

ОЩАДБАНК

МІЙ БАНК. МОЯ КРАЇНА

JOINT STOCK COMPANY
STATE SAVINGS BANK OF UKRAINE"

APPROVED BY
decision of the Supervisory Board of JSC
"Oschadbank"
dated August 5, 2026, Minutes No. 34

ENDORSED BY
Decision of the Management Board of JSC
"Oschadbank"
dated July 7, 2026, Minutes No. 70

*We, managers and employees of JSC "Oschadbank",
being aware of the mission, purpose, values and Manifesto of the Bank,
following the generally accepted principles of communication and
business ethics,
accept the Code of Conduct (Ethics) of JSC "Oschadbank"*

**CODE
OF CONDUCT (ETHICS) OF
JSC "OSCHADBANK"**

Kyiv – 2026



СЕД АСКОД АТ "Ощадбанк"

№ 320543/67/1-04-2026 від 13.08.2026

Підписувач Каціон Юрій Миколайович

Сертифікат 305700AA12A7C1D6464B6F855D16A0AE499D13BD

Дійсний з 26.01.2026 0:00:00 по 26.01.2027 0:00:00

	COMPLIANCE CONTROL AND REGULATORY COMPLIANCE DEPARTMENT	Version 1.0
	CODE OF CONDUCT (ETHICS) OF JSC "OSCHADBANK"	

FOREWORD OF CEO OF JSC "OSCHADBANK"

Dear colleague,

You are reading one of the key documents setting out the principles governing the work of the Bank and its employees – the Code of Conduct (Ethics) of JSC “Oschadbank”.

Every new employee of the Bank shall read this document carefully. And we shall return to it every year in order to remember: who we are, what we are responsible for, what we aspire to, where we are heading, and how we should proceed.

The Bank’s vision, as set out in our Strategic Programme, is as follows: Oschad is an inclusive Ukrainian bank with high ethical standards that has earned the trust of its customers and is number one choice due to its modern products and services for the support of Ukrainians and business growth, playing a leading role in sustainable economic development, in line with leading ESG practices, and achieving the goals of its stakeholders, with constant care for employees, commitment to innovation and efficiency.

Each of approximately 16,000 employees of Oschadbank, at any given moment, embodies the Bank for our more than 6,000,000 customers, for all Ukrainians, and for the whole world.

The speed at which this vision ceases to be Oschadbank’s future and becomes our present depends directly on the extent to which we all adhere to the principles of the Code of Ethics.

Sincerely,

Yurii Katsion,

Chairman of the Management Board of Oschadbank



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MY BANK. MY SUPPORT Our Manifesto

My bank is my support,
The support of millions of people who now say "My":
My people. My business. My freedom.

We have gone through the darkness together
And we are going to the light together.
My contribution. My courage. My hope.

With us, free cities are being rebuilt
And businesses are flourishing.
My home. My street. My land.

People trust us with their tomorrow,
Because we are open to everyone.
We are always there for you.
The largest universal bank.

My history. My movement. My future.
Our future.
My.

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FOREWORD

The main asset of JSC "Oschadbank" (hereinafter - "Oschadbank" or the "Bank") are managers¹ and employees of the Bank (hereinafter - the "Bank Employees"). It is their professionalism that underlies the Bank's prosperity.

Each employee shall embody the Bank in his/her conduct thereby supporting its reputation and image. We, the Bank employees, remember that our actions and deeds are perceived as those of Oschadbank.

Each Employee of the Bank shall be fully aware of and take measures to confirm that Oschadbank is:

- 1) changing and initiating changes;
- 2) a sustainable and successfully developing bank;
- 3) a reliable and competitive bank that holds leading positions in all segments of the banking market;
- 4) a universal bank actively working with a diversified customer base in various sectors of the Ukrainian economy;
- 5) a state-owned bank with good traditions, high business culture, and impeccable reputation among its business Partners and Customers;
- 6) a progressive bank operating in accordance with high ethical standards;
- 7) an open bank that can be a role model in compliance with the requirements and provisions stipulated by the current legislation of Ukraine and generally accepted standards of ethics and conduct.

SECTION 1. PURPOSE AND OBJECTIVES OF THE CODE

Article 1. The Code of Conduct (Ethics) of JSC "Oschadbank" (hereinafter - the "Code") is a collection of basic moral, ethical and business norms and principles, corporate values and rules of conduct, which are followed by all Bank Employees.

Article 2. Adherence to high ethical standards is a priority rule for all the Bank Employees, both during day-to-day work and within internal corporate relations.

Article 3. The **purpose of the Code** is to raise awareness of the Bank Employees of unified norms, principles of activity, ethics and conduct aimed at supporting the flawless image and impeccable reputation, enhancing the value, ensuring the financial stability and efficiency of Oschadbank and satisfying the Bank Customers' interests.

Objectives of the Code:

- 1) ensuring understanding by the Bank Employees of Oschadbank's mission and purpose, corporate values and the Manifesto, as well as their role in fulfilling Oschadbank's mission;
- 2) defining the policy and rules of interaction of Oschadbank with the Shareholder, Investors, Customers, state authorities, business Partners and Competitors;

¹ In accordance with Article 42 of the Law of Ukraine *On Banks and Banking*, managers are Chairperson, his/her deputies and members of the Bank Supervisory Board; Chairperson, his/her deputies and members of the Bank Management Board; Chief Accountant of the Bank

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- 3) defining standards of ethics and business conduct of the Bank Employees;
- 4) defining acceptable and unacceptable conduct of the Bank employees;
- 5) development of corporate culture, risk management culture, orientation of the Bank Employees to common corporate goals and values, enhancing corporate identity;
- 6) ensuring that the Bank employees have personal responsibility to business partners, suppliers, customers, investors and the Bank Shareholder for the performance of their functional/official duties;
- 7) supporting the flawless image and impeccable reputation of Oschadbank;
- 8) compliance with the highest standards of ethical conduct in the performance of functional/official duties by the Bank employees.

Article 4. The Code has been developed on the basis of regulations of the National Bank of Ukraine, current legislation of Ukraine, generally accepted standards of ethics and conduct, business practices and best international practice.

Article 5. The principles and norms set out in the Code are binding on all Oschadbank's employees regardless of their position.

All the Bank employees who perform managerial functions shall take measures to ensure that their subordinate employees comply with the rules and requirements of the Code.

Article 6. The principles and norms of the Code shall be taken into account in the development of Oschadbank's internal regulatory documents governing activities of its structural and autonomous units and the Bank employees.

SECTION 2. MISSION, VISION, PURPOSE AND CORPORATE VALUES OF OSCHADBANK AND ITS EMPLOYEES

Article 7. The Mission of the Bank is to work to provide inclusive, innovative and affordable financial services of high quality as a universal bank for Ukrainians and entrepreneurs throughout Ukraine, ensuring stability, leadership in the recovery and support of Ukrainian businesses and strategic sectors of the economy, as well as promoting high standards of sustainable development.

The Vision of the Bank is an inclusive all-Ukrainian Bank with high ethical standards, which has gained the trust of its customers, is the Bank of First Choice with modern products and services to support Ukrainians and business growth, playing a leading role in sustainable economic development, in line with the best ESG practices and achieving the goals of its stakeholders, with constant care for employees, commitment to innovation and efficiency.

Article 8. The purpose of the Bank is to ensure its financial stability and strengthen its market position, as well as to promote economic growth and social progress in the country in all areas of activity.

The Strategic Goal of Oschadbank is to continue to function as a universal bank that plays a key role in supporting the economy and society during and after the war.

Oschadbank's key strategic objectives are:

1) Effectiveness:

- a) improving customer focus and service quality;
- b) digitising distribution channels and transforming efficiency;



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c) business growth acceleration.

2) Further modernisation:

- a) transformation of the Bank to ensure effective use of data and analytics;
- b) optimisation and automation of processes;
- c) developing an innovative corporate culture and strengthening the employer brand.

3) Resilience:

- a) strengthening financial sustainability, resilience and security;
- b) support for economic recovery;
- c) increased focus on ESG issues.

Article 9. The Bank's corporate values are:

1) Humanity

People are at the heart of everything we do. The principles of gender equality, accessibility, social inclusion, integrity and honesty are part of our DNA.

2) Focus on Ukraine

We are a Ukrainian Bank We act in the interests of the Ukrainian community in Ukraine and around the world. Using our scale, we project a positive impact on the development of financial services for all Ukrainians.

3) Support and pillar

We are a reliable support and pillar for all the parties involved. We are a pillar of support for business, and we support government lending programmes for MSMBs and Ukrainian citizens.

4) European values

We are adherents of European values, principles and standards. Ukraine is Europe! That is why we are already implementing the best European practices in the Bank's activities, in line with the European standards for responsible banking in the areas of environmental, social responsibility and corporate governance.

Article 10. Oschadbank's corporate values have become a basis of the Bank's Manifesto, which is a credo and a guide to action for the Bank Employees.

The Bank Employees shall share corporate values and strictly adhere to them. The Bank Employees performing managerial functions, shall demonstrate, by their own example, the importance and necessity of maintaining corporate values by other Bank Employees.

The following requirements and responsibilities are assigned to the Bank managers:

- 1) the duty of care – the duty of the Bank managers to take decisions and act in the interests of the Bank on the basis of legal requirements, provisions of the Bank's Charter and other internal regulatory documents of the Bank, and comprehensive assessment of the available/provided information;
- 2) the duty of loyalty – the duty of the Bank managers to act in good faith in the interests of the Bank and Customers (and not in the interests of their own, the interests of another person or a group of persons with prejudice to the interests of the Bank);



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- 3) obligation to adhere to high professional and ethical standards while performing their functional duties;
- 4) obligation to adhere to proper corporate governance practices, including decision-making that takes into account the principles of sustainable development;
- 5) obligation to comply with eligibility criteria and have impeccable business reputation;
- 6) obligation to adhere to the "tone at the top" principle – the duty of the Bank managers to demonstrate responsible leadership in adherence to the Bank's corporate values;
- 7) citizenship requirement – the Bank managers shall not possess citizenship/nationality of a state that carries out armed aggression against Ukraine.

SECTION 3. CORPORATE PRINCIPLES OF ACTIVITIES

Article 11. In conducting its activities, Oschadbank shall be guided by the following principles:

- 1) ensuring high quality of its products and services;
- 2) ensuring maximum financial efficiency of the Bank's activities;
- 3) protecting the interests of the Shareholder and depositors of the Bank;
- 4) ensuring strict adherence to regulations of the National Bank of Ukraine, current legislation of Ukraine, internal regulatory documents of the Bank and generally accepted standards of ethics and conduct, customs of business practice;
- 5) strictly adhering to the information protection requirements set by the current legislation of Ukraine, including restricted information, confidential information and information that constitutes banking and/or commercial secrets;
- 6) investing in and ensuring access to professional development for the employees;
- 7) ensuring clear distribution of responsibilities among the Employees for all areas of activities, which enables prompt decision-making;
- 8) ensuring proper working conditions for Employees;
- 9) ensuring social protection of the Bank Employees;
- 10) establishing rules to ensure that conflicts of interest are avoided or, in the event of such conflict, all appropriate and necessary measures are taken to resolve it;
- 11) ensuring zero tolerance for unacceptable behaviour of Employees, including any forms of fraud;
- 12) enhancing the risk management culture and supporting it at all levels of corporate governance;
- 13) conducting activities in accordance with the principles of sustainable development, ensuring that environmental, social and governance (ESG) factors are integrated into business processes for the benefit of society and responsible conduct of business;
- 14) further developing of accessibility and ensuring equal access to the Bank's services for every customer, regardless of age, disability or other temporary or permanent impairments;
- 15) implementing social protection and charitable measures by supporting social initiatives and collaborating with charitable foundations;



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- 16) providing support to and facilitating the reintegration of male and female veterans, including employment, professional adaptation, workplace adjustments and the provision of conditions enabling them to realise their professional potential in accordance with the Bank's capabilities;
- 17) implementing initiatives to improve the public's financial literacy and ensure financial inclusion.

Article 12. The Bank, drawing on best international practices and in accordance with Ukrainian legislation, is implementing Environmental and Social and Managerial Responsibility Management System within its operations, whilst also ensuring economic responsibility in its activities.

Article 13. Each of Bank Employees, in the course of his/her day-to-day activities, seeks to contribute to the growth of profitability, increase in the Bank's efficiency, establishment of long-term partnerships with business Partners and Customers, reduction in costs, ensuring financial stability and strengthening business reputation of Oschadbank.

Article 14. We, as Employees of Oschadbank, who are part of it, representing its interests and acting on its behalf, undertake to:

- 1) demonstrate, by our actions and deeds, to colleagues and subordinates an example of attitude to the standards of conduct (ethics) defined by this Code, commitment to the Bank's corporate values, create necessary atmosphere for adherence to the risk management culture, demonstrate by word and deed that deliberate misrepresentation of information or unethical behaviour will not go unnoticed, even if the result of actions provided the Bank with a certain advantage or benefit;
- 2) create atmosphere of transparency and accountability in which each Bank Employee actively responds to actions incompatible with this Code;
- 3) perform our functional/official duties in accordance with job descriptions, standards and rules established by the Bank, values and principles adopted by the Bank;
- 4) act professionally, in good faith and diligently in the performance of our functional/official duties, making every effort in this regard;
- 5) strive for higher effectiveness of our work, ensuring the increase of performance of our activities and activities of the Bank as a whole;
- 6) comply, in our daily activities, with the current legislation of Ukraine, internal regulatory and administrative documents of the Bank, in particular Anti-Corruption Programme of Joint Stock Company "State Savings Bank of Ukraine" (hereinafter - Anti-Corruption Programme), generally accepted standards of ethics and behaviour;
- 7) comply with the requirements of the legislation of Ukraine in the field of personal data protection and internal regulatory documents of the Bank regarding the processing and protection of personal data, prevent unlawful disclosure in any way of personal data entrusted to us or which we have become aware of in connection with the performance of professional or official duties or employment;
- 8) not to disclose restricted information, including confidential information and information constituting banking and/or commercial secrecy, follow the established procedures for preventing unauthorised use of such information (whereby information is transmitted to third parties solely on the terms and in accordance with the procedure established by the current legislation of Ukraine and the Bank's internal regulatory documents);



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- 9) use the state language when servicing Customers and providing them with information about products and services, while developing regulatory and administrative documents of the Bank, in working communication, including by means of corporate e-mail, when posting general information and in other cases provided for by the Law of Ukraine "On Ensuring the Functioning of the Ukrainian Language as the State Language";
- 10) maintain and store all documents and all records of official nature in full compliance with the current legislation of Ukraine and internal regulatory and administrative documents of the Bank;
- 11) build our relations with Customers and business Partners on the principles of honesty, integrity and trust; prevent situations that may damage the interests or business reputation of the Bank;
- 12) build our relations with colleagues on the basis of goodwill and effective cooperation, and maintain atmosphere of respect and tolerance towards each other;
- 13) strictly adhere to the current legislation of Ukraine in the sphere of consumer rights protection, including to react to information on possible violation of such rights of Customers;
- 14) prevent damage to the Bank's property, avoid inefficient and unnecessary expenses in servicing the Bank Customers, comply with the Internal Labour Rules and all occupational safety and health rules and instructions, treat office property and use hardware, software and information resources provided to Employees for performing their functional/official duties in a careful and responsible manner;
- 15) not to initiate or take part in any actions or inaction which are related to actual or potential violation by the Bank Employee of the current legislation of Ukraine or internal regulatory documents of the Bank and which may cause financial, reputational or other risks for the Bank;
- 16) not to take any actions and avoid inaction, which may be considered as unacceptable behaviour, that includes the submission of false financial, statistical and management reports, crimes in the sphere of professional activity, bribery, corruption, crimes in the sphere of economic activity (fraud), violation of sanctions, legalisation (laundering) of proceeds of crime, terrorism financing and financing of proliferation of weapons of mass destruction, uncompetitive practices, consumer rights abuse, unfair treatment (discrimination) of employees, violation of the legislation of Ukraine, internal documents of the Bank;
- 17) not to commit actions that may be regarded as discrimination, including by gender, age, race or religion, intimidation, psychological pressure, harassment (mobbing) or stalking (including sexual harassment²);
- 18) pay special attention to risks which arise or may arise in the course of daily activities of Employees and which may cause risks to the Bank or reputational losses, respond to them promptly and appropriately, make every effort to prevent them from occurring and inform the immediate superior and relevant units of the Bank of their presence;
- 19) inform Compliance Control and Regulatory Compliance Department (hereinafter - "Compliance Department") about conflicts of interests, unacceptable conduct and other violations in the Bank's activities concerning us personally or other Bank Employees;

² Sexual harassment is defined as any actions, remarks, proposals or other behaviour of a sexual nature that undermine a person's dignity or create an offensive, humiliating or hostile atmosphere in the workplace. Such actions are unacceptable and shall be regarded as a serious breach of ethical standards, which may result in liability under Ukrainian law.



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- 20) inform the Anti-Corruption Officer of the Bank responsible for the implementation of the Anti-Corruption Programme (hereinafter - the "Anti-Corruption Officer") of providing and accepting business hospitality, giving and receiving gifts, committing corruption or corruption-related offences in accordance with the Anti-Corruption Programme and other violations of the Law of Ukraine *On Prevention of Corruption*;
- 21) to store properly the results of their work, including documents, reports, presentations, projects etc. produced in the course of their duties, bearing in mind that everything created whilst working at Oschadbank is the property of the employer.

SECTION 4. RELATIONS WITH THE SHAREHOLDER

Article 15. Oschadbank is a universal state-owned banking institution, one of the largest and system-forming in Ukraine. The sole Shareholder of Oschadbank is the state of Ukraine represented by the Cabinet of Ministers of Ukraine.

Article 16. By constantly improving the efficiency of our work, we create favourable conditions for the development of the Bank. With our work, we try to meet the expectations of the Shareholder.

Article 17. We value the trust of the Shareholder and Investors and do our best to strengthen it. That is why we make the following commitments:

- 1) to steadily fulfil and protect the interests of the state as the Shareholder;
- 2) to provide professional and quality management for obtaining sustainable and long-term profit of the Bank, to optimise the costs;
- 3) to provide open and timely access to information that is limited only by provisions of the current legislation of Ukraine and competitive conditions;
- 4) on the basis of strict observance of the legislation of Ukraine and regulations of the National Bank of Ukraine, to ensure proper quality and reliability of accounting and reporting;
- 5) to ensure accuracy and accessibility of information on results of the Bank's activities.

SECTION 5. RELATIONS WITH CUSTOMERS, BUSINESS PARTNERS AND SUPPLIERS

Article 18. Customers are the basis of banking business. The success of all the Bank's activities depends on the maximum satisfaction of their needs. We strive for the highest standards of service while protecting the interests of each Customer. Satisfaction of interests and needs of the Customer is the priority for Oschadbank and its Employees. The exceptions to this rule are related to the contradiction between demands of the Customer and the current legislation of Ukraine and/or moral and ethical rules of doing business and/or in case of conflict of interests.

Article 19. The Bank is interested in establishing long-term partnerships with the Bank's Customers and Partners. When offering banking products and providing services, the Bank aims to make them understandable to the Customer and compliant to his/her needs.

Article 20. The Bank's relations with Customers, Suppliers and Business Partners are based on the principles of equality, honesty, integrity, professionalism, trust and respect, accessibility, social inclusion, adherence to obligations, and in accordance with the principles of sustainable development, so that Customers, Suppliers and Business Partners recognise the importance of ensuring that their activities comply with the standards laid down by Ukrainian legislation.



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The Bank ensures that every Customer has unhindered and equal access to financial services, actively promoting accessible environment by adapting its physical infrastructure, digital services and service channels to the needs of all customers, whilst taking into account accessibility requirements, and guaranteeing professional service based on respect and the individual needs of each Customer.

In communications with Customers, Suppliers and Partners, the Bank's Employees are guided by the Bank's corporate values.

Article 21. When selling products and providing services, the Bank shall ensure compliance with the consumer protection requirements established by the current legislation of Ukraine and take all appropriate and necessary actions to prevent violations. For this purpose, the Bank shall take the following measures:

- 1) disclose to consumers complete and reliable information they need to receive products/services in the manner and under the terms and conditions specified by applicable Ukrainian laws, in particular, the Law of Ukraine *On Financial Services and Financial Services Market, On Consumer Protection, On Ensuring the Functioning of the Ukrainian Language as the State Language*;
- 2) strictly comply with the requirements of the Laws of Ukraine *On Advertising, On Banks and Banking, On Consumer Lending*, the Regulation on Information on Banking and Other Financial Services to Be Provided by Banks approved by NBU Resolution No. 141 dated 28.11.2019, as amended, when disclosing information about products/services offered by the Bank to consumers of financial services;
- 3) ensure responsible attitude towards all categories of financial service consumers and prompt response to their appeals in accordance with the Law of Ukraine *On Consideration of Citizens' Appeals*;
- 4) prohibit the Bank's Employees and financial intermediaries from imposing additional financial services on Customers;
- 5) ensure protection of funds and other assets of financial service consumers from fraud and abuses;
- 6) ensure protection of personal data of financial services consumers, Employees, Customers, Business Partners, Suppliers and other personal data subjects in compliance with the requirements of the Law of Ukraine *On Personal Data Protection*;
- 7) ensure compliance with the requirements for ethical behaviour in the settlement of overdue debts in accordance with the requirements of the Regulation on establishing additional requirements for interaction with consumers of financial services and other persons in settlements of overdue debts (ethical conduct requirements) approved by NBU Board Resolution No 170 dated 04.08.2022;
- 8) provide for the right of the financial service consumer to refuse to receive the services/agreement in accordance with the procedure and on the terms stipulated by the legislation and agreement between the Bank and the financial service consumer;
- 9) create and implement the mechanism of pre-trial resolution of disputes on provision of financial services;
- 10) promote competition in the provision of financial services, in particular, place convenient tools on its website to compare the cost of services (calculator, examples);



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№ 320543/67/1-04-2026 від 13.08.2026

Підписувач Каціон Юрій Миколайович

Сертифікат 305700AA12A7C1D6464B6F855D16A0AE499D13BD

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- 11) constantly improve qualifications of the Bank's financial intermediaries and Employees working with customers, etc.

Article 22. The Bank carefully considers and promptly responds to the comments, complaints and claims of Customers against the Bank and its Employees, obtained from written correspondence, via Internet, and through the contact centre. This written correspondence is accumulated in the unified software complex "Quality Module" and processed in accordance with the Procedure for Interaction and Influence on the Processes / Products / Activities of JSC "Oschadbank" under Retail Business area based on the results of customer experience analysis. In case of complaints from Customers, the Bank's responsible employees shall make every effort to resolve issues of appeals in a substantial manner.

Article 23. None of the Bank employees shall disclose restricted information (including information containing banking secrecy, commercial secrecy and other confidential information) related to Customers, Suppliers or Business Partners, as well as other information, the disclosure of which may harm business reputation or other intangible or material interests of the Customer, Supplier or Business Partner, unless disclosure of such information is expressly provided for by applicable legislation of Ukraine.

Article 24. When communicating with Customers, Suppliers and Business Partners, regardless of the method of communication, the Bank's Employees shall comply with the rules of politeness, behave kindly and show patience in case of misconduct by Customers, Suppliers, Business Partners and other persons.

The rules governing the interaction of the Bank RDs employees with Customers are set out in the following internal regulatory documents: Corporate Standards at institutions of JSC "Oschadbank" and Standards for High-Quality Customer Service at institutions of JSC "Oschadbank".

The Customer, who has applied to Oschadbank's Employee, shall receive the answer to his/her question or recommendation as to which of the Bank's Employee or Customer Services he/she can apply to receive the necessary advice and assistance regarding his/her issue.

Article 25. The Bank establishes relations with Suppliers that share the values and principles, rules of ethics and business conduct of Oschadbank set out in the Code. The Bank builds relations with Suppliers on the basis of trust, transparency and honesty. To this end, the Bank undertakes to:

- 1) select Suppliers on a competitive basis through an objective and transparent procedure, by comparing and selecting the best commercial offers for the Bank;
- 2) provide all Suppliers with equal competitive opportunities for cooperation, avoid any form of discrimination, and not select Suppliers based on personal relationships;
- 3) build relationships with Suppliers on the basis of maximum honesty, especially in the conclusion of agreements, thus avoiding situations of conflict of interest, even potential ones;
- 4) prevent corrupt actions and abuses;
- 5) fulfil obligations under agreements concluded with Suppliers in a timely manner and in full.

SECTION 6. RELATIONS WITH COMPETITORS

Article 26. Relations with the Bank Competitors shall be based on the principles of equality and mutual respect. The Bank follows only honest and fair competition and adheres to the rules and standards of doing business and business practices. Violation of civilised business rules and rules of



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business ethics is unacceptable to any of us as this impedes the implementation of Oschadbank's mission and is incompatible with its reputation. That is why we NEVER:

- 1) distribute knowingly false information about Competitors;
- 2) mislead Customers about the content, cost and quality of our products and services and do not criticise the products and services of Competitors;
- 3) use methods and ways of interaction with Competitors that may be recognised or regarded as non-competitive practices.

SECTION 7. RELATIONS WITH STATE AUTHORITIES, THE NATIONAL BANK AND OTHER REGULATORY AND SUPERVISORY BODIES

Article 27. Oschadbank builds its relations with state authorities, the National Bank and other regulatory and supervisory bodies on the principles of transparency, legality and accountability, whilst adhering to ethical standards, and without resorting to improper means of influencing administrative decisions.

Article 28. Communications of the Bank's Employees with representatives of above-mentioned authorities, namely: provision of written replies to requests, sending requests on behalf of the Bank, participation in meetings and other events, where the official position of the Bank is broadcast by the Bank Employee, is carried out by decision of the Bank CEO or a Member of the Management Board in charge of relevant area of activity while adhering to the legislation and the Instruction on Document Management at JSC "Oschadbank".

When processing requests, the Bank ensures that complete, accurate and up-to-date information is provided within the timeframes and to the extent required by applicable legislation. Communication of the Bank Supervisory Board Members within the scope of their powers, with representatives of state authorities, namely: provision of written replies to requests, sending requests, participation in meetings and other events, where the official position of the Bank is broadcast by a Member of the Bank Supervisory Board, is carried out pursuant to a prior approval by the Chairman and other Members of the Bank Supervisory Board.

All communications by members of the Bank's Management Board and Supervisory Board must be consistent with the Strategic Program of JSC "Oschadbank" for 2024–2028 and this Code.

Article 29. Oschadbank shall carry out its activities in compliance with the current legislation of Ukraine and regulations of the National Bank of Ukraine. At the same time, each employee of the Bank shall comply with the prohibition of engaging in any illegal activities, including taking into account inadmissibility of violations of sanctions established at the national and/or international level.

SECTION 8. CONTACTS WITH MASS MEDIA

Article 30. All communications of the Bank's employees with the mass media are coordinated by Public Relations and Mass Media Division.

Article 31. The procedure for agreeing upon the communications of the Bank's employees with mass media in accordance with the types of communications is set out in Corporate Communications Policy of JSC "Oschadbank".

SECTION 9. SOCIAL MEDIA CODE OF CONDUCT

Article 32. Social media helps us to network and communicate daily with our social surrounding sharing views and ideas on issues of common interest. Our individual Internet activities, much as it



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seems a personal option and affair, may also affect our business life and, accordingly, the Bank, especially when our profile includes our job and title. In order to protect our private and business life, it is also advisable to consider that anything posted on the Internet remains in a permanent file, which may be reproduced without any limitations.

Article 33. In order to protect our personal reputation and image, as well as the Bank's business reputation, below there are some recommendations that we shall comply with when communicating on social media:

- 1) every social network operates as a website and is therefore exposed to the same risks as any website. We shall carefully review e-mails that invite us to log on any media (it may be a phishing mail), shall have active antivirus software and, generally, be very cautious;
- 2) We are informed about the rules and style defined by the owner of the website (Facebook, blog, forum etc.), and make sure that we respect and observe them. A good practice is to refer to comments and posts made by other users to understand "unwritten rules" of the website before we attempt to express our own views and opinions;
- 3) We carefully read the rules and privacy settings provided by each social network. These settings largely determine the "degree of impact" of other users. Generally, it would be advisable to "open up" to our more or less close circle of users;
- 4) we shall be aware of any changes to our privacy policies. Such changes may allow access to our data that were previously totally private;
- 5) We respect every user's intellectual property and copyright. When we reproduce/distribute news or comment written by another person or entity, we always mention our source;
- 6) We always write in the first person. Thus, we make it clear that we express our own personal thoughts for which we are responsible and "sign" with the name (real name or alias) that we use to be recognised by other users of these media;
- 7) Issues related to politics, religion, sexual preferences and racial discrimination are considered highly sensitive and shall not be topics of any public online discussions. If you share them, then they are no longer personal data and may be reproduced at will by any third party, without you being able to defend yourself. When disclosing your personal details or business identity, you should consider the risks related to such disclosure;
- 8) Our posts shall not be considered "temporary". Anything we share is not oral message but written on public media and, therefore, every user of social networks may easily republish (e.g. re-tweet) and save it;
- 9) We are also cautious with multimedia materials we use (photos, videos, etc.). It is not allowed to broadcast such materials from the workplace. Before uploading a photo or video we shall understand how it would be displayed to those who are allowed to view it, especially if the content is incompatible with our professional activity;
- 10) We can use an alias on certain Internet resources (e.g., blogs). We may also consider that, behind an alias, we can express ourselves differently. However, we shall always remember that the website owner may record our addresses which, under certain conditions, may lead to our identification;
- 11) We never offend or insult other users for their views and opinions much as we disagree with them;



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- 12) We never hold strong disputes with other users. We use arguments to support our views and avoid posting comments we are infuriated. Unless our post is 100% correct, we refrain from broadcasting it on social media;
- 13) We are accurate in our description and arguments. We acknowledge and assume responsibility for our mistakes, and immediately correct our comment;
- 14) Using social media is our personal choice, therefore we avoid any verbal or visual reference to the Bank, especially regarding its operations and reputation. If any blogger or social media user confronts the Bank, we do not enter into disputes with them either using our name or hiding behind an alias. We immediately notify Public Relations and Mass Media Division for an appropriate response to the situation in the event of negative and/or inaccurate reports about the Bank and/or its activities;
- 15) We never forget that, as the Bank Employees, we are ambassadors of its reputation and influence opinions of the Bank's investors and customers, as well as the public opinion in general. We, therefore, have to be particularly careful of the content we share when it is associated with our professional activities, and avoid expressing our views about the Bank. We never make comments about competitors because, even if a comment is expressed as a personal opinion, it creates risks for the Bank's reputation and upsets its professional relations;
- 16) we shall refrain from any slanderous posts about the Bank;
- 17) We never use Bank logos in our personal communication;
- 18) We keep confidentiality about issues pertaining to the Bank operations as well as personal data of the Bank's Customers and Employees;
- 19) We never publish confidential information or news that have not been officially published by the Bank yet (on the Bank's website, on its social media pages, as well as in the accounts/pages in social media of the Bank Management Board members regarding activities of the relevant units under their control). For instance, we never provide information about any Bank's Draft our social media page, unless it has been officially published;
- 20) As users, we may also share and comment on posts (news) published by the Bank's relevant departments as official communications: on the website, social media, the Bank's pages, and the social media accounts of the Chair of the Management Board and members of the Management Board. At the same time, we are mindful that we bear personal responsibility for the materials, reviews, or comments we publish;
- 21) We are mindful that information published on our behalf may be interpreted as an expert assessment of certain actions or situations by the Bank, so we shall avoid any categorical statements other than those that are directly in line with the Bank's mission, goals and corporate values;
- 22) When mass media representatives request information about the Bank in the personal social media accounts, we immediately forward the request to Public Relations and Mass Media Division at pr.00@oschadbank.ua;
- 23) We do not promote our personal external activities via the Bank's online sales channels. In addition, if we detect that any third party attempts to perform any of its trade activities via the Bank's online sales channels, we immediately contact Marketing Department to react respectively;



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- 24) We never post photos or videos in an indecent manner (wearing clothes with provocative images, inscriptions with profanity, sexual images, etc.), especially if our personal profile indicates that we work for Oschadbank.

Article 34. As an organisation, the Bank contributes to the development of society, culture and environment, therefore we may be proud of that and, if we wish, we may share it in our online social life.

Article 35. The recommendations above are not intended to discourage you from using social media. On the contrary, they draw attention to some important issues that relate to our professional activities and warn against possible mistakes when communicating on social media.

SECTION 10. RELATIONS WITH EMPLOYEES

Article 36. The Bank's managers perceive the Employees as a key, universal and strategic asset, which can ensure long-term competitive advantages, sustainable development and achievement of leading positions in the banking and financial services market.

Article 37. The Bank's management is taking measures to ensure decent and safe working conditions, with a view to protecting the health and safety of Employees, while creating all the necessary conditions for their professional development and improved social welfare, including the provision of suitable workplaces for Employees with disabilities in accordance with the Bank's capabilities.

Article 38. The success of the Bank's activities depends on the success of each Employee. Therefore, each of us shall treat our and other Bank Employees' work time as an important corporate resource and use own abilities to achieve a quality and timely final result.

Article 39. Oschadbank shall not allow forced labour or child labour, as well as any manifestation of discrimination against the Bank's Employees on the basis of political views, religious beliefs, age, marital and property status, race, gender or any other grounds during recruitment, remuneration, promotion, etc. All Employees are subject to the principle of being provided by the Bank with equal opportunities that depend only on professionalism and personal potential of Employees.

Article 40. The Bank prevents all forms of victimisation or psychological pressure on Employees and is strongly against mobbing (harassment), attitudes or actions that contradict the corporate principles.

Article 41. The Bank shall encourage and appreciate any ideas of Employees, the implementation of which may be important for the development of the Bank, for improving processes and quality of services. Each Employee of the Bank may submit his/her proposal by means provided for on the internal portal OschadLife https://life.oschadbank.ua/Pages/IWant/podilytis_ideeyu.aspx.

Article 42. We respond in a timely manner to the requests of the Bank Employees, including with the use of e-mail or telephone communication. If at the time of receiving a phone call or e-mail the Bank Employee was not at his place of work, he/she is advised to call/reply to the Employee who initiated the request no later than 12:00 the next working day. When communicating via corporate e-mail we use signatures of the established sample indicating the full name, position, unit and contact information³, and at the beginning of telephone calls we introduce ourselves and say our unit name.

Article 43. An employee of the Bank who is outside of the office during working hours shall notify his/her immediate supervisor in advance of his/her absence in the workplace. For informing about

³ In accordance with the current Policy of External Corporate Communications of JSC "Oschadbank", all employees of the Bank, when communicating via corporate e-mail, shall use a standardised electronic signature, a sample of which is available on the Bank's internal portal (<https://life.oschadbank.ua/Pages/IWant/pidpys.aspx>)

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long absence in the workplace (leave, business trip, etc.), an autoreply of corporate e-mail with the obligatory indication of the full name, position and contacts of the Bank employee, who is delegated authority for the period of absence, is used.

Article 44. An employee shall treat the Bank's property with care and responsibility, ensuring the preservation of tangible and intangible assets of the Bank. The Bank Managers, within their powers, should ensure that the tangible values of the Bank are safeguarded within that the rules on handling tangible assets are followed by the subordinated Bank Employees. In the event of loss or damage to property, the Bank Employees shall be liable under the current legislation of Ukraine.

Article 45. In the manner and under the conditions established by the Whistleblowing Policy of JSC "Oschadbank", Bank Employees are obliged to inform immediately the Compliance Department of any actions or omissions related to real or potential violation of the current legislation of Ukraine or internal regulatory documents of the Bank, including this Code may incur financial, reputational and/or other losses to the Bank.

The Bank shall ensure the functioning of the Whistleblowing Mechanism, which shall operate in compliance with the following principles:

- 1) confidentiality, which requires that no information be disclosed about the person reporting the breach or about the person referred to in the report. The Bank's units involved by the Compliance Department in investigating a report are prohibited from disclosing information about the report to other persons who were not involved in the investigation;
- 2) a ban on "retaliatory actions", which consists in prohibition of any unlawful measures or any form of harassment against the persons who have reported unacceptable behaviour or breaches in good faith;
- 3) anonymity, which provides an opportunity for a person to report unacceptable conduct/violations without revealing his/her identity.
- 4) presumption of innocence, which stipulates that the person referred to in the report of unacceptable conduct/violation is considered innocent until his/her guilt is proven in the prescribed manner;
- 5) personal data protection which consists in collecting and processing personal data to the extent necessary to consider the report without disclosing personal data without sufficient grounds;
- 6) fairness, which involves treating all the Employees fairly, including those who may be wrongly accused (to avoid unfounded accusations, each report shall be thoroughly investigated);
- 7) honesty and substantiation, which means that reports shall be truthful and contain well-founded and reasonable grounds for suspicion or for reporting a breach; reports shall not be made for personal gain, frivolously or maliciously;
- 8) a duty of good faith, which stipulates the obligation on employees who are aware of unacceptable conduct or breach to provide full and accurate information regarding such conduct or breach to the employees of the Compliance Department responsible for investigating it.

In case of confirmation of facts that indicate violations, unacceptable conduct, the Bank shall take all appropriate and necessary measures aimed at eliminating the prerequisites, causes and consequences of such violations, unacceptable conduct, and Bank Employees found guilty of



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unacceptable conduct / violations based on the results of the consideration / investigation, shall be liable pursuant to the Bank's internal regulations and the current legislation of Ukraine.

SECTION 11. PARTICIPATION IN POLITICAL PROCESSES

Article 46. The Bank shall observe the principle of neutrality against any public movement, political party or association, acting within the framework of the Constitution and the current legislation of Ukraine solely as a business entity.

Article 47. At the same time, the Bank respects the rights of its Employees as individuals and recognises their right to express their views freely on the social and political life of the country and to take an active part in political processes during their free time without representing the Bank's interests, where this does not create a conflict of interest.

Article 48. The Bank does not provide its Employees with a paid leave for conducting political activities.

Article 49. The use of software, office equipment, stationery and other necessary accessories for the purpose of political activities is prohibited.

Article 50. Campaigning in any form at the Bank's premises in support of any candidate or political party and distributing political and/or religious literature is strictly prohibited.

SECTION 12. PREVENTION AND COUNTERACTION TO LEGALISATION (LAUNDERING) OF PROCEEDS OF CRIME, FINANCING OF TERRORISM AND FINANCING OF PROLIFERATION OF WEAPONS OF MASS DESTRUCTION, OTHER ILLEGAL ACTIVITIES

Article 51. The Bank shall comply with the current legislation of Ukraine and international standards in the field of prevention and counteraction to the legalisation (laundering) of proceeds of crime, financing of terrorism and financing of proliferation of weapons of mass destruction. For this purpose, appropriate internal regulatory documents on financial monitoring have been developed and implemented in Oschadbank, and appropriate controls in automated banking systems have been implemented as well.

Article 52. The main principle of implementation of the Bank's internal regulatory documents on financial monitoring is to ensure the participation of Employees (within their competence) in identification of suspicious and risky financial transactions and timely, complete and accurate provision of information on such transactions to the relevant control bodies in accordance with the procedure established by the current legislation of Ukraine.

SECTION 13. REQUIREMENTS TO COMPLY WITH THE RISK MANAGEMENT CULTURE

Article 53. The Bank creates a comprehensive, adequate and effective system for managing risks that the Bank is exposed to in its activities, which takes into account specifics of the Bank's operations and requirements of the National Bank of Ukraine for risk management. In order to comply with the risk management requirements, the Bank shall clearly define the duties, powers and responsibilities of each Employee in relation to risk management in job descriptions of the Employees, regulations on structural units and internal regulatory documents of the Bank governing banking processes/activities.



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Article 54. The Bank shall provide for the formation and development of a risk management culture providing for the institution of rules and regulations that determine the procedure for the systematic process of identifying, measuring, monitoring, controlling, reporting and mitigating all types of risks.

Article 55. The Bank takes all possible measures to ensure that the Employees are aware of the risks by systematically informing all the units about the Bank's risk management strategy, policies and procedures, and by encouraging the free exchange of information and critical assessment of the Bank's risk-taking, as well as by conducting training sessions on risk management, including ESG risk management.

Article 56. All Employees shall be aware of their role in the risk management system in order to achieve the objectives of the Bank's activities, as well as their responsibility for violating the established level of risk limits.

Article 57. All Employees are responsible for day-to-day management and control of risks associated with the performance of their functional/ official duties and arising / that may arise in their activities and activities of their structural units. All Bank Employees, within their competence and in accordance with their role in the risk management system, shall ensure that the Bank operates within a defined risk exposure and risk limits.

SECTION 14. COMPLIANCE

Article 58. Compliance is a system of measures aimed at the Bank's compliance with the current legislation of Ukraine, regulations, market standards, rules of fair competition, rules of corporate ethics, internal regulatory and administrative documents of the Bank and prevention of conflict of interests. All Bank Employees shall comply with such requirements set for the Bank's operation and their day-to-day activities.

Article 59. All Employees, within the framework of their functions/responsibilities, are obliged to identify compliance risks in their activities and take measures to manage them.

Article 60. The compliance risk management system is based on cooperation between the Bank Employees and the Compliance Department, which enhances effectiveness of Employees and the Bank as a whole and allows for control over effectiveness of compliance risk mitigation measures.

SECTION 15. CORPORATE STYLE AND CULTURE

Article 61. All Bank Employees are obliged to look neat and adhere to the business style in clothes that correspond to the image of the Bank.

On days before holidays and weekend, Employees of the Head Office and regional directorates may wear business casual clothes, provided that the Bank Employees do not have business meetings with Customers, Partners, etc. on these days.

The following is prohibited in the appearance of all the Bank **Employees**:

- 1) a large number of decorations;
- 2) torn or damaged clothes or shoes;
- 3) too colourful or transparent clothing;
- 4) miniskirts and clothes with bare shoulders;
- 5) sport clothes (apart from branded clothing as specified in the Bank's Corporate Style Guide), beachwear and footwear (T-shirts, shorts, flip-flops);
- 6) clothes that contain images or inscriptions of a provocative or aggressive nature.



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Employees of the Bank's branches (front office units) shall comply with the external appearance requirements set out in the internal regulatory document Corporate Standards in Institutions of JSC "Oschadbank".

Article 62. The Bank also adheres to a unified corporate style in the production of souvenir and presentation products in accordance with the Procedure for Marketing Activities for Customers and Partners of JSC "Oschadbank".

Article 63. In accordance with the Law of Ukraine *On Measures to Prevent and Reduce the Use of Tobacco Products and Their Harmful Effects on Public Health*, the Bank Employees are prohibited from using tobacco products and devices for tobacco consumption, in particular, electronic devices for heating tobacco, electronic cigarettes, hookahs, in the Bank's premises. Smoking is allowed in designated smoking areas only.

SECTION 16. CONFLICT OF INTEREST

Article 64. Each Employee of the Bank shall carry out his/her activities in view of the need to prevent situations when a conflict of interests arises in his/her actions, the actions of his/her close persons⁴ or other Employees. A conflict of interest within the Bank shall be understood as any real or potential contradiction between personal interests and official or professional duties of Employees, which may affect the performance of his/her duties in good faith, objectivity and impartiality in taking managerial decisions.

Article 65. When performing functional/official duties, each Employee shall put the interests of the Bank, its Customers and business Partners above his/her private interests. At the same time, the Bank respects the rights of its Employees as individuals and recognises the right to engage in lawful financial, entrepreneurial, public, educational, scientific, creative or other activities in free time from the principal work, provided that such activities do not create a conflict of interest, do not affect the ability of the Employee to perform functional/official duties at the Bank and have no adverse effect on the Bank. If being engaged in / intending to be engaged in external activities⁵, Bank Employees shall inform the Compliance Department in the manner specified by the Policy for Prevention of Conflicts of Interest in JSC "Oschadbank".

Article 66. Bank Employees, while performing their functional/official duties, shall not have the right to directly or indirectly influence the decision-making, process or agreement if there is a real or potential conflict of interest.

Bank Employees are prohibited from using their official position to obtain unfair personal benefits or to provide such benefits to third parties while performing their functional/official duties.

⁴ *Close persons:*

persons who are married to an Employee of the Bank (husband, wife), persons living together, having a common household and mutual rights and obligations towards a Bank employee (except for persons whose mutual rights and obligations towards an employee are not of a family nature), including persons living together but who are not married; and, regardless of the conditions above, father, mother, stepmother, stepfather, son, daughter, stepson, stepdaughter, sibling, cousin, sibling of the spouse, nephew, niece, uncle, aunt, grandparent, great-grandparent, grandchild, great-grandchild, son-in-law, daughter-in-law, father-in-law, mother-in-law, parents of the spouse of son (daughter), adoptive parent or adoptee, guardian or custodian, a person under the care or custody of an employee of the Bank

⁵ *External activities of an Employee are activities performed in Ukraine regarding the following:*

- 1) holding a position in a management body of a public or charitable organisation, or political party;
- 2) holding any position / performing part-time work in another bank or company, institution, organisation (including in a management body);
- 3) becoming a shareholder in the authorized capital of a legal entity, or establishing a legal entity;
- 4) carrying out activities by an Employee as a self-employed person, in particular, performing work / providing consulting or other services under civil law contracts, if such activities are not related to the performance of official duties by the Employee in the Bank (i.e., independent professional activities).

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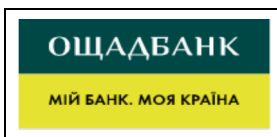
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Article 67. In order to prevent conflicts of interest in the Employees' actions, the Bank shall take appropriate and necessary measures to limit the direct subordination of the Employee's close persons. The Employee is obliged to inform the Compliance Department about immediate supervision of close persons in the course of performance of their functional/official duties (including the temporary performance of such duties).

Article 68. Bank Employees shall have the right to carry out private transactions with securities, but only if they observe the principle of securing and preventing the misuse and dissemination of insider and/or confidential information for the purpose of receiving their own benefit, the benefit of the Bank Employees or third parties. Securities transactions are also prohibited if the Employee can influence the formation of the value of these securities in one way or another.

Article 69. In the presence of signs/prerequisites of a potential or real conflict of interest (including in the event of the Employee's external activities or reporting the direct subordination of a close person), the Bank Employee shall submit relevant information to the Compliance Department following the procedure determined by the Policy for Prevention of Conflicts of Interest in JSC "Oschadbank" and the Procedure for Managing Conflicts of Interest in JSC "Oschadbank".

Article 70. Bank Employees shall make every effort to prevent and avoid situations of conflict of interest. Information on conflict of interest is provided by the Bank Employee during:

- 1) recruitment to the Bank;
- 2) appointment to a new position or change of functional/official duties;
- 3) identification of a situation of potential or real conflict of interest;
- 4) periodic and annual reviews in terms of conflict of interest by Compliance Department.

Article 71. A Bank Employee shall independently assess conditions and actions that may potentially affect his/her objectivity in the performance of functional/official duties. The manager, when defining functional/official duties and assigning tasks, shall know and take into account information about a Bank Employee to prevent the appearance of signs/prerequisites of conflicts of interest.

SECTION 17. GIFT POLICY

Article 72. Gifts, informal dinners, invitations to celebrations or other signs of attention are all the part of business life. However, giving/receiving gifts that may affect the Employee's performance of his/her duties in good faith, objectivity and impartiality in taking managerial decisions is prohibited.

According to the Bank, a gift is cash or other property, benefits, advantages, services, insurance policies, gift certificates and intangible assets provided/received by Bank Employees free of charge or at a cost that is below market value in the course of performance or related to performance of their functional/official duties.

Article 73. Bank employees are strictly prohibited from soliciting and/or accepting gifts and/or improper benefits from third parties—Customers, Suppliers, or Business Partners—in connection with services or products provided or sold by the Bank, or in exchange for information regarding the Bank or its Customers. Bank employees are prohibited from accepting or giving money or monetary equivalents, such as checks, gift certificates, etc. Even if not prohibited by current Ukrainian law, employees may not accept benefits or gifts if they:

- 1) violates the requirements of the Bank's internal documents;
- 2) may be perceived as an improper advantage or regarded as a non-competitive practice;
- 3) imposes certain obligations on the Employee and may adversely affect the quality of the Employee's performance of his/her job duties;



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Підписувач Каціон Юрій Миколайович

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4) causes conflict of interest.

Article 74. Bank employees may give or receive gifts provided that such gifts are not considered an improper benefit and that their value does not exceed the limits established by the Law of Ukraine “On Preventing Corruption,” namely: a single gift must not exceed two subsistence minimums for able-bodied persons, as established on the date the gift is accepted, and the total value of such gifts received from a single person (or group of persons) during the year does not exceed four subsistence minimums for able-bodied persons, as established as of January 1 of the year in which the gifts were accepted,

Furthermore, gifts must conform to generally accepted notions of hospitality, specifically meeting the following conditions collectively:

- 1) are not cash (regardless of form or currency), and such actions have no signs of conflict of interest;
- 2) are directly related to the Bank's legal activities, such as presentation or completion of business projects, successful performance of contracts, or public holidays or anniversaries;
- 3) are justified (correspond to the content of the event), are not luxuries;
- 4) do not constitute a concealed remuneration for the service, action, omission, indulgence, patronage, assignment, decision making relating to an agreement, licence, permit, etc. or an attempt to influence the recipient for any other unlawful or unethical purpose;
- 5) do not create reputational risk for the Bank and its Employees, as well as for other persons (in case of disclosure of information about gifts or representation expenses);
- 6) meet the requirements of the Policy for Prevention of Conflicts of Interest in JSC "Oschadbank" and Anti-Corruption Programme.

Article 75. Bank Employees, as well as persons acting on behalf of the Bank, shall refrain from offering gifts to civil servants, MPs of Ukraine, members of local councils, their close persons, actual or potential business partners, their employees or representatives, as well as from any other conduct, which may be considered as willingness to commit a corruption offence related to the Bank's activities. Gifts may be allowed in cases where they are in accordance with generally accepted notions of hospitality and their value does not exceed the amount prescribed by the Law of Ukraine *On Prevention of Corruption*.

All Employees and persons acting on behalf of the Bank are prohibited from offering, promising, giving or consenting to give any values for the purpose of influencing a civil servant.

Article 76. Measures to prevent acts of corruption and bribery, as well as the procedure for informing Bank Employees about giving/receiving gifts, the rules for refusing them, approving and registering gifts are defined in the Anti-Corruption Programme.

SECTION 18. DISCLOSURE OF INFORMATION

Article 77. Any information, except for publicly available information or information disclosure of which is prescribed by the legislation, including information about Bank Employees, the Bank Shareholder, financial flows, etc., is restricted information.

Article 78. A Bank Employee shall, in writing, undertake not to disclose confidential information by signing the relevant Commitment during recruitment.

Article 79. The amount of information provided to Customers, business Partners and other persons (institutions, organisations) shall be determined by the current legislation of Ukraine, the nature of transactions and internal regulatory and administrative documents of Banks.



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Article 80. Bank Customers and business Partners shall be sure that information about their business or other activities, including information that they are the Bank's Customers, is considered restricted information (including information constituting banking and/or commercial secret) and shall not be disclosed except as expressly provided by the current legislation of Ukraine, or where disclosure of such information occurs with the written permission of the Customer or business Partner and does not contradict the terms and conditions of agreements.

Article 81. The official information available to Employees shall not be disclosed to other persons, including work colleagues who do not have powers to work with this information, family members and other close persons or friends.

Article 82. Use of official information for personal gainful purposes is inadmissible in any case.

Article 83. In order to ensure proper and transparent coverage of the Bank's activities in mass media, their representatives shall be provided with information about the activities of Oschadbank only by authorised employees of the Bank in accordance with the requirements of the External Corporate Communications Policy of JSC "Oschadbank". At the same time, every Bank Employee shall remember that any view expressed by him/her as a Bank Employee or the information disclosed by him/her directly relates to the Bank itself, its image and affects its reputation.

SECTION 19. ACCOUNTING AND REPORTING

Article 84. The Bank shall ensure timely, complete and accurate reflection of all transactions in accounting and provision of information to users on the status of assets and liabilities, equity, results of financial activities and their changes. Financial and statistical reporting is prepared on the basis of accounting data..

Article 85. Oschadbank shall reflect transactions in the accounting in accordance with the requirements of regulations of the National Bank of Ukraine, international standards of financial reporting and internal regulatory documents.

Article 86. Oschadbank shall prepare financial statements in accordance with the procedure established by regulations of the National Bank of Ukraine and international financial reporting standards.

SECTION 20. BANK SUPERVISORY BOARD ETHICS COMMITTEE

Article 87. To contribute to corporate culture and corporate values at the Bank, the Bank Supervisory Board has established the Bank Supervisory Board Ethics Committee (the "Committee"). The Committee shall act in accordance with the legislation of Ukraine, regulations of the National Bank of Ukraine, the Charter of Joint Stock Company "State Savings Bank of Ukraine", Regulation on the Supervisory Board of Joint Stock Company "State Savings Bank of Ukraine", Regulation on the Supervisory Board Ethics Committee of JSC "Oschadbank" (defining the status, objectives, competences, rights and powers of the Committee, the procedure for the Committee establishment and operation) and other internal regulatory documents of the Bank approved by the Bank Supervisory Board.

Article 88. The Committee shall ensure that compliance with the ethical rules and standards of the Bank as defined by this Code and the Principles (Code) of Corporate Governance of Joint Stock Company "State Savings Bank of Ukraine" by Members of the Bank Supervisory Board, Members of the Bank Management Board, heads of structural units of the Bank Head Office directly subordinated to the Bank Supervisory Board and Corporate Secretary of the Bank is monitored.



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SECTION 21. RESPONSIBILITY AND CONTROL OVER COMPLIANCE WITH THIS CODE

Article 89. Compliance with provisions of this Code is obligatory for all Bank Employees.

Article 90. Each Bank Employee shall be personally responsible for compliance with provisions of this Code and for the quality of his/her work and efficient use of his/her working time. Violation of provisions of the Code are regarded as the Employee's disloyalty to the Bank and may become grounds for disciplinary action to be applied to the Employee.

Article 91. For causing any damage to the Bank, a Bank Employee shall be liable under the current legislation of Ukraine and internal regulatory and administrative documents of the Bank

Article 92. Each Bank Employee is obliged to apply to the Compliance Department if he/she has doubts about compliance with the Code in a particular case or if he/she has reason to believe that the Code is not observed in general.

Article 93. In order to comply with high ethical standards, the Compliance Department ensures that the Bank Employees are provided with mandatory training and familiarisation with this Code.

All newly recruited employees (including managers) of the Bank are obliged to:

- 1) upon joining the Bank, be familiarized by the Human Resources Department with the Code of Conduct (Ethics) of JSC "Oschadbank" and sign the Commitment of the Bank Employee to comply with the Code (Annex 1 to the Code). The signed Commitments are attached to personnel files of Employees and are stored during the entire period of Bank Employees' work;
- 2) undergo a basic distance-learning course to familiarise themselves with the main principles of the Code.

The head of HO structural unit or the head of regional directorate to which the new employee is subordinated shall be responsible for ensuring that the new employee completes the basic training on the Code and for assessing their knowledge (through testing) of the training content.

The Compliance Department shall ensure that all managers and employees of the Bank are familiarised with the Code within the Bank's scheduled annual training programme.

Should a new version of the Code be approved or amendments be made to it, the Compliance Department shall send a notification via ASKOD electronic document management system to the heads of HO units and the heads of regional directorates instructing them to ensure that they and their subordinate employees are familiarised with the updated version of the Code.

Heads of units / heads of regional directorates shall ensure and control that their subordinated employees are familiar with the updated version of the Code and sign to confirm this, by issuing a relevant resolution via ASKOD electronic document management system.

Bank Employees shall familiarize themselves with the requirements of the Code within thirty working days from the date of receipt of the relevant notification from Compliance Department.

Compliance Department controls the implementation of and compliance with the Code and advises the Bank's employees on the matters relating to compliance with it. To seek advice, the Bank employees may send an enquiry via the corporate email to the Compliance Department compliance@oschadbank.ua. The Compliance Department will consider the request and provide a response within one month.



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Compliance Department reports to the Bank's Supervisory Board at least once a year on compliance / non-compliance with the Code, on any breaches identified, and the measures taken to prevent such breaches in the future.

SECTION 22. DOCUMENT REVISION PROCEDURE

Article 94. This Code is subject to review and update at least once a year.

Article 95. If during a regular review and analysis of the relevance of this Code within the period specified in Article 94, the owner of this Code has established compliance of the current version of this Code with the current legislation of Ukraine, including regulations of the National Bank of Ukraine, this Code shall be considered relevant and is subject to next review no later than as specified in Article 94 of this Code.

SECTION 23. FINAL PROVISIONS

Article 96. Amendments to the Code shall be endorsed by decision of the Bank Management Board and approved by decision of the Bank Supervisory Board.

Article 97. The Code shall enter into force on the next working day following the date of approval, unless otherwise provided for by a resolution of the Bank Supervisory Board.

Article 98. The owner – Director of Compliance Department – is responsible for supporting and updating this Code.

ANNEXES

Table 1. List of annexes

Annexes	Annex name
Annex 1	Commitment of the Bank Employee to comply with the Code of Conduct (Ethics) of JSC "Oschadbank"



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Annex 1

to the Code of Conduct (Ethics) of JSC "Oschadbank"

COMMITMENT OF THE BANK EMPLOYEE TO COMPLY WITH THE CODE OF CONDUCT (ETHICS) OF JSC "OSCHADBANK"

I, _____

(full name),

while working with JSC "Oschadbank", I confirm that I have read / become familiar with the Code of Conduct (Ethics) of JSC "Oschadbank" and undertake to strictly comply with the requirements of this Code. I agree that this Commitment is an integral part of my employment contract, and I am aware that violation of the rules established hereby may be grounds for disciplinary action, including dismissal (in cases provided for by the Law of Ukraine).

I also understand and agree that this Commitment applies to all future amendments and additions to this Code adopted in accordance with the procedure established in JSC "Oschadbank". I understand that I can view the current version of the Code on the Bank's internal website (on Compliance Department's page under "Documents" section) and on the Bank's external website in "Corporate Ethics and Compliance" section.

Signature _____ / _____

Date ____ . ____ . ____



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