GENERAL
CODE OF CONDUCT

Bank Group

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1 INTRODUCTION

This document describes the behaviours and standards of conduct that everyone who is part of Group must follow.

All colleagues on the workforce, members of management and members of the governing bodies overseeing the companies that make up Group are required to be aware of and comply with this code. This does not exempt them from any other obligations to observe other codes of conduct specific to their activities.

The Code acts, on the one hand, as a tool for preventing the risks we are exposed to, while also serving as a defence mechanism against potential breaches of our regulations.

2 DEFINITIONS AND SCOPE

For the application of this Code, the following definitions shall be taken into consideration:

- **Code: General Code of Conduct.**
- **Employees/ Professionals**: all persons employed in the Bank under an employment contract or cooperating with the Bank under a civil law contract, including Members of management and members of the Bank's governing bodies.
- **Members of management:** persons holding managerial positions in a given entity, responsible for the daily management of the activities of a given organizational unit and reporting to the Management Board
- **Conflict of interest**: generally occurs when one or more people and/or entities and/or units or businesses have interests that may be potentially adverse to the interests of another individual, entity, units or business, as well as when there is duty of care or trust with regards to third parties with interests in the entity. Likewise, It may also occur when a situation or circumstance may have an adverse impact on the performance of the obligations and responsibilities assigned to an individual within Group entities.
- **Related party**: natural or legal person with whom the Employees of Group (including members of Management Board or Supervisory Board) maintain an economic, family relationship (as per the definition of Family ties) or friendly relationship (as per the definition of Friendship) with the ability to significantly influence their function or decision making within the Group.
- **Family ties**: refers to your spouse or cohabiting person, your grandparents, your parents, your children, your siblings, your aunts or uncles, your nieces or nephews and your brothers-in-laws. It also includes the spouses or cohabiting persons of the people mentioned above.
- **Friendship**: This refers to any close friendship you may have with a member of Management or Supervisory Board that could give rise to favouritism.
- **Economic links:** an economic link with a legal entity is considered to exist when more than 5% of the shares in capital are acquired or when a managementor supervisory role is assumed in the legal entity.

- **Insider information**: This is information about securities or financial instruments admitted to trading in a market or an organised trading system, or in the process of being so, or issuers of the same, which has not yet been made public and that, if it were, could affect its price.
- **Financial information:** refers to all accounting and financial information that we present to our customers, shareholders, investors, auditors, as well as to supervisory authorities.
- **Erste Group:** a group of entities that make up Erste Group Bank AG as a parent company, and the subsidiaries over which it has direct or indirect control. For greater clarity, it is composed of Erste Group Bank AG and any other unit or subsidiary of Erste Group.
- **Bank Group, hereinafter referred to as Group:** a group whose parent company within the meaning of the Accounting Act of 29.09.1994 is Erste Bank Polska S.A.
- **Subsidiary:** a subsidiary that forms part of Erste Group/ Group
- **Compliance monitoring unit:** Compliance Monitoring Department (in Legal and Compliance Division) as a separate unit in Erste Bank Polska S.A.
- **Compliance assurance unit:** Compliance Department (in Legal and Compliance Division) as a separate unit in Erste Bank Polska S.A.
- **Human Resources unit:** Personnel Department (in Business Partnership Division) as a separate unit in Erste Bank Polska S.A.
- **Relations unit:** Ethics and Relations Office (in Business Partnership Division) as a separate unit in Erste Bank Polska S.A.
- **Training unit:** a separate unit (in Business Partnership Division) engaged in talent development and training
- **Communication unit:** a separate unit in Erste Bank Polska S.A. engaged in public relations.

3 SCOPE OF APPLICATION AND TRANSPOSITION BY SUBSIDIARIES

This document is applicable to Erste Bank Polska S.A. (hereinafter referred to as Bank).

The members of Erste Bank Polska Group are expected to use this document as a basis for developing their own relevant documents.

This Code should be adopted at the following subsidiaries of the Bank:

1) Erste Towarzystwo Funduszy Inwestycyjnych S.A.
2) Erste Leasing S.A.
3) Erste Factoring sp. z o. o.

The solutions contained in this document should be reflected in the internal regulations of subsidiaries, while the detailed solutions may differ from the Bank's solutions.

4 THE CODE OF CONDUCT MAIN CONTENTS FOR EMPLOYEES

4.1 OUR CORPORATE CULTURE

- The Group's corporate culture is an approach to conducting business. It defines:
  - **purpose:** to help people and business progress;

- **aim:** To be the best open for financial services platform.
- **way of work**:
  - Simple: We offer accessible services and products.
  - Personal: We interact with people, which is why we treat each person as unique. We offer them the products and services that best suit their needs.
  - Fair: We promote fairness and transparency and we keep our promises. We establish good relationships with different stakeholders because we know that what is good for them is also good for us.

- To become a Simple, Personal and Fair bank, we have set our **corporate behaviours, which we have summed up in the word TEAMS.** They guide how we all should act and behave:
  - **Think customer:** I care about our customers so I go the extra mile to earn their trust and loyalty.
  - **Embrace Change:** I embrace new challenges and I see new ways of doing things as an opportunity to grow.
  - **Act Now:** I take accountability and manage risks accordingly, always keeping things simple.
  - **Move together:** I seek opportunities to promote collaboration and work together to achieve common goals.
  - **Speak Up:** I feel free to raise any idea, ask any question or escalate any issues or risks, building an environment of respect and trust. I am comfortable sharing and receiving feedback.

- Group has its way of managing risks, called Risk Pro, a shared, attentive and robust management system engaging all team members, from branch staff to the Supervisory Board members.

4.2 CODE - YOUR DAY-TO-DAY TOOL

4.2.1. WHAT IS THE CODE OF CONDUCT?

This document describes the behaviours and standards of conduct that everyone who is part of Group must follow.

We will build a fair and ethical Group thanks to your exemplary behaviour in your day-to-day work. This Code is a tool you can rely on your journey towards the progress and transformation of the business world and society as a whole.

The Code acts as a tool for preventing the risks we are exposed to.

4.2.2. WHO IS REQUIRED TO OBSERVE IT?

This Code applies to all Group Employees. Everyone is required to be aware of and comply with this Code. This does not exempt them from any other obligations to observe other codes of conduct specific to their activities.

4.2.3. WHAT HAPPENS IF IT IS BREACHED?

Failure to comply with any provision of this Code or its implementing regulations may result in disciplinary actions, in addition to administrative or criminal sanctions.

In your day-to-day work, there might be situations where you don´t know how to behave. If you need guidance or you have any questions relating to any section of the Code, please get in touch with Compliance monitoring unit.

If you detect any breaches or irregularities, speak up: you should tell your manager or the appropriate person from: Compliance monitoring unit. We are also here to listen to you on whistleblowing channels, which we will explain in further detail in section 4.4.

4.3 KEYS THAT GUIDE YOUR BEHAVIOUR

As a colleague within the Group, make sure you have the necessary knowledge and be aware of the responsibilities required of your position; perform your work with impartiality, judgement and diligence. You are part of our team, which is why it is important that you commit to and comply with the following:

- Comply with external and internal regulation that affect the work you do.
- Be impartial and honest, and do not engage in any illegal or unethical behaviour as defined in this General Code of Conduct.
- Inform, as soon as possible, your manager, Human Resources unit and Compliance monitoring unit should you be involved in any criminal or administrative proceedings initiated by authorities or bodies that are supervising the operations of any of the companies from the Group. You must inform them of this whether you are the alleged perpetrator, a witness or even if your participation is not related to your professional activity.
- Always act in our interest and do not benefit personally from business opportunities pertaining to Group.
- Prioritise the work you do for Group and take care of its good.
- If, pursuant to the agreement, you are prohibited from conducting competition activities with the Bank, refrain from taking any actions that may result in violating this prohibition. In such a situation, the provision of services to a competitive entity, regardless of the nature of the relationship, may take place exceptionally and each time requires the prior, express consent of your supervisor, the Human Resources unit and the Compliance monitoring unit. If you have any doubts about the non-compete obligation applicable to you, you can consult the Compliance monitoring unit.
- In order to eliminate the potential risk related to a possible conflict of interest and acting to the detriment of the Bank resulting from:

- your business activity or work for an entrepreneur or other legal entity, or
- your activities as a supplier/customer of the Bank, or
- in situations of a similar nature

inform your manager, the Human Resources unit and Compliance monitoring unit about it.

- When conducting in transactions on behalf of the Bank, bear in mind the external and internal regulations, as well as the rules and rates that determine the prices and conditions applicable to the various products and services we sell.
- Respect internal procedures, particularly work regulations and procedures relating to the exercise of powers/powers of attorney and the application of risk limits.
- Take care of the resources that we have made available to you. Do not use work tools to gain access to information unrelated to your professional duties, in particular to data of the Bank's clients that are not necessary to perform the tasks entrusted to you.
- Learn and engage in training to develop professionally. You are also required to attend any mandatory training or information sessions that we organise, and in particular those concerning the Code.
- Respect the right to organise, collective bargaining and freedom of association.
- Follow rules relating to safety and hygiene in the workplace to prevent and minimise labour risks. This is a way of looking after not only yourself, but your colleagues too.

Erste Bank Polska S.A. complies with applicable Environmental, Social and Governance (ESG) regulations and contributes to several of the United Nations Sustainable Development Goals.

The commitment to responsible banking that we have embedded across the Group seeks, *inter alia*, to improve the quality of life of our Professionals and their families. We work to create a safe work environment that is compatible with personal development while helping Professionals to balance, as best as possible, their work commitments with their personal and family lives. We also believe that the health and safety of our Professionals is crucial to building a safe and comfortable workplace. We foster open, transparent and constructive dialogue with organisations representing Employees to strengthen employee relations.

As a Professional at the Group, we need you to form a part of our team and fulfil these commitments in your work, applying our corporate behaviours and Risk Pro as an integral part of the corporate culture.

4.4 WHISTLEBLOWING CHANNEL - WHAT IS IT AND HOW DOES IT WORK?

At Group, we strive to advocate a culture of open and honest work. We foster an ethical, responsible and transparent environment where people feel free to express themselves and speak up. To make sure this is always the case, we have a whistleblowing channel, designed to help people express themselves and speak up with guaranteed confidentiality and anonymity.

You can report violations (also anonymously) via the following whistleblowing channels:

1) Indicated in *Whistleblowing Policy* for Employees, suppliers and customers:

   a. e-mail address: **etyka@erste.pl**

b. dedicated application indicated on the Bank's internet and intranet website – from the date of its launch and publication on the Bank's internet and intranet website.

Additionally, for Employees the following whistleblowing channels are available:

c. **KLAKSON application –** until the internal communication on disabling the application,
d. ethical helpline **(available from 8-16),**
e. a letter **sent by post** to the Bank's address,
f. meeting;

2) indicated in *Internal reporting procedure (whistleblower protection)* for persons who report the information on the infringement of the law as set forth in the *Procedure*, which has been obtained in the work-related context:

a) e-mail address: **sygnalista@erste.pl**,
b) **application** indicated on the Bank's internet and intranet website (tab „Investor relations – Corporate documents") – from the date of its launch and publication on the Bank's internet and intranet website,
c) a letter **sent by post** to the Bank's address
d) meeting.

Through whistleblowing channels, you can report suspicions about behaviour that takes place in the professional or labour sphere relating to:

- a suspected criminal offence;
- a suspected breach of the General Code of Conduct;
- a suspected breach of internal or external regulations (including regulations on the prevention of money laundering and terrorist financing);
- financial and accounting irregularities; or
- a suspected violation of corporate behaviours in Group.

These channels are operated by a Compliance monitoring unit. When accepting the notifications or reports, Compliance monitoring unit guarantees confidentially (and anonymously if you so wish).

Whistleblowing channels can be used by Employees:

- customers and suppliers – on the basis of *Whistleblowing Policy*,
- other persons who file a report in the work-related context – on the basis of *Internal reporting procedure (whistleblower protection)*.

It is forbidden to make any retaliation, or threaten any retaliation, against anyone who has filed a report on a breach. It does not exclude undertaking disciplinary actions in case when internal investigation proves that the report had been made in bad faith. .

In the management and processing of communications received through the whistleblowing channels, the rights and guarantees of the persons involved in the report are protected.

If you know, suspect or believe there to be any kind of conduct that jeopardises our reputation as an ethical, responsible and fair bank, speak up.

You have at your disposal the Whistleblowing Policy and *Internal reporting procedure (whistleblower protection)* to learn more about the criteria and management principles that regulate our channel.

Group promotes actively reporting any breaches. Whistleblowing channels are a preferable way to report any serious misconduct such as those which may constitute serious or grave penal or administrative crimes or infringement of the European Union law. Such misconduct may also be reported via an external channel operated by the Commissioner for Human Rights and via external channels operated by other public authorities, whose jurisdiction includes follow-up actions for a given subject of report.

- **I would feel more comfortable reporting the situation in person. Is that possible?**

  Yes. You can request a meeting with those in charge of whistleblowing channels through Compliance unit. There are the same guarantees in the case of this meeting as in the case of any other kind of communication through whistleblowing channel.

- **I'm not sure if what I've witnessed constitutes a situation that should be communicated via whistleblowing channels. What should I do?**

  Report such situation anyway, even if it is merely a suspicion.

4.5. THE CODE IN PRACTICE. WE ARE A BENCHMARK OF CONDUCT.

4.5.1. YOUR RELATIONSHIP WITH YOUR COLLEAGUES

4.5.1.1. We offer equal opportunities and we don´t discriminate

We hire Professionals based on their talent, training, skills and experience. Personal achievement and merit are the only factors that influence our decision.

When you are involved in a selection, recruitment or promotion process, be guided by the principle of equal opportunities. You should not discriminate on the grounds of, for example, sexual orientation or gender identity, race, religion and beliefs, political ideologies, adherence to trade unions or lack thereof, disability, place of origin, age, language, marital or social status.

When making decisions, be objective, tolerant and promote diversity: make sure that your only goal is to find the right person for the position.

Remember that we do not offer jobs or employment contracts to authorities or public officials who are involved (or have been involved recently) in matters that directly affect our interests.

4.5.1.2. An inclusive and respectful work environment

We want to make sure that Group is a safe place to work, a place where you can be yourself and everyone enjoys the same opportunities. We refuse to tolerate any of our Professionals, suppliers or customers being discriminated against on the grounds of, for example, sexual orientation or gender identity, race, religion and beliefs, political ideologies, adherence to trade unions or lack thereof, disability, place of origin, age, language, marital or social status. So we will not tolerate anyone making

remarks or acting in such a way that could undermine the culture of respect. We expect you to be tolerant and to set an example.

Any kind of abuse, intimidation, mobbing, harassment (including sexual harassment), disrespect or behaviour that could undermine a person's dignity - particularly any negative behaviour regarding someone's personal traits, whether visible or otherwise - affecting any professional associated with us, is prohibited.

If you witness or experience any behaviour of this kind while you are working, you should report it immediately to your manager. If this is not possible, use whistleblowing channels or contact an Employee of Compliance monitoring unit directly.

If you wish to consult any behaviour from the area of employment relations, you can also use a relational helpline: 798 712 712, operated by the Relations unit. Please remember that this helpline is not a whistleblowing channel.

4.5.1.3. How to prevent a conflict of interest with friends or family members

Do not participate (as an Employee) in any transactions carried out by Group entities in which you or a person linked to you has an interest.

Do not take part in or influence procedures involving the purchasing of products or services with companies or people with whom you have ties either financially or personally.

Do not give favourable treatment or special work conditions to people with whom you have a friendship or family or financial ties.

Do not influence any hiring process, promotions or improvements of working conditions involving a family member or friend.

In order to prevent a potential conflict of interest with other Group employees, with whom you have family ties, inform Compliance monitoring unit and Human Resources unit, and remember:

- If you are directly dependent functionally or hierarchically to a close family member or other relative, we will transfer one of you to another unit within a year. We will proceed in the same manner if there is indirect hierarchical dependence with a member of the closest family.
- If reporting, hierarchical or functional dependency with other relative is indirect, your situation will be analysed by Compliance monitoring unit or Human Resources unit in order to ensure there is no potential conflict of interest. We will proceed in the same manner if there is hierarchical dependence with a member of the closest family.
- If you belong to do Promontorio, Faro or Solaruco responsible for relations with corporate customers, your family relations may be individually assessed by Compliance monitoring unit and Human Resources unit even if there is no hierarchical/functional dependency with the members of the family.

Moreover, if you have family ties with a Member of management, Management Board or Supervisory Board of the Bank or any entity from Group, who may have an ability to have an impact on your

professional situation, it is necessary for both parties to inform the employee superior, Compliance monitoring unit or Human Resources unit, as it may help to ensure that hiring, promoting or improvement of work conditions (including remuneration) will be based on merit and free of conflict of interest.

4.5.2. YOUR RELATIONSHIP WITH GROUP

4.5.2.1. How to prevent a conflict of interest with the Group

You can purchase any of the products or services that we offer in accordance with regular market conditions or pursuant to the general terms established for our Professionals.

You may not purchase or lease—either directly or through people to whom you are linked—assets or goods from Group or vice versa (we may not purchase or lease assets or goods that belong to people to whom you are linked). However, there are two exceptions to this rule:

- when they are purchased or leased via a public offering; or
- when this is authorised by Compliance monitoring unit and Human Resources unit.

In such cases, Compliance monitoring unit and Human Resources unit will oversee that the transactions are conducted with transparency and equality for other stakeholders, and that they are in accordance with market conditions and do not constitute neither a conflict of interest nor the use of insider information.

If you would like to invest in a business in which we have a stake, a direct share (co-investment), or even in a business in which we no longer have a stake, you will need to get prior authorisation from your manager and opinion from Compliance monitoring unit - in the case you identify a conflict of interest. This authorisation will be granted when it has been confirmed that there is no conflict of interest both now and in the future. You should refrain from starting the investment process until you have obtained both written authorisations.

You can read more about this in our policy on conflicts of interest.

4.5.2.2. How to process confidential information and personal data

You should treat any information that we have not made public as completely confidential, as well as respecting the personal data to which you have access as part of your work, or as a consequence thereof. This applies even if you were to stop working with us.

You must only use this information and personal data when carrying out your duties. Only use the data and information that are strictly necessary and make sure you have the authorisation to do so.

When dealing with personal data, make sure the necessary technical and organisational measures are taken to guarantee the correct level of security at all times to protect interested parties' rights and freedoms.

Do not share personal data with third parties unless there is a legal basis for doing so.

Never use the information to which you have access as part of your duties for your own benefit or for the benefit of a third party.

Should a judicial body, public administration or any other competent authority request information from you, provide only the data you are asked for. If you have any doubts, before providing information contact Compliance monitoring unit and unit in charge of the personal data protection.

4.5.2.3. Your conduct in front of the media and public appearances

Do not share information, remarks or rumours about us or third parties to the media.

Channel any journalist or media enquiry with Communication unit.

If you are asked to give a speech or you are thinking of giving an interview on matters relating to our corporate purpose or your professional role with us, you must first request authorisation from your manager and Communication unit.

If you are going to participate in public forums, social media or similar platforms where you may be likely to reveal certain political or ideological biases that compromise our neutrality, you must not mention Group, refrain from emphasising your status as a Group professional and you must make it clear that you are speaking on your own behalf.

4.5.2.4. Your conduct in the securities market

If you enter into personal transactions on financial markets (including securities and financial instruments), bear in mind the special rules that may apply to you in the Code of Conduct in Securities Markets. Even if you are not subject to the Code of Conduct in Securities Markets you must comply at all times with our principles:

- Do not participate in transactions with immediate gains or speculative profit, or that require, due to their risk or volatility, continuous monitoring that may interfere with your work.
- Check with Compliance monitoring unit if you have any questions regarding:
  - the speculative nature of your transactions;
  - the potential for a certain piece of information to be considered insider information;
  - your understanding of this section.
- Never operate in overdraft or without sufficient funds when investing with your personal finances
- Do not enter into transactions on the basis of confidential information from customers or suppliers or information that is sensitive to us and that you have obtained while performing your work duties.
- Should you be in possession of insider information, do not operate on securities or financial instruments affected by the said information, and do not advise others to operate on them or share the insider information. Either way, you should report this to Compliance monitoring unit and indicate the source from which you obtained it.

➢ **What should I do if I receive insider information?**

If you have accessed insider information and you are not on the insider list nor are you part of the related project, or if you accessed the information by mistake, contact Compliance unit without undue delay.

Should you receive insider information as part of your work and the person in charge of the project in question authorised this, you do not have to contact Compliance monitoring unit, although we recommend that you make sure you have been included in the related insider list.

4.5.2.5. The kind of competition we like: fair and responsible

Compete fairly and effectively in the commercial activities you take part in.

Encourage free and effective competition that benefits the market, customers and everyone with whom you have commercial or professional relationships.

Comply at all times with internal competition rules that may apply to each particular activity.

Report any anti-competitive practices that you may detect when dealing with competitors. If you have any doubts or suspect anything, check with Legal unit or Compliance monitoring unit. For further details, read the competition policy carefully.

4.5.2.6. Cybersecurity: how to stay safe

Cybersecurity is the responsibility of all of us who form part of Group. Our policy on cybersecurity rules for protecting Group regulates the proper use of IT systems and information technologies (e.g., computers, mobile phones, email, Internet access, social media, etc.). It also covers the risks that may arise.

As a Group professional, follow the cybersecurity practices indicated in our policy.

If, due to your job position, you are involved in a very specific use of our IT systems requiring special privileges (e.g., if you are a developer or system administrator), as well as the policy on cybersecurity rules for protecting the Group, you must also pay special attention to the policy on cybersecurity requirements for technical users.

We must avoid malicious practices or inappropriate behaviour that could lead to severe security breaches, such as the use of unauthorised software, breaches by technical users, exfiltration or leakage of information.

4.5.2.7. Responsible use of personal social media

While the personal use of social media is every individual's responsibility, remember that your association with us could create reputational or cybersecurity risks, or other kinds of risks for the Group. We therefore recommend that you handle your online profiles and the content you post on social media responsibly and conscientiously.

Read the Policy on the personal use of social networks by Employees and follow the basic principles.

- **Can I comment my opinion on posts on our corporate profiles?**

Of course. You can express your opinion on your own posts or by taking part in ours, but you should always do so transparently, honestly, and as an individual, making sure not to reveal any confidential information, respecting intellectual property and following the principles of the policy on personal social media for Group Professionals.

4.5.2.8. How to protect our assets

Protect and look after our assets (properties, goods, estates, etc.) and do whatever you can to prevent them from being damaged.

Use assets properly and for the purpose they were provided to you, and follow the internal control procedures we have in place for protecting them. In particular, electronic devices (mobile phones, computers, etc.) which, as they are for professional use, may be subject to inspection.

Unless you have the authorisation from your manager to do so, do not create or permit any security over any asset neither sell, transfer or otherwise dispose of any asset, or enter into any other arrangement having a similar effect.

Do not sell, transfer or withhold goods that are owned by us to evade responsibilities with regard to our creditors.

4.5.2.9. Financial information: reliable and transparent

Financial information refers to all accounting and financial information that we present to our customers, shareholders, investors, auditors, as well as to supervisory authorities.

This information is the responsibility of everyone who works at Group, which is why we must rigorously and accurately process and present it.

When dealing with information of this kind, make sure that the data being collected are reliable, complete, and that they follow the applicable regulation.

Always bear in mind the internal control procedures we have in place and follow them. If you detect a breach, inform your manager or speak up via whistleblowing channels.

4.5.2.10. Control of individual expenses

As part of your professional activity with us, you may incur individual expenses, for example, if you need to travel for professional reasons, if you attend training sessions, if you have meal allowances, etc. In these cases:

- Provide accurate proof of your expenses following the policy guidelines.
- If you are a manager, carefully check your team members' expenses and make sure that they are correct before authorising or rejecting them.

Likewise, bear in mind the rest of the guidelines foreseen within the policy on travel and other expenses.

4.5.2.11. Bear in mind intellectual and industrial property rights

At Group, we have intellectual property and/or use rights regarding original works, courses, programmes, IT systems, processes, technology, know-how and, in general, with any work developed or created at the Group, whether as a result of its professional activity, or that of third parties.

Only use the resources and knowledge described above to carry out your professional duties at Group and return all material when we ask you to do so.

Always use the name, image and brands of Group appropriately and only do so while you are working with us.

Likewise, respect intellectual and industrial property rights of third parties or companies. Do not use information or material that belongs to them and that you obtained as a result of your previous position in said entity or without their consent.

4.5.3. YOUR RELATIONSHIP WITH CUSTOMERS, SUPPLIERS AND INTERMEDIARIES

4.5.3.1. Selling products and services

When you are part of any stage in the design and sales process, bear in mind the internal regulations regarding sales and consumer protection to ensure that our customers are treated honestly, impartially, transparently and professionally throughout the process.

Design products and services so that they meet the needs of our customers while balancing risks, costs and profitability. Mitigate any conflict of interest that may arise.

Take advantage of the training we provide to gain more expertise, skills, and experience, which will help your customer relationships and your ability to close sales.

Provide information about and sell our products and services to the appropriate target market, remaining transparent and truthful throughout the entire process.

Deal with requests, incidents and complaints from customers fairly and diligently.

When selling a product or service to a customer, remember that you are not allowed to give them advice regarding tax planning. Only provide them with the tax information that the specific product or service offers. Let them know that it is their sole responsibility to be aware of their tax obligations regarding the products or services that they purchase. Include this information in the presentations or documents for the products you are providing.

4.5.3.2. How to interact with suppliers and intermediaries

In our business, we interact with many people in many different ways. As a responsible bank, we seek collaborators, suppliers and intermediaries that have the same aims as we do, that promote social responsibility, ethical business, human rights in the workplace and environmental sustainability. At the same time, we ensure that their activity meets our values and ethical standards.

When interacting with suppliers and intermediaries, check the regulations regarding purchases, supplier selection, cooperation with suppliers and outsourcing, as well as conflict of interest.

Make sure that the selection process is fair, unbiased and impartial.

Avoid conflicts of interest throughout the process. If you come up against a potential conflict, check it with Purchasing unit, your line manager and/or Compliance monitoring unit.

4.5.3.3. Third party gifts and invitations

When carrying out your professional duties, do not request, accept, promise or offer payments, commissions, gifts, compensation, invitations, money, to loans or financial facilities to take advantage of your position in the Group for your own personal gain, except in the following circumstances:

- merchandising of little value;
- invitations that are considered reasonable in terms of regular social and courtesy uses; or
- occasional gifts, such as Christmas or wedding presents, as long as they are not in cash and for a moderate and reasonable price;
- invitations to sports or cultural events sponsored by Erste Group under the conditions described in the corresponding policy.

For more information check regulations on counteracting bribery and corruption.

- **What should I do if a customer or supplier offers me tickets to a sports or entertainment event?**
  Check gift and invitation guidelines where we outline the criteria for accepting or rejecting invitations from third parties, including the required consents. If you're still not sure whether you can accept the invitation and whether an approval is required, check with Compliance monitoring unit.

When you find yourself in these kinds of situations and you are unsure if you should accept or offer a gift or invitation, check with Compliance monitoring unit.

4.5.4. YOUR RELATIONSHIP WITH THE WIDER COMMUNITY

4.5.4.1. We are fighting financial crime

Financial crime causes dangerous situations and serious losses for society, which is why we must contribute to the prevention and prosecution of such crimes.

All Employees have the obligation to avoid and not facilitate any kind of crime, whether this be providing the means or passing on information to customers that could be misused. We also fully collaborate with the authorities wherever we operate in the fight against financial crime, which we all have a responsibility to prevent, deter and detect. We are counting on your unwavering commitment to reduce the risk of our products and services being used in criminal activities, or facilitating them.

As part of financial crime prevention, we are fighting against money laundering, terrorist financing, the breach of international sanctions, bribery and corruption.

This is why, as a part of the team, we are relying on you to follow the corporate framework for financial crime prevention, its policies and the related procedures.

4.5.4.2. Political activities that affect our neutrality

We respect your right to free political association. Nevertheless, you must make it clear that your participation is on a personal capacity and does not involve the Group.

If you have been offered a public office and you are thinking of accepting it, before you decide, inform your manager and check with Human Resources unit, Compliance assurance unit and Compliance monitoring unit. It is important that we first check to make sure that they are compatible and that it won't compromise your position at the Group.

4.5.4.3. Commitment to tax obligations

We have zero tolerance as regards tax evasion. All of our entities fulfil their tax obligations and follow the principles outlined in our tax strategy.

Do not engage in any practice that involves the illegal avoidance of tax obligations in your professional activity. You must follow the internal regulations in this regard.

4.5.4.4. How to interact with authorities

When interacting with public authorities or their representatives, be transparent, respectful and collaborate.

4.6. BEHIND THE CODE OF CONDUCT. TEAMS INVOLVED.

- **Compliance monitoring unit**:
  - executes, interprets and puts the Code into practice;
  - advises on the resolution of conduct relating to this Code and internal regulations, as well as for the prevention of the associated reputational risk;
  - receives suggestions, queries and reports relating to the contents of this Code; and
  - designs training and awareness actions for the Code.
- **Human Resources unit/ Relations unit / Training unit:** supports Compliance monitoring unit in the:
  - communication of the Code;
  - design, organisation and delivery of training initiatives on the Code;
  - design training and awareness actions for the Code;
  - in case of Relations unit - dealing with the queries raised by Professionals related to Respect and Dignity Policy.

  In addition, Human Resources unit organises the disciplinary process.

The owner of the General Code of Conduct and the body responsible for approving it is the Management Board Erste Bank Polska S.A., subject to approval by the Supervisory Board of Erste Bank Polska S.A.

Compliance Committee, Management Board as well as Audit and Compliance Committee of the Supervisory Board oversee that our Professionals comply with the Code.

5 RELATED INTERNAL REGULATION FOR FURTHER INFORMATION

- Respect and Dignity Policy
- Corporate Defense Policy
- Anti-Bribery and Corruption Policy (ABC for short)
- Conflicts of Interest Policy
- Competition Law Policy
- Code of Conduct in Securities Markets
- Cybersecurity Policy - Business part
- Cybersecurity Policy - Technological part
- Information Security Guide
- Information Policy
- Media Policy
- Business Travel Policy
- Model for managing conduct risk in relations with customers
- Consumer Protection Policy
- Procurement Policy
- Policy on Cooperation with Suppliers and Outsourcing
- Financial Crime Compliance Corporate Framework
- Policy on the Prevention of Money Laundering and Terrorist Financing
- Sanctions and Financial Countermeasures Policy
- Tax Policy
- Responsible Banking and Sustainability Policy

6 OWNERSHIP, INTERPRETATION, DATE OF VALIDITY AND PERIODIC REVIEW

- The approval of this document is the responsibility of the Management Board of Erste Bank Polska S.A., subject to approval by the Supervisory Board of Erste Bank Polska S.A. The owner of this document is the Management Board of Erste Bank Polska S.A.
- The interpretation of this document corresponds to the Compliance monitoring unit.
- The regulations arising from this Code apply accordingly to employees or contractors of Partner Branches or Agents in accordance with cooperation agreements concluded with the Bank.
- This document will take effect on the date of its publication. Its contents will be subject to periodic review, being made or if appropriate, any changes or modifications deemed appropriate.

7 CONTROL OF THE DOCUMENT

Date	Version	Description	Author	Date of approval by the Management Board	Date of approval by the Supervisory Board
09.01.2013	1	First version of the General Code of Conduct	Leszek Taterka	09.01.2013	
15.06.2016	2	Change re investment rules	Leszek Taterka	15.06.2016	
08.10.2018	3	Update of the organisational structure of Erste Group	Leszek Taterka	08.10.2018	
18.12.2020	4	Information on the new application - KLAKSON, adding a new point re competition law, adding statements on sexual harassment at work	Leszek Taterka	18.12.2020	23.02.2021
27.09.2022	5	Update of the regulation in line with changes to the corporate regulation	Leszek Taterka, Stella Jankowska	27.09.2022	28.09.2022
07.02.2024	6	• Update of the regulation in line with the KNF's recommendation, changes to the corporate regulation and amendments to the Labour Code: • The need to report professional activities outside the Group is qualified, limiting this obligation to those cases in which a conflict of interes or a damage to the Bank may arise. • Inclusion of a reference to compliance with social and environmental regulations. • References to internal regulations regarding whistleblowing channels have been updated. The list of whistleblowing channels has been updated. The rights of reporting persons and those affected by the reporting have been clarified	Katarzyna Berdych, Joanna Bilska, Stella Jankowska	16.02.2024	28.02.2024
01.2025	7	• Update of quidelines re. preventing conflict of interest with family members. • Update provisions of whistleblowing channels in relation to Whistleblower Protection Act.	Stella Jankowska	21.02.2025	26.02.2025
11.2025	8	• Update resulting from changes in the organizational structure. • Minor clarification of provisions regarding conflicts of interest.	Stella Jankowska, Anna Lendzion	28.11.2025	10.12.2025
04.2026	9	Adjustment related to the change of shareholder and rebranding – based on rebranding resolutions.	Stella Jankowska, Anna Lendzion	08.01.2026; 04.03.2026	09.01.2026; 10.04.2026