the business in which you work and the type of client that you are dealing with.

For example, in Retail Banking there are these considerations.

- Keeping to the Client Charter
- Taking part in all necessary training and getting relevant qualifications and certifications
- Disclosing relevant fees, risks and product features clearly to clients
- Delivering on service level promises

For example, in Corporate and Institutional Banking there are these considerations.

- Identifying and managing possible client conflicts in an open and clear way
- Carrying out client orders in a way that treats all clients fairly

These are all more fully developed in various documents including Relationships with Clients (formerly Customers) Policy, and its related procedures, Financial Markets Code of Conduct, Appropriateness Profile and Transaction Approval Procedures, Termsheet Procedures, and complaints procedures.

Remember:

Each of us must take personal ownership and responsibility to make sure that clients are treated fairly in all our dealings with them.

Further information can be found in the resources section of the Code.
I commit to the Code.
Manage conflicts of interest

Why is this important?

Managing conflicts of interest makes sure that we always aim to act fairly, avoid legal and regulatory risk, and protect our brand, reputation and our own personal standing.

Conflicts of interest fall into two broad categories: business and personal. If you identify possible conflicts of interest, you must take immediate action to deal with them in an open and effective way.

Business conflicts of interest can arise in the following situations:

- Between the Group and its clients, suppliers or other third parties
- Between clients and/or other third parties
- Between different businesses within the Group

Personal conflicts of interest may arise when you put your personal interests ahead of those of a client, supplier, other third party or the Group. This would include instances where you have an external interest or association (an outside business interest) which may interfere with the interests of the Group or its clients. It may also arise where you have close personal relationships or close financial relationships with other members of staff.

What does this mean for me?

You must:

- Always act with integrity in your dealings
- Anticipate and properly identify all possible conflicts of interest
- If you identify a conflict, report it immediately to your line manager
- Make sure any conflict is dealt with in a clear, open and effective way
- Get approval before you take part in outside business interests

You must ensure that you are familiar with the Group Conflicts of Interest Policies and Procedures and comply with the provisions outlined.

Compliance and the Control Room can also give you more advice if you need it.

---

Remember:

It is important not to put yourself in a position where your judgment is affected or could be seen to be affected. You have a responsibility to identify and report any personal or business conflicts of interest.

Further information can be found in the resources section of the Code.
Do not engage in or support insider dealing

Why is this important?

Insider dealing creates an unfair advantage and undermines the financial system. The nature of our work means that we are trusted to handle inside information in an appropriate way, and we are all individually responsible for living our values and demonstrating our commitment to being trustworthy.

Inside information is non-public information which, if it were made generally available, would be likely to have a significant effect (either positive or negative) on the price of the shares or other securities to which it relates. Insider dealing includes dealing on your own account or encouraging anyone else to deal, based on the inside information held. Insider dealing may also take place if you reveal the information to anyone else, other than in the proper performance of your employment. Insider dealing is a criminal offence in a number of states and countries.

What does this mean for me?

All members of staff must keep to our Personal Account Dealing Policy and any other specific business procedures governing personal account dealing. This policy applies to transactions carried out by staff on their own account or if they have influence over the investment decisions on the accounts of others. If you break the Personal Account Dealing rules, we treat this as a serious disciplinary matter.

Do not deal or cause someone else to deal:
• When you or they have inside information
• In the securities of companies listed on the Restricted List; or
• In any Standard Chartered PLC securities during a close period

If you have, or have access to, inside information:
• Escalate this in line with our Conflicts of Interest Policy and Procedures; and
• Make sure that the information is not shared with or revealed to any other people, other than in the proper performance of your employment

If you are a Relevant Employee, you must clear certain dealings with the Control Room.

Remember:
You have a responsibility to act with integrity and treat inside information in an appropriate way and should be aware of your responsibilities under the Group Personal Account Dealing Policy and Procedures.

Further information can be found in the resources section of the Code.
Protect confidential information

Why is this important?

As part of delivering financial services, we receive information about organisations, markets and the Group, as well as personal data of clients, staff, and other people. It is critical that how we use this information and personal data instils trust and confidence, not only in those directly affected, but in the broader community in which we operate. We are committed to handling information and personal data respectfully and appropriately.

What does this mean for me?

All information and personal data you gather through your employment and dealings with the Group is to be considered confidential unless clearly stated to be otherwise. For example, this may be at the request of management, by agreement from a client or as required by law. This includes information and personal data on clients, staff, other organisations and the Group. This obligation will apply even after you have left the Group.

You must respect the confidentiality of the information and personal data you receive and use it only for the proper performance of your duties, in line with all laws, regulations, contracts and Group policies and procedures which apply.

You must exercise due skill, care and diligence in securing confidential information and personal data. This includes:

- How you access, store and get rid of it, in line with our security policies
- How certain information about individuals must be protected and handled to meet privacy requirements
- How it is transferred to others or within the Group
- Not viewing it in public
- Respecting information walls that may be applied to it
- Not using or disclosing confidential information or personal data on any social networking sites you may use
- Being vigilant for any signs of cyber threats, including phishing emails and other social engineering designs.

If you suspect that confidential information or personal data is lost or stolen, you must report it immediately to your line manager, Compliance or through the Speaking Up programme.

Make sure you follow extra legal requirements and Group policies and procedures that apply to personal data and information provided by individuals including by clients or staff along with any specific Group policies.

We collect personal data for specified and legitimate work purposes only, and we respect individuals’ rights and regulatory requirements when handling personal data.

More generally, communications made about the Group must be accurate and reflect the Group’s views. You must not release confidential information or personal data or make representations about the Group to the media or on any public forum — including social media. Only authorised staff may make media comments.

Remember:

Building trust is a basic part of our relationships with everyone who has an interest in our business. You must not disclose client’s personal data or Group information unless you are authorised to do so.

Further information can be found in the resources section of the Code.
Compete fairly in the market place

Why is this important?

Many states and countries around the world have developed competition law (or antitrust) regimes to regulate anti-competitive agreements and practices between businesses; as well as abusive behaviour by businesses that have market power or are in a dominant position in a particular market, and mergers and acquisitions, including creating joint ventures.

The aims of these regimes are broadly similar and include:

- Protecting consumers
- Preventing restraints on trade
- Promoting economic efficiency

We are committed to competing fairly, but the risk for the Group is increasing, due to its growth, and changing regulation. The consequences of breaking competition laws can be far-reaching and can include large fines, restrictions on how we can operate and damage our reputation. Individuals within the Group may also be held responsible for breaking laws which could result in fines and imprisonment.

What does this mean for me?

This section of the Code is likely to be relevant to you if you negotiate agreements on behalf of the Group, contract with clients or others on our behalf or come into contact with our competitors. You must understand the laws which affect how we compete in both local markets and cross border.

As a result, you must:

- Know and understand our Competition/Anti-trust Policy and Procedure
- Comply with any competition laws and regulations which affect your work
- Report to your Country Head of Compliance immediately any suspicion or knowledge that competition rules have been or are being broken within the Group (or by others in relation to our business)
- Be aware of and follow standing instructions if there is a dawn raid by competition authorities
- If you come into contact with competitors, be particularly aware of the risk of sharing information with them, which can happen inside or outside work, and may lead to or be seen as price-fixing or other anti-competitive behaviour
- Seek Legal or Compliance advice if you are unsure of the application of competition rules to a particular business practice

Remember:

You have a responsibility to observe proper standards of market conduct, understand how competition risk applies to your role, and to raise possible issues as you become aware of them.

Further information can be found in the resources section of the Code.
I commit to the Code.
Treat colleagues fairly and with respect

Why is this important?

Treating people fairly and with respect is important in helping us to create a fair, safe, inclusive and enjoyable place to work, that encourages creativity, collaboration and continuous improvement. These are basic parts of our core values and central to how people prove they are Here for good every day.

Trust and fairness are also a central part of our approach to managing and developing people, as we believe that building on people’s strengths and unique abilities helps them to achieve their full potential. Adopting these behaviours is an important part of creating a culture of long-term high performance.

What does this mean for me?

We expect you to treat your colleagues with fairness and respect. All staff are entitled to a safe working environment that is free from discrimination, bullying, harassment or the use of inappropriate language.

Particular areas to take account of are shown below.

- We value diversity and work together as a team. We are committed to providing equality of opportunity and fair treatment in employment. We do not accept unlawful discrimination in our recruitment and employment on the grounds of race; colour; nationality; national or ethnic origins; gender; parental status; marital or civil partner status; sexual orientation; gender identity, expression or reassignment; HIV or AIDS status; employment status; flexibility of working arrangements; disability; age; religion; or belief. We appoint, train, develop, reward and promote staff on the basis of their merit and ability.
- Action may be taken to address disadvantage or under-representation among specific groups, with the aim of ensuring that employment decisions are free from bias.
- We do not tolerate any bullying, harassment, discrimination against, or victimisation of staff, clients, or visitors of the Group – whether verbal, written, physical or psychological. All staff have a duty to treat people they come into contact with through work with dignity and respect.
- We must make sure that our communications are appropriate. Staff should make sure that all communications are factual and do not contain offensive or abusive language.

We are committed to resolving any issues that are brought to our attention. We will thoroughly investigate complaints of harassment, discrimination or victimisation and take formal disciplinary action where misconduct has taken place.

Remember:

We are all entitled to a safe and pleasant working environment and we each have a responsibility to treat colleagues fairly, with respect and without discrimination.

Further information can be found in the resources section of the Code.
Be open and co-operate with regulators

Why is this important?
Maintaining strong and effective relationships with regulators and governments is essential if we are to keep our banking licences and gain new ones. If we fail to meet our commitments, our regulators may lose confidence in us and take action against us, including fines and taking away our licences which may result in damage to our brand and reputation.

What does this mean for me?
You must interact with government officials and regulators in a responsive, open, honest and co-operative way and must give them information they would reasonably expect.

You must:
• Immediately refer enquiries received from regulators to Compliance and do not discuss the enquiry with the regulator unless authorised to do so by the relevant country Government and Regulatory Relationship Plan or Country Compliance
• Contact your Country Head of Compliance if you have any questions about how to respond to a regulatory enquiry or relationship
• Never mislead regulators or cover up a problem

If you are responsible for communicating with regulators, you must:
• Always be open and honest in your dealings
• Make sure you are familiar with the current country Government and Regulatory Relationship Plan
• Take an active role in communicating with regulators to make sure that we understand their expectations, and can anticipate risks and opportunities
• Keep them informed of our activities so there are no surprises
• Prepare properly for meetings with regulators and for regulatory inspections
• Practise and demonstrate that you strictly keep to the letter and spirit of rules, regulations and other regulatory expectations
• Give the regulator full and accurate information as soon as you can

Remember:
If you have contact with regulators, you should make sure your dealings are responsive, open and co-operative.

Further information can be found in the resources section of the Code.
Respect our communities and the environment

Why is this important?

Contributing to the communities where we operate is a central part of our strategy and supports our commitment to be Here for progress. We invest in communities at a worldwide and country level. To contribute to the economic development of our markets, we recognise that we have a responsibility to reduce the effect of our operations on the environment. We aim to do this by managing the resources we use across our operations, raising staff awareness about the importance of caring for the environment, and working with our clients to reduce risks. We respect human rights impacted by our activities with employees, suppliers and clients. Where adverse impacts occur, we are committed to addressing these.

Operating a commercially successful business also includes making sure we have a safe and healthy environment.

We are a strictly apolitical organisation. We do not engage in political activities, support political parties nor have any political affiliations.

What does this mean for me?

You must understand and keep to our commitments to human rights, the environment and the wider community. These commitments focus on:

- Programmes in tackling avoidable blindness (Seeing is Believing), promoting HIV and AIDS education supporting financial education and providing life skills training to adolescent girls
- Our responsibility to reduce the negative effect of our operations on the environment and people
- The effect associated with clients’ activities using our financing
- Providing a safe, secure and healthy working environment for our people and clients

As staff, we ask you to:

- Use your volunteering days to make a difference and encourage your team members and colleagues to do the same
- Reduce, reuse and recycle as much as possible
- Ensure the provision of financial services is done in alignment with the Group’s Position Statements, which outline the environmental and social standards we expect clients to observe
- Follow our requirements for providing a safe, secure and healthy working environment
- Ensure that any political activity taken in your personal capacity (including volunteering and party membership) is lawful, does not involve the use of the Group’s resources nor create any potential conflict of interests

Remember:

We each have a responsibility to have a positive effect on our communities and the environment.

Further information can be found in the resources section of the Code.
Resources
so you can ‘live’ the Code day to day

This section of the Code gives you a number of resources to help you live the Code day to day. These resources are designed to give you ready access to important information. As a member of staff, use them to help you find the requirements specific to your role. As a manager use them to guide your teams on their understanding of the Code.

They do not take the place of the Code and you should always read them alongside our policies and procedures.

This section contains links to resources, including fact sheets on important areas of the Code, frequently asked questions, important actions for managers and details of relevant Group and business policies. These are important documents for you to explore and understand the Code and its requirements. Read them all or read those which most apply to your role.

You can also read more about the Group’s commitment to good conduct principles here.