

## Index

Index.....	1
1. PURPOSE.....	3
2. SCOPE .....	3
3. VALUES .....	3
4. ETHICAL GUIDELINES.....	4
4.1. Honesty, Integrity and Trustworthiness.....	4
4.2. Fair Competition.....	4
4.3. Adherence to Local and International Standards.....	4
4.3.1. Compliance with Laws, Rules and Regulations .....	4
4.3.2. Anti-Money Laundering.....	4
4.3.3. Anti-Bribery & Corruption .....	5
4.3.4. Tax Evasion .....	5
5. PROFESSIONAL CONDUCT .....	5
6. RESPECT .....	6
6.1. Violence and Harassment-Free Workplace.....	6
6.2. Discrimination-Free Workplace.....	6
7. A HEALTHY WORK ENVIRONMENT.....	7
7.1. Alcohol and Drug-Free Workplace .....	7
7.2. Smoke-Free Workplace .....	7
7.3. Personal Hygiene.....	7
7.4. Desk and Office Order .....	7
8. ACTING RESPONSIBLY.....	7
8.1. Working Hours.....	7
8.2. Use of the Bank’s Property.....	7
8.3. Telephones, Internet and Email .....	7
8.4. Personal Belongings .....	8
8.5. Politics and Religion.....	8
8.6. Betting and Gambling.....	8
8.7. Dress Code.....	8
8.8. Communication with the Media and the Public.....	8
8.9. Responsible Use of Social Media.....	9
9. SAFETY FIRST .....	9
9.1. A Secure Workplace .....	9

9.2.	Special Situations, Force Majeure, and Emergency Situations .....	9
10.	MANAGING INFORMATION.....	10
10.1.	Information Confidentiality .....	10
10.2.	Password Protection .....	10
10.3.	Information Transfer .....	11
10.4.	Accuracy and Retention of Records .....	11
10.5.	Tipping Off .....	11
11.	CONFLICT OF INTEREST .....	11
11.1.	Participation in Commercial Activities Outside the Bank.....	11
11.2.	Personal Relationships .....	12
11.3.	Personal Finances.....	12
11.3.1.	Loans and Borrowing.....	12
11.3.2.	Banking and Financial Transactions .....	12
11.3.3.	Personal Guarantees and Sureties .....	13
11.3.4.	Power of Attorney .....	13
11.3.5.	Declaration of Assets.....	13
11.4.	Gifts and Benefits .....	13
11.4.1.	Accepting Gifts and Benefits .....	13
11.4.2.	Giving Gifts and Benefits .....	14
12.	GOOD GLOBAL CITIZENS.....	14
12.1.	Involvement in Corporate Social Responsibility.....	14
12.2.	Human Rights .....	14
13.	WHISTLEBLOWING .....	14
14.	REPORTING OPERATIONAL RISK EVENTS .....	14
15.	INVESTIGATIONS.....	15
16.	ADMINISTRATION OF THE CODE OF ETHICS AND CONDUCT POLICY.....	15
16.1.	Violation of the Policy .....	15
16.2.	Review and Amendments of the Policy.....	15
17.	UPDATE HISTORY.....	15

## 1. PURPOSE

Odeabank is strongly committed to ethical behavior, which was successfully built on a resolute dedication to the core values that define its relationship with all stakeholders.

From this perspective, the Bank's Code of Ethics and Conduct Policy puts into writing the institution's highest ethical and behavioral standards which it upholds and practices throughout all its entities, subsidiaries and affiliates to build and maintain strong bonds with the Bank's clients, stakeholders, communities and one another.

The Policy, in effect, is a set of guidelines designed to establish all your personal and professional obligations towards business, calling upon each of you to act honestly, responsibly and with integrity at all times. These guidelines will allow you to make quick and rightful decisions and hold yourselves to the highest professional and ethical standards.

You are therefore urged to read this Code of Ethics and Conduct Policy to understand how it relates to you and live up to its standards.

## 2. SCOPE

This policy covers all Odeabank employees. Our employees are responsible for learning the content of this policy and acting in accordance with it. Any case of violation may cause serious consequences that may require the implementation of "P-056-IK Disciplinary Committee Procedure".

## 3. VALUES

Odeabank's long-standing and solid commitment to its core values revolving around Authenticity, Excitement, Openness and Respect is anchored and reflected in its Code of Ethics and Conduct Policy.

### **Authenticity**

- We empathize with our stakeholders and make their lives easier.
- We think creatively and provide fast and practical solutions.
- We differentiate ourselves by making personal impacts.

### **Excitement**

- We wonder, explore, and believe in lifelong learning.
- We take courageous steps to improve ourselves and help others improve.
- We design together, we finalize together.

### **Openness**

- We build honest and reliable relationships through accountability.
- We prioritize keeping streamlined, transparent and accessible.
- We openly share our thoughts and experiences.

**Respect**

- We respect the individual and value diversity and multi-voices.
- We support gender equality and advocate for an equitable world.

**4. ETHICAL GUIDELINES****4.1. Honesty, Integrity and Trustworthiness**

The Bank's entire business model and success largely depend on an unwavering commitment to trust and integrity. To foster such credibility, the Bank expects you to display honesty, fairness and reliability at all times. Results are important; yet, how you achieve goals and conduct business are just as important. Therefore, you are urged to place trust at the center of all activities and acknowledge that integrity and honesty are the best policy when dealing with internal and external stakeholders.

**4.2. Fair Competition**

The Bank will deal fairly and honestly with customers, competitors, suppliers and other associates. You shall seek to outperform competition with quality service and product excellence and never through dishonest practices. Taking unfair advantage over competitors or obtaining information about them through manipulation, concealment, abuse of privileged information or any other unjust practice does not comply with the Code of Ethics and Conduct.

**4.3. Adherence to Local and International Standards****4.3.1. Compliance with Laws, Rules and Regulations**

The Bank has the responsibility to adhere to the prevailing laws, rules and regulations in its countries of presence. As members of this institution and speaking or acting on its behalf, you must abide by these rules and duly commit to legal and professional ethics in day-to-day activities. Good judgment and common sense should guide your decisions and relationship with others.

**4.3.2. Anti-Money Laundering**

Money Laundering and Terrorism Financing are worldwide problems with potentially devastating consequences on societies, financial institutions and banks.

Money laundering is disguising the proceeds of an illegal activity through a series of legitimate transactions. Similarly, terrorism financing is collecting funds in a legitimate way (fundraising, charity, etc.) or from an illegitimate source (e.g. drug trade) to finance terrorist activities.

As a provider of financial products and services, the Bank is highly active on the anti-money laundering front and joins forces with governments, international organizations and other financial institutions to close the channels money launderers and terrorists use. The Bank's AML-CFT Policy urges the business to implement relevant effective

programs in compliance with the applicable laws and regulations, and to protect itself from being pulled into money laundering and financing terrorism.

As Odeabank employees, you should fully comply with this policy and adopt the “Know Your Customer” practice, especially when dealing with high-risk customers, countries, products or services.

You have to immediately refer to the Compliance Department when you learn, suspect or have reasons to believe that a person is engaged in money laundering or terrorism financing activities.

#### **4.3.3. Anti-Bribery & Corruption**

Bribery is one of the main tools of corruption and may occur in order to obtain, retain or direct business or to secure any other improper advantage in the conduct of business. Anything of value can be considered a bribe, including a gift or favor such as an offer of employment to relatives of the person being bribed. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Facilitation as a Bribery Act, defined as payments or gifts made to facilitate or expedite routine administrative tasks or processes, are strictly prohibited under the Bank’s Anti-Bribery and Corruption Policy.

Corruption involves the dishonest behavior of individuals in charge or the misuse of entrusted power for private gain. Corruption includes but is not limited to acts of bribery, fraudulent transactions, diversion of funds and various forms of improper business practices that destroys the Bank’s reputation and breaks the public’s trust towards it. As Odeabank employees, you are responsible for actively implementing and adhering to the Anti-Bribery and Corruption Policy within the organization. Every employee plays a vital role in safeguarding the organization’s reputation, integrity, and legal compliance.

#### **4.3.4. Tax Evasion**

In line with international requirements and best practices aiming to ensure transparency in financial matters and combat tax evasion, you shall refrain from assisting or encouraging customers to evade tax obligations.

## **5. PROFESSIONAL CONDUCT**

Lying at the heart of the Bank’s success is customer satisfaction and a solid reputation due primarily to internal stakeholders’ professionalism.

You display professional behavior by:

- Understanding and responding to customers’ needs with products and services that are suitable to the customer’s profile;

- Providing customers with accurate, clear, and ample key information about the Bank's products and services, their risks and benefits and any change in their conditions.
- Refraining from pressuring customers to take rushed decisions and employing unethical and improper sales techniques;
- Abstaining from acting in a way that favors or benefits one customer over another;
- Addressing customers' complaints in a timely, discrete and efficient manner;
- Maintaining a positive attitude at all times.
- Avoiding unethical behavior towards employees, customers, suppliers, and other third parties, and acting in a manner that upholds the bank's honor.

## 6. RESPECT

Having a high regard for dignity, Odeabank maintains a work environment featuring mutual respect and, as such, has zero tolerance for all forms of violence, harassment, discrimination and intimidation.

You are expected to behave in a courteous and respectful manner with one another.

### 6.1. Violence and Harassment-Free Workplace

The possession of firearms or any kind of dangerous weapons on the Bank's premises is completely prohibited. This includes knives, rifles, pistols or any other object that can be used to harm others.

The Bank does not tolerate any type of conduct that threatens the safety and well-being of any individual. Such behavior includes, but is not limited to, the use of profane or abusive language, fighting or inflicting bodily injury, engaging in unwelcomed physical contact or sexual advances as well as pressuring colleagues to participate in unwanted activities.

Employees are responsible for ensuring that their behavior and attitudes comply with this policy. All complaints are handled seriously and sensitively within the framework of employee confidentiality and privacy principles. Complaints brought forward are managed constructively and resolved entirely by the Human Resources Department, ensuring confidentiality. Detailed information on this matter is included in the Human Resources Policy.

### 6.2. Discrimination-Free Workplace

The Bank champions an inclusive culture that prohibits all forms of discrimination based on gender, age, marital status, pregnancy status, race, citizenship, religion, union affiliation, belief or disability.

**7. A HEALTHY WORK ENVIRONMENT****7.1. Alcohol and Drug-Free Workplace**

Odeabank will not tolerate the unlawful consumption, possession, manufacture, distribution, sale or purchase of any illicit substance, drug or alcoholic beverage that could harm your ability to perform your duties, violate the laws or otherwise negatively affect your colleagues' attitude or the Bank's business. Such acts will be dealt with promptly and firmly.

**7.2. Smoke-Free Workplace**

Committed to safeguard and improve the health and well-being of all internal and external stakeholders, Odeabank is an entirely smoke-free workplace. Smoking is prohibited in offices, conference and meeting rooms, gymnasium, cafeterias, restrooms, hallways, stairs, car parks and all other closed facilities.

**7.3. Personal Hygiene**

To provide and maintain a hygienic work environment and safeguard the health and safety of all, you are requested to adopt effective hygiene practices such as hand hygiene and overall cleanliness.

**7.4. Desk and Office Order**

Desks and offices should always be kept tidy and clean, and information security risks should be taken into consideration. Documents containing internal and confidential information belonging to our bank, its customers, suppliers and employees should be kept in locked cabinets and should not be left open on the table or cabinet.

**8. ACTING RESPONSIBLY****8.1. Working Hours**

In order to ensure a proper workflow and optimal performance, you should abide by the Bank's work schedule and manage your time efficiently in order to enhance productivity.

**8.2. Use of the Bank's Property**

You must properly care for and protect the Bank's property, assets and resources which include, but are not limited to, electronic communication systems, material, equipment and facilities. You are not allowed to borrow nor remove any asset from the Bank's premises without the concerned departments' permission.

**8.3. Telephones, Internet and Email**

Telephones within the Bank are only available for use in conducting business. Personal calls should be kept at a minimum level, and only be made whenever absolutely necessary, and shouldn't interrupt daily work.

Due attention should be paid to internal applications and rules about the use of telephones, internet and e-mails. Internet and e-mail systems are intended for business purposes only. Circulation of e-mails with a political content, adult only or non-work related, or that may be disrespectful towards others, should be avoided.

#### **8.4. Personal Belongings**

Do not leave personal belongings such as keys, purses, security cards or mobile phones unattended. The Bank shall not be held responsible for any loss, damage or theft employees might incur. All staff members are responsible for the safety of their own belongings.

#### **8.5. Politics and Religion**

Employees are expected to respect the political and moral values and beliefs of others and to avoid discussing these matters in the workplace.

Representing Odeabank in any political or religious organization, participating in any political activity during working hours, or using bank premises for such purposes is not appropriate.

The open display of political and religious symbols should be avoided, and a prudent approach should be taken to respect the social and cultural environment in the workplace

#### **8.6. Betting and Gambling**

Illegal betting, gambling, or other games of chance must not be played during or outside of working hours. Under no circumstances should employees engage in such activities with colleagues, customers, or third parties associated with the bank.

#### **8.7. Dress Code**

Employees are expected to maintain a clean, neat, and professional appearance at all times, whether working on-site, remotely, or representing the bank in any capacity. A reasonable personal appearance is a professional responsibility for all employees. In this regard, common sense should be the primary guide, and employees should use their discretion in deciding what to wear at work.

Clothing that is excessively tight, short, revealing, or contains messages and images that are inappropriate for a professional setting should not be worn. All managers are responsible for ensuring that their team members adhere to a professional dress code, monitoring compliance, and providing necessary guidance or warnings when needed.

#### **8.8. Communication with the Media and the Public**

To ensure clear and consistent communication, all inquiries from the media and the public regarding the bank should be directed to the Corporate Communications Department. Questions related to the group's commercial activities, products, financial status, and investments should be managed through this process.



## 8.9. Responsible Use of Social Media

The term “Social Media” in this policy refers to interactive platforms that enable individuals to quickly share their information, opinions, interests, and other forms of personal expression through virtual communities and networks.

The bank recognizes that social media can be beneficial when used responsibly on an individual level. In this context, employees are expected to exhibit safe, professional, appropriate, and respectful online behavior to avoid harming the bank, its customers, and human resources.

Employees should not post false, aggressive, harmful, or legally inappropriate comments about the bank, other employees, or customers on social media. They should also refrain from sharing confidential communication details or photos that may violate privacy regulations.

For further guidance and detailed information on the topic, employees can refer to the “Social Media for Employees” procedure.

## 9. SAFETY FIRST

### 9.1. A Secure Workplace

The Bank secures a safe and healthy work environment in compliance with applicable laws and regulations. There are procedures to handle all serious incidents and unfortunate events that might affect workplace safety; in such situations, you must follow security experts’ instructions.

You are expected to be proactive and cooperative when faced with health and safety issues at the Bank and should report any situation that could cause a workplace accident, disease or any other damage to the concerned parties.

### 9.2. Special Situations, Force Majeure, and Emergency Situations

On days when specific situations occur that affect the community in the location where our bank operates and can be defined as force majeure, special precautions are taken in accordance with instructions from official institutions unless otherwise stated by our bank.

An emergency situation includes any event that disrupts normal operations within the bank and poses an actual or potential threat to the safety or security of bank employees or assets.

These situations include, but not limited to, disruptions in transportation (such as road and airport closures), uprisings, unlawful activities, or violent incidents. All emergencies are evaluated exclusively by our bank.

It is the responsibility of all managers to promptly relay relevant information and instructions to employees and to ensure that everyone acts in accordance with the Emergency Procedure.

## 10. MANAGING INFORMATION

### 10.1. Information Confidentiality

All Bank-related information should be kept secure and confidential and used for proper business purposes.

Odeabank prohibits the dissemination of confidential information. You must respect the Bank's obligation to comply with applicable laws and regulations (especially the Banking Law No.5411, Personal Data Protection Law No. 6698, Regulation on Sharing of Confidential Information). You may not, without prior written authorization, disclose to any third party or colleague, data regarding the Bank's activities or clients' affairs. Information is shared with other employees on a need- to-know basis.

Therefore, you have to hold the following information in strict confidentiality:

- Nonpublic information obtained or created during activities with the Bank;
- Financial or organizational information about the Bank including operations, strategies, business plans, processes, proprietary products, technologies, etc.;
- Information regarding customers (including walk-in clients) and their accounts;
- Third party information provided by the Bank's suppliers and business contacts;
- Information related to employees' salaries, medical, personal or professional history;
- Any other information relative to the Bank or any of its clients or representatives.

You should keep the entire Bank's confidential data, customers' and nonpublic information in secure places and not disclose them to any third party or colleague who has no need or interest therein.

Carrying confidential and sensitive data outside the Bank via any unsecure means (hard copies, USBs, forwarding to personal emails, etc.) is prohibited as it might expose the data to leakage by means of theft or disclosure.

You must not use any proprietary information to your own advantage, including any original or copies of manuals, notebooks, drawings, notes, reports, proposals or other documents which are the sole property of Odeabank.

Even after leaving the Bank, you should keep all proprietary and sensitive information confidential.

### 10.2. Password Protection

Information security requires the use of strong passwords. Weak passwords can put the bank's data systems and services at risk. Therefore, you must take necessary precautions when setting and safeguarding your passwords. Under no circumstances should you share your password with anyone, including Management, IT Department, Internal Audit Department, family members, or friends. Compliance with Information Security Policies is mandatory.

**10.3. Information Transfer**

You should refrain from trading or engaging in any price manipulation or market abuse of the Bank's stock, or other companies' stock, when exposed to confidential material and nonpublic information<sup>1</sup> that could affect the Bank's or other companies' stock price, if published. It's strictly forbidden to disclose such information to a third party, colleague, family member or friend, providing them with an unfair trading advantage unavailable to the public.

You may not share inside information with anyone other than the Bank's representatives who actually need to know such information.

**10.4. Accuracy and Retention of Records**

Transactions with external stakeholders (individuals/ organizations) must be accurately recorded and well-documented.

You should maintain accurate, reliable and complete record of all business activities in accordance with the Bank, country and respective departments' retention policies.

When in doubt, refer to your manager for relevant policy compliance.

**10.5. Tipping Off**

The unauthorized disclosure of confidential or sensitive information can have serious implications for bribery and corruption within the Bank. Odeabank employees must be vigilant to ensure that confidential information is not improperly shared with external parties; as such actions may be motivated by personal gain or advantage. To mitigate this risk, Odeabank enforces strict confidentiality protocols, conducts regular training on anti-bribery and corruption policies, and has established clear mechanisms for reporting suspicious activities.

**11. CONFLICT OF INTEREST**

You must avoid conflicts or the appearance of conflict in any of the Bank's business activities. A conflict of interest could occur when you provide a customer with a service, which may benefit the Bank (or another customer the Bank is acting for) and materially damage their interests. You are expected to contribute to the Bank's success and avoid conflicts of interest or the appearance of conflicts in personal and business activities. Accordingly, you should clearly understand how to manage different types of conflicts. When in doubt, conflicts could be escalated to a higher authority.

**11.1. Participation in Commercial Activities Outside the Bank**

Employees must avoid any relationships or activities that may compromise their impartiality and ability to make fair decisions in their duties or even appear to do so. In this regard,

---

<sup>1</sup> **Material and Nonpublic Information:** information about a business organization that is not generally available to or known by the public and that may be considered important by an investor in making his/her investment decisions, or market/price sensitive information that would affect the value of securities.

employees should not engage in secondary employment that could lead to criticism of themselves or the bank or significantly affect the time and attention required for their primary duties.

According to the Disciplinary Committee Procedure, employees are not allowed to engage in direct or indirect commercial activities, even outside working hours, without obtaining the necessary permissions and notifications from the bank. Additionally, working for wages or on a voluntary basis, practicing a freelance profession, or undertaking official or private duties based on a special legal provision is not permitted.

The Human Resources Department must be consulted regarding the appropriateness of any commercial or external activities and relationships.

## **11.2. Personal Relationships**

You should ensure that your personal relationships do not interfere with your job performance. They should not impair your ability to act in the best interest of the Bank and make employment-related decisions, among others, that should be solely based on qualifications, skills and experience. When in doubt, refer to your manager or Human Resources.

## **11.3. Personal Finances**

You are expected to manage your personal finances with a high level of integrity and consideration to your relation with the Bank. You should not commit to or perform any type of transactions that could discredit you or the Bank.

The Bank has adopted the following principles to protect its business and employees:

### **11.3.1. Loans and Borrowing**

It is prohibited to borrow money from colleagues, suppliers, or customers.

Employees are expected to manage their financial responsibilities prudently and avoid excessive borrowing. The bank expects its employees to avoid debt levels and financial obligations that exceed their repayment capacity and to prevent financial difficulties and delays in payments.

### **11.3.2. Banking and Financial Transactions**

It is not appropriate for any employee to use the authority they have due to their duties to perform transactions on their own or their relatives' accounts at our Bank, to evaluate their own accounts and those of their relatives in their own portfolios, to withdraw or deposit cash using their own safes, and to perform similar banking transactions that may lead to a conflict of interest.

### **11.3.3. Personal Guarantees and Sureties**

Employees may only provide personal guarantees and sureties to their immediate family members (parents, siblings, spouses and children) for transactions at our Bank, provided that they obtain the prior written permission of the Human Resources Department. Our employees must not provide personal guarantees or sureties to customers and/or other employees for transactions at our Bank.

### **11.3.4. Power of Attorney**

Employees may only act as proxy for their immediate family members (parent, sibling, spouse or child) for transactions at our Bank. Apart from this, since our employees cannot assume the role of banker and customer at the same time, they should not take power of attorney from customers and/or other employees for transactions at our Bank and act on their behalf.

### **11.3.5. Declaration of Assets**

According to the procedures and principles in the Anti-Bribery and Anti-Corruption Law and related legislation, all employees with manager and above titles are required to declare their assets. The process is managed by the Human Resources Department within the framework of the legislation. Details of the subject are specified in the Human Resources Policy.

## **11.4. Gifts and Benefits**

In the course of business, it is not unusual for an individual/organization to receive or offer gifts or benefits, such as products, dinner invitations and tickets to events.

### **11.4.1. Accepting Gifts and Benefits**

Our employees should not accept gifts that would jeopardize their professional independence from current or prospective customers.

In exceptions, where it would be inappropriate to decline the gift, and provided that such acceptance will not create any traffic of influence, non-cash gifts that do not exceed \$200 or corresponding TL amount in value may be accepted. Upon the request of the manager or the CEO, such gifts should be donated to a charity (this process shall be administered by HR in consultation with the Compliance Department). If the value of the gift exceeds the amount specified above, or in the case of doubt regarding the appropriateness of accepting the gift, it is requested to discuss the matter either with the manager, or the Human Resources Department.

Invitations to business meals are usually accepted. For activities that are not predominantly business related (such as concerts, plays, sports games or other activities organized at nights), employees should make sure that their participation will be suitable whether their participation is in line with common business practice.

In cases where the above conditions are not met, the Compliance Department should provide their opinion; before any gift is accepted, pre-approvals should be obtained from the managers, and the Compliance Department and HR Department should be informed.

#### **11.4.2. Giving Gifts and Benefits**

You should not give customers gifts and benefits granting them improper business advantage or influence. Gifts and benefits that may be considered as acts of bribery or enticement, even for business purposes, are prohibited.

You shall refrain from offering anything of value to public servants influencing them to take, or refrain from taking, any official action, or persuading them to conduct business with the Bank. By adhering to the Anti-Bribery and Corruption Policy, the Bank promotes transparency and integrity in business dealings and strictly discourages any form of bribery, including facilitation payments.

For exceptional events or for events about which the employees have doubts, they should first consult their Department managers, then inform the Compliance Department and obtain permission in this regard.

## **12. GOOD GLOBAL CITIZENS**

### **12.1. Involvement in Corporate Social Responsibility**

The Bank embraces Corporate Social Responsibility and is keen on developing its community of presence by playing a proactive, cooperative and collaborative role. It also helps ensure a good quality of life and the well-being of the general public, secure cultural advancement and make the community a better place to live and conduct business in. Therefore, the Bank encourages each of you to volunteer in activities contributing to the overall welfare of society.

### **12.2. Human Rights**

The Bank endorses and supports internationally recognized principles under the Universal Declaration of Human Rights which promotes global respect for human rights and fundamental freedoms for all, without distinction of race, color, gender, language, religion, opinion, descent, or national or ethnic origin.

## **13. WHISTLEBLOWING**

When you become aware of irregularities or serious malpractices at work (referred to as 'harmful violation') that affect others or the Bank, you are required to report the incident in good faith and in compliance with the provisions of the Whistleblowing Procedure.

Whistleblowers are entitled to identity confidentiality and shall be protected against any acts of retaliation or retribution.

## **14. REPORTING OPERATIONAL RISK EVENTS**

When faced with any unusual event, operational in nature, which caused or had the potential to cause damage to the Bank, you are required to report it by accessing Operational Risk.

## 15. INVESTIGATIONS

You must fully cooperate with any authorized internal or external investigations including, but not limited to, those involving ethical issues, discrimination and harassment complaints. Making false statements or misleading internal or external auditors, the Bank's counsels, representatives or regulators is enough reason for immediate termination of employment or any other relationship with the Bank.

You should always refrain from withholding information that raises ethical questions and should be brought to the attention of a higher authority.

## 16. ADMINISTRATION OF THE CODE OF ETHICS AND CONDUCT POLICY

### 16.1. Violation of the Policy

Violations of the Code of Ethics and Conduct Policy and failure to report them will subject you to disciplinary action, including termination of contract or employment.

### 16.2. Review and Amendments of the Policy

The present Policy is reviewed on a regular basis or whenever needed by Human Resources Department who shall recommend modifications to the approval of the Board of Directors.

## 17. UPDATE HISTORY

<b>DOCUMENT OWNER</b>		Human Resources Department	
<b>RELATED DEPARTMENTS</b>		Compliance Department - Internal Audit Department	
<b>UPDATE HISTORY</b>			
Version No	Date of Publishing	Type of Change*	Explanation
1	18.02.2025	New	

\*Type of Change = New, Addition, Cancellation, Update, Review.