



# CODE OF ETHICS AND CONDUCT **CREDIABANK**

POL- 74.1/20.11.2025



# Table of Contents

---

<b>Document History</b>	4
<b>Message from the BoD Chairman</b>	5
<b>Message from the Chief Executive Officer</b>	6
<b>Introduction - CrediaBank's Principles</b>	7-8

---

<b>1. Customer Management</b>	1.1 General principles	9
	1.2 Obligations	9-11
	1.3 Shareholders - Investors	11-12

---

<b>2. Personal Data Protection</b>	2.1 Data Collection and Processing	13
	2.2 Subjects' Consent and Rights	13
	2.3 Data Security	13
	2.4 Training and Awareness	14
	2.5 Confidentiality and Integrity	14
	2.6 Compliance with Legislation	14

---

<b>3. Money Laundering and Terrorist Financing</b>	15
--	----

---

<b>4. Staff</b>	4.1 General Principles	16
	4.2 Staff Transactions	16
	4.3 Named or Anonymous Reporting of Omissions, Illegal Activities and Regulatory Violations (Whistleblowing)	17
	4.4 Bribery – Graft – Accepting Bribes – Participation in gambling	18
	4.5 Engagement in Other Work	18
	4.6 Employment of relatives	19
	4.7 Participation in social and other activities	19
	4.8 Participation in political groups, associations and forums	19
	4.9 Conflict of interest	19
	4.10 Legal associates	20
	4.11 Protection and respect for the Group's property and resources	20
	4.12 Defining Suppliers Relationships	21

<b>4. Staff</b>	4.13 Representation of the Group on the Media	21
	4.14 Participation in Social Media	22
	4.15 Professional Conduct	22
	4.16 Maintaining safety in the workplace	23
	4.17 Policy against violence, harassment and all forms of discrimination	23
	4.18 Accountability and Responsibility of Senior Management	23
	4.19 Risk Awareness	24
	4.20 Business Continuity Plan (BCP)	24

---

<b>5. Assignment of Rights</b>	25
--------------------------------	----

---

<b>6. Contribution to society</b>	25-26
-----------------------------------	-------

---

<b>7. Application of the Code</b>	27
-----------------------------------	----

---

<b>8. Approval and Revision of the Code</b>	28
---	----

---

# Document History

ISSUE	DATE OF APPLICATION	DESCRIPTION	APPROVAL	RELATED CIRCULAR	OWNER
1	27/08/2008	Code of Ethics & Conduct		89/27-08-2008 Circular by the BoD Chairman & the CEO	
2	15/06/2009	Code of Ethics & Conduct		107/15-06-2009 Circular by the BoD Chairman & the CEO	
3	18/07/2019	Code of Ethics & Conduct		4373/197/18-07-2019 Circular	
4	20/11/2025	Code of Ethics & Conduct		5045/10/223/ 20-11-2025 Circular	

# Message from the BoD Chairman

Dear colleagues and associates,

CrediaBank is a bank that stands by people and empowers them. Every day, we build relationships of trust with people, thanks to our sense of responsibility and commitment to the principles of transparency and enhanced governance with which we work, while remaining faithful to the standards of ethical behavior that unite us.

Our priority is every need of our shareholders, customers, partners, and, of course, our people. In an environment that is constantly evolving and presenting us with new challenges, the Bank's Code of Ethics and Conduct is a point of reference and reflects our collective commitment to maintaining a modern, yet ethical banking institution that puts people at the center.

Our strength comes from the trust our customers and partners place in us. By adhering to the Principles set out herein, as well as to everything that unites us, we continue to work consistently and responsibly to ensure that our Bank is a model of ethics and professionalism in the banking sector.

**Constantinos Herodotou**  
BoD Chairman



**“ Our priority is every need of our shareholders, customers, partners, and, of course, our people. ”**

# Message from the Chief Executive Officer

Dear colleagues,

At CrediaBank, the Code of Ethics and Conduct is more than just a guide for our daily activities, interactions, contacts and professional relationships. It is the foundation of our corporate ethics, expressing our commitment to integrity, respect, and accountability regardless of our role and position. It is a collective effort that highlights the standards of conduct, boundaries, obligations and rights of all of us.

The creation and observance of such a Code is a substantial commitment to promoting transparency and respect in all our activities. Each of us is called upon to take responsibility for applying these principles, thereby ensuring a meritocratic working environment that promotes trust and cooperation.

With the aim of complying with the legal and regulatory framework in force, we have an updated and modern code, inspired by reliability and respect. A thorough understanding and adherence to this Code by all of us is the first step towards balance, transparency and security in our working environment.

I encourage you to take the time to read the Code and use it as a point of reference and guide in your daily work and in any other work that may directly or indirectly affect CrediaBank, the Bank where we all pursue our professional careers.

Our collective commitment to these principles is what sets us apart and makes us a trusted choice for customers.

Thank you for your continued support and commitment to excellence.

**Eleni Vrettou**  
Chief Executive Officer



**“ Our collective  
commitment to these  
principles is what  
sets us apart and  
makes us a trusted  
choice for customers.**

**”**

# Introduction

For CrediaBank, a fundamental element of its corporate culture is compliance with the applicable regulatory and legislative framework, international best practices and the standards and rules of ethics and conduct that are inextricably linked to its dynamism and credibility.

The Code of Ethics and Conduct includes the main principles and Charters that define CrediaBank's Internal Regulation and Policies, based on the applicable banking regulatory framework. The Bank's Management and all its employees perform their duties in accordance with these principles.

The General Principles included in the Code are based on the Corporate Governance Principles and reflect the concepts of integrity, impartiality, sound entrepreneurship, professionalism, transparency, social and environmental responsibility, respect for human rights, teamwork and responsibility for compliance with the legislative and regulatory framework.

## **The Code is addressed to:**

- a) the members of the Board of Directors of the Group companies,
- b) the Executives and Senior Management of the Group companies,
- c) all employees of the Group,
- d) persons employed by the Group on a contract basis,
- e) persons employed by the Group in consultant positions, and
- f) third parties that do business with CrediaBank and other Group companies.

The persons referred under points (a) to (e) shall receive the Code and, after fully understanding its content and accepting it, they shall sign the declaration of commitment in Annex I.

The Code is available to the public in Greek on the Bank's website ([www.crediabank.com](http://www.crediabank.com)) and can also be requested at the customer service points of the Bank and the Group companies. In this way, anyone interested can learn about the values, principles and operating rules of the Organization and evaluate them.

# CrediaBank's Principles

The Code of Ethics and Conduct of CrediaBank and the Group companies clarifies the Bank's ethical principles and specifies the framework for the conduct of employees and the Management in line with corporate governance rules and the legislative and regulatory framework.

The Code is a point of reference for all executives and employees of the Bank and its subsidiaries, contributing substantially to the protection of the interests of its shareholders, customers, and employees, and based on the documented governance structures, while compliance with the principles it sets out ensures the maintenance and strengthening of the credibility, solvency, and reputation of the Bank and its Group companies.

The main ethical principles governing all activities of the Bank and the Group, with a view to the development and interests of the Organization, respect for the customer, who is at the center of all the Organization's activities, and social contribution, are:

- Transparency,
- Objectivity,
- Confidentiality,
- Prudent risk assumption,
- Integrity and impartiality, and
- Healthy competition.

# 1. Customer Management

## 1.1 General principles

Customer trust and satisfaction are key benchmarks for the services provided within the scope of the Group's activities. Customers are treated equally, impartially, transparently and with respect for their needs and interests.

- The provision of complete, accurate and timely information to customers about the Group's products and services is supported.
- Any customer complaints about products and services are examined with empathy and objectivity, with the aim of investigating them quickly and effectively, pursuant to the Group's Complaint Management Policy.
- Technological developments are adopted with the aim of improving the Group's competitiveness and promoting innovation.

The Bank's employees interact with customers with transparency, honesty and confidentiality, while providing services to them with the same completeness, quality and proper conduct, without any different treatment based on the customers' nationality, religion, gender, financial or professional status.

The Principles and Rules set out in this Code aim to continuously upgrade the services provided by Bank employees, whose obligations are not limited to simply complying with them, but also to the simultaneous, strict application of the provisions of the applicable Corporate Governance and Operation Regulation of CrediaBank, as well as the applicable Circulars, Service Notes and Guidelines.

## 1.2 Obligations

### **Every Bank employee has, inter alia, the obligation to:**

- Communicate with customers in a calm, pleasant and polite manner, offering them high-quality services in accordance with the Bank's service standards and values.
- Inform customers clearly, responsibly, comprehensively and patiently about the services and products offered, as well as about the appropriate actions to take for the proper execution of their transactions.
- Make every effort to serve customers promptly.
- Address customers politely, in plural, avoiding excessive familiarity or expressions and gestures that are inappropriate for their professional position.
- Treat all customers without prejudice, and with particular care and sensitivity when dealing with vulnerable groups (people with disabilities and chronic illnesses, the elderly, pregnant women, etc.).
- Ensure that the customers has fully understood what they've been told and hasn't been guided or encouraged to assume risks they can't handle, if they occur. Furthermore, they are only allowed to advise the customer in accordance with the Bank's documented procedures.
- Ensure the protection of customers' personal data pursuant to the Bank's policies and procedures, as well as the protection of bank secrecy.
- Discourage friends and relatives from staying in the workplace during transactions and after the completion thereof.

### **In addition, every employee has, inter alia, the obligation not to:**

- Create common or mutual financial interests with the Bank's customers, as this creates a risk of conflict of duties, which may lead to disciplinary and legal sanctions against them.
- Lend or borrow money to/from the Bank's customers.
- Perform banking transactions or provide any form of facilities outside the applicable institutional and regulatory framework.
- Smoke in trading areas and public reception/waiting areas, as provided for by the applicable law, the Internal Regulation and the relevant Circulars of the Bank.
- Conduct personal business in front of customers.
- Mediate in financial or other transactions between the Bank's customers, including transactions where the contracting parties are relatives.
- Receives various items from the Bank's customers on terms more favorable than those on the market and to not create obligations (installments, bills of exchange, etc.) that they will not be able to meet.
- Seek the assistance of the Bank's customers for the successful outcome of non-banking events.
- Participate directly or indirectly (through intermediaries) in auctions for the sale of movable or immovable property of the Bank's debtors, as well as in any related action that could have an adverse effect or impact on the Bank's credibility and reputation. Cases where the Bank invites its Staff to participate in any procedure as interested parties are excluded, pursuant to the applicable procedures of the competent Bank Unit.

Furthermore, Bank employees (i.e. all persons to whom this Code applies) have, inter alia, both during their employment with the Bank and after its termination for any reason, the following obligations:

Not to disclose to any third party, or use in any way whatsoever, any information or data relating to:

- The business,
- The operations,
- The products,
- Business, administrative and financial methods and practices,
- Research and development,
- Future intentions and business plans,
- Trade secrets, accounts and financial data,
- Customer lists,
- The policy, affairs and transactions of the Bank, its affiliates or subsidiaries,
- Or any of its customers,
- that have come to their knowledge in their capacity as employees of the Bank, and they shall generally make every effort to prevent such information from becoming available to third parties, except where, and to the extent that, the contrary is necessary for the performance of their duties, as specified from time to time by the Bank or by the law.

Finally, during their employment with the Bank, employees must fully comply, when processing personal data when performing their duties, with the applicable provisions, as in force, as well as with the relevant policies and procedures of the Bank.

### **1.3 Shareholders - Investors**

The Bank shall make appropriate investment choices, with prudent business decisions taken with the required flexibility and financial integrity, aiming for the best possible return to promote the Bank's long-term interests.

Furthermore, investors shall be provided with accurate, complete and timely information on the Bank's financial position and results.

At the Bank level, practices shall be adopted that ensure a high level of corporate governance, structures and policies that create standards of professional conduct and business ethics and contribute to the smooth functioning of the market and the strengthening of Shareholders' trust.

The Bank has a Shareholder support service which is responsible for providing Shareholders with immediate, accurate and equal information regarding the exercise of their rights under the law and the Bank's Articles of Association. The Bank's priority is to ensure that Shareholders are fully and promptly informed, not only about their obligations but also about their rights.

### **In particular, the Bank:**

- Aims to increase profitability and improve efficiency for the benefit of those who trust it by investing in its shares,
- Safeguards its assets by investing in its areas of activity and trying to reduce its operating costs.
- Establishes clear lines of reporting, supervision, and control and ensures that the competent bodies act within a specific framework, ensuring transparency towards its Shareholders and that the General Meeting of Shareholders is clearly informed about the Bank's activities.
- Facilitates the participation of the Shareholders in the General Meeting,
- Ensures that the Shareholders are adequately informed regarding the decision-making process of the General Meeting,
- Presents the Annual Financial Report to the Shareholders, which includes the Corporate Governance Statement.

### **The Bank also:**

- Has adopted the Greek Corporate Governance Code, that is posted on its website, which describes in detail the structure and policy of corporate governance, promotes continuity, consistency and effectiveness of the operation of the Board of Directors, the collective Management bodies and, in general, the governance of the Bank and the Group.
- It ensures the creation of an appropriate framework for the implementation of corporate governance principles, which includes management bodies with clear and distinct roles, responsibilities and obligations, an internal audit system and two-way communication, both with the external and internal environment.
- It incorporates the guidelines of international, European and national supervisory authorities by implementing the appropriate procedures for the effective operation of the Internal Audit System and by keeping its employees informed on an ongoing basis.

## 2. Personal Data Protection

Our Bank is committed to protecting the personal data of its employees, customers, suppliers and shareholders, recognizing the importance of privacy and data security.

All of our human resources are responsible for staying informed and operating with diligence and compliance with the applicable data protection legislation and the relevant regulatory framework.

On the Bank's website, one can easily find information leaflets for Customers, Suppliers, Shareholders, BoD Members, visitors, employees or job applicants.

At the same time, the documents for the Video Surveillance System and the First-Level Health Care Scheme are also posted.

More specifically, we implement the following measures:

### 2.1 Data Collection and Processing

Personal data is collected only for legitimate, clearly defined and lawful purposes.

Personal data is processed in a transparent, fair and appropriate way, limited only to data that is necessary for the purposes of the Bank.

### 2.2 Consent and Subjects' Rights

The Bank obtains the clear and explicit consent of data subjects for the processing of their personal data, unless there is another legal basis for the processing. The rights of data subjects to access, rectify, delete and restrict the processing of their data are facilitated pursuant to the General Data Protection Regulation (GDPR).

### 2.3 Data Security

Technical and organizational security measures are implemented to protect personal data from loss, theft, unauthorized access, alteration or destruction.

Security measures are reviewed and updated regularly to ensure continuous data protection.

### 2.4 Training and Awareness

All staff members are regularly trained and informed about their obligations regarding the protection of personal data.

Awareness on privacy and data security issues is promoted through training programs and awareness-raising activities.

## **2.5 Confidentiality and Integrity**

All information relating to personal data is treated with absolute confidentiality. The integrity of the data is ensured throughout the processing thereof.

## **2.6 Compliance with Legislation**

Our Organization fully complies with the applicable national and European legislation on data protection, including the GDPR.

Any personal data breaches are reported immediately to the competent authorities and data subjects, as required by law.

By adopting these principles, the protection of the personal data of all interested parties is ensured, strengthening trust and credibility in our relationships with the staff, customers, suppliers and shareholders.

All of the above are reflected in the Policy on the Protection of Personal Data, which our Bank has established and adheres to.

### 3. Money Laundering and Terrorist Financing

**Group employees must:**

- Strictly and fully comply with the policies and guidelines for the prevention and deterrence of money laundering and terrorist financing, as well as the general applicable legislative framework.
- Not assist or cooperate with any customer who is involved in any way whatsoever in the laundering of money derived from criminal activity.
- Report any suspicious customer for money laundering or related transaction to the AML & Data Provision Unit, pursuant to the Group's policies and procedures (Compliance and AML Policy).

## 4. Staff

### 4.1 General Principles

The development and retention of high-quality employees is a primary concern for CrediaBank. Issues relating to its human resources are managed using meritocratic systems and procedures. To this end, the Bank:

- Implements a merit-based system for assessing staff performance, promotions and remuneration. The aim is to recognize and reward the efforts made by each employee.
- Invests in the continuous improvement of Staff skills and encourages lifelong learning and training by organizing training and development programs and providing educational opportunities based on the policy in force at the time.
- Ensures good and safe working conditions, providing equal rights and opportunities to all, with the aim of achieving a balance between employees' working time and personal life.
- Promotes diversity in terms of (indicatively): gender, age and ethnicity.
- Respects human rights and does not allow any form of social exclusion.

### 4.2 Staff transactions

- Bank employees are allowed to hold joint accounts only with their spouses, relatives (up to the 4th degree of kinship by blood or up to the 3rd degree of kinship by marriage), and persons with whom they cohabit in a free union. In the event of opening or continuing to hold an account with persons not included in the above categories, prior approval must be obtained from the supervisor of the staff member requesting approval, followed by permission from the Compliance and Corporate Governance Division.
- Bank employees are not allowed to carry out any transactions on their own accounts (including, but not limited to: opening accounts, transfers between their own accounts and those of third parties, liquidating investment products, adding joint account holders, etc.), as well as any cash transaction for their own benefit, through the Bank's systems to which they have access in the course of their work. The prohibition also applies to any cash transaction made by a Staff member on accounts and/or portfolios with investment products in which they are a joint beneficiary. It is also not allowed to open/maintain a joint account with customers and/or suppliers.
- Cash transactions must be carried out through official transaction channels (branch, ATM, e-banking & m-banking).

- Bank Staff employed in the General Divisions of Credit, Risk Management, Money Markets, and any other areas, who, due to their position and duties, have or may acquire privileged information under the provisions of legislation on Capital Market, are required to comply with the Bank's regulations and procedures on market abuse and to disclose in writing to CrediaBank's Compliance and Corporate Governance Division any investment positions they already hold in securities of listed companies involved in any way with takeover bids (Declaration in Annex II).
- Employees or persons in comparable positions, including agents and distributors, who have been assigned tasks related to the Bank's compliance with Regulation (EU) 2024/1624 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto-assets, as well as any administrative act issued by any supervisory authority, shall inform the Head of the Compliance and Corporate Governance Division of any private or professional relationship they have with the Bank's customers or potential customers and tasks related to the Bank's compliance with relation to said customers shall not be assigned to them.

#### **4.3 Named or Anonymous Reporting of Omissions, Illegal Activities and Regulatory Violations (whistleblowing)**

Bank employees must be alert to the possibility of fraud, theft or other illegal activity that could harm the Bank or its customers. Failure by an employee to report illegal activity, violations of regulations or suspected fraud is misconduct and will be treated as such.

In the context of business transparency and trust, pursuant to best standards of business ethics, the Group implements a Whistleblowing Policy for Named and Anonymous Reports and has a system in place for submitting and monitoring reports of incidents involving violations of the Bank's Policies and Procedures or the applicable legislation (e.g. fraud, corruption, theft, embezzlement, money laundering, falsification of accounting documents and financial statements), using organizational and technical means that ensure the confidentiality and secrecy of the information.

Employees who become aware of such an act or violation or information may submit a named or anonymous report, through a certified platform, to the email address that the Bank has created for this purpose ([whistleblowing@crediabank.com](mailto:whistleblowing@crediabank.com)), by mail or by telephone to a special automated recording hotline that operates 24/7/365.

Reports submitted, regardless of the channel of submission, are received exclusively by the Receiving and Monitoring Officer (RRMO) who convenes the Named and Anonymous Reports (Whistleblowing) Evaluation Committee to evaluate and investigate them. Upon completion of the required actions, the RRMO informs the reporting person of the Committee's findings.

The Group prohibits any measures against staff members who have reported complaints or cases of non-compliance with the Code in good faith, or even suspicions of illegal behavior, and the Group also provides protection to the reporting person from any possible retaliatory measures.

#### **4.4 Bribery – Graft – Accepting Bribes – Participation in gambling**

No Group employee, nor any first-degree relative thereof, is allowed to engage in bribery/graft of any kind, either directly or indirectly. Bribery is defined as "any offer or acceptance of any gift, money, loan, commission, reward or other privilege or benefit from or to any person as an incentive for the improper conduct of the Group's business, especially when the offer or acceptance of any gift is fraudulent, illegal or violates confidentiality."

The acceptance of gifts or the securing of personal benefit from any customer or individual or organization that cooperates or wishes to cooperate with the Group is not permitted. Exceptions are made for small-value business gifts (up to €100), such as office supplies bearing the customer's logo, that are demonstrably offered in accordance with local business customs for reasons of courtesy. Any gifts that do not fall into the above category must be reported in writing to the Director of Compliance and Corporate Governance.

Personal activities that create dependencies and may hinder the smooth performance of the professional duties of Group employees should be avoided as they are not considered acceptable and do not promote its principles. In particular, the systematic participation of employees in gambling for financial gain is prohibited and constitutes a misconduct that is subject to penalties.

#### **4.5 Engagement in Other Work**

Group employees are not permitted to be employed, either full-time or part-time, on behalf of another person, engage in business activities on their own behalf and/or participate in the management of businesses or the Boards of Directors of companies, unless they have obtained the necessary approval from the Bank's/Subsidiary's Management, pursuant to the provisions of the Group's Non-Banking Activities Policy - Procedure in force at the time. In particular, lawyers and BoD members are exempt from the obligation to obtain prior approval to engage in other work, provided that they refrain from work that involves a conflict of interest with the Bank.

#### **4.6 Employment of relatives**

Persons with family ties, whether by blood or marriage, may be employed in all departments of our Bank.

In order to avoid conflicts and tensions, but also to ensure full compliance with internal merit-based procedures, we stipulate that related employees shall not be appointed to positions that are directly affected, directly controlled, or have direct contact with the same object. In this way, we avoid any internal conflicts of interest, interpersonal judgments or special treatment of employees.

#### **4.7 Participation in social and other activities**

No Bank employee is permitted to participate in clubs, associations, organizations, etc., whose activities conflict with or harm the Bank's reputation.

## 4.8 Participation in political groups, associations, and forums

Our people are the most important part of our Bank. Their social activities inside and outside the workplace also affect our corporate image.

As mentioned above, participation in social activities, organizations and social actions is important, but their quality and credibility must be monitored to avoid any negative involvement.

In order to specify the cases of involvement in socio-political activities, we must distinguish the following:

- Our Bank encourages and applauds its executives' involvement in charitable and voluntary activities promoting social solidarity, welfare, support for vulnerable social groups or environmental protection.
- Every employee is free to choose to engage in public affairs through local government organizations or political parties, in a way that responsibly and carefully expresses their personal positions and opinions.
- All of the above activities should be carried out in a way that does not affect the performance of professional duties and ensures that conflicts of interest are avoided.
- For any such participation or involvement in a political party with a relevant candidacy, for any involvement in a social organization/association or participation in a conference/forum, it is advisable to inform supervisors and managers, both for approval and for updates regarding the protection of the company's image.

## 4.9 Conflict of interest

CrediaBank and its Group companies provide a wide range of investment and banking services. Consequently, in the course of its activities, regular or extraordinary conflicts of interest may arise that are detrimental to the interests of customers.

In order to prevent actual or potential conflicts of interest, the Group has established policies and procedures for identifying and managing such situations. Specifically, in this context, the following have been adopted: (i) the Policy on the Prevention of Conflict of Interest for BoD Members, Senior Executives and Group Staff in order to control and manage actual or potential conflicts of interest between the Group and its high/senior executives, as well as (ii) the Policy on the Prevention of Conflict of Interest (MiFID II Directive), that sets out the framework for avoiding, identifying and managing conflicts of interest between the Bank and its customers, as well as between customers themselves when providing investment and ancillary services (iii) the Policy regarding persons with a special relationship with the Bank, that sets out the framework for transactions carried out by the Bank and its staff.

Group employees receive the Policy on the Prevention of Conflict of Interest when hired; they are required to read it and, after fully understanding it, accept by signing a relevant statement.

## 4.10 Legal associates

Our Bank employs lawyers and legal advisors (internal or external) who provide services to the Bank and the Group companies and are required to adhere to the principles of the Code of

Conduct and avoid any actions that may lead to a conflict of interest.

When performing their duties and after the completion thereof, legal associates must maintain absolute secrecy and confidentiality in all matters and demonstrate sensitivity and control in the handling of each case.

They commit in writing - to the General Division of Legal Services - to all of the above and confirm their compliance with all applicable rules and safeguards.

#### **4.11 Protection and respect for the Group's property and resources**

Staff members must protect the Group's assets and available equipment from destruction or misuse, while following safety rules.

The computer applications, e-mail and Internet services, phone devices, fax machines, computers, and other machines provided may be used only by authorized persons for professional purposes. Any personal use should be minimal and in line with the Group's principles and ethics.

Specifically, Staff members are not permitted to:

- Install and use any software programs that have not been approved/purchased by the Group on Group computers, for the security of computer systems and to avoid legal obligations of the Group that may arise from any violations of user licenses.
- Use the Internet for non-work-related matters that are not connected with the performance of work duties.

#### **4.12 Defining relationships with suppliers (Supplier Relationships)**

In order to ensure the selection of reliable partners and the maintenance of the required balance, we have specified detailed and separate provisions for the relationships between our human resources and our suppliers and service providers.

The criteria for selecting suppliers and partners in terms of the quality of their services, the legality of their procedures, their suitability for the job and their financial situation are of paramount importance to our internal operation.

In order to avoid problems arising from relationships and balance with suppliers, the Bank has adopted specific parameters for defining staff and supplier-partner relationships.

In summary:

- We ensure that our judgment regarding new partnerships is not influenced by personal relationships and interactions.
- We carefully check the partner we have to choose applying objective criteria.
- We reject suppliers who have shown signs of non-compliance with the law or poor performance of their services.
- We do not accept any gifts or, in general, personal transactions between our executives and suppliers.

- We follow predetermined procedures for assigning services and initiating cooperation.
- We pay due attention to issues of confidentiality, discretion and increased professionalism in all communications and relationships with suppliers and partners, as is the case in all our dealings.

#### **4.13 Representation of the Group on the Media**

The General Division of Marketing & Corporate Communications is responsible for representing the Bank and the Group on the media. Questions from journalists or other media representatives regarding the Group's operations, activities or presence should be forwarded to said Division.

Before making any public appearances, giving interviews, speeches or writing articles in the media and on the Internet regarding issues related to the Bank and its Group, the banking and financial system, as well as related financial issues, the Group employees must comply with the stipulations of the Corporate Communications Policy on Corporate Communications – Media Relations – Social Media.

In the context of open and transparent communication with their customers, the Bank and the Group companies ensure that all advertising complies with the applicable legal provisions, is decent in the context of the prevailing perception of ethics, truthful, clear, and without any exaggeration.

Advertising is carried out with the aim of providing the public with the most complete information possible about services and products. It is therefore honest, it does not create any false impressions of particularly favorable terms, conditions, and benefits and it is written in easily understandable language. It does not offend public decency, exploit the ignorance or fear of the public, refer disparagingly or defamatorily to competitors or imitate the advertising of third parties. The CrediaBank Group does not promote the policies of its companies with false, inaccurate or misleading information.

Direct promotion of advertising messages to customers who have expressed their opposition to this, either in writing at the start of the relationship or subsequently, is not permitted. The Bank and the Group fully comply with the institutional framework for the promotion of sales of goods and services.

#### **4.14 Participation in Social Media**

In an era characterized by technological revolution and advanced social networking, our Bank's participation in Social Media is considered necessary. The aim is to inform the public and attract potential customers by promoting our services and products. The competent Units are responsible for ensuring the Bank's responsible and aesthetically pleasing presence in the media, always adhering to our principles and corporate culture.

At the same time, we fully recognize the right of each member of our team to participate in social media with personal accounts. It is essential that our presence on these platforms does not create any problems in the performance of our corporate duties or in the corporate image. We recommend the careful and safe use of social media outside working hours and with the utmost caution.

In conclusion, participation in social media offers an important opportunity for communication and interaction with all stakeholders.

However, our employees must follow specific guidelines to protect the company's reputation and ensure the security and confidentiality of information.

It is important to make a separate reference to the Protection of Personal Data and Confidentiality:

- It is essential to avoid at all costs the disclosure of any confidential information about our Bank, its customers or colleagues.
- At the same time, we must take all necessary measures to protect data and prevent its leakage through social media.

#### **4.15 Professional Conduct**

In order to continuously improve the services offered by the Group's employees and maintain a high level of professional conduct in all transactions and relationships, both with customers and colleagues, every employee must:

- Behave with integrity, courtesy and dignity. Treat colleagues with the same courtesy that they should or require to be treated with.
- Contribute to the creation of a healthy and peaceful working environment, avoiding the misuse of phones or other devices in the workplace.
- Ensure that they are appropriately dressed for their workplace and job.
- Recognize that the need to coexist with different personalities requires a spirit of adaptation, compromise and compatibility.

Comments to colleagues, customers, visitors and associates regarding the following are prohibited: racial origin, nationality, religion, sexual orientation, age, political beliefs, membership in trade unions, marital status, pregnancy and any special needs, in order to avoid any form of harassment or sexual harassment in the workplace and to achieve harmonious coexistence among the Group's employees.

Any comments from a supervisor to a subordinate should be made privately and with discretion.

Recognizing that the success of the Bank and the Group can contribute to improving employee remuneration and on the basis of their willingness to work as part of a team striving to be the best in its field, every employee must:

- Develop initiatives to better address the needs of daily work, in the interest of the company, within the limits of legality and hierarchy, and not be just a passive recipient of instructions.
- Adapt quickly to the actual conditions imposed by the needs of their work.
- Not complain about the tasks assigned to them, especially when these are dictated by circumstances or by the need to avoid jeopardising the Group's interests.

#### **4.16 Maintaining safety in the workplace**

Health and safety in the workplace are a commitment for the Group, and ensuring a safe working environment that complies with legal and regulatory provisions remains a priority.

The Group's main objective is to ensure the adequacy and suitability of existing health and safety standards in the workplace, with the aim of preventing occupational hazards and protecting employees in cases of violence (robbery, verbal/physical abuse). The Bank implements relevant training activities for employees and prepares emergency response plans, while Staff are committed to contributing to and complying with the relevant guidelines, which aim to provide comprehensive protection.

#### **4.17 Policy against violence, harassment and all forms of discrimination**

At our Bank, any violent and harassing behavior is completely unacceptable. Our work culture has no place for any discrimination and inappropriate behavior.

At CrediaBank, the protection of human rights and the respect of individual freedoms are a constant priority. We do not tolerate any incidents of intimidation, oppression or discrimination, whether they concern our human resources or our customers.

Based on the Organization's Principles and Regulations, procedures are in place for reporting any inappropriate behavior.

Our actions and the initiatives we have already undertaken demonstrate in practice our respect for Equality, Inclusion and Diversity. For example, CrediaBank was the first bank in Greece to sign the Diversity Charter for Greek companies, having incorporated ESG (Environmental, Social and Governance) criteria and corporate responsibility into its operations.

#### **4.18 Accountability and Responsibility of Senior Management**

Our Bank's senior management employees are committed to operating with the highest degree of ethics and professionalism, ensuring that their actions are always in the best interests of our customers, shareholders and employees.

In particular, our senior management employees:

- Are accountable for their decisions and actions and are required to provide clear and accurate reporting on their activities to the Board of Directors and shareholders. Any decision or action must be documented and transparent, providing the necessary information and reports to support their actions, which can serve as an example or inspiration to other staff.
- Must act in the best interests of the Bank, avoiding any action that could create a conflict of interest. Their responsibility extends to maintaining the confidentiality of information, implementing the Bank's policies and procedures, and promoting a working environment that respects the rights and dignity of all employees.

Ethical principles and values must guide their actions, ensuring that decisions are made with transparency, integrity and fairness. Must act as role models of ethical behavior for the rest of the Bank's staff.

At the same time, they are responsible for identifying, assessing and managing any risks that may affect the Bank, promoting strategies that ensure the Bank's sustainability and stability.

The commitment of senior management to accountability and responsibility is critical to maintaining the trust of customers, shareholders and employees, as well as to achieving the

Bank's strategic goals.

#### **4.19 Risk Awareness**

Understanding and managing risks is fundamental to ensuring the stability and reliability of the Bank and our Group companies.

We are committed to integrating risk awareness into all aspects of our operations, from decision-making to day-to-day transactions and services.

Our executives are required to:

- Identify, assess and report any potential risks that they foresee may affect the quality of their work.
- Make decisions based on a documented understanding of risks, ensuring the integrity and security of customers and the bank.
- Adopt and adhere to preventive measures and procedures to mitigate any potential risks and crises.
- Participate in regular training to develop risk and crisis identification and management skills.

#### **4.20 Business Continuity Plan (BCP)**

The main purpose of the Business Continuity Plan is to ensure our Bank's ability to continue its core functions during and after a crisis or risk. This includes protecting the interests of customers, shareholders, employees and the general public. At the same time, the goal is to protect the Bank's reputation, credibility and sustainability.

We are fully aware of the risk of unforeseen events, emergencies or extreme situations that could hinder our safe operation.

We are committed to having all the functions and mechanisms in place to be able to limit any impact that may be caused due to emergencies, unforeseen situations or dangerous incidents in order to:

- Not put our human resources at risk.
- Ensure that our customer service is not affected.
- Ensure the reputation and corporate image of our Bank.
- Limit and avoid any financial or operational impact.
- Ensure our continued operation.

To fully ensure business continuity, the Bank has adopted a Business Continuity Management System (BCMS).

The incorporation of the elements of the Business Continuity Plan into the Code of Ethics

## 5. Assignment of Rights



The CrediaBank Group's Staff hereby assigns to the Bank any intellectual or industrial property rights related to their individual or group work or activities at the Bank, such as inventions, discoveries, improvements, methods, etc.

## 6. Contribution to society



The CrediaBank Group believes that its long-term success and value enhancement are intertwined with the development and prosperity of the society in which it operates. For this reason, inter alia:

- It ensures the creation and implementation of an appropriate corporate social responsibility program. It supports social, intellectual and artistic life and ensures the preservation and promotion of cultural heritage, subsidizes intellectual works, artistic and cultural events and contributes to the development of sports.
- Complies with decisions prohibiting cooperation with countries, companies or individuals included in:

- The lists of persons or entities subject to restrictive measures issued on the basis of European Union Regulations and UN Security Council Resolutions, or
- Domestic lists issued by the competent police and judicial authorities, containing persons or entities that have committed criminal activities.
- Lists of persons or entities subject to restrictive measures issued by the OFAC (Office of Foreign Assets Control) and originating from countries that do not adequately implement the FATF recommendations.
- It does not directly or indirectly (in the form of sponsorship or donations) support political parties and the media.

The CrediaBank Group, with a sense of responsibility towards people, vulnerable social groups and the environment, and recognizing that business practices will have better results in a robust and healthy environment, develops social and environmental actions, cares for human resources and the working environment and the social and cultural life of the community. In particular, the values specified in the context of the Bank Group's Corporate Social Responsibility are as follows:

- Respect for human rights and full compliance with decisions prohibiting cooperation with countries, companies or individuals that promote violence and terrorism.
- Respect for the environment, adoption and implementation of specific environmental policies within the framework of environmental responsibility (e.g., energy saving, reduction of paper use, reduction of water consumption, recycling).
- Social contribution, by supporting efforts to address international social and economic development issues.
- Contribution to the arts, culture and education by strengthening and promoting cultural values in the areas in which it operates.
- Respect for diversity by giving equal rights to men and women, and to ethnic, religious, and racial minorities.

## 7. Application of the Code



Every employee of the Bank and its Group Companies must respect and strictly adhere to this Code. Everyone, regardless of position/role or type of service provided, has the obligation to prevent actions that may not be consistent with the commitments undertaken by the Group in this Code.

Any Staff member who needs advice or guidance on any provision of the Code of Ethics & Conduct may contact the Compliance and Corporate Governance Division or the Human Resources Division. Employees may send questions regarding the application of the Code to the specific Divisions or report possible violations, without of course risking any sanctions against them as a result of submitting a report.

It should be noted that the Group takes all necessary measures to protect the identity of any employee who reports a possible violation of this Code in good faith.

The Compliance and Corporate Governance Division is responsible for monitoring the implementation of the Code and staff compliance with it, and conducts regular or ad hoc checks on compliance with the principles herein, at all levels and functions of the Group, following the Procedures set out. In addition, it cooperates with the Human Resources Division on Staff training and information procedures regarding the Code. The Human Resources Division ensures that this Code is included in the orientation materials received by new hires and that it is signed.

Violations of this Code are examined in conjunction with the provisions of the Staff Regulation and may result in disciplinary sanctions pursuant to the Bank's established procedures.

## 8. Approval and Revision of the Code



The Code of Ethics and Conduct is reviewed on an annual basis and any amendments or additions to it are put into effect and adopted by the Boards of Directors of the Bank's subsidiaries.

The Audit Committee reviews the Code whenever necessary, but at least every three years, in order to ensure the suitability thereof in relation to the principles adopted and the rules applied by the Group. In the event of a revision, the Compliance and Corporate Governance Division makes a relevant proposal to the Executive Committee and the Audit Committee of the Bank's Board of Directors.

The need to revise the Code may arise, for example, in the following cases:

- Establishment of new rules and principles and/or significant changes in the legislative and regulatory framework governing the operation of credit institutions and financial organizations, or
- Establishment of new international best practices regarding issues in the banking and the broader financial sector.

Bank and the Group Companies shall annually ensure, that the Code is communicated and is being accepted by the staff.

## ANNEX I

### SOLEMN DECLARATION BY CREDIABANK STAFF COVERED BY THE CODE OF ETHICS AND CONDUCT

**Place:**

**Date:**

I, the undersigned (full name) \_\_\_\_\_  
declare that I have received a copy of CrediaBank's Code of Ethics and Conduct, which  
I have read, fully understood, and accept its contents. I will monitor any amendments  
thereto and disclose all my transactions and activities as and when required.

#### THE DECLARING PERSON

.....

(Signature)

## ANNEX II

### CREDIABANK

#### REPORTING OF INVESTMENT POSITIONS TO THE COMPLIANCE & CORPORATE GOVERNANCE DIVISION

Place: ..... Date: .....

I, the undersigned (full name) \_\_\_\_\_  
hereby declare that I hold the following investment positions in securities of listed companies that are in any way related to takeover bids, either as the object of a takeover or as potential buyers or sellers or affiliated companies:

No.	Date of acquisition	Type/description of security	Quantity

#### THE DECLARING PERSON

.....

(Signature)

