### **Our Statement on Conduct**

Our commitment to the highest ethical standards lies at the heart of our core values and drives all our business activities; our strategy, our corporate governance, our planning and business model, our culture and behaviours, our interaction with all our stakeholders.

Our culture has been shaped through the years, by the way we run our Bank every day, by acting responsibly and managing risk effectively. We recognise that nurturing a strong culture is a continuous effort that requires thoughtful, purposeful action. To this end we ensure that all responsible corporate actions and behaviours are aligned with our vision which is to create lifelong partnerships with our customers, guiding and supporting them in a changing world.

### Our approach to Conduct

There are 5 pillars that form the pathway of our approach to Conduct and the guidelines that we follow in order to meet the expectations of all our stakeholders.

PILLARS	
Strategy, Governance and Risk Culture	Our governance framework provides effective oversight of how we fairly conduct our business towards our people, customers, shareholders and society.
Responsible Services	We provide high quality of service to our customers in a timely and professional manner.
Our People	Our people are our most valuable asset and the key to achieving our goals and objectives, and are competent and empowered to consistently do the right thing for our customers, shareholders and society.
Our Society	We go Beyond Banking and we are committed to making a difference by fulfilling our responsibility as the largest financial organization of the country in driving social economic and technological change.
Our Environment	We are fully aware of our responsibility to minimize the negative impact of our operations on our planet and we are committed towards environmental sustainability.

## 1. <u>Strategy, Governance and Risk Culture</u>

- Our strategy, business models as well as our business decisions are customer focused.
- We engage with regulatory bodies in a timely open and transparent manner.
- We commit to implementing a zero tolerance policy on fraud, money laundering, terrorism financing and corruption and we do not accept any violations of the relevant legislation nor breaches of our internal policies and procedures. <u>Learn more</u>
- We aim at establishing explicit and robust risk management practices in all business areas, aligned with business strategy and embedded in the provision of products and services to our customers.
- We are committed to protecting the integrity of financial markets and we seek to prevent inappropriate market conduct, market manipulation/ market abuse.
- We manage <u>Conflict of Interests</u> by focusing on principles, procedures and arrangements for the prevention, identification, documentation, escalation and management of such Conflicts and in compliance with the legal and regulatory framework both at bank level and on a personal level.
- We maintain appropriate procedures for compliance with <u>Competition</u> <u>Law</u> and educate our people to recognise antitrust issues.
- We keep accurate records and have appropriate reporting which helps us to meet our legal and regulatory requirements as well as to ensure the accuracy of all business and financial records.
- We safeguard company assets, both physical and digital, and we protect them from damage, loss, misuse and theft.
- We continuously invest in improving our existing information systems in accordance with our Digital Transformation Strategy.
- We train and encourage our staff to Blow the Whistle in good faith if they have concerns about wrongdoing or malpractice without fear of retaliation, victimization, disadvantage or dismissal. <u>Learn more</u>

# 2. <u>Responsible Services</u>

- We design and offer products that meet the different needs of our customers, governed by terms and conditions that are clear and understandable.
- We recognise our customers' real needs and support them in finding the right solutions.

- We continuously adjust our products and services in order to be customer focused. We respect customers' privacy and maintain confidentiality in respect of our Bank and our clients.
- We act honestly and fairly.
- We act with integrity and we 'walk our talk'.
- We do not accept any gifts or benefits that could affect our judgement in the performance of our duties. <u>Learn more</u>
- We offer a variety of safe digital channels via online services to our clients.
- We communicate in a timely and transparent manner with various external bodies for the benefit of our customers and society in general.
- We collect, use and process any personal information only for legitimate business purposes and protect it from possible loss, misuse or disclosure and maintain relevant policies regarding <u>Information</u> <u>Security</u> and <u>Data Protection</u>.
- We apply strict controls seeking to ensure the legitimacy of the commercial transactions of all our customers.
- We challenge ourselves to better ourselves, by acknowledging when things go wrong. We fix things and we try to learn from our mistakes:
  - ➤ We ensure that customers are aware of the various channels they can utilise to raise an issue and /or make a complaint: our website <u>www.bankofcyprus.com.cy</u>, through our branches or through 1bank using their Subscriber number.
  - We investigate and resolve our customers' complaints in a timely and effective manner.
  - Upon completion of investigations, we provide responses to our customers regarding the outcome and the remedial actions (where appropriate) that are undertaken.

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# 3. Our People

- We value our people and we provide good working conditions for them.
- We create an inclusive and fair working environment and we provide equal opportunities regardless of gender, age, religion, ethnicity or race, sexual orientation, physical abilities or political convictions.
- We aim at creating lifelong learning, development and opportunities for career advancement.

- We value outstanding performance, customer centricity, change and innovation, outstanding contribution, team spirit and actions that promote our ethics and values.
- We recognise that our employees are the most valuable resource of our Group. Among others, we implement the "Well at Work" well being programme, which promotes physical, mental, social and financial health.
- We encourage our employees to participate in corporate volunteering activities making a positive societal impact.

### 4. Our Society

- We operate beyond our business activities to be the bank for Cyprus, through key partnerships and initiatives, in the pillars of Health and Education.
- We drive partnerships with the formal sector and in collaboration with our customers and Civil Society, to meet compelling societal needs.
- We contribute in promoting learning, development and social welfare and in preserving local culture and history.
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#### 5. Our Environment

- We improve our eco-efficiency through measures, such as the efficient use of energy and paper, including green Information Technology (IT).
- Through digitization we encourage our employees to reduce the use of paper in everyday transactions and tasks, aiming transition to a paperless organisation.
- We developed an action plan for environmental investments following the energy audit, and implemented a number of initiatives towards better energy management.
- We are committed to mitigating environmental risk by educating and supporting our partners accordingly.
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