

## SUMMARY OF PROVISIONS OF BC "MAIB" S.A. CODE OF ETHICS,

Approved by the Bank Board of Directors' decision as of 10.10.2024 (Minutes No. 17)

BC "MAIB" S.A. (hereinafter – "Bank" or "**maib**") has developed the Code of Ethics (hereinafter – "Code") to reconfirm the Bank's commitment to manage its business and relationships with its customers, partners and shareholders, as well as with the supervisory and/or control authorities, which is based on the highest standards of integrity and professionalism and is in strict accordance with laws, regulations and generally applicable practices.

The Code is applicable to the members of the Bank's governing body and to all employees, including persons holding key positions. Each employee has the obligation to carry out their professional activity in accordance with the policies and practices established by the Code, regardless of their position, hierarchical level or duration of the individual employment contract /mandate contract.

The purpose of **maib** is to *create simple* and smart financial solutions fitting the lifestyle that *inspire* people to be happier and businesses – more prosperous.

**Maib** puts **customers** at the center of its attention – as customers are a priority, the core of our business decisions: from products, services and processes to the development of their distribution channels. Everything we do is based on the aspirations or challenges our customers may face. We strive to excel in customer relations, developing a mutually beneficial long-term relationship.

In this regard:

- **we create:** by experiences that make customers and employees happier; by a *transparent* and *trustworthy* environment; *team spirit*, so that people enjoy themselves, work and have fun together;
- **we inspire:** by taking *responsibility* and delivering results; by *innovation* and creative thinking; by taking environmentally and socially responsible actions;
- **we simplify:** products and services; operations and communication; our way of working by becoming *agile*.

The principles of ethical conduct in **maib**:

- **Relationship and communication with the bank's customers**, which is about impeccable customer service, offering the highest quality products and services that address the specific needs and interests of customers. This involves knowing the Bank's customers, their reputation and the nature of their business activities.
- **Employees' conduct**, which focuses on the rules of professional, personal and inter-personal conduct, as well as the conduct of members of the Bank's governing body, persons holding key positions and heads of sub-units.
- **Interaction with the authorities and public officials** is based on fairness, professionalism, efficiency and compliance with the regulatory framework in force. The Bank prohibits its employees from taking actions that are intended or intended to influence a public official.

- **Anti-Fraud and Anti-Corruption**, which establishes and promotes the principle of zero tolerance of any form of fraud, bribery or corruption. Each employee is responsible for preventing, deterring and not engaging in internal/external fraud and/or abuse and is obliged to discourage any attempt of internal fraud by other employees and to report any fraud or suspected fraud in accordance with the Bank's internal policies and procedures. The Bank obliges its employees to apply appropriate precautionary measures against money laundering and terrorist financing, and prohibits the acceptance of inadmissible gifts, or the ones that are intended to influence the decision-making ability of employees.
- **Corporate loyalty**, via which is ensured the following: avoidance of conflicts of interest; protection of the Bank's assets and intellectual property; a procurement activity based on principles of transparency, honesty and fairness; and confidentiality and security of information and personal data protection.
- **Business relations based on trust**, whereby the Bank does not tolerate abuse in the financial market, condemns the misuse of inside information and guarantees not to allow abuse of its position in the banking market, thereby promoting fair competition.
- **Impartiality and non-discrimination**, which ensures that the Bank eliminates any form of discrimination.
- **Relations with the authorities and media** are open, transparent and cooperative, ensuring the compliance with legal provisions on banking secrecy. Communication with media is carried out in accordance with the Bank's rules in this area.
- **Health and environmental safety protection** – the Bank ensures a healthy and safe working environment for its employees, with appropriate assessment and management of environmental risks. Each employee is obliged to avoid any actions that may harm the safety of the environment.

Bank employees must consider compliance with ethical standards as a very important element of their responsibilities. The Bank requires its employees to support and promote the purpose, values and principles set out in the Code, by demonstrating the highest standards of professional and personal conduct.