

**ANTI-CORRUPTION PROGRAM
OF PUBLIC JOINT-STOCK COMPANY
JOINT-STOCK BANK “PIVDENNY”
(Short Version)**

The Anti-Corruption Program of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” was approved by the resolution of the Supervisory Board of Joint-Stock Bank “Pivdenny” (Resolution No. 134 dated 08.07.2025, Version 7).

Through this Anti-Corruption Program, PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” (hereinafter referred to as the Bank), being aware of its liability for promoting the values of the rule of law and integrity, striving to ensure its sustainable development, safeguarding its business reputation, and encouraging fair commercial practices, as well as in the interests, in particular, but not exclusively, of its executives, employees, business partners, and clients, declares that its managerial bodies, executives, employees, and representatives, in their activities, as well as in legal relations with business partners, public authorities, local self-government bodies, and other legal entities and individuals adhere to the principle of zero tolerance for corruption in any form and manifestation and make (will make) all efforts to prevent, detect, and counteract corruption as provided by the applicable legislation and this Program.

The Anti-Corruption Program (hereinafter referred to as the Program) constitutes a set of rules, standards, and procedures for detection, counteraction, and prevention of corruption in the Bank’s activities, which define the key purpose, principles, and objectives of the Bank’s anti-corruption system, as well as its participants, their tasks, functions, authorities, and responsibilities.

The Program is binding upon all employees and officials of the Bank. Employees and officials are prohibited from circumventing the requirements of this Program through the activities of their counterparties, consultants, agents, or other third parties.

The general principles and prohibitions set forth in the Program apply to legal relations with persons performing work or providing services under contracts with the Bank, agents, consultants, and other third parties acting on behalf of the Bank, as well as business partners through the inclusion of relevant anti-corruption provisions in contracts concluded by the Bank with these persons. The Program also applies to relations of the Bank with business partners, public authorities and local self-government bodies, regulatory authorities and their officers, as well as officials of clients and counterparties.

The Program is constantly publicly available to employees, executives, managerial bodies, representatives of the Bank, clients, and business partners on the Bank’s official website.

I. PURPOSE AND OBJECTIVES OF THE ANTI-CORRUPTION SYSTEM

The purpose of the anti-corruption system is to ensure that the Bank’s activities comply with the legislation of Ukraine on the prevention and counteraction of corruption, applicable provisions of international law, and international anti-corruption standards and practices.

The main objectives of the anti-corruption system in the Bank are:

- prevention, detection, termination, and investigation of corruption-related offenses;
- minimizing the risks related to involvement of the Bank and its employees in corrupt activities;
- fostering among employees, officials, counterparties, and partners of the Bank a zero-tolerance toward corrupt behavior and a unified understanding of measures aimed at counteracting any manifestations of corruption.

II. PROFESSIONAL ETHICS STANDARDS OF BANK EMPLOYEES

Bank executives shall ensure tone at the top that promotes and maintains a standard of zero tolerance toward any forms or manifestations of corruption and shall serve as examples of ethical conduct.

Bank executives, heads of divisions, and employees of the Bank shall:

- perform their functional duties and implement decisions and instructions of the Bank's managerial bodies and their direct supervisors conscientiously, competently, timely, efficiently, and responsibly;
- prevent abuse and inefficient use of the Bank's funds and assets;
- not disclose or otherwise use confidential information that has become known to them in connection with the performance of their functional duties, except in cases provided for by the law;
- regardless of personal interests, refrain from the implementation of decisions or instructions of Bank executives if such decisions or instructions pose a threat to legally protected rights, freedoms or interests of individuals, the Bank and legal entities, or to state and public interests, or if they contradict the applicable legislation;
- independently assess the lawfulness of decisions or instructions received from executives and the potential harm that may result from the implementation thereof;
- act in good faith, irrespective of personal interests, personal attitude toward any individuals, political views, ideological, religious, or other personal beliefs and convictions;
- not use their authority in the interests of political parties and/or politicians.

Bank executives, heads of divisions, and employees of the Bank are prohibited from:

- using their official powers or position and related opportunities to obtain undue advantage for themselves or others;
- using any assets of the Bank for private purposes;
- requesting or receiving any tangible or intangible benefit (for themselves or related persons) in connection with the performance of their official duties which is not provided for by an employment or other contract concluded with the Bank;
- organizing, acting as an intermediary, or personally carrying out any cash or cashless payments or settlements with the Bank's business partners if such payments or settlements are not provided by the applicable legislation;
- directly or indirectly influencing the decisions of other Bank employees in order to obtain any tangible or intangible benefit for themselves or related persons that is not provided for by an employment or other contract with the Bank;

- committing any actions that directly or indirectly incite other Bank employees to violate the requirements of the Law or the Program;
- after dismissal or termination of other cooperation with the Bank, disclosing or otherwise using for own benefit or for the benefit of third parties any restricted information that became known in connection with the performance of their duties or contractual obligations in the Bank, except as provided by the law;
- requesting, soliciting, or receiving gifts for themselves or third parties from legal entities or individuals (directly or indirectly) in connection with the performance of their duties or their position and related opportunities.

III. ANTI-CORRUPTION MEASURES IN THE BANK'S ACTIVITIES

For the purpose of preventing, detecting, and counteracting corruption, the Bank ensures:

- allocation of duties and powers among managerial bodies, executives and employees of the Bank regarding anti-corruption issues;
- implementation of anti-corruption standards and procedures in the Bank's activities.

The Bank's main anti-corruption standards and procedures include:

- familiarizing new employees with the contents of the Program;
- obtaining written commitments from employees to comply with the requirements of the Program;
- conducting training activities for all Bank employees on the prevention and counteraction to corruption;
- conducting anti-corruption due diligence of clients, counterparties, and business partners;
- establishing restrictions on the Bank's conclusion of employment agreements (contracts) or transactions in the field of business activities;
- establishing restrictions on the Bank's support of political parties and engagement in charitable activities;
- implementing the mechanism of reporting (including on an anonymous and confidential basis) by employees, clients and counterparties of the Bank on the detected signs of violation of the Program, corruption or corruption-related offenses, and protection of reporting persons;
- implementing the procedure for reviewing reports on the detected signs of violation of the Program, corruption or corruption-related offenses, and conducting internal investigations;
- taking response measures to detected facts of corruption or corruption-related offenses, including application of disciplinary measures;
- implementing professional ethics standards, duties, and restrictions/prohibitions for employees;
- implementing mechanisms for prevention and resolution of conflicts of interest;
- establishing restrictions on gifts;
- providing explanations and consultations to Bank employees;
- exercising supervision and control over compliance with the requirements of the Program.

IV. REPORTING PROCEDURE

The Chief Compliance Manager, on a regular basis (quarterly), submits for review to the Supervisory Board, the Risk Management Committee, and the Management Board information on the prevention and counteraction to corruption in the Bank as part of management reporting on the compliance risk.

Based on the results of the review of the reports, the Supervisory Board and the Management Board of the Bank take necessary measures to prevent, detect, and counteract corruption in the Bank's activities, including by amending existing anti-corruption standards and procedures.

V. LIABILITY FOR COMPLIANCE WITH PROGRAM REQUIREMENTS

The Compliance Department is liable for ensuring the implementation and monitoring of measures aimed at detecting, counteracting, and preventing corruption offenses committed by Bank employees in accordance with the requirements of the Program.

All Bank employees, regardless of their position, bear personal liability for violations of the principles and requirements of this Program. Heads of the Bank's structural divisions monitor compliance with the Program requirements by their subordinate employees.