



Policy on Business Dealings of Employees

Purpose

The purpose of this policy is to mitigate conflicts of interest and ensure that business dealings of employees with the Bank are beyond reproach. This policy applies to business dealings between the Bank and its employees and their related parties, as defined by applicable laws and regulations.

Scope

With reference to Article 57(2) of the Financial Undertakings Act No. 161/2002, business dealings of employees, and their related parties, with the Bank shall be subject to the same rules and procedures as transactions with other customers. Rules and procedures in this regard refers to applicable loan rules and credit framework, etc., as set by the Bank in general, but not the Bank's schedule for fees and interest rates.

Special Terms in Business Dealings of Employees

Employees and their spouses may be offered special terms in their business dealings with the Bank. Such special benefits must be offered to all employees on an equitable basis. Special terms in this respect mainly refers to discounts from certain items in the Bank's schedule for fees and interest rates.

Loans granted to employees and their spouses must always be granted in accordance with the relevant laws and regulations, the Bank's credit framework, and other internal rules and procedures, as applicable.

The CEO shall determine what special terms can be offered to employees. He/she may delegate this task to another Managing Director of the Bank, as appropriate.

The Bank has in place specific rules on personal account dealings for security transactions by employees and related parties, which are monitored by the Compliance function.

Limitations on acting on behalf of the Bank

Employees may not act on behalf of the Bank in transactions related to themselves personally, or their related parties. However, employees are allowed to make use of self-service delivery channels, such as automatic teller machines, online banking, and apps.

The policy comes into effect once published and shall be made available on the Bank's website.