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Material for the 3rd Session  
of the Board of Directors

Item Nr.: 5.10.

Date of the Session: 31.08.2023

Reporter: Gem Maloku

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**NLB Group Code of Conduct**

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**Proposal of Resolution:**

*Management Board of NLB Banka sh.a. Prishtina proposes to the Board of Directors to review and approved the following*

NLB Group Code of Conduct, version 2

*Date: 31.08.2023*

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## NLB Group Code of Conduct

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<b>Name of the internal act:</b> <i>NLB Group Code of Conduct</i>			
Proposer: <i>Compliance and Integrity NLB dd</i>			
Cause of submission: NLB Group harmonisation Name of the Act on NLB Group level: NLB Group Code of Conduct, version 2			
Content changes: please include separately: Changes due to Compliance and Integrity Competent Line demand			
Number and date of the session of the Management Board	03.08.2023	Responsible Management board member	Gem Maloku
Competent CL	Compliance & Integrity CL	Opinion is:	Positive
<b>Opinion of competent CL:</b> The document is harmonised in coordination with Compliance and Integrity Business Line			
<p>RE: Kodeks ravnanja v NLB Skupini/ NLB Group Code of Conduct</p>			
Deviations from NLB Group (CL) standards: NO			

Prepared by:  
Compliance and Integrity Sector

- Appendix:
1. Internal act in track changes
  2. Statement 1

Gem Maloku  
Member of Management Board

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On the basis of article 51, item 13 of the Statute of the Bank, Board of Directors of NLB Banka sh.a. Prishtina, after review of proposal of Compliance and Integrity Section, at the meeting held on August 31, 2023 hereby approves the following

## **NLB Group Code of Conduct**

**Version 2, August 2023**

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## Chronology of amendments

Version	Date	Description
1.	16/05/2017	Adoption of a new Code of Conduct in the NLB Group, replacing the existing Code of corporate compliance of NLB d.d., Version 1, April 2014, Code of ethical conduct of NLB d.d., Version 3, September 2009, Code of ethical conduct of employees in NLB Group, Version 1, December 2008.
2.	August 2023	The Code of Conduct in the NLB Group was updated because of the changed values of the Bank.

# **I. Introduction and goals**

## **Mission of the NLB Group**

The NLB Group employees are committed to the culture of responsibility for the customer, realisation of the planned business results and care for the environment and a healthy lifestyle. We act in accordance with the legislation and the rules of profession, the ethical principles and good business practice, as well as the values of the NLB Group.

The confidence that we enjoy among the customers, fellow employees, shareholders and society at large gives us great responsibility. We justify this trust by working with the stakeholders for a positive change, mutual benefits and growth.

By incorporating our values into everything we do, we contribute to the positive development of our environment.

## **Meaning of the Code**

The NLB Group Code of Conduct is a set of fundamental principles, values and rules that must be understood and complied with by every employee of the NLB Group. This is the only way for us in the NLB Group to act in accordance with the ethical standards.

The Code stipulates the Fundamental principles of conduct on which the operations and actions of the NLB Group are based. In this way the Code guides us in our daily conduct and helps understand what is expected from each employee and other stakeholders in the NLB Group. In this manner, it also defines what is crucial for fulfilling the long-term development strategy of the NLB Group and its responsible conduct in which we must maintain the confidence of our customers, employees, shareholders and the social environment in which the NLB Group operates.

Therefore, the Code clearly defines the expectations from each employee in the NLB Group and also lays down the standards expected in our relationship with the other stakeholders and instructions and guidance in our everyday work and the operations of the NLB Group.

The NLB Group is present in a wide range of different national and cultural environments in which the employees in the member companies of the NLB Group work. In the spirit of cultural differences in the countries where the NLB Group operates, we strive for cooperation and exchange of different views and experiences. In the spirit of cultural and other differences in the countries where the NLB Group operates, we also interpret the principles of the desired conduct written in this Code.

NLB Group Code of Conduct:

- represents the values and fundamental principles of conduct,
- sets out the rules that every employee in the NLB Group must understand and respect,
- defines expectations from each employee in the NLB Group and also reflects the standards that we expect in our relationship to the rest of our stakeholders.

The Code is structured so as to be of practical help in our everyday work. There is a special chapter intended for all managers at all organisational levels with special responsibility in the transfer of the Code into practical use in the NLB Group.

## **II. Scope of application of the Code and persons bound by it**

### **Employees**

The guarantee for the consolidation of the confidence in the NLB Group and the key to its reputation and long-term successful performance is operations compliant with the Code. All employees of the NLB Group must understand and comply with the values, principles and rules contained in this Code of conduct, taking them into account when pursuing the Bank's current values.

As employees of the NLB Group, we are responsible for the reputation of each member of the NLB Group and must be familiar with this Code and comply with it in our daily conduct. The Code is structured so as to be of practical help in our everyday work.

The conduct in accordance with the rules of the Code of Conduct of the NLB Group can contribute to a more successful development of the entire NLB Group and all us, employees. Every employee is obliged to comply with the Code and encourage their colleagues and business partners to do the same.

### **Leadership**

This Code fully applies to members of the bodies of the NLB Group. In this sense the term employee of the NLB Group is also interpreted.

Managers at various levels in the NLB Group, including members of the management bodies (management board members, supervisory boards, executive directors, board members) have specific responsibilities:

- Discuss this Code with the members of your teams and make sure that all have understood it, thus promoting the ethical culture in the NLB Group;
- Make sure that the fundamental principles and rules of conduct are implemented and complied with;
- Make sure that the values of the Bank are achieved in the light of set principles and rules of conduct;
- Encourage open, fair and honest relationships among the employees, without fear and vindictiveness;
- Encourage open discussions about all questions handled by this Code;
- Your conduct and behaviour should set an example embodying the values and meeting the basic principles of the NLB Group;
- You are responsible for reacting swiftly if you perceive any ethical problems in your environments;
- Do not demand any conduct from your employees which would be contrary to the legislation or other prescribed rules or this Code.

### **Relationships with business partners**

The NLB Group abides by the basic principles and rules of desired conduct in its operations with business partners and other stakeholders. Therefore, the NLB Group expects that all business partners and other stakeholders apply the standards at least equal to those written in this Code, including their attitude towards the employees. The NLB Group is committed to respecting all relevant interests of the parties involved in a transparent manner and in accordance with the agreements.

### III. Fundamental principles and rules of desired conduct

Ethics is a set of moral principles. It thus represents the norms and values of each ethical individual, defined by honesty, fairness and good intentions towards other people. The core ethical issues are: what is good, what do I have to do, what kind of a person should I be and how should I not behave.

The employees of the NLB Group abide by the fundamental principles and rules of desired conduct and are aware of what is considered inadmissible behaviour. The fundamental principles guide us to the expected standards of conduct.

More detailed rules of conduct are written under each fundamental principle, together with practical advice to help you make the right decision.

Basic principles	Rules of conduct
<b>Act ethically - responsibly</b>	<ul style="list-style-type: none"> <li>• Act with responsibility and in line with the powers of attorney</li> <li>• Comply with the rules of the Code</li> </ul>
<b>Respect our colleagues and maintain a pleasant working environment</b>	<ul style="list-style-type: none"> <li>• Honesty and respect among colleagues</li> <li>• Zero tolerance for discrimination</li> <li>• Pleasant and safe work environment</li> <li>• Taking care of the employees' personal data protection</li> </ul>
<b>Respect our customers</b>	<ul style="list-style-type: none"> <li>• Respect the customers' interests</li> <li>• Taking care to keep customer data confidential</li> <li>• Professional attitude</li> <li>• Fair customer complaint handling procedure</li> </ul>
<b>Avoid conflicts of interest</b>	<ul style="list-style-type: none"> <li>• Exclusion from the process of preparing proposals, adopting material and decision-making procedures with related persons (e.g. relatives, personal acquaintances)</li> <li>• Obtaining prior approval to perform the functions or activities outside the NLB Group</li> </ul>
<b>Prevent unacceptable practices</b>	<ul style="list-style-type: none"> <li>• Reject bribery and corruption</li> <li>• Prevent and report any harmful conduct</li> </ul>
<b>Our business is legal and we abide by the rules</b>	<ul style="list-style-type: none"> <li>• Our business is legal</li> <li>• Prevent money laundering and terrorist financing</li> <li>• We protect confidential and strictly confidential information</li> <li>• We do not abuse inside information</li> <li>• We are committed to fair competition</li> </ul>
<b>Prudent and ethical handling of assets and property of the members of the NLB Group</b>	<ul style="list-style-type: none"> <li>• Protection and rational use of company assets and resources</li> <li>• Intellectual property protection</li> </ul>
<b>Be socially responsible</b>	<ul style="list-style-type: none"> <li>• Respect for human rights</li> <li>• Care for the social environment</li> <li>• Environmental awareness</li> <li>• Communication in the NLB Group</li> <li>• Cooperation with the competent authorities</li> </ul>

## **1 ACT ETHICALLY - RESPONSIBLY**

### **1.1 ACT WITH RESPONSIBILITY AND IN LINE WITH THE POWERS OF ATTORNEY**

Every person in NLB Group is committed to uphold the highest standards of moral integrity, professional and ethical conduct, which is beneficial not only for the NLB Group but also for its customers, internal and external, colleagues, business partners, shareholders, the financial system and the community at large. The only guarantee for the consolidation of the confidence in the NLB Group and the key to its reputation and long-term successful performance is ethical, diligent and responsible operations compliant with the Code. Trust is the foundation of the banking activity.

The NLB Group is responsible towards its customers, colleagues, stakeholders, owners, business partners and social and natural environment. Understanding customers and taking care of their positive user experience is our fundamental responsibility. This includes the understanding of their needs and the related risks for themselves and for the NLB Group. We carefully and responsibly build partnerships with all those we enter into business relationships with. As employees we have a duty to each other and to all stakeholders to act professionally and with commitment and mutual respect in our work. Regardless of the opportunity, all employees in the NLB Group must act with complete fairness, honesty and integrity in everything we do, and face challenges in a responsible manner. With due responsibility, we take care of the reputation of the banking and broader financial activity and also meet our responsibility towards the broader social and natural environment.

Every person in the NLB Group:

- at all times complies with the principles of ethics, fairness and expertise;
- acts in a responsible, positive and constructive manner, in line with the strategy, goals and values;
- prevents and eliminates the risks of harmful conduct;
- works according to the law, regulations and good practices.

### **1.2 COMPLY WITH THE RULES OF THE CODE**

As employees of the NLB Group, we are responsible for getting familiar with this Code and fully complying with it in our conduct.

A violation of the standards and rules of conduct defined by this Code can lead to a serious violation of work obligations of each employee and result in potentially imposed measures for the elimination of the consequences of misconduct. Serious violations can result in other appropriate sanctions and other measures (including labour law measures) that can lead to termination of any further cooperation between the employee in the NLB Group and a member of the NLB Group. Therefore the Code also forms the basis for all other rules and instructions of operations, including organisational rules and procedures, the existing powers of attorney as well as decisions, agreements and contracts made by the NLB Group.

#### **Guidelines**

We are aware that the public identifies their work, proceedings and attitude towards the customers with the conduct of the NLB Group as a whole, with all consequences arising from such conduct.

Therefore, we must strive to always base a successful relationship with the customers on mutual trust, earned by a fair and open dialogue, understanding and freedom of choice.

We shall perform our duties by acting in accordance with the adopted principles and rules and in a way ensuring that our work and behaviour inside and outside the working environment does not damage reputation of the NLB Group or any of its members, and the banking and financial activity as such.

We are therefore responsible to:

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- act in a responsible, positive and professional manner, in line with the strategy, goals and commitments, laws, rules and good practices;
- prevent and eliminate all possibilities of corruptive practices in any member of the NLB Group, as well as all violations of the applicable rules or fundamental ethical norms;
- prevent any conduct, decisions or actions that would be contrary to the laws, internal rules, the strategy of the NLB Group and the commitments, legally permitted goals, ethical principles or values of the NLB Group, particularly if these could result in damage to an individual or any member of the NLB Group.

The management staff of the NLB Group sets an example and should therefore promote open, fair and earnest relations among the employees, without vindictiveness, and act swiftly in the case of perceived ethical issues in the working environment. It is your task to promote ethical culture and not to demand any conduct from your employees which would be contrary to the legislation or other prescribed rules or this Code.

### **Examples of desired conduct**

- I keep my promises.
- I make sure I understand the requirements described in this Code and in the internal documents I must comply with.
- When I am not sure how to act, I use common sense and the framework questions below, which will help me decide.
- I learn about and comply with the policies and procedures that are mandatory and important in my work.
- I regularly participate in training in different areas (mandatory and other necessary training) so that I can understand my responsibility in acting in compliance with this Code and other internal documents.
- I openly talk with my superior and other colleagues about the open issues and dilemmas concerning the implementation of internal procedures and rules in my field of work and the compliance with this Code.
- I report without reservation any behaviour, procedures or systems in which I suspect actual or potential violation of laws, other regulations, policies and internal rules of the NLB or this Code.
- I participate actively in every review, investigation and inquiry. I am committed to transparent and honest business.
- I always take care of my personal appearance.
- I avoid any ungrounded discrimination of other individuals or companies.
- I do not abuse my authorisations or authorisations of other persons, or encourage conduct so as to circumvent the prescribed rules and procedure.
- I help colleagues improve cooperation within the team, with other employees in the NLB Group.
- I make the right decisions.

### **Examples of unacceptable conduct**

Conduct that is not in compliance with the spirit, purpose and rules written in this Code and other rules foreseen for the NLB Group will be investigated and, if necessary, sanctioned accordingly.

Any potential conduct that is contrary to this Code will be treated by the NLB Group seriously and with due diligence. Serious violations can also be handled by regulatory and other competent authorities.

### **Questions for help**

When we face the question of how to act correctly, we follow the next steps towards adopting the right decisions and consult with others, if required, to adopt the correct decision. When considering your decision, follow the steps described in the chapter Adopting the right decisions.

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It is important to know the way leading to the goal which was set at the beginning. It is Even more important to fulfil our promises in order to gain the customers' trust in the employees, the Bank and the Group as a whole. What is the most important is to be aware that each of us has an important role in the relationship with the colleagues, towards the customers, our stakeholders, other banks and financial institutions at home and abroad, towards the economy and nonetheless the society in general. Therefore, each of us, employees of the NLB Group, is responsible to act in accordance with this Code both at work and elsewhere, and at the same time to encourage all employees of the NLB Group to always live and work in accordance with these principles.

### **Practical examples**

- If I participate in forums or in social networks, I take care not to post any comments that might be harmful to the reputation of the NLB Group or to disclose its business secrets, confidential banking data, other confidential and strictly confidential data and inside information.
- When I know something is not right, I open the Code and try to find orientations on how to react in a specific circumstance. If I am still not sure, I consult with the colleagues and my boss or contact the organisational unit in charge of the compliance of operations.
- In our team, we monthly discuss a practical case that opens new ethical and other questions related with the desired conduct of the employees in the NLB Group. Thus, we build mutual trust and spread awareness about the Code among other colleagues we work with.
- I say what I think and I do what I say. That is integrity. It is the only way to maintain trust among the people, particularly the customers.

## **2 RESPECT OUR COLLEAGUES AND MAINTAIN A PLEASANT WORKING ENVIRONMENT**

### **2.1 Honesty and respect among colleagues**

Honesty is the basis of all responsible actions, particularly in banking. The employees of the NLB Group are honest and pursue the highest ethical standards. By ensuring safe, stimulating and health-friendly working environment, we are building a long-term and solid corporate culture which is an important stone in the mosaic of our success.

The NLB Group strives for good mutual relationships based on cooperation, mutual respect, politeness and assistance. Every employee respects the dignity and personal integrity of the colleagues, motivates them, helps them acquire new skills and knowledge and also contributes to their personal and career development. Every employee of the NLB Group is responsible for getting familiar with this Code and complying with it in our conduct.

The NLB Group therefore promotes the expression of opinions among the employees and open communication. Open communication and cooperation are the basis of our work. Before speaking, we first listen. Our word is our bond. We state clearly what we can and cannot do. We appreciate and actively seek feedback. We share information openly, and in a timely fashion. We give constructive criticism in a respectful and honest manner. We share knowledge for the good of the NLB Group, and learn from one another. In communications we are straightforward and unambiguous. We do not fear difficult questions and do not shift our tasks to others. We work with all stakeholders in good faith, and with professionalism.

We take care of the development of positive culture in the NLB Group and ensure that every individual is treated with respect and dignity, as an essential element of the NLB Group.

### **2.2 Zero tolerance for discrimination**

The NLB Group is committed to fair treatment of all candidates in all employment selection procedures. We judge on the basis of objective knowledge, experience and competencies. We guarantee equal opportunities for all employees in a fair and transparent manner, regardless of the gender, age, race, colour of the skin, nationality, sexual orientation, religious belief and other personal traits.

We at the NLB Group reject and will not tolerate any kind of discrimination, unequal and unfair treatment of employees and any violence, molestation, harassment or mobbing of individuals at their workplace.

Everybody can work in the NLB Group without fearing any such practices. We respect human rights of each individual and promote positive working environment which contributes to our success.

### **2.3 Kind and safe work environment**

We at the NLB Group take care for the development of employees because we trust in the competencies, loyalty, integrity and devotion of our employees. The care for the development of employees leads to appropriate and successful performance and development of the company.

We therefore take care of safe and kind environment and make sure that we maintain a healthy working environment, relations based on mutual respect and encourage employees to lead a healthy life. Employee satisfaction is very important for achieving our goals.

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### **2.4 Taking care of the employees' personal data protection**

The NLB Group respects the right to privacy and interests of all the employees and therefore pays special attention to personal data protection of the employees.

Every employee is obliged to respect the right to privacy of their colleagues and handle their personal data in accordance with their internal rules and the foreseen procedures.

#### **Guidelines**

Our colleagues are our internal customers. We are obliged to treat them fairly, respectfully and responsibly. Treat them as you would treat an external customer. We can only be successful if we cooperate!

Good and open relationships between all employees of the NLB Group significantly contribute to business excellence. These relationships should be based on mutual cooperation, assistance and understanding. We respect the rights and duties of co-workers and also their differences. Any disagreements must not provoke incorrect conduct or infringement of the rules of operation and respectful and honest conduct.

As employees of the NLB Group we are obliged to contribute to an open and transparent mutual communication. The managerial staff are obliged to issue instructions and define tasks politely, clearly and comprehensibly. It is their responsibility to create a positive climate, to encourage co-workers to innovative thinking and to set a good example.

We are obliged to understand the needs of our internal customers and consider their interests. Based on our experience and expertise, we are committed to providing advanced, innovative and modern products and services suitable to their needs and requirements. Each of us strives to find opportunities for a good user experience of other employees in the NLB Group with whom they cooperate. The goal of each of us must be to ensure that interior customers of the NLB Group benefit in an optimised manner and that together we contribute to the efficiency and optimised user experience. We are even better when we work together!

As employees of the NLB Group we must refrain from all types of sexual, verbal or other harassment and molestation of their co-workers. Such harassment and molestation is not tolerated in the NLB Group and is prohibited. Harassment is any undesired behaviour associated with any personal circumstance with the effect or intent of adversely affecting the dignity of a person or of creating an intimidating, hateful, degrading, shaming or insulting environment. Therefore, you yourself are obliged to ensure that your conduct does not put others in an uncomfortable position or threaten their health and safety.

Learn about and comply with the internal rules and procedures on health at work. You are obliged to immediately report to the relevant internal organisational units about unhealthy working environment or incidents as well as any physical violence or threat to the company property.

The employees of the NLB Group may not use for their own benefit or forward to any third person any confidential data specified by law and/or business secret determined as such by the member of the NLB Group and entrusted or in any other way made available to the employees. Any data which could obviously cause material damage if submitted to unauthorised persons shall also be deemed business secret.

#### **Examples of desired conduct**

- I cooperate because:
  - I also encourage other employees to have a feeling of common goals.
  - Together, we can achieve synergies, better solutions and co-create a positive working environment.

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- Cooperation means searching for a common solution to achieve common goals - the goals of the NLB Group.
- Different views and opinions always result in a better solution, which is why it is good to take into account the opinion of every participant.
- I do not avoid my responsibilities.
- I always help internal customers find a contact person who will know how to answer their questions which I am unable to answer.
- I share knowledge and experience with all colleagues in my team with the aim of successful cooperation.
- Customers from other organisational units are my internal customers.
- I look for constructive solutions for any problems by reaching agreements with all those involved.
- I foster honest and earnest relationships with all employees I work with. This is essential for our satisfaction in our working environment. In crisis situations, we are able to quickly find solutions and prove that we can do more together.
- If somebody raises their voice on me, I point this out clearly to them.
- When I make a mistake, I apologise and correct it immediately.
- When I see somebody drowning in work and requiring assistance, I offer it.
- I do not tolerate and participate in ill-intended rumours. When I see someone being shamed or slandered, I point this out loudly.
- As a team leader, I do not hide information and I discuss things openly.

## Examples of unacceptable conduct

- Avoiding responsibilities.
- Shifting tasks and responsibilities within one's area of work to others.
- Encouragement or contribution to hostility in the working environment, including verbal violence, screaming.
- Framing and humiliating colleagues.
- Deliberately encouraging bad relationships among colleagues.
- Excluding employees from conversations or joint activities in a discriminatory manner.
- Defaming the work and abilities of the colleagues in front of other colleagues (either superior or inferior). Contempt.
- A focused effort to reduce a colleague's self-confidence and similar actions and conduct with the effect or intent of threatening the dignity of a person or creating an intimidating, hateful, degrading, shaming or insulting environment.
- Use of personal data of the customers or colleagues for personal or other non-professional intentions
- Comments about body features, racial, ethnic, religious or other personal circumstances of the employees or customers.
- Sending offensive, discriminatory (racial, religious or other discriminatory) content via e-mail.
- Political, religious or other ideological belief of the colleagues or customers.

## Questions for help

- Have I helped find the most efficient solution of a problem during a 3-hour meeting even if that meant taking over the coordination of work activities?
- Have I communicated honestly and openly with the colleagues from other organisational units even though the task was not primarily related to my area of work?
- Have I helped internal customers find a contact person who will know how to answer their questions which I am unable to answer?
- Do I treat all employees in the manner I wish them to treat me - respectfully and professionally?
- Do I look for constructive solutions for any problems by reaching agreements with all those involved?
- Do I foster honest and earnest relationships with all employees I work with?
- Do I point out any inappropriate behaviour or conduct of another employee?

**Practical examples**

- *My superior bespattered me in front of my colleagues in a manner that made me uncomfortable. Is this harassment?*

As an employee, you are entitled to work in an environment in which you are not subjected to intimidation, hostile and similar conduct, against which you are protected by the applicable laws. However, not every comment or critical remark should be considered harassment. If such conduct makes you uncomfortable, tell that to the superior in a non-ambiguous manner. Should such conduct repeat, seek assistance from the relevant organisational units which will help you resolve the problem.

## **3 RESPECT OUR CUSTOMERS**

### **3.1 Respect the customers' interests**

Our customers, both internal and external, are in the centre of our focus. In order to secure their trust, the employees of the NLB Group are obliged to protect the interests of our customers and other business partners and respect all relevant provisions.

The employees of the NLB Group meet our promises, achieve and exceed the expectations of our customers, business partners, shareholders, regulatory and other competent bodies and the society at large. We cooperate in the implementation of the NLB Group strategy and are actively committed to fulfilling the strategic objectives in the spirit of credibility and fairness. We draw attention to challenges and encourage each other until the objectives have been met since we are aware that the Companies of the NLB Group can only be successful by combining our strengths, knowledge and experience. We are aware that we are stronger and the best when working together.

We are bound to understand the needs of our customers and consider their interests. Based on our experience and expertise, we are committed to providing advanced, innovative and modern products and services that suit the customers' needs and requirements. Our wish is to contribute to the fulfilment of their plans and our task is to advise them, inform them and raise their awareness about the type and level of risks related to their wishes and requirements.

We find solutions and resolve problems by creating benefits and added value for our customers. We understand that every problem can have several solutions in a given moment, which is why we offer innovative solutions. Thus, we achieve mutual benefits. We invest in the skills of our employees and the quality of the working environment, which contributes to the success of the entire NLB Group. We monitor modern trends and search for and identify new and better approaches to providing services and products for our customers. Innovation is also encouraged at the level of processes, organisation and internal functioning in general, as well as at the level of comprehensive solutions for the customers, all with the aim of improving the user experience of (internal and external) customers, creating value added of our products and services and improving their accessibility.

One of our fundamental objectives is efficiency in everyday work. We offer our customers effective solutions and added value. Thus we save them time and energy. We optimise our processes so that the NLB Group teams can work efficiently. This allows us more time to devote to our customers. We actively reduce complexity to allow for simple operations, pursuing the state-of-the-art technological solutions and modern lifestyle.

Our goal is to ensure optimum benefits for the customers in relation to the products and services offered by the NLB Group and that by taking into account their interests, we carefully build partnerships and maintain trust in the NLB Group.

### **3.2 Taking care to keep customer data confidential**

One of the basic rules is to respect the protection of obtained confidential data of the customers, either customers, business partners or third persons and protect them and prevent their potential abuse and/or disclosure to an unauthorised person. Protecting the privacy and information entrusted to us by our customers is our primary concern and in doing so we act in compliance with the valid provisions and international standards. The banking members of the NLB Group are further bound to do so because of the obligation to protect banking confidential information.

In our business, the NLB Group is committed to uphold the highest standards of diligence in personal and confidential data management. We only ask for and process those data we need for the fulfilment of our obligations under the applicable provisions and for the fulfilment of our commitments to the customers, business partners and regulators. Thus we improve our products and services and the NLB Group governance. We are aware that this is the only way to ensure long-term trust in the NLB Group.

### **3.3 Professional attitude**

Our attitude towards the customers is professional and shown through personal appearance, tidiness of work premises and the highest ethical and professional standards in daily operations and communication with the customers in the sales and marketing of our products and services.

### **3.4. Fair customer complaint handling procedure**

We treat customers fairly. The employees of the NLB Group immediately report the customers' complaints to those in charge, resolve them quickly and efficiently, for the benefit of all parties involved.

#### **Guidelines**

The customers of the NLB Group are essential for achieving our common goal - successful operation, which is why in our operations with the customers we are committed to abide by the highest standard of professional and ethical conduct. The trust of our customers is the most important for our operations.

In our everyday work, we must be aware that the interests of our customers and the Bank, as well as those of other stakeholders (owner, public in general) come first. When pursuing these principles, each of us also searches for the opportunities in improving the user experience with their internal customers, i.e. other employees of the NLB Group with whom they cooperate - more on this issue in Section 2 Respect our colleagues and maintain a pleasant working environment.

The common goal of all employees is to ensure optimum benefits for the customers in relation to the products and services offered by the NLB Group. We have to offer innovative solutions, modern products and services and take into account their desires, needs and interests. The employees of the NLB Group must therefore know the customers well, understand their needs and act in their interest, while taking care that these interests are not in conflict with those of the NLB Group. When in doubt whether a situation is actually a conflict of interest, ask your direct superior or the organisational unit in charge of compliance.

One of the basic rules is to respect the obligation to protect the obtained confidential data and prevent their potential abuse. It is the duty of every employee to know the rules on the confidentiality of the data on customers, other confidential information (including banking confidential information) and business secrets and apply them in their work. Employees of the banks that are members of the NLB Group are particularly bound to protect the customers' personal data and confidential banking data relating to the customers; there is zero tolerance for any events that could result in leaking or forwarding of information to unauthorised persons.

The respect of the customers means that they are treated equally. This means that as an employee of the NLB Group, we must comply with the pricing policy and the authorisations for deciding in each case when determining the conditions for entering into business relationships. In no case shall the employees grant or attempt to grant especially low prices for banking products or services to persons not entitled to such prices pursuant to the applicable internal rules. Any customer complaints are immediately reported to the superior, it is important that they are resolved as quickly as possible and for the benefit of all those involved in accordance with the applicable regulations.

The complaints of our customers and business partners are resolved in a professional, ethical, fair, quick and efficient manner. In this, we pursue the internal rules and procedures for resolving complaints, take into account the customer's feedback, identify the source of the problem and actively participate in the resolution of the problem in order to prevent such complaints from happening in the future.

#### **Examples of desired conduct**

- In know the interests and needs of my customers and take them into account in selling and marketing products.

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- I do not mislead my customers to achieve higher profits.
- My word (to a customer) is my commitment (to such customer). Therefore, I also explain small print to my customer.
- Same as every other employee, I must act in good faith and honestly in all business relationships. I disclose all relevant facts and conceal nothing.
- I respect the obligation to protect the obtained confidential data of customers and prevent their potential abuse or unjustified disclosure to third parties.
- I know the rules on the confidentiality of the data on customers and business secrets and apply them in my work.
- I treat every customer equally, fairly and in line with the internal rules and procedures.
- I avoid any different, preferential or more favourable treatment of a customer, if it could be considered unfair or unjust.
- I try to find a solution that will be mutually beneficial in a given situation, when a customer experiences financial difficulties.
- When resolving a customer's problem, I first think about what I can do for the customer within the authorisations, then what I can do for them with the help of my superior. I always listen to everything the customer has to tell.
- I am always honest with the customer - if their expectations cannot be met, I clearly tell them so in advance.
- I seek innovative solutions. I always present correct and accurate information to the customer, even when it is not beneficial for them. It is essential to keep the customers' trust.
- The customer's complaint is resolved swiftly, efficiently respectfully and honestly towards the customer. I look for solutions that will be beneficial for both. I propose solutions related to a product or service that will remedy the cause of customer's complaint.

## Examples of unacceptable conduct

- I present incomplete information damaging to naive customers either in advertising or personal selling.
- I make a promise that a deal would be completed, knowing this to be impossible or out of my influence.
- I abuse data on the customer and break the fundamental rule on the confidentiality of their data (personal information or data on customers which are deemed a banking secret).
- To achieve the sales goals, I sell any products and services to everybody and I also convince my friends, acquaintances and relatives to buy them.
- I do not take the customers' complaints seriously. I do not try hard to eliminate the cause of a problem and help find a solution in order to prevent similar complaints in the future.

## Questions for help

- Do I know all interests and needs of a customer?
- Have I offered products and services to the customers which meet their interests and needs?
- Have I presented the information on a product or service in a fair and open manner so that the customer can adopt a responsible decision?
- How do I want the customer to speak of their experience with the Bank to their acquaintances, relatives and friends, and specifically about their experience with me?
- How does a customer who does not complain feel, what is their problem and how can I help them or maybe I cannot help them?
- How do I wish to be treated when provided a similar service?
- How do I strengthen the customer's loyalty and trust?
- Have I done everything to eliminate the cause of a problem and help find a solution in order to prevent similar complaints in the future?

## Practical examples

**For internal use only**

- “When working with customers I am professional and I can ensure confidentiality. Trust is the foundation of long-lasting co-operation.”
- *A customer comes to you to verbally report an incident, namely suspected abuse of their personal data. How do you act?*

Kindly advise the customer to submit a detailed written report about their suspicion. Hand the report over to your superior without delay.

## **4 AVOIDANCE OF THE CONFLICT OF INTEREST**

The employees of the NLB Group understand and accept responsibility for adopting the right decisions led by our business interests. We are obliged to identify, monitor and exclude potential conflicts of interest.

A conflict of interest arises when an employee's personal activities or their relationships from private life intertwine with the business interests of the NLB Group (its members) and thus affect the objectivity of the employee in adopting business decisions in line with the best interests for the NLB Group. A conflict of interest can also reduce the value of shares and expose the NLB Group to legal risks and/or reputation risks.

The employees of the NLB Group take great care to avoid such conflict of interest and follow our internal rules which dictate that we must recognise and appropriately and efficiently manage the conflicts of interest (business and private).

Every employee of the NLB Group must focus their attention on the detection, prevention and elimination of the conflicts of interest. In the framework of performing the tasks and adopting decisions, they must always follow the interests of the NLB Group and not their private interests.

### **Guidelines**

As employees in the NLB Group we must at all times take care to ensure that our work outside the member of the NLB Group does not interfere with the interests of the NLB Group and does not affect our decision that would be contrary to its interests, values and goals.

Conflict of interest can arise in the relationship between the NLB Group (its members) and the customers, other customers or business customers, between the customers of the NLB Group (its members) and/or third parties and between different business activities within the NLB Group.

On a personal level, the conflicts of interest usually occur when our private interests could prevail over the interests of the customers, suppliers, other business partners or the NLB Group (its members). Such cases arise when our interests overlap with the interests of the NLB Group or its customers or when we have a close personal or financial relationships with other employees in the NLB Group.

The employees of the NLB Group have a duty to respect internal rules about the disclosure of such activities, functions or inclusion in the business activities and other circumstances that could represent a conflict of interest. This is the only way to appropriately manage or prevent potential negative consequences of a conflict of interest in a transparent, ethical and fair manner.

The following shall be deemed a conflict of interests: if an employee of the NLB Group has a personal, financial or business relationship with the customer or the business partner, which could influence the process of adopting a decision on a transaction or other business decisions. Any transactions related to financial instruments owned by the employee and all other transactions, including opening of bank accounts and performing of transactions, regardless of whether or not they are transactions performed on behalf of the employee or another person (as authorised person) shall also be considered a conflict of interests. Transactions for own account include transactions which the employee performs for the account of related persons.

Most common situations that can lead to a conflict of interest:

- Privately financed projects or private (business activity intertwining with the services offered by the NLB Group and development of new products (including innovations).
- Functions that could be incompatible with the interests of the NLB Group, such as memberships in the management bodies of competitive companies to the members of the NLB Group.
- Ownership or investment in a company that is directly or indirectly connected (a key customer, contractual partner, etc.) with the NLB Group.

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### Examples of desired conduct

- Always ask for approval of the superiors to take over new functions, either executive or non-executive, outside the NLB Group, taking into account the internal rules; new employees should always disclose the existing positions.
- Always disclose business activities (part-time sole proprietorship, limited liability company, other forms) outside the NLB Group that could affect the reputation of the NLB Group or a potential conflict of interest.
- Do not exploit business secrets or confidential information and personal data acquired during your work for private purposes.
- Do not disclose business secrets or confidential information and personal data about the customers or other employees to your acquaintances, friends and relatives.
- Do not include the NLB Group (brand or member companies) into your personal activities without first obtaining approval from your superiors.
- Always inform your superior or the competent organisational unit and discontinue the relevant activities if you find yourself in a conflict of interests with the NLB Group or a customer and you, for instance, decide on loans, provide investment or similar services and related transactions.
- Exclude yourself from the examples that could give the impression that you are in a conflict of interest.

### Examples of unacceptable conduct

- Participation and deciding in matters in which we have personal interests or benefits above the interests of the NLB Group (e.g. financial investments in companies that are competitors, customers or suppliers).
- Exploiting business contacts for private business activity (personal, family's, a friend's).
- Exercising influence in a candidate selection procedure for new employment, supplier or business partner.
- Investing in companies that are closely related to the NLB Group based on acquired inside information.
- Non-disclosure of the afternoon activity that is competitive with the activities in the NLB Group (e.g. insurance brokerage).
- Accepting a gift of major value, luxurious or morally dubious hospitality by an external partner.

### Questions for help

- Could your work within the NLB Group result in a conflict of interest due to your holding several positions?
- Do you, your family members, your friends or acquaintances perform a private business activity or hold an important position (business or political) that could affect your decisions in the NLB Group?
- Is the legal entity or its business activity where you hold or are applying for a position in any way connected with the NLB Group?
- When assuming a new position, do you plan to obtain authorisations that would allow you to adopt decisions that could in any way be connected with the NLB Group or affect it in a manner?
- Did you come to the NLB Group from a company that previously provided services for the NLB Group and was it possible for you to participate in the selection procedure?
- Could circumstances arise in your case where you would be forced to weigh between the interests of the NLB Group and other interests?
- Could your work outside the NLB Group give impression that you are not objective in your actions and adoption of decisions?
- When in doubt, refer to your superior or the organisational unit in charge of compliance.

## **Practical examples**

- *One of our most important business partners has invited me to training in Italy. No participation fee is to be paid. Accommodation costs are also paid. Can I accept the invitation?*

When deciding whether or not to accept an invitation, the following questions are important: who is the provider and organiser of the training, what are the costs covered for you, are there any business reasons for you to participate in the training, are (or will there be) any negotiations underway for a deal with the business partner inviting to training. In some circumstances, it is perfectly OK to accept such an offer, if there are justified business reasons, if there are no circumstances that would expose you to a conflict of interests, if the costs covered by the organiser or a business partner (customer, supplier, third party) are reasonable and if the content of the programme is appropriate. See internal documents for instructions about giving and receiving gifts and preventing a conflict of interests to answer these questions. If you need additional guidance, refer to the organisational unit in charge of compliance.

- *The head of the branch office is visited by her good family friend who needs a loan. The friend decided to ask her to arrange for a loan because she knows her, trusts her and believes she would be better able to advise her.*

The head of the branch office is in a dilemma on how to grant a loan to her friend in “her” branch office. She is aware that she does not want to be in a conflict of interest because of the personal friendship. She refers her friend to the branch director who is authorised to carry out all the necessary procedures for granting a loan in the branch office in a transparent manner.

- *A local volunteers’ organisation asked me to help them develop a new application to help the children in need, as an IT specialist.*

Such a side activity is not problematic as long as it does not give rise to a conflict of interest in terms of the type of volunteers’ organisation and the application to be developed. To avoid a potential conflict of interests, ask your superior before deciding and potentially also the organisational unit in charge of compliance.

## **5 PREVENT UNACCEPTABLE PRACTICES**

### **5.1 Reject bribery and corruption**

The NLB Group rejects all types of bribery and corruption. These forms of action are unfair, illegal and damage the countries in which the corruptive practices take place, and the society in general.

The NLB Group offers no bribes or inappropriate incentives for any purpose whatsoever, nor does it accept them. We expect and demand the same conduct from our customers, business partners and third persons.

Inadmissible acts are categorically rejected and actively prevented in our business. The employees of the NLB Group thus carefully build partnerships with all stakeholders of the NLB Group and are obliged to prevent their occurrence.

Therefore, all employees of the NLB Group are subject to limitations in giving and accepting gifts, offering hospitality and otherwise influencing the conduct of the employees of the NLB Group.

### **5.2 Prevent and report any harmful conduct**

In addition to bribery and corruption, the NLB Group identifies as harmful behaviour also fraud, abuse, counterfeit and all other actions that could result in regulatory sanctions, criminal liability, reputation or integrity, and which have been committed to the detriment of an individual or all members of the NLB Group or their employees, customers and business partners.

We at the NLB Group believe that responsible corporate governance is more than just respecting the laws, regulations and standards. An important part of our operation is also the integrity and transparency of operations.

All employees of the NLB Group are thus expected to understand and accept responsibility for adopting the right decisions. The prevention of other harmful conduct is the responsibility of all employees.

If they notice any harmful conduct the employees of the NLB Group are obliged to immediately report their concerns and observations. Every employee is thus obliged to immediately report any information on anything they believe, in good faith, could present a violation or non-compliance with the regulations or internal rules, or in the event of harmful conduct. The NLB Group encourages the reporting of conduct in cases an employee is aware that something "is amiss".

It is the duty of every employee who has been informed of harmful conduct by a colleague, customer or third party to promptly report such harmful conduct to their direct superior (unless there is suspicion that such direct superior is a participant in such harmful conduct or if informing them could negatively affect the progress of the investigation into such conduct due to the prescribed legal deadlines for implementing the procedures in the field of labour legislation), who forwards the case to the organisational unit in charge of compliance. The employee submits the report via one of the available communication paths established with the aim of submitting reports of suspicious harmful conduct (can also be anonymous). If an employee is not convinced that a potential action has the nature of misconduct, unlawful or unethical action, they may consult their superior or directly the organisational unit in charge of compliance.

In these cases, the NLB Group does not tolerate or allow any retaliation against the employees who bona fide report a suspected harmful conduct, even if it turns out that the action reported was not unfair or unlawful, but was reported bona fide. We guarantee protection of identity of the person who bona fide reports misconduct as well as those to whom such reports on misconduct refer.

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### **Guidelines**

If somebody offers you a benefit to influence your conduct or action, that is a bribe. If someone wants to use their position to obtain benefit for themselves, that is corruption. An employee of the NLB cannot give or accept bribe. We may not participate or allow corruption in any form at any level. We must ensure that our actions and conduct do not give the impression that we are inclined towards bribery or corruption.

The risk of corruption can occur in any activity carried out in the NLB Group, whenever we are in contact with third persons. It has many forms: in the tenders and selection of suppliers in purchasing procedures, costs, gifts, hospitality, deciding on employment, sponsorships, donations, activities of our customers, and so on. We are obliged to carefully consider which activities can be exposed to corruption risks and prevent such actions.

Gifts that are absolutely prohibited to give or accept are rejected categorically. The NLB Group is aware that certain gifts of small value can be part of establishment or maintenance of a business relationship. If we receive such attention, the gifts or expressions of hospitality may in no way affect the business decisions we adopt.

In the case of suspicion as well as actual misconduct of our colleagues, customers, business partners and other persons, the employees are obliged to report such actions. Only if we are aware of this can we react swiftly and prevent damage or restrict damage that the employees, Bank or other members of the Group will have difficulties remedying.

The NLB Group encourages bona fide reports, namely reports based on available information and observations that make you reasonably suspect or know of any harmful conduct.

When handling and investigating individual reports, the data in the report are strictly protected, and this ensures the protection of the whistle-blower during the entire procedure of disclosure and potential sanctioning of misconduct.

To report irregularities, use the established paths for reporting violations which guarantee your anonymity, or contact the organisational unit in charge of compliance in your company, member of the NLB Group

### **Examples of desired conduct**

- Regularly participate in internal e-training on corruption and other forms of unacceptable practices and misconduct.
- Discuss open dilemmas with your superiors and the members of your team.
- Pay attention to the circumstances that could represent suspected misconduct.
- Report any suspected misconduct if you reasonably suspect or know of any actual or potential harmful conduct.
- Respect internal documents about giving and receiving gifts and preventing a conflict of interests and corruption.
- Immediately report any suspected or actual act of corruption or bribery and all other harmful conducts that have already occurred or are expected or suspected to the organisational unit in charge of compliance.
- Study the weaknesses to establish how to improve internal control environment and inform all relevant employees, and follow our best practices.

### **Examples of unacceptable conduct**

- I am aware that harmful activity is underway or is about to occur but I fail to report it.
- I accept or give money or another type of benefit, thus enabling others to affect my decisions or actions.

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- I accept a bribe (not necessarily in cash) or other inappropriate incentives for any purpose whatsoever.
- I behave or conduct myself in a manner that gives the impression of corruption or willingness to accept bribes or other favours/compensations/incentives in exchange for influencing or implementing a deal.
- I accept a gift, attend a hospitality event or another activity, professionally or privately, involving and paid by business partners during the period of deciding about the purchase of their products or services or as fulfilment of a promise of a business partner during the period of the selection procedure.

## Questions for help

- Do you know your customers well and are able to recognise potential misconduct?
- Do you work with the state and its related persons? Pay special attention if you do business with the state or its related persons (including those working for government services and state-owned companies). Even if certain practices are acceptable in a certain country, they could mean for the NLB Group that we accept corruption and could thus have a negative impact on the NLB Group. You need to consider that in your performance at work.
- Does the case involve third persons, such as agents, intermediaries, proxies in third countries (particularly those with a high corruption index)? The NLB Group could suffer grave damage arising from the actions of the intermediaries or agents or third persons working on our behalf anywhere in the world. When working with third persons make sure that the risk of corruption was assessed and is being managed.
- Did you establish and have a bona fide reason to believe that something is simply not right in a specific case? This can be the conduct of your customer, an employee, the management style.

## Practical examples

- *A supplier offered me 2 tickets to a football game of the Champions League. Can I accept them?*

It depends on the circumstances. What is the market value of the tickets (is it within the limitations prescribed by internal documents for accepting gifts)? Will the supplier go to the match with you and are the tickets intended for you personally? Are you expected to do anything in return, will you feel anyhow indebted to the supplier? See internal documents for instructions about giving and receiving gifts and preventing a conflict of interests to answer these questions. If you need additional guidance, refer to the organisational unit in charge of compliance.

- *In the pre-new year time I received a gift from a regular customer that slightly exceeds the amount prescribed with internal documents. In our country, rejection of a small gift is considered an offence.*

Discuss the case with your superior. If the item offered is considered a polite gift, considering the relationship with the customer, you can accept it and report the receipt and the value of such gift to the organisational unit in charge of compliance.

- *One of our outsourced consultants on the factoring of receivables added a new type of fee to their regular fees charged. As they operate in a highly corruptive manner I was worried that they might also have intermediaries for the sales transactions and wanted to guarantee additional profits to others.*

The NLB Group has zero tolerance towards bribery and other forms of corruption, either direct or indirect through third persons. All employees of the NLB Group are obliged to actively prevent such conducts and point them out immediately. Corruption can have serious consequences for the NLB Group, as well as wide social consequences. If you suspect that any fees are charged inappropriately, immediately refer to the organisational unit in charge of compliance for guidance.

- *Several months ago, I reported a suspected misconduct and received no feedback. Has anybody even looked at my report?*

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All reports are immediately registered and carefully studied and handled according to the prescribed procedure according to the internal documents. If you reported the suspicion with your data (disclosed identity), you will always receive feedback on the result/completion of the procedure. Even if your report was submitted anonymously, via the relevant application, you will receive a notification to the created user account.  
The amount and type of information you will receive depends on each case separately.

- *Am I obliged to participate in an internal investigation if I am asked to do so?*

Yes. The employee provides explanations to the employer. The person who conducts the investigation has been informed by the employer who expects you to actively cooperate. With your cooperation you help gather all the relevant information and documents needed for investigating the specific case in order to ensure that the findings are objective.

## **6 OUR BUSINESS IS LEGAL AND WE ABIDE BY THE RULES**

### **6.1 Our business is legal**

The employees of the NLB Group are obliged to respect the legislation and other rules prescribing requirements regarding our daily business. We avoid actions that could constitute an alleged or actual breach of prescribed rules. The employees of the NLB Group therefore analyse and manage risks related to compliance in internal organisation, decision-making processes, disclosure policies, internal reporting and reporting to external (supervisory) institutions.

### **6.2 Prevent money laundering and terrorist financing**

The NLB Group has been conducting procedures to discover and prevent money laundering, know your customer procedures and procedures for identifying and preventing financial and other crime – the NLB Group has zero tolerance for these.

In the case of abuse resulting from money laundering and terrorist financing, in addition to loss of reputation, individual members or the entire NLB Group could be subject to financial and regulatory sanctions. Therefore, the employees of the NLB Group are obligated to keep up to date with internal policies, rules and procedures to discover suspected money laundering and terrorist financing. We have also developed procedures and measures to respect sanctions and embargoes that prevent persons or organisations to conduct business with certain countries, groups of persons, companies, organisations and individuals, including those connected with terrorist activities, drug smuggling, nuclear weapon development and similar. The NLB Group has zero tolerance for the above.

To successfully prevent and discover suspicious transactions, every employee in the NLB Group who is faced with such transactions in the course of their work, has to act in accordance with internal acts of the NLB Group members and report such transactions to their superiors and the competent internal organisational units.

### **6.3 We protect confidential and strictly confidential information and data**

We at the NLB Group guarantee the highest standards of diligence in the management of confidential data and other information regarding individual members of the NLB Group, the entire NLB Group, the employees, customers and business partners. This is the only way to ensure the discretion of business relationships with business partners and customers as well as relationships with employees based on long-term trust.

Employees of the banks that are members of the NLB Group are thus bound to protect the confidential banking data, strictly confidential information and business secrets; there is zero tolerance for any events that could result in leaking or forwarding of information, data and business secrets to unauthorised persons.

The NLB Group employees are obliged to comply with the internal rules and procedures to protect all information and data disclosed to them in the course of their work. This obligation applies to all communication channels, social networks, all types of media and means of communication. Every employee is responsible and takes care of the protection of any confidential information, data and business secrets of which they become familiar during their work.

Such information may only be used internally, for business purposes of the employer, and may not be disclosed to third parties, unless permitted by the regulations or internal rules.

The employees of the NLB Group may not use for their own benefit or forward to any third person any confidential data specified by law and/or business secret determined as such by the member of the NLB Group and entrusted or in any other way made available to the employees. Any data which could

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obviously cause material damage if submitted to unauthorised persons shall also be deemed business secret.

### **6.4 We do not abuse inside information**

The NLB Group has in place a strict ban on trading in financial instruments based on inside information and other forms of abuse of the market in financial instruments. The NLB Group is obligated to protect the confidentiality of inside information on NLB d.d. or other issuers and uses such information only for the purposes for which it was disclosed.

Certain confidential information is deemed inside information within the meaning of regulations on market abuse prevention. The NLB Group employees who are disclosed such information, either in the scope of their work assignments or accidentally, shall keep this information strictly confidential and shall not trade on the basis of inside information. Through internal acts the NLB Group has established measures that prevent conflicts of interest, set up information barriers, ensure timely and transparent disclosure of inside information on NLB d.d., establish control over the implementation of personal transactions, provide regular training in abuse of markets in financial instruments and guarantee full cooperation with the competent regulators. The NLB Group employees and other liable persons whom we cooperate with or who are included in the corporate governance system are obligated to fulfil their obligations as specified in the regulations governing personal transactions in financial instruments and to comply with the ethical standards, internal acts and rules defined in the NLB Group.

### **6.5 We are committed to fair competition**

The NLB Group is committed to fair dealing on the markets where it operates, which includes avoiding unfair sales and business practices, restrictive agreements unfair competition and abuse of a potential dominant market position. The NLB Group is aware of the risks related to safeguarding competition, which is why we operate in compliance with our obligations. It is our responsibility to keep up to date with and to act in line with the regulations on the prevention of the restriction of competition and to understand how the risk of unfair competition influences our work obligations.

## **Guidelines**

All our actions and each decision have to be aligned with this Code, the legislation and other regulations applying to the members of the NLB Group, and with the applicable internal acts. We have to be well familiar with these documents and act in line with the instructions regulating the performance of our tasks.

It is our duty to provide accurate and comprehensive documentation about all our business activities.

Every member of the NLB Group plays a key systemic role in the discovery and prevention of money laundering. At the NLB Group we should therefore be every day aware that money laundering and terrorist financing constitute a severe criminal act prosecuted *ex officio*. Thus, the front office employees have to ensure that the rules and procedures for money laundering and terrorist financing are complied with every day.

We have to identify early our considerations of potential (also future or possible) non-compliance. This is the only way to prevent violations. When in doubt we refer to our superior or the internal organisational unit in charge of compliance.

Are you considering trading for own account based on the information obtained in the course of your employment? Are you planning to use your employment for personal gain? The NLB Group has in force a strict ban on insider trading and market abuse.

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In the event of a (potential) breach, you should immediately report thereon to the organisational unit in charge of compliance by use of the designated reporting channels in line with internal documents.

Information is crucial for preserving our competitive advantage. Employees in the NLB Group are responsible for the protection of secrecy and integrity as well as availability of information and data owned by members of the NLB Group, our customers, suppliers and other business partners. Therefore you have to comply with all internal rules and procedures and act so that this information and data are properly protected.

### Examples of desired conduct

- I keep up to date with the relevant changes in the legal environment or the recommendations and the requirements of regulators and other international organisations, I identify the effects on my company and the NLB Group and I actively participate in the activities for adjusting to new requirements.
- I carry out all activities in the field of money laundering and terrorist financing prevention.
- I regularly undergo training in the field of compliance in the NLB Group and keep up to date with the amendments to internal rules and procedures.
- I actively consult other employees on amendments to regulations and other acts and try to find optimal solutions for compliant and effective operations of the NLB Group.
- If I am disclosed inside information or if I in any way cooperate with employees who have access to inside information, I undergo training and education in this field and notify potential suspicion of abuse.
- I can always ensure that my actions are consistent with internal regulations and applicable legislative and regulatory requirements.
- I carefully handle business secrets and other information and data, in compliance with the internal rules and procedures on information protection.
- To my best of knowledge I pay particular attention to the signs that could indicate a cyber attack or social engineering, of which I report to the organisational unit in charge of compliance.
- I comply with the rules and procedures specifying the manner in which personal data on individuals have to be protected (either customers, employees or third parties).
- I act in line with the rules and procedures specifying how data can be submitted or shared within the NLB Group and what are the requirements regarding disclosure to third parties.
- I do not disclose (either directly or indirectly) business secrets or other confidential information that is disclosed to me in the course of my work if this is in contravention to internal acts.
- I do not disclose confidential information or personal data of other persons on social networks that I am using nor elsewhere, if this is not permitted according to internal rules.
- I act in line with the rules on market abuse, including the rules on the use of inside information.
- I proactively identify and report on potential abuse of the market in financial instruments and contribute to reducing the risk of damage for the customers and the market.
- I protect the banking and business secrets, confidential, strictly confidential data and data and information about markets, customers, and comply with the internal rules on information barriers, I do not abuse this information and data, and I do not influence changes in market prices (directly or indirectly) with the aim of gain (decreasing loss, increasing profit).
- I always act in good faith, according to internal rules and procedures, the highest ethical standards and in the spirit of this Code.

### Examples of unacceptable conduct

- I do not comply with this Code, I do not ensure that business is done legally and I do not undergo training.
- I do not handle data carefully and in line with the requirements of internal rules and procedures on the protection of information, confidential information and business secrets.
- I disclose personal data about individuals (either customers, employees or third parties), confidential information and business secrets contrary to the regulations and internal rules (e.g. without an individual's written consent).

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### Questions for help

- *What should I do if a superior orders me to do something dangerous or perhaps even illegal? I am afraid of retaliation if I report the incident!*

In such cases refer to the organisational unit in charge of compliance. No retaliation by your superior or other persons for making a bona fide report will be permitted, which is why measures are in place to protect whistleblowers.

### Practical examples

- *When a credit proposal was made, I realised that it did not contain the key information about risks.*

I warned those participating in the approval process that the credit proposal was incomplete and that the competent internal bodies should not make uninformed decisions without the crucial content of a credit proposal. We supplemented the risk assessment and forwarded the supplemented material to approval process. In the opposite case, the credit proposal could be approved contrary to internal rules.

- *An employee learned about the interim results of NLB d.d., namely 30 days before they were published. On the basis of this information the employee seized the opportunity to make good profit and bought 100 shares.*

Such an action is intolerable. Such information is considered inside information, since it is specific, not available to the public and would, if it became public, probably have a significant impact on the price of the NLB d.d. share. That is why the purchase of shares in this case constitutes a breach of applicable legislation, which prohibits and imposes strict sanctions on any abuse of inside information, and also constitutes a violation of internal rules of the NLB Group and it also constitutes a criminal offence prosecuted ex officio.

## **7 PRUDENT AND ETHICAL HANDLING OF ASSETS AND PROPERTY**

### **7.1 Protection and rational use of company assets and resources**

With the aim of long-term success, the NLB Group applies the duty of rational use of assets of each member of the NLB Group, including property, plant and equipment, technological equipment, intellectual property, financial assets, trademarks in the NLB Group and relations with customers and business partners of the NLB Group and the reputation of the NLB Group.

The employees have a duty to reasonably use office supplies and other assets needed for work and in generally protect the assets of all companies of the NLB Group.

The employees are obligated to respect the rules on reimbursement of business travel expenses and other costs related to work, which regulate suitable reporting and documenting of such expenses. It is prohibited to handle the assets of the NLB Group unethically.

The employees may not use means of work or other assets for their own personal gain or to the benefit of any third parties. The employees of the NLB Group are obliged to prevent any unauthorised use of assets and sources of a member of the NLB Group for personal benefits of other persons, regardless of whether the assets and/or resources are used without authorisation voluntarily or due to negligence.

### **7.2 Intellectual property protection**

Protection of intellectual property is an essential element of a successful internal market, since it is important not only for the acceleration of innovation and creativity but also for the development of employment and improvement of competition. The employees of the NLB Group have to promptly ensure that the intellectual property rights are regulated by contract and protected. Intellectual property rights include e.g.: patents, firms, certificates, models, trademarks, geographic markings and copyright and similar rights. The subject of such right may not be commercially exploited without the permission of the member of the NLB Group which holds the intellectual property rights.

The employees of the NLB Group are obliged to comply with the copyrights and intellectual property of third persons (authors, providers, etc.). In this respect we make sure that the copyright work and intellectual property is only used in accordance with the intended purpose or with the consent of the author of such copyright work. Furthermore, we only use those tools for which the Bank had obtained the relevant licences in our work.

### **Guidelines**

The primary concern of the NLB Group is to preserve the trust of its customers, business partners, and the society that we operate in. Trust can only be preserved by respecting promises and commitments and by conducting all our business activities with integrity, fairly and ethically as well as in accordance with business practice.

Each employee has a duty to accept a clear responsibility for keeping promises and meeting deadlines, because everyone at the NLB Group is aware that consistent actions and decisions are crucial for preserving the trust in the NLB, the NLB Group and the financial industry in general.

Every employee of the NLB Group is obligated to prudently handle the assets and other property of the NLB Group members, to respect internal rules on cost reimbursement and the use of means of work. A good guidance is to handle the property of the NLB Group with equal care and responsibility (with due diligence) as own property.

We have to respect the approved budget, guidelines and restrictions on the use of assets or business premises. Strong internal controls in all members of the NLB Group have to ensure accordingly prudent and diligent handling of property of NLB d.d. and other members of the NLB Group.

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### Examples of desired conduct

- I estimate if we are acting with due care and professionalism, because in any case we must comply with the principle of due diligence.
- I reasonably and economically use working tools and other assets owned by the employer (e.g. office supplies are only used in the course of work and not for personal purposes).
- I do not use the company PC and mobile phone for private purposes in an excessive manner.
- I carefully allocate time to relationships with customers and other stakeholders of the NLB Group.
- I actively contribute to the protection of the assets of the NLB Group, including physical assets, technological equipment, intellectual property, financial assets, trademarks in the NLB Group and relationships with customers and business partners of the NLB Group.
- I participate in the prevention of inappropriate use of assets of the NLB Group.
- When using text from articles or other documents I always cite the sources, as appropriate, and I only use photo material for which the relevant copyrights have been obtained.

### Examples of unacceptable conduct

- Negligent use of assets of the NLB Group.
- The use of means of work for the purpose for which an authorisation has not been issued.
- Sales and disposal of the assets of the NLB Group without suitable authorisation and in contravention of internal rules.
- Destroying, hiding, concealing or disposing with any property of the NLB Group in any other inadmissible way.

### Questions for help

- Do I understand the rules regulating handling of assets used in the course of my work and the property of the NLB Group?
- If it were up to me, would I wish them to be used by someone else for other purpose without my permission?
- Do I really need to use the specific asset or can I use it in a more economic manner?
- Would I handle such property in my household in the same manner if it were my own?
- What would be the consequences for the NLB Group if all employees would do that?

### Practical examples

- *An employee has a sideline that does not represent a potential conflict of interest. For convenience purposes this employee instructs customers to call them at the company phone because that way their problems can be solved quickly.*

Such action by the employee is not appropriate. The use of all means of work for business purposes means to use them for performing work obligations in the scope of employment at the NLB Group. Using the means of work for a profitable sideline or for advising third parties outside regular work obligations is not permitted.

- *How should I act if the superior asks me to adjust some figures in financial reports, which would be contrary to the applicable regulations?*

It is your responsibility to be honest and consistent. If you feel any pressure of the superior, point this out in a clear manner. If the warning is not sufficient, the matter is reported to the relevant internal organisational unit via the established channels. Anonymous report and total protection of the whistle-blower is also guaranteed.

## **8 WE ARE SOCIALLY RESPONSIBLE**

### **8.1 Respect for human rights**

The NLB Group strictly respects and protects the nationally and internationally recognised human rights and fundamental freedoms that are in compliance with the highest international standards.

In accordance with the mission of the NLB Group, special attention is paid to respecting human rights and fundamental freedoms. We are an organisation that strives for long-term trust of employees, customers, business partners, supervisory bodies and the company as a whole, which is why we operate in line with the commitments and promises made, and in a transparent manner.

At NLB Group, we value our employees and want to be a good employer. For our employees we create appropriate and safe working environment, in which the dignity and integrity of the employees in the workplace are protected and respected. We encourage the personal and professional growth and development of our employees. We strive to create a working environment that respects the personal, sexual, religious, racial, national, ethnic, cultural, social, geographic, family, physical, age and any other individual characteristic or belief of the employees.

We believe that a fair relationship with the customers must be based on joint values and fundamental principles, including the respect of human rights in all offered banking products and services. The NLB Group only does business with customers it can trust, and therefore expects its customers to comply and strive for compliance with the applicable regulations and standards in the area of human rights conduct their business in accordance with the principles of business ethics and with an appropriate level of candour in communication.

We at the NLB Group strive for the respect of human rights throughout the entire supply chain, which is why the suppliers and their subcontractors are carefully selected and asked to respect human rights.

We devote special care to assessing the respect for human rights in setting criteria within our investment policy, and with due diligence take into account direct and indirect effects on the observance of human rights in the countries where we are present, requiring all employees to do so.

### **8.2 Care for the social environment**

At the NLB Group we are aware of the role that surpasses the framework of the financial sector in which we operate. In relation to employees, customers and society at large and the stakeholders, we pursue the social and environmentally responsible policy, which regulates the issue of NLB Group's integration in society and environment. We thus demonstrate the commitment to and respect for social and environmental values, placing in the forefront individuals, the local community and the society at large in all countries where the NLB Group is operating.

The Bank pays special attention to knowledge and lifelong learning. The key pillars of the socially-responsible operations of the NLB Group are, in addition to the care for its employees, also the protection of integrity, mentorship, support to professional and youth sports, humanitarian activities and protection of cultural heritage.

With the aim of fulfilling the obligation to adhere to its own principles and the corporate principles, the NLB Group shows it is aware of its wider social role and thus joins the circle of domestic and international public and private financial institutions and companies which are aware of their social role.

The NLB Group remains politically neutral and supports no political organisations or activities by donations or subsidies, even if so permitted by the local legislation. The NLB Group also respects the activities of the employees who, as citizens, wish to privately participate in public life, while they have a duty to carefully protect the reputation and credibility of the NLB Group.

### **8.3 Promoting sustainable economic activities and financing**

The NLB Group supports and promotes transition to low-carbon sustainable economy that will use the resources in a more efficient manner and commits to positively contribute to the financial system that will support sustainable growth. It is committed to supporting financial products and services with the aim of ensuring environmental and social well-being to which they also contribute. We at the NLB Group promote sustainable economic activities with the aim of improving the quality of life and ensuring a better future for the entire region, and support our customers in their plans and activities in the area of climate protection.

### **8.4 Environmental responsibility and awareness**

Our commitment is to improve the quality of life in the region in which we live. Environmental responsibility means protection of the environment in which we live in two ways:

- By changing our business model and development of banking products and solutions that have a positive impact on the environment, using digitalisation and technological development, which allows us to offer our customers completely digitalised packages, and financing projects that co-create low-carbon society and economy.
- By changing our behaviour. This means that we take into account direct and indirect environmental aspects and the aspects of our business decisions, and act in such a manner that our impact on the environment is as positive as possible.

The employees of the NLB Group are committed to taking care of the environment in the manner of contributing to saving energy, paper and other assets. As far as possible we responsibly and actively participate also in the projects that strengthen our joint responsibility towards the environment.

### **8.5 Communication of the NLB Group**

Communication with publics is professional and consistent with the NLB Group policies. The employees of the NLB Group have a duty to respect internal rules on public appearance and public expression of opinion that might influence the NLB Group. Outside the NLB Group we do not discuss matters that we are not authorised for. The NLB Group employees make no comments about or in relation to the NLB Group to the media, investors, financial or industrial analysts, external consultants, in on-line chat rooms, social networks or at other public fora without specific permission.

The NLB Group systematically and actively performs corporate communication activities, at the same time building relationships with the publics. During communication we always put our values first and thus strengthen the reputation of the NLB Group. We provide an example of open, respectful and responsive communication with employees, customers, owners and financial public.

### **8.6 Cooperation with the competent authorities**

The NLB Group is committed to full cooperation with regulatory authorities and other competent bodies responsible for supervising and checking the compliance of the NLB Group's operations in the countries where it operates. That way we provide transparent and accurate information used by supervisory bodies, the financial sector, shareholders, customers and public at large in the countries where the NLB Group is operating.

The employees participating in the preparation of financial and other prescribed reports must always provide complete, accurate, timely and understandable disclosures in reports and documents that the NLB Group submits or files with the regulatory and other competent bodies and in other public releases.

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### **Guidelines**

We have to respect and strive for long-term trust of employees, customers, business partners, supervisory and other competent bodies, external auditors, investors and the company as a whole. The operations of the NLB Group have to be comprehensive, consistent with the values and promises made, transparent and positive.

Each of us can contribute to the pursuit of these goals in everyday actions and work.

### **Examples of desired conduct**

- I pay attention to the observance of human rights in everyday work and in relationship to other employees, customers and business partners.
- In potentially planned assumption of functions in political parties or bodies of local or national authority I am aware that the NLB Group is in principle politically neutral, and I act with due diligence, consult the superiors or the organisational unit competent for the compliance of operations, regarding potential incompatibility of functions.
- If possible, the principle of sustainable mobility is used when selecting business trips.
- I participate in charity campaigns and encourage employees and colleagues to do the same.
- I recycle, reuse packaging, and use environment-friendly materials.
- I contribute to preventing the pollution of the environment, work premises and the environment surrounding our office buildings.
- I have been acquainted with and adhere to internal rules on environmental and social responsibility.
- I keep up with and fulfil requirements on safety and health at work.
- I act in accordance with the key behaviours for achieving and fulfilling the values of the NLB Group.

### **Examples of unacceptable conduct**

- Appearing in public or expressing opinion in public about the NLB Group without previously informing and obtaining permission from the organisational unit in charge of corporate communications.
- Failure to observe human rights in relationship to any person that you cooperate with.

### **Questions for help**

- Do I contribute to reducing the effects of our actions on the environment and people?
- Am I aware of the potential effects of our customers' activities that are not permitted (child labour to perform activities, participating in unethical activities and similar) on our business activity and the reputation of the NLB Group?
- Do I respect internal rules in social and environmental awareness?
- Do I undergo sufficient training and do I understand the rules regulating our social responsibility?

### **Examples from practice**

- At the sports games open to all NLB Group employees I participated in painting a local primary school. I regularly go to blood donor campaigns and by helping renovate the interior of the school I contributed to a broader social environment.
- In the last annual report I read how much paper and electricity was saved by more economical operations. Because we spend a lot of time at work, it is also important that we at the NLB Group are environmentally conscious and thus contribute to preserving our planet. Efficient use of all natural resources is a model example of social responsibility.

## IV. Values of the NLB Group

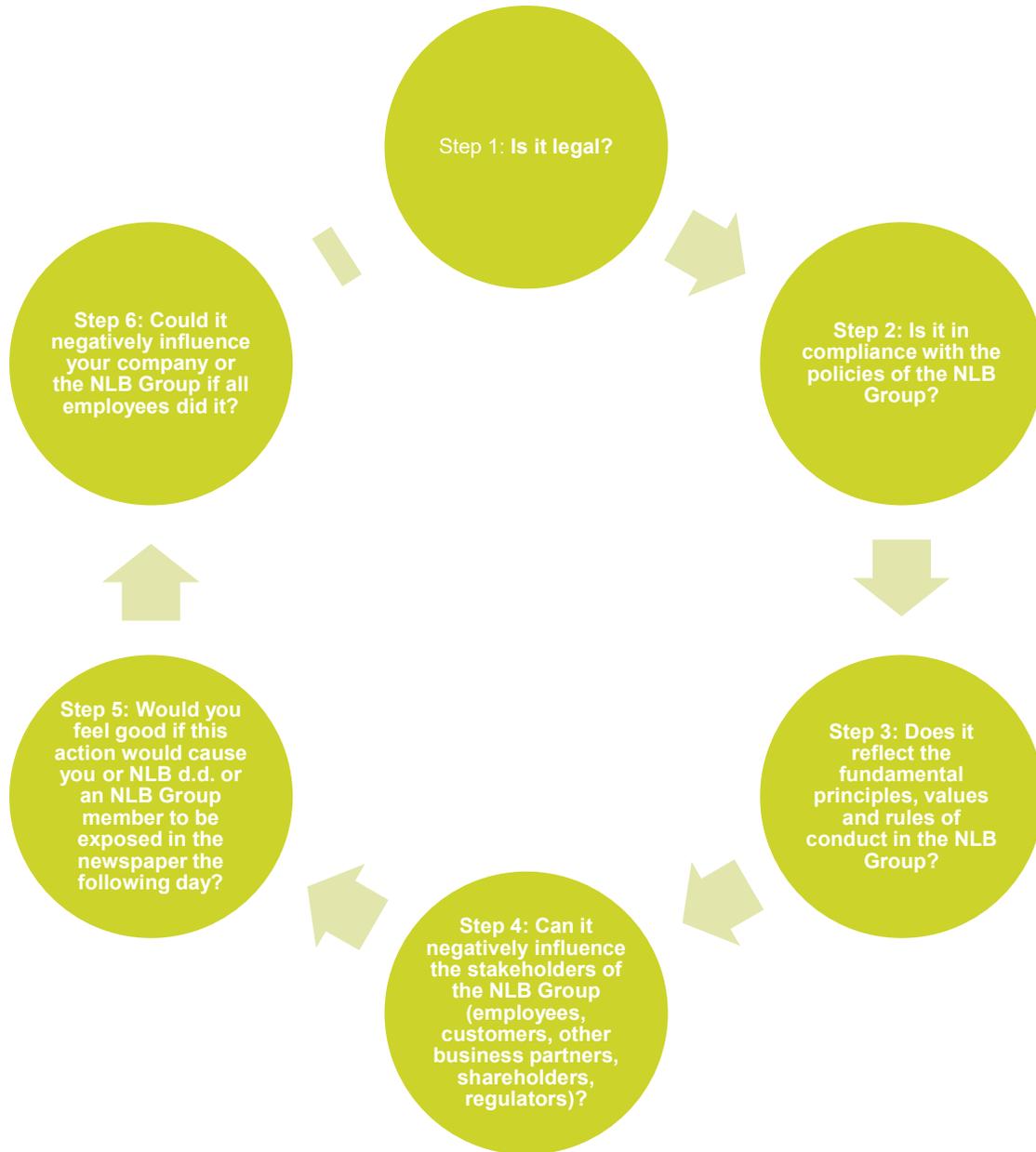
Each goal begins with a clearly set path. After reviewing the processes, our advantages and possibilities for improvement, and with the aim of improving the organisational climate in the NLB Group, we searched for the values and behaviours through which we can live our mission and achieve our vision. A diverse group of employees, with strong support of the management, found 3 principal values and 5 key behaviours required for implementing each of the three values. The values of the NLB Group are achieved and lived by taking into account the fundamental principles, recorded in this document.

VALUE	KEY BEHAVIOURS
<b>We develop</b>	<ul style="list-style-type: none"><li>• Gain and share knowledge</li><li>• Persistently strive for constant improvements</li><li>• Offer support to learning and improvements</li><li>• Cooperate to achieve a common goal</li><li>• Speak frankly and listen actively</li></ul>
<b>We promote entrepreneurship</b>	<ul style="list-style-type: none"><li>• See everything through the prism of digitalisation</li><li>• Always take another step forward</li><li>• Improve our agreements and promises</li><li>• Propose innovative and simplified improvements</li><li>• Strive for empowerment and assume responsibility</li></ul>
<b>We improve lives</b>	<ul style="list-style-type: none"><li>• We are defenders of sustainable practices and we use them</li><li>• We show interest and understanding towards each other</li><li>• Each of us leads to change</li><li>• We take care of our personal impact on the environment</li><li>• We promote changes</li></ul>

## V. Making the Right Decisions

Our success depends on our ability to make the **right decisions** – those that are consistent with our fundamental principles and values.

When we face the question of how to act correctly, we follow the next steps towards adopting the right decisions and consult with others, if required, to adopt the correct decision. When you consider this, follow the next steps:



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<p>Step 1: Is it legal?</p> <p style="text-align: center;">↓</p>	<p>YES → go to step 2.</p> <p>NO → The action can have serious consequences. Do not do it.</p> <p>? → contact the local organisational unit in charge of providing advice about the Code.</p>
<p>Step 2: Is it in compliance with the policies of the NLB Group?</p> <p style="text-align: center;">↓</p>	<p>YES → go to step 3.</p> <p>NO → The action can have serious consequences. Do not do it.</p> <p>? → check the internal documents; talk to your superior for guidance or contact the local organisational unit in charge of providing advice about the Code.</p>
<p>Step 3: Does it reflect the fundamental principles, values and rules of conduct in the NLB Group?</p> <p style="text-align: center;">↓</p>	<p>YES → go to step 4.</p> <p>NO → The action can have serious consequences. Do not do it.</p> <p>? → check internal acts in relation to ethical conduct; talk to your superior for guidance or contact the local organisational unit in charge of providing advice about the Code.</p>
<p>Step 4: Can it negatively influence the stakeholders of the NLB Group (employees, customers, other business partners, shareholders, regulators)?</p> <p style="text-align: center;">↓</p>	<p>YES → The action can have serious consequences. Do not do it.</p> <p>NO → go to step 5.</p> <p>? → talk to your superior; for guidance, contact the local organisational unit in charge of providing advice about the Code.</p>
<p>Step 5: Would you feel good if this action would cause you or NLB d.d. or an NLB Group member to be exposed in the newspaper the following day?</p> <p style="text-align: center;">↓</p>	<p>YES → go to step 6.</p> <p>NO → The action can have serious consequences. Do not do it.</p> <p>? → talk to your superior; for guidance, contact the local organisational unit in charge of providing advice about the Code.</p>
<p>Step 6: Could it negatively influence your company or the NLB Group if all employees did it?</p>	<p>YES → The action can have serious consequences. Do not do it.</p> <p>NO → It looks that you can make a decision for such action.</p> <p>? → talk to your superior; for guidance, contact the local organisational unit in charge of providing advice about the Code.</p>

## **VI. The Code and the local and international legislation and regulations**

The NLB Group pursues its development strategy and updates its codes which regulate the standards of conduct in the NLB Group in accordance with its orientations and by keeping abreast with the development. Thus, this Code replaces the previously applicable Code that regulated the ethical conduct and corporate compliance at the level of NLB d.d. and the NLB Group. The NLB Group members shall in due time adjust all internal acts, rules and procedures to harmonise them and base them on this Code.

The members of the NLB Group are obliged to regularly (at least once a year) carry out the training of all employees in the field of the Code, as well as regularly and actively promote it, raise awareness, train and inform about the contents of the Code, as well as provide explanations regarding their use in specific situations faced by the employees.

The Code sets out the standards of conduct and behaviour of NLB Group employees, as well as expectations from its business partners and other stakeholders. In the event of a conflict between the provisions of this Code and the requirements of the national legislation, the NLB Group will accordingly harmonise the Code with the local regulations and, while doing so, suitably comply with the rules stated herein, following the strictest criteria relevant in the case at hand.

The Code does not regulate all questions that we face in our daily operations in the NLB Group. It is essential to follow the purpose, spirit and text of this Code. Our objective must be to do what is “right” and not only what is permitted. More detailed guidance for the NLB Group employees is prescribed in guidelines and other internal acts of the respective NLB Group member, following the spirit and purpose of this Code and the requirements of the local regulations as well as the specifics of the cultural and social environment in which it operates.

The NLB Group operates in sectors that are highly regulated because of the urgency to ensure financial stability and prevent system risks. The NLB Group is aware that compliance is the foundation of its business.

Every employee is expected to be familiar with the international standards, applicable laws, rules and regulations in all areas, and professional standards that they have to be acquainted with in the course of their work.

Unfair business practices and similar intolerable actions have a negative impact on our customers' trust and harm the reputation of the NLB Group, and may expose us to regulatory measures, fines or other negative consequences. Therefore, all employees in the NLB Group are personally obligated and responsible to act in line with the applicable regulations, internal rules and procedures, and instructions and to follow the spirit, purpose and the rules specified herein.

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## VII. Transitional and final provisions

This Code shall enter into force when it is adopted by the Board of Directors of the Bank and after it has been published in the Bank's intranet. The Code is published in the website of the Bank, if allowed by the website, it is also available in digital form (e-book).

On the day this Code enters into force, the NLB Group Code of Conduct, Version 1, May 2017, ceases to apply. If there is a discrepancy between the provisions hereof and the provisions of the Bank's internal documents, the provisions of this Code shall apply.

All bank employees shall be notified of the adoption of this Code.

## VIII. Reference documents

- NLB Group Code of Conduct, version 2, March 2023
- Regulation on Corporate Governance of Banks, August 2019, Central Bank of Kosovo

## IX. Statement of the administrator of internal document about the alignment and approval of the internal document

*"I, the administrator of this internal document, hereby assure that this internal document was submitted for review, revision and confirmation to all the organisation units in the Bank affected by this internal document and its amendments and that it was approved by them. This internal document was coordinated with them in a way that its content is clear and consistent with other internal documents and regulations and it does not conflict with other internal documents of the Bank."*

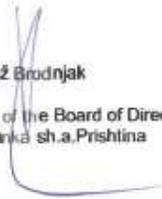
### Preparation/Review

Signatory and position in the company	Reason for signing	Date of signing	Signature
Visar Maioku Director of Compliance and Integrity sector	Reviewed by	01.09.2023	

Competent body adopting the document: Board of Directors of NLB Banka sh.a. Prishtina

Prishtina, 31.08.2023

Blaž Brodnjak  
Chairman of the Board of Directors  
of NLB Banka sh.a, Prishtina



**Appendix : Statement 1**

NLB Banka sh.a., Prishtina

**Statement**

We confirm that the content of document NLB Group Code of Conduct, complies with the document NLB Group Code of Conduct, version 2, that was prescribed by NLB d.d.

NLB Banka sh.a. Prishtina, shall be fully responsible for implementing and enforcing the adopted content.

Date: 31.08.2023

Gem Maloku  
Member of Management Board

