

CODE OF CONDUCT (ETHICS) OF PIRAEUS BANK ICB JSC

This Code of Conduct (Ethics) sets out key corporate values and forms the foundation of the corporate culture that is based on the legal framework and ethical principles. Compliance with clear and transparent rules of conduct as set forth in this Code protects the Bank's and its employees' business reputation, ensures favorable employment conditions, and affects relationships between employees.

To this end, the Bank's employees have the following liability:

- Not disclose bank/commercial secrecy, in particular keep full confidentiality of any actions, agreements, and relationships with customers and of operations, measures, and plans of the Bank/Group that have come howsoever to their knowledge. This requirement survives the termination of an employment relationship with an employee for any cause.
- Act consistently and with due care when dealing with cash, securities, bonds, checks, etc. that may be made available to employees subject to their official functions.
- Being always polite and well-behaved in the relations with clients, partners and colleagues.
- Maintaining cooperation while performing the official duties and serving the interests of the Bank / Group.
- Behaving so as not to prejudice or damage the business and public image, reputation of the Bank and the Group in general.
- Do not accept from the client, supplier or other party entering into an agreement with the Bank any discounts, royalties or gifts in cash equivalent or in the form of services offered by them to the Bank (including for the benefit of third parties and with the exception of gifts , defined by the Compensation - Bank Policy).
- Providing services to the Bank's clients in an unbiased, honest and professional manner in order to meet the best interests of the clients.
- Treating the clients politely and calmly, taking care that they are offered quick and high-quality services and their needs are satisfied to the full.
- Refraining from activities that are inconsistent with one's own competency and the duties of the Bank's employee.

- Informing the Bank of any significant changes relating to the employees and connected with labor relations such as. The Bank guarantees confidentiality of any and all information received and will not disclose such information except where otherwise provided by applicable laws or where an employee gives his/her personal consent thereto.
- Abiding by the law and the Bank's internal regulatory documents.
- Refraining from advertising the products and services of our competitors.
- Informing the authorized persons and/or structural units of the Bank immediately of any unacceptable behavior in the Bank, disruptions of the Bank's operations, conflicts of interest arising in the Bank, violation of the Code of Conduct (Ethics Code), the Bank's internal documents, applicable laws and of compliance risks that need to be notified immediately (or of any signs of such risks).

A violation of this Code of Conduct (Ethics) constitutes a violation of the Employee Regulations for all employees of the Bank. The liability of the Bank's employees for a violation of the Employee Regulations is governed by the applicable laws of Ukraine and the Bank's Collective Bargaining Agreement.