

Extract

Partner Code of Ethics of OTP Bank S.A.

- (1) Transparency and ethical business conduct are of paramount importance to the OTP Bank S.A. (hereinafter – Bank). A prerequisite for long-term success is to operate with integrity and to maintain a reputation based on trust, which helps to build stable partnerships and to achieve long-term business goals.
- (2) The purpose of the Partner Code of Ethics is to provide clear and unambiguous guidelines and expectations for those who have a relationship with the Bank on ethical business conduct in order to protect the values of the Bank.
- (3) The Bank endeavours to ensure that all its suppliers, business partners, agents and other contractual partners (hereinafter – Partners) undertake to comply with the provisions of the Partner Code of Ethics (or equivalent own regulations) by accepting the provisions of the Partner Code of Ethics, as a clauses of the contract with the Bank.
- (4) If a manager or employee of a partner company knows or has reasonable grounds to suspect that the values set out in the Partner Code of Ethics have been violated in the partnership with the Bank, or if they have any questions about the Code, please indicate them

to the Compliance Direction of OTP Bank S.A.

- in person during working hours (by appointment) or by letter:
OTP Bank S.A.. Compliance Direction (bd. Ștefan cel Mare și Sfânt, nr. 81A, Chișinău, Republic of Moldova)
 - by telephone, Mondays-Fridays, 8:30– 17:30, +373 22 812355
 - by e-mail at alerte.conf@otpbank.md
- (5) Reports can also be made anonymously. The Bank will always treat notifications, requests and investigations confidentially in observance of the applicable statutory regulations and internal rules, protecting the whistleblower.

I. Compliance with laws, regulations and official requirements

- (6) The partners of the Bank are obliged to comply with the applicable legal provisions, decisions and guidelines of the authorities, as well as with the organisational standards and ethical requirements applicable to their business activities. They shall ensure, through appropriate regulation and training within their companies, that their employees and managers act in accordance with internal rules and applicable laws and regulations.

II. Transparency of accounts and reports

- (7) The Bank's suppliers, business partners, agents and other contractual partners are required to prepare and publish their accounts and financial reports in accordance with generally accepted accounting principles and applicable laws.

III. Compliance with competition law and consumer protection rules

The Bank's Partners are expected to adhere to the principle of fair competition and to comply with applicable competition laws. Partners act ethically and fairly in compliance with competition law, and

refrain from any conduct that could result in an unfair restriction of competition or abuse of a dominant position. Unfair price-fixing, collusion in tendering, market-sharing agreements or abuse of dominant position are prohibited.

- (8) The Bank's Partners are also expected to pay special attention to the protection of consumer interests and rights, and the quality of services provided to consumers.

IV. Conflict of interest

- (9) The Bank's Partners must act transparently and honestly in relation to their business activities: they must disclose to the Bank any direct or indirect relationship between the Partner and the employees of the Bank that affects business relations and report any such event to the Bank without delay.

V. Anti-corruption

- (10) The Bank is committed to combatting corruption, and declared zero tolerance towards all forms of bribery and the gaining of unfair advantages. The Bank ensures that national and international legislation to which the Republic of Moldova is a party, on the prevention of corruption is fully enforced and expects its employees and contractual partners to comply with it.
- (11) The Bank expects its Partners not to: promise or offer any benefits or advantages to employees of Bank with the intention of obtaining business advantages; or demand or offer bribes, gifts or other benefits of value for the purpose of obtaining or realising business opportunities with a Bank.

VI. Avoiding insider dealing

- (12) In the course of their daily work, certain employees of Bank's Partners may come into possession of inside information, which they may not use for financial gain or share with unauthorised persons. Bank's Partners are expected to take all necessary measures to avoid and prohibit insider trading.

VII. Confidentiality, protection of personal data

- (13) The Bank's Partners are expected to protect and safeguard trade secrets, banking secrecy and securities secrecy in accordance with the applicable laws, to keep confidential business data relating to the Bank secure, without time limit and not to use or disclose them to third parties without prior consent.
- (14) The Bank's Partners must ensure an adequate level of protection of personal data processed by them, and must take appropriate security measures to ensure the confidentiality, integrity and availability of the data to the authorised parties in accordance with the Law No.133 of 08.07.2011 on personal data protection and similar as defined in the Policy on the security of personal data processed within OTP Bank S.A no. A_000888.

VIII. Activities against money laundering and terrorist financing, international sanctions and restrictive measures

- (15) The Bank expects its Partners to act in the strongest possible way to prevent and deter money laundering and terrorist financing, to apply sanctioning rules and, by following the "Know Your Customer" principle, to obtain exhaustive customer information.
- (16) The Bank's Partners are committed to complying with the economic, financial, trade sanctions and embargo laws and regulations adopted by the European Union and the United Nations and, to the

extent as can be expected from them, the sanctions and laws of other applicable jurisdictions in particular those of the United States of America and the United Kingdom).

IX. Safe and healthy working environment

(17) The Bank's Partners ensure that their employees have a healthy and safety workplace that complies with labour regulations, that their health and safety are protected and that the necessary safety, occupational safety and fire protection training is provided.

X. Respecting human rights, ensuring workers' rights

(18) The Partners of the Bank are obliged to protect the universal human rights enshrined in the Constitution of the Republic of Moldova and in international conventions to which the Republic of Moldova is a party and to firmly reject child labour, the employment of minors and forced labour. All employees must be treated fairly and with respect. The rights relating to personality, dignity and privacy of workers must also be respected.

(19) In the exercise of workers' rights, it shall, to the extent that it is entitled to do so, ensure the following: the right to work, to free choice of employment, to just and satisfactory conditions of work, fair wages; the right to freedom of association and collective bargaining, the right to form and join trade unions, the right to be free from all forms of trafficking in persons, child labour and forced or compulsory labour; the right to non-discrimination, the principle of equal pay for equal work and the right to freedom of expression, the right to strike, the right to a healthy environment, the right to privacy, family, private life and secrecy of correspondence, etc..

XI. Protection of the Bank's assets and interests

(20) The Bank's Partners must assume responsibility for the integrity, proper and economic use of the Bank's assets to which they have access or to which their activities have an impact.

(21) The Bank's Partners will also avoid any situation that could adversely affect the business interests or reputation of the Bank.

XII. Sustainability

(22) The Bank's Partners assess and comply with sustainability (ESG) requirements to the extent that they can be expected to do so, and meet the E–Environmental, S–Social and G–Governance requirements applicable to them.