



PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY”

APPROVED

By Resolution of the Supervisory Board
of PUBLIC JOINT-STOCK COMPANY
JOINT-STOCK BANK “PIVDENNY”

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**CODE OF ETHICS
OF PUBLIC JOINT-STOCK COMPANY
JOINT-STOCK BANK “PIVDENNY”**

Version 6

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ADDRESS OF THE MANAGEMENT BOARD

DEAR COLLEAGUES

Since the establishment and up to the present day, the key aspects of the activities of Joint-Stock Bank “Pivdenny” have been a firm commitment to conducting business in accordance with ethical standards, conscientious and full compliance with legislation, as well as honest and responsible attitude toward clients, partners, employees, the state, and society.

The Code of Ethics of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” (the Code) is a document that defines the values and principles adhered to by the Bank and its employees. It serves as the formation for building a strong corporate culture and directly influences clients’ trust, the Bank’s reputation, and its successful long-term development.

For every Bank employee, compliance with the ethical standards set forth in the Code is a mandatory condition of employment.

It is the duty of all Bank executives to serve as an example of impeccable conduct, to foster an atmosphere of open communication, and to give priority to ethical principles in any situation.

We expect all Bank employees to understand and comply with the provisions of the Code in their daily work.

If you have any questions regarding ethical nature of an action or decision, please contact your immediate supervisor or the whistleblowing HOTLINE.

The success of the Bank depends on each of us.

Only through joint efforts will we be able to grow, achieve success, and accomplish our goals.

*Sincerely,
The Management Board of Joint-Stock Bank “Pivdenny”*

1. PURPOSE OF THE CODE

The Code of Ethics of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” (hereinafter referred to as the Code) is a set of principles and standards of conduct to be followed by executives and employees of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” (hereinafter referred to as the Bank) in their activities.

The purposes of the Code are:

- ✓ to define a system of corporate values;
- ✓ to establish standards of conduct for executives and employees of the Bank in their relations with clients, shareholders, partners, colleagues, public authorities, and society;
- ✓ to develop a corporate culture based on high ethical standards:
 - unified understanding and compliance with business ethics standards by all Bank employees (regardless of position);
 - maintaining an atmosphere of trust, mutual respect, and integrity within the Bank’s team;
 - open exchange of opinions, including timely communication of concerns to the Bank’s management;
- ✓ to assist each Bank employee in making appropriate decisions to avoid situations that may harm the reputation of both the Bank and the employee.

The ethical standards set out in the Code define the Bank’s approach to the conduct of business.

2. SCOPE OF THE CODE

The Code applies to:

- ✓ all Bank employees, regardless of position, as well as members of the Bank’s Supervisory Board;
- ✓ clients, counterparties, partners, persons acting on behalf of the Bank, individuals performing work or providing services under contracts with the Bank, agents, and consultants. The Bank cooperates with persons of good reputation who share the ethical standards of the Code.

3. MISSION AND VISION OF THE BANK

BANK’S MISSION:

We create financial opportunities for business development and for improving the quality of life of our clients and their families.

BANK’S VISION:

A universal Ukrainian bank – a leader in financial solutions that understands clients’ needs and offers simple and reliable products.

4. OUR VALUES

FOCUS ON CLIENTS’ NEEDS

The main principle of all the Bank’s products and services is to maximize benefits for the client while ensuring simplicity of services.

We always respond to clients' wishes, take their opinions into account in our work, and continuously improve our products and services.

INTEGRITY

We provide complete, accurate, and timely information about our products and services, honor our commitments, and always act in the client's best interests.

We trust one another and openly discuss any work-related issues.

INITIATIVENESS

We openly discuss new ideas and use every opportunity to implement them. We always welcome innovative solutions and are not afraid to go beyond the established boundaries.

We initiate business communication with clients, provide reasoned arguments, inspire, and embrace new challenges.

COMMITMENT TO DEVELOPMENT

For us, any change represents new opportunities. We set ambitious goals, confidently achieve them, and are not afraid to make mistakes.

We support our employees' pursuit of excellence and create the most favorable conditions for achieving common goals.

TEAM

Our team is our main asset, therefore, we comprehensively develop our employees' potential and believe in their professionalism.

For us, success is the victory of the entire team, and we do everything to ensure that every employee feels like a part of it.

5. ETHICAL STANDARDS

5.1. RELATIONS WITH CLIENTS

Clients are the foundation of the Bank's business development.

The Bank's relationships with clients are based on partnership – “Being a partner for the client every day”, which means:

- ✓ mutually beneficial cooperation;
- ✓ open and transparent relations;
- ✓ long-term relationships.

In their relations with clients, Bank employees:

- ✓ always strive to provide services professionally and with high quality;
- ✓ offer products that meet clients' needs and anticipate those needs in advance;
- ✓ communicate transparently and clearly;
- ✓ demonstrate engagement, attentiveness, humanity, care, and a sincere desire to help;
- ✓ respond promptly and provide timely replies to client inquiries;
- ✓ value clients' time and meet established deadlines;
- ✓ provide timely and high-quality consultations;
- ✓ offer optimal solutions and alternatives;
- ✓ inform clients about changes and innovations;

- ✓ inform clients about risks;
- ✓ not mislead clients;
- ✓ take measures to improve service quality;
- ✓ ensure convenient communication, document flow, and transaction channels;
- ✓ ensure protection of client information;
- ✓ bear personal liability for their work.

The Bank has established the Customer Service Quality Standards of Joint-Stock Bank “Pivdenny”, which guide employees in client service.

The Bank makes significant efforts to meet clients’ needs, takes their opinions and wishes into account, and continuously works to improve the quality of banking services.

The Bank excludes the possibility of providing inaccurate information about its financial condition to clients, partners, and other stakeholders.

The Bank makes significant efforts to ensure the protection of information constituting banking secrecy, personal data, confidential information, and trade secrets.

The Bank complies with the legislation regarding consumer protection and ensures measures to prevent violation of consumer rights, in particular informs individual clients about the terms and procedures for providing banking and other financial services, organizing the review of client appeals, etc.

The Bank ensures the creation of an inclusive financial environment by implementing solutions that provide accessibility of financial services to all consumers, enabling each consumer to use financial services according to their capabilities and to participate equally in economic and social life. The Bank adheres to a zero-tolerance principle toward any form of discrimination against consumers based on social, physical, functional, or other characteristics.

The Bank highly appreciates and carefully considers every feedback/appeal/complaint from clients and other stakeholders. The Bank has established the Procedure for handling client complaints, proposals, reports, and acknowledgements.

For each feedback/appeal/complaint, the Bank promptly takes measures to resolve the situation and prevent similar cases in the future.

Feedback from clients and other stakeholders is an important condition for the Bank’s development and improvement.

5.2. RELATIONS WITH SHAREHOLDERS

The Bank’s relations with shareholders are based on respect for the rights and legitimate interests of all shareholders.

The Bank ensures:

- ✓ equal treatment of all shareholders;
- ✓ shareholders’ right to participate in the management of the Bank (through participation in the General Meeting of Shareholders – the highest managerial body of the Bank – and in other managerial bodies if elected);
- ✓ the ability of shareholders to exercise rights provided by the legislation of Ukraine;
- ✓ effective protection of shareholders’ rights;
- ✓ provision of complete, accurate, and timely information to shareholders.

The Bank expects all shareholders and their authorized representatives to act reasonably and prudently when exercising shareholder rights, recognizing their responsibility toward other shareholders, the Bank, management, and other stakeholders.

The Bank strictly adheres to corporate governance principles and standards, ensuring a balance of interests among majority and minority shareholders, management, business partners, and society as a whole.

5.3. RELATIONS WITH BUSINESS PARTNERS

The Bank’s relationships with business partners are based on mutual benefit, transparency, and full responsibility for obligations undertaken in accordance with contractual terms.

The Bank:

- ✓ complies with contractual terms and fulfills its obligations toward business partners;
- ✓ does not allow the granting of unjustified benefits or privileges to business partners;
- ✓ selects suppliers of goods, works, and services on a transparent basis, prioritizing the best price, quality, and supply conditions, as well as the counterparty’s good business reputation.

The Bank:

- ✓ does not establish business relations with persons who violate human rights (including employee exploitation, use of child labor, unsafe working conditions, etc.).

5.4. RELATIONS WITH PUBLIC AUTHORITIES

The Bank’s relations with public authorities, local self-government bodies, and banking regulatory and supervisory agencies are based on strict compliance with the legislation of Ukraine, constructive interaction, and cooperation.

In communication with representatives of public authorities, Bank employees demonstrate respect and competence, and express only the official position of the Bank.

The Bank excludes the possibility of corruption and other unlawful actions both on the part of public authorities and on the part of the Bank’s officials and employees.

The Bank seeks to provide full support and assistance in investigations conducted by public authorities, where applicable.

5.5. SUSTAINABLE DEVELOPMENT AND CORPORATE SOCIAL RESPONSIBILITY

The Bank implements a systematic approach to integrating Environmental, Social, and Governance (ESG) factors and comprehensive ESG risk management in order to promote sustainable business financing and sustainable societal development (long-term economic prosperity that is less dependent on the use of limited resources and environmental exploitation and is more socially inclusive).

The Bank recognizes the extent of its social responsibility and voluntarily undertakes additional measures to improve the quality of life of its employees and their families, as well as local communities and society as a whole.

The Bank shapes its development strategy and creates products and services with due regard to the interests of society – supporting the development of Ukrainian business, creating new jobs, addressing social issues, improving financial literacy (including among children and students), and enhancing the well-being of Ukrainian citizens. The Bank actively participates in socially significant initiatives/projects (including sustainable development of education during wartime), as well as in charitable and sponsorship activities.

During martial law in Ukraine, the Bank supports the Armed Forces of Ukraine and provides assistance to strengthen Ukraine’s defense capabilities, ensures uninterrupted banking operations for clients (24/7 remote service channels, on-duty branches – “points of invincibility”), and implements measures to support Bank employees.

5.6. RELATIONS WITH EMPLOYEES

Employees are the Bank’s main asset.

The Bank’s relations with employees are based on respect for human rights, personal dignity, and equal opportunities for all employees.

The Bank strictly complies with labor legislation.

Recognizing its responsibility to employees, the Bank undertakes the following commitments:

- ✓ strives to create jobs with competitive wages and social guarantees;
- ✓ provides employees with opportunities to realize their potential and encourages professional development;
- ✓ takes all necessary measures to ensure occupational health and safety in accordance with applicable legislation and creates safe working conditions;
- ✓ creates conditions for open and trust-based dialogue between officials and employees in the event of conflicts;
- ✓ ensures respect for human rights;
- ✓ evaluates and encourages employees’ ideas and proposals that have a positive impact on the Bank;
- ✓ refrains from any forms of discrimination (based on religion, nationality, race, gender, age, political beliefs, or other characteristics) in hiring and appointments.

Teamwork is valued and supported at the Bank:

- ✓ we openly discuss mistakes and problems;
- ✓ we respect everyone’s opinion;
- ✓ we share knowledge to achieve excellent collective results;
- ✓ we strive to maintain a comfortable working environment and minimize workplace conflicts;
- ✓ we demonstrate goodwill and flexibility in solving shared tasks.

Executives act as mentors of their subordinates, lead by personal example, support the achievement of goals and objectives, listen to employees’ opinions, and ensure that assigned tasks correspond to employee’s job responsibilities.

Relations between employees, regardless of position, are based on mutual respect, integrity, and conscientiousness.

Mobbing (workplace bullying) is unacceptable in the Bank – systematic intentional actions/inaction by some employees/group of employees aimed at humiliating an employee’s honor and dignity or damaging their business reputation, including for the purpose of acquiring/changing/terminating their labor rights and obligations, which manifest in psychological and/or economic pressure, including through electronic communications, or by creating a tense, hostile, or offensive environment that may cause an employee to underestimate their professional competence.

Indecent, vulgar, rude, cruel, discriminatory, aggressive, or offensive expressions, gestures, and forms of behavior are unacceptable in the relations between employees.

5.7. OCCUPATIONAL HEALTH AND SAFETY

The Bank takes all necessary measures to maintain a high level of occupational health and safety.

Workplace safety directly depends on employees’s compliance with the following requirements:

- ✓ employees must know and strictly comply with occupational health and safety requirements, as well as rules/instructions for operating office and other equipment;
- ✓ employees must take care of their own safety and health and that of others while performing work or while staying in the Bank’s premises, and strictly follow procedures during air attack alerts;
- ✓ employees must immediately inform their direct supervisor of any situations posing a threat to life or health;
- ✓ employees must conduct business activities in a way that minimizes negative environmental impact and preserves natural resources;
- ✓ employees are prohibited from performing work requiring special training or authorization without prior instruction and approval;
- ✓ employees are prohibited from staying in the Bank’s premises under the influence of alcohol or any prohibited substances;
- ✓ smoking is permitted only in specially designated areas.

5.8. PROTECTION OF BANK’S PROPERTY

No Bank employee shall allow waste or improper use of the Bank’s property and other assets (including intellectual property, trade secrets, and other confidential information).

The Bank’s property may be used only for approved purposes and in compliance with the established rules and procedures.

The Bank’s property, information, and working hours must be used exclusively in the Bank’s interests.

Employees are prohibited from performing personal tasks or using the Bank’s property or information for personal interests, and executives are prohibited from instructing/ordering or allowing employees to do so.

5.9. RISK MANAGEMENT CULTURE

The Bank maintains and continuously improves its risk management system.

An effective risk management system requires a strong risk culture.

Risk culture is understood as approaches and behavioral models used for risk awareness, risk acceptance, and risk management.

Key components of the risk management culture include:

- ✓ development and communication to employees of the Risk Appetite Declaration;
- ✓ allocation of responsibilities for risk management among managerial/control bodies and structural divisions based on the “three lines of defense” model:
 - first line* – business divisions and support units;
 - second line* – Chief Risk Officer/Risk Management Division and Chief Compliance Officer/Compliance Division;
 - third line* – Internal Audit Service.
- ✓ ensuring by Bank executives, heads of control divisions (risk management division, compliance division, internal audit service), and other employees that operations remain within the established risk appetite and risk limits;
- ✓ defining the procedure of actions by managerial/control bodies and employees in cases of violation of risk appetite/risk limits, including disciplinary measures for excessive risk-taking;
- ✓ establishing the procedure for reporting Bank executives on risk-related issues.

5.10. CONFLICT OF INTEREST

Executives and employees of the Bank must avoid situations that may lead to a conflict of interest.

Conflict of interest is understood as existing or potential contradictions between employee’s (official’s) personal interests and their official or professional duties that may affect proper performance of their authorities, objectivity, and impartiality in decision-making.

Executives and employees of the Bank must disclose information in cases where a potential conflict of interest may arise in order to ensure timely measures for its resolution.

The principles adopted by the Bank regarding prevention, detection, resolution, and control of conflicts of interest, as well as examples of situations that may lead to a conflict of interest, are set out in the [Conflict of Interest Management Policy of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” \(Internal Regulatory Document No. 84\)](#).

5.10.1. EMPLOYMENT OF RELATED PERSONS AT THE BANK

Employment of related persons at the Bank is not prohibited.

However, in order to minimize the risk of conflicts of interest, the Bank has established restrictions on the employment of related persons. In particular, employment of related persons in direct functional subordination relationship is not permitted, as well as in other cases defined in the [Conflict of Interest Management Policy of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” \(Internal Regulatory Document No. 84\)](#).

5.10.2. BUSINESS ACTIVITIES BEYOND THE BANK, PARTICIPATION IN AUTHORIZED CAPITALS OR MANAGERIAL BODIES OF THIRD PARTIES

The Bank complies with the legislation of Ukraine, according to which:

- ✓ a member of the Bank’s Management Board may not be an executive, official and/or member of the management board or other managerial body of another bank registered in Ukraine, except as provided by the legislation of Ukraine;
- ✓ the Chairperson and members of the Bank’s Management Board, as well as the Bank’s Chief Accountant are prohibited from holding positions in other legal entities (except for the Bank’s controller, entities sharing the same controller as the Bank, and banking unions or associations).

Executives and employees of the Bank are prohibited from:

- ✓ engaging in activities beyond the Bank or participating in authorized capitals or managerial bodies of third parties if such activities/participation may result in a conflict of interest with their official duties or negatively affect the Bank’s reputation;
- ✓ performing activities during working hours in their own interest or in the interest of third parties that are not related to their official duties at the Bank;
- ✓ engaging during working hours in activities related to participation in managerial bodies of third parties, providing consulting or agency services, or part-time employment, except where such participation or activities are officially assigned by the Bank’s management in accordance with the established procedures, etc.

The Bank’s restrictions and prohibitions regarding activities beyond the Bank and participation in authorized capitals or managerial bodies of third parties are set out in the [Conflict of Interest Management Policy of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” \(Internal Regulatory Document No. 84\)](#).

When engaging in the activities related to participation in managerial bodies of third parties, providing consulting or agency services, etc. (except for established prohibitions), Bank employees must strictly comply with information protection requirements concerning information that has become known to them in the course of performing their official duties.

The Bank has established rules requiring employees to notify the Bank, in accordance with the established procedures, of any activities beyond the Bank and participation in authorized capitals or managerial bodies of third parties.

5.10.3. GIVING AND RECEIVING GIFTS

The exchange of business gifts and invitations to representative events that comply with the accepted business practice is not prohibited at the Bank.

Bank employees may give or receive gifts and invitations that are permitted under specific circumstances and meet the requirements established by the Bank’s internal regulations.

At the same time, employees must adhere to the established restrictions and prohibitions regarding giving and receiving gifts. In particular, it is prohibited to accept gifts for performing any work-related actions in the form of cash or cash equivalents, especially where there is no a generally accepted occasion for such a gift.

The rules and restrictions adopted by the Bank concerning giving/receiving gifts and services in the course of business communication of employees are set out in the [Procedure for Handling Gifts of](#)

5.10.4. RECEIVING SERVICES FROM THE BANK AND COUNTERPARTIES

Executives and other employees of the Bank are prohibited from using their official position to obtain unfair personal advantages or to grant such advantages to third parties.

Employees receive the Bank’s services on the same terms and conditions as other clients.

Beneficial conditions of servicing employees as the Bank’s clients are permitted exclusively within the framework of employee encouragement programs.

Beneficial conditions of servicing clients are permitted exclusively within the framework of the established rules and procedures set out in the Bank’s internal regulatory documents.

Employees may receive services from the Bank’s clients, counterparties, and partners. However, privileges (for example, discounts) from such clients, counterparties, or partners may be accepted only if such privileges are offered to other clients on the same basis.

5.10.5. BUSINESS AND PUBLIC ACTIVITIES BEYOND THE BANK

The Bank recognizes the right of executives and other employees to participate in scientific, educational, socio-political, and cultural activities. At the same time, executives and employees must act solely in their personal capacity and are required to avoid any situations or actions that may result in a conflict of interest or affect their impartiality and independence when considering and making decisions in favor and in the interests of the Bank.

The Bank has zero tolerance for collaborative activities. Each employee must understand the inadmissibility of any such activities and bears personal liability for any unlawful actions that may be associated with collaborative activities.

5.11. PREVENTION OF CORRUPTION

The Bank emphasizes that its employees, officials, and shareholders, both in their internal activities and in legal relations with business partners, public authorities, and local self-government bodies, do not tolerate any manifestations of corruption and shall take all measures provided by the applicable law to prevent, detect, and counteract corruption and related practices.

Executives and employees of the Bank are prohibited from:

- ✓ using their official powers or position and related opportunities to obtain an improper benefit for themselves or for related persons;
- ✓ demanding or receiving any tangible or intangible benefit (for themselves or related persons) in connection with the performance of their official duties;
- ✓ directly or indirectly influencing the decisions of other Bank employees in order to obtain any tangible or intangible benefit for themselves or for related persons.

Improper benefit means money or other property, advantages, privileges, services, intangible assets, or any other tangible or intangible benefits promised, offered, provided, or received without legal grounds.

Each employee of the Bank must make reasonable efforts to minimize the risk of involvement of the Bank and its employees in corrupt relationships.

The standards and procedures adopted by the Bank for detection, counteraction, and prevention of corruption are set out in the [Anti-Corruption Program of PUBLIC JOINT-STOCK COMPANY JOINT-STOCK BANK “PIVDENNY” \(Internal Regulatory Document No. 85\)](#).

5.12. PREVENTION OF UNLAWFUL ACTIVITIES

5.12.1. REPORTING

The Bank conducts its activities transparently and publishes accurate and timely financial, statistical, and other information necessary to form a complete and objective understanding of the Bank's operations.

Financial, statistical, and other reporting is prepared in full compliance with applicable legislation and accurately reflects the Bank's financial position and performance.

Falsification of data or documents is strictly prohibited at the Bank. Submission of inaccurate financial, statistical, or other reports is unacceptable.

Within the scope of their competence, Bank employees are responsible for preparing and submitting accurate and timely reporting on the Bank's activities.

5.12.2. OFFICIAL MISCONDUCT AND FRAUD

The Bank has zero tolerance to any official misconduct (including abuse of authority or failure to perform or improper performance of official duties that may harm interests of clients/shareholders/partners/employees/the Bank/society) and fraud. The Bank treats any suspicions of fraud or official misconduct with utmost seriousness and responds fully and fairly.

Persons found guilty of official misconduct or fraud may be subject to disciplinary, civil, administrative, and criminal liability in accordance with the legislation of Ukraine and the Bank's internal regulatory documents.

5.12.3. SANCTIONS

When establishing business relationships/providing financial services to individuals or legal entities, the Bank complies with restrictions/prohibitions imposed by applicable sanctions.

The Bank has implemented mechanisms to monitor compliance with sanctions. Within the scope of their competence, Bank employees are responsible for adhering to the rules/procedures established by the Bank's internal regulatory documents.

5.12.4. LEGALIZATION (LAUNDERING) OF PROCEEDS FROM CRIME, TERRORISM FINANCING AND FINANCING THE PROLIFERATION OF MASS DESTRUCTION WEAPONS

The Bank complies with the legislation on the prevention and counteraction to legalization (laundering) of proceeds from crime, terrorism financing and financing the proliferation of mass destruction weapons. The Bank's internal regulatory documents provide for appropriate customer due diligence and assessment of client and service (transaction) risks that may be used for legalization of proceeds from crime/terrorism financing.

The Bank intends to conduct business only with clients who use its services for legitimate purposes and whose financial activities can be identified and verified by the Bank.

The Bank is prohibited from providing services or consultations to clients and counterparties aimed at helping them or their counterparties evade taxes or fulfill obligations established by the legislation of Ukraine or contractual terms.

5.12.5. COMPETITION

The Bank adheres to the principles of fair competition and operates in compliance with legislation on the protection of fair competition and market conduct rules.

The Bank's relations with partners and competitors are based on the principles of equality and non-discrimination.

5.13. PROCESSING, STORAGE, AND DISCLOSURE OF INFORMATION

5.13.1. RESTRICTED INFORMATION

The Bank makes every effort to protect restricted information (banking secrecy, personal data, trade secrets, official information, and other confidential information).

Bank employees are prohibited from disclosing restricted information (banking secrecy, personal data, trade secrets, official information, and other confidential information), except in cases provided by the applicable law.

Upon appointment, executives and employees of the Bank sign non-disclosure agreement concerning banking secrecy, trade secrets, personal data, and other confidential information.

Each employee of the Bank is familiar with and must strictly comply with the Bank's internal regulatory documents governing the procedure of processing, storage, and disclosure of restricted information to third parties.

Persons found guilty of disclosure and/or unauthorized third-party access and/or improper use of the Bank's restricted information shall bear disciplinary, administrative, financial, or criminal liability in accordance with the legislation of Ukraine.

5.13.2. INSIDER'S INFORMATION

Disclosure and/or use of insider's information by executives or other employees of the Bank who have access to such information (insiders), for their own benefit or for the benefit of third parties before such information becomes publicly available, violates the principle of equal treatment of shareholders and constitutes a violation of the law.

Violations of legislation concerning insider's information may result in serious consequences, including administrative, criminal, and civil liability, and may significantly damage the Bank's reputation.

Executives and other employees of the Bank must comply with statutory prohibitions regarding insider's information:

- ✓ not enter into transactions involving financial instruments to which insider's information relates, for their own benefit or for the benefit of others, prior to public disclosure of such information;
- ✓ not transfer insider's information or grant access thereto to other persons, except as within the scope of professional, labor or official duties or in other cases provided for by the law;
- ✓ not provide recommendations to any person regarding financial instruments in respect of which they possess insider's information, prior to public disclosure of such information.

5.13.3. COMMUNICATIONS ON BEHALF OF THE BANK

In its activities, the Bank adheres to the principles of transparency and accountability. The Bank provides accurate and timely information to all stakeholders within the limits established by the legislation of Ukraine and the Bank’s information policy.

All public communications on behalf of the Bank may be made exclusively by duly authorized representatives.

Bank employees are not permitted to independently (without the involvement of the Corporate Communications Department) provide information, make public statements, or give comments to representatives of the mass media. If media representatives request an official comment regarding the Bank’s activities, business performance, or events, they must be referred to the Bank’s Corporate Communications Department. In the event of similar inquiries from clients, suppliers, or partners, Bank employees must rely solely on official information published on the Bank’s corporate website (www.bank.com.ua). If relevant information is not available on the corporate website, employees must seek clarification from the Corporate Communications Department.

5.13.4. COMMUNICATION IN SOCIAL MEDIA

Communication between Bank employees in social media is of public nature.

The Bank recognizes employees’ right to use social media for personal purposes. However, when communicating in social media, employees must comply with the applicable legislation and the Bank’s internal procedures, refrain from statements that may negatively affect the Bank’s reputation, and strictly observe the requirements regarding protection of restricted information.

6. OTHER CORPORATE STANDARDS

6.1. APPEARANCE OF EMPLOYEES

Bank employees are required to adhere to a business dress code. The appearance of Bank employees should not be careless or provocative.

6.2. COMPLIANCE WITH LABOR DISCIPLINE

Bank employees must strictly comply with labor discipline. In cases where circumstances arise that may lead to violation of labor discipline, the employee must inform their immediate supervisor of such circumstances.

The standards adopted by the Bank regarding employee appearance, workplace organization, telephone communication, and business correspondence are set out in the Customer Service Quality Standards of Joint-Stock Bank “Pivdenny”, the internal communication rules, and other internal documents of the Bank.

7. REPORTING ON VIOLATIONS

Bank employees are required not only to comply with the provisions of the Code in their daily activities but also to require compliance with the Code from other employees.

If you become aware of any cases of inappropriate behavior/violations of the legislation, internal regulatory documents or requirements of the Code, or if you are asked to take actions that, in your opinion, may lead to violations, you must immediately inform your immediate supervisor or contact the whistleblowing HOTLINE.

Unacceptable behavior includes:

- ✓ submission of inaccurate financial, statistical, or management reporting;
- ✓ crimes in the field of official activity, crimes in the field of business activity (fraud);
- ✓ violation of sanctions, legalization (laundering) of proceeds from crime, terrorism financing and financing the proliferation of mass destruction weapons;
- ✓ anti-competitive practices;
- ✓ bribery;
- ✓ corruption;
- ✓ violation of consumer rights;
- ✓ violation of the legislation of Ukraine or the Bank's internal documents.

Violations that must be immediately reported to the whistleblowing HOTLINE:

- ✓ violation of consumer rights;
- ✓ cases of fraud;
- ✓ abuse of office by employees;
- ✓ violation of legislation, the Bank's internal regulatory documents, or requirements of the Code;
- ✓ abuse of authority and violation of restrictions related to banking operations;
- ✓ cases of conflicts of interest;
- ✓ misuse of the Bank's property and assets;
- ✓ improper use of restricted information (banking secrecy, personal data, trade secrets, or other confidential information);
- ✓ actions that may result in legal sanctions, financial losses, or damage to the Bank's reputation;
- ✓ violation of labor discipline, occupational health and safety rules, workplace safety, or fire safety requirements;
- ✓ violation of the legislation or the Bank's internal procedures in the field of AML/CFT (anti-money laundering and counter-terrorist financing);
- ✓ discrimination, mobbing, or violation of employees' rights;
- ✓ other actions recognized as unlawful under the legislation of Ukraine.

When contacting the whistleblowing HOTLINE, anonymity and confidentiality are ensured for the reporting person. Employees may provide personal data and contact information only at their own discretion and if they wish to receive feedback.

The Bank guarantees protection of employees reporting on unacceptable behavior/violations in the Bank from any discriminatory measures (including dismissal or forced resignation, bringing to disciplinary liability, or other adverse actions such as transfer to another job, certification (re-certification), changes in working conditions, refusal of promotion, salary reduction, etc.), as well as from threats of such measures.

8. LIABILITY FOR VIOLATION OF THE CODE

- 8.1. Bank executives, heads of divisions, and other employees (regardless of the position) must perform their official duties professionally, in good faith, with due effort and diligence, and in full compliance with the legislation of Ukraine, regulations of the National Bank of Ukraine, the Bank’s internal regulatory documents, and ethical standards of the Code.
- 8.2. Upon employment, each Bank employee undertakes to comply with the provisions of the Code (in accordance with [Model Form No. 912](#)).
- 8.3. Employees who fail to comply with the provisions of the Code may be subject to disciplinary measures in accordance with the procedure established by the legislation of Ukraine. In cases involving corruption, official misconduct, fraud, misuse of insider’s information, misuse of the Bank’s restricted information, and other unlawful actions, the guilty persons may be subject to disciplinary, administrative, financial, or criminal liability in accordance with the applicable legislation of Ukraine.

9. FINAL PROVISIONS

- 9.1. This Code shall enter into force upon its approval by the resolution of the Supervisory Board of the Bank, unless another date is specified in the respective resolution, and shall remain in effect until a new version is approved or until the Supervisory Board of the Bank adopts relevant resolution on cancellation.
- 9.2. Amendments to the Code shall be made in the event of changes in legislation and in other necessary cases. Amendments shall enter into force upon their approval by the Supervisory Board of the Bank.
- 9.3. In the event of changes in the legislation of Ukraine, the Code shall remain in effect to the extent that it does not contradict new legal requirements, until the relevant amendments are made.
- 9.4. Issues not regulated by this Code shall be governed by the legislation of Ukraine, other internal regulatory documents of the Bank, separate resolutions of the Supervisory Board, orders/instructions of the Chairperson of the Bank’s Management Board/other authorized persons, and official correspondence.
- 9.5. The Code shall be binding upon all executives and employees of the Bank.
- 9.6. Heads of the Bank’s structural divisions shall be responsible for ensuring that this Code is communicated to subordinate employees and for monitoring its proper implementation.