

# Principles

of Ethical Conduct  
at Tatra banka Group



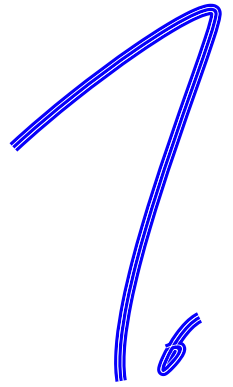
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The Principles are also based on one of the principles of ESG - Governance, which is the principle of sustainable management. We not only follow our ethical principles, we live by them. They come from us, from our moral credit and the value framework of our business. At the same time, they are a commitment to each employee, colleague, supplier, shareholder and the company as a whole.



# Mission, Vision, Values



## Mission

We transform continuous innovation into superior customer experience. We constantly seek new ways to develop and improve. We build on innovations and technological progress in order to improve our clients' lives and make their interaction with us a unique experience.

## Hodnoty

Ambition  
Creativity  
Partnership  
Courage

## Vision

We are the most recommended banking group in Slovakia. If clients have a unique experience with us based on trust and satisfaction, we believe that they will naturally and directly share this with people around them.

Achieving our vision concerns all of us at Tatra banka, Raiffeisen Bank, Tatra Asset Management, Doplnková dôchodková spoločnosť Tatra banky, and Tatra Leasing.

# Responsible Business



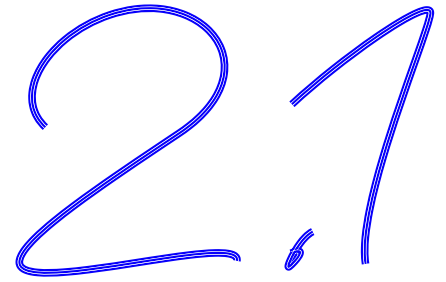
We push the limits of banking, where the arts, education, and technologies combine to create a new, intelligent future. We realize that we're part of society as a whole, and our actions can also positively influence and shape it. As an advanced business entity active in the banking sector, we naturally think not only about generating of profit, but also about our responsibility and the value framework of our business.

Companies, like people, grow with time, developing their personalities. A perfectly functioning human brain has both hemispheres in balance, and that is also the case for successful, mature brands. The left hemisphere takes care of logic, analytics, rationality, and control. The right is responsible for creativity, emotions, and intuition. Our company's left hemisphere consists of its technologies and innovations, while our right hemisphere is characterized by an ongoing link between our work and the arts and education.

We want to share our business success and give part of it back to society. Through the Tatra banka Foundation and many strategic initiatives, we connect our innovative personality with areas that define us and enrich our clients' experience with us. We also understand the solidary, visionary, and social dimensions of our existence.

Our business is based on ethical principles and sustainability, which we not only adhere to, but in fact live. We feel sufficiently strong, capable, and responsible to contribute actively to an intelligent future for all of society.

We act in accordance with our values, even in the digital world, including social media – with integrity, transparency, ethics, and respect towards every employee, client, supplier, shareholder, and the entire company.



# Responsible Business

## Protection of Human Rights and the Environment

### Human Rights

We respect and promote the protection of human rights, as stipulated in the European Convention on Human Rights as well as the Universal Declaration of Human Rights.

### Environment

We consider the environmental impact of our business activities. We also treat the environment responsibly in our everyday working life at the workplace, by complying with the principles of waste recycling, energy saving, and using public or shared modes of transport.

# Responsible Business

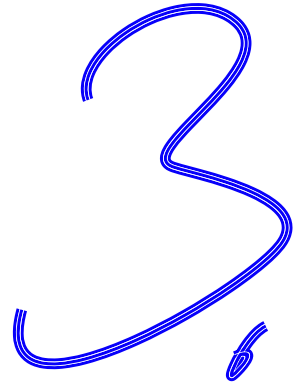
## Community Relations

We are also mindful of and considerate to our social environment.

Our employees engage in activities and volunteer projects that bring social benefit to all of society, or part of it.

We support various charity projects and organizations. No such support is used as a means to influence our business decisions in dealings with these entities or to influence public officials.

# Employee Relations



We are the employer of the future for smart people and the place we would like to be, create, and advance. We fulfill this intention and commitment through three basic pillars: ambience, creative and meaningful work, and work-life balance.

We comply with all applicable legal employment frameworks while also adhering to ethical standards ensuring a safe space for employees to perform their work to the fullest. We treat employees with dignity as well as respect for their personality. We strictly reject any form of harassment, discrimination, inappropriate pressure, and humiliation.

## Equal Opportunities

At Tatra banka we create an environment that promotes diversity built on mutual respect. Everyone, regardless of their social status, sexual orientation, disability, racial, religious, national, gender or other affiliation or identity, has the opportunity to show their abilities and perform their work in a safe and tolerant environment. Everyone can develop their competencies and achieve career growth.

## Support and Partnership

We can and do rely on each other. We appreciate the work of others and accept various opinions and attitudes. We support and help others, in their work and elsewhere. In the event of unexpected and critical situations, we stand by our employees and seek ways to assist them through difficult times.

We provide support for our employees in their everyday life. We let them align their work and private life, creating a working environment in which they can freely and flexibly realize their potential.

# Employee Relations

## Fair Compensation Conditions

Fair treatment is one of the basic prerequisites for employee satisfaction and lasting loyalty. People are hired based on their abilities, personal qualities, know-how, and professional experience. This is the basis for their career advancement to higher management and expert positions.

Compensation principles are based on objective and fair parameters derived from the results achieved by the whole banking group. Compensation plays a part in evaluating the employee's performance and serves as an individual evaluation and motivation for the employee's further engagement. All employees are provided a broad range of financial and non-financial benefits.

## Leadership, Development and Training

We guide our people to mutual and fair feedback to contribute to their professional development. Employees have space for open feedback without in any way suffering as a result. Line and indirect managers approach all employees taking into account their personalities. Feedback is provided respectfully and fairly.

Employees can develop in areas that contribute to enhancing their competencies. We actively identify and support talents that

can significantly contribute to the development of the bank, not only in its business activities, but also internally.

## Health and Safety

We care about protecting our employees' health and safety. We comply with all applicable regulations and create physically safe working environments and conditions.

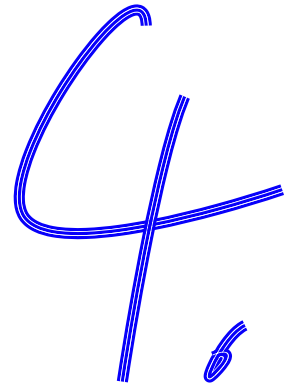
## IT Security

IT security providing digital services and internal systems is a high priority for us. We strive to keep our clients' money safe and our systems reliably secure against any cyberattacks.





# Client Relations



Our employees act in compliance with our internal quality standards and are the bearers of our values, through which we offer a unique client experience. The satisfaction of our clients is our priority. Every one of us, not just staff in direct contact with clients, feels responsibility for the client's experience. We act fairly, professionally, and loyally on the bank's behalf, even in our private life. When conducting our business, we comply with all applicable legal and regulatory obligations, including consumer protection.

Even in the world of social networks, we act and communicate in accordance with our principles. For us, this represents a space in which we can be connected with our clients and non-clients. It allows us to share information and have an active dialogue. We are not afraid to take a stand, stand up for a good cause, and also accept feedback. We are open to attitudes and opinions, while mutually cultured and respectful communication is a fundamental value for us.

## Personal Data and Confidential Information

We adequately protect and work with our clients' personal data and maintain banking secrecy. We handle all the confidential information clients provide to us with discretion and in compliance with applicable laws.

## Respect and Esteem

In direct contact, we approach each client – in person, on the phone and in writing – with respect and esteem. Clients are our partners, who trust us, and we do our best not to betray their trust.

## Decency and Social Etiquette

In client communication we comply with all relevant standards of decent social behavior.

## First Impression and Client Conversations

We approach clients in a way that makes them feel welcome. We express understanding and empathy towards clients, while professionally handling their affairs.



# Client Relations

## Professionalism and Expertise

We always act and communicate professionally on behalf of the bank. We feel a responsibility for providing correct information. We have sufficient professional qualifications that enable us to provide top-quality products and services. We approach clients proactively.

## Investor Protection

Clients and investors are provided clear and appropriate information. All employees providing investment services or participating in their creation and management comply with applicable laws and regulations and are duly qualified to perform this work.

## Conflicts of Interest

We have strict internal regulations and processes in place to prevent conflicts of interest. Employees are obliged to ensure that their own interests are not in conflict with their obligations to the bank or the bank's obligations to its clients.

## Ethical Advertising

Our advertising communications are legal, decent, honest and truthful. Advertising is always prepared with due regard for social and professional responsibility and in compliance with fair competition principles.

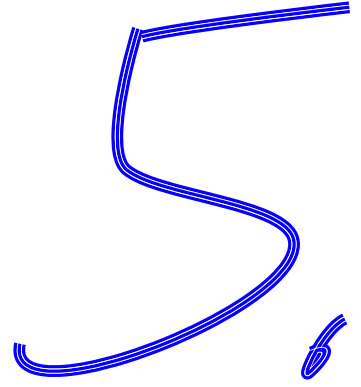
Our communications by their nature would never undermine public trust in marketing. We pay special attention to marketing communication targeting children and young people, so as not to jeopardize positive social behavior, lifestyle, or attitudes in any way.

## Communication in the Online Space

We communicate respectfully and civilly in the online space, and on social networks. We respect each other, and respect different attitudes and opinions. We encourage discussion in which everyone can feel safe. We do not allow disparaging communication or communication contrary to good manners. We do not support or spread conspiracies, hoaxes, and statements aimed at dividing the society.



# Shareholder Relations



Sustainability with regard to the long-term financial, social, and environmental impact of our activities is a value that makes us committed to the good corporate governance of our company. We carry out responsible business activities in compliance with laws and shareholder expectations, to ensure prosperity and further enhance company goodwill.

We maintain and continuously improve an efficient internal control and risk management system.

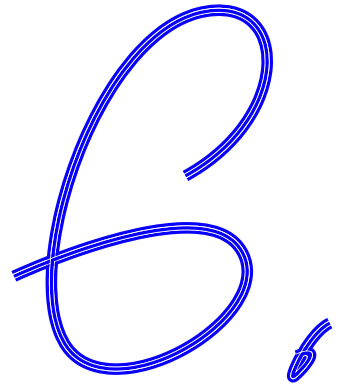
## Protection of Reputation and Fairness

We communicate truthfully and fairly informing all shareholders without distinction about all important facts having direct and indirect impact on the bank's operation and prosperity. It is our responsibility to safeguard our reputation. In everything we do, we guarantee respect for shareholder rights.

## Transparency

We consider transparent management crucial to building a trustworthy institution. We apply transparency to activities and information for the public and shareholders, as well as to internal communication. We share our corporate information even when it is unfavorable. We communicate with all stakeholders in a prompt and relevant context.

# Third-Party Relations

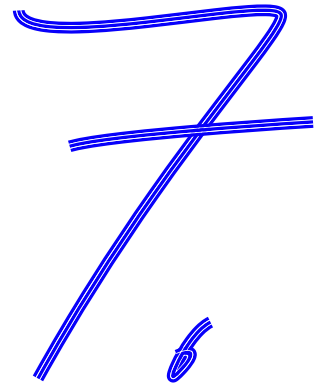


When communicating with suppliers and other third parties with whom we do business, we adhere to the decent conduct standards embedded in our culture. We build fair relations based on mutual trust, honesty, respect, and openness. In business relations, we do not misuse in any way available information that could damage the bank's reputation or the public's trust. Also, when choosing suppliers, we consider their adherence to ethical conduct principles and their reputation as well as integrity.

In the supplier selection process, we take care to ensure equal conditions and equal treatment for all parties.

We apply internal rules and regulations that contribute to building long-term business relations. We execute only transactions that leave no room for any suspected conflict of interest or ulterior motives.

# Fight against Financial Crime



## Bribery and Corruption

We reject every attempt at bribery or illegal gratuity. Corrupt conduct in any form is unacceptable for us. We take special care when dealing with public officials. We do not participate in any transaction for which there is reason to believe that corruption is involved.

## Accepting Gifts and Invitations

Employees are only permitted to accept or offer gifts and invitations that are appropriate and reasonable under the circumstances and that comply with our internal rules. Gifts of cash or cash equivalents cannot be accepted under any circumstances.

## Prevention of Money Laundering and Terrorist Financing

We comply with all laws for preventing money laundering and terrorist financing. We conduct business only with clients involved in legitimate business activities, whose funds are derived from legitimate sources.

We define and apply internal rules which lead to prevention, reporting, and detecting of suspicious transactions or unusual trading operations.

## Economic Sanctions and Embargoes

Business dealings with individuals or legal entities trading in certain goods or technologies (including financial services) and affected by financial sanctions or embargoes (FiSa) are only permitted if done in strict compliance with applicable financial sanctions and embargo legislation.

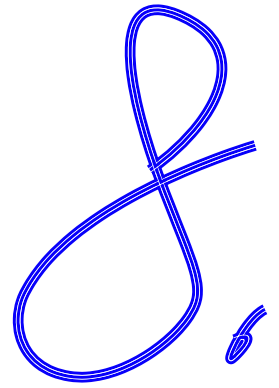
In addition to compliance with generally binding legal regulations, we apply internal rules, procedures, and controls to ensure compliance with applicable legal regulations. Each staff member is responsible for applying relevant FiSa rules in daily business.

## Insider Trading and Market Abuse

Any trading in securities of any company while in possession of material, non-public information regarding the company is prohibited. We do not support or tolerate any attempted or actual manipulation of markets or prices of securities, options, futures, or other financial instruments available to selected employees.



# Adherence to and Application of the Principles



Tatra banka is part of the Austrian Raiffeisen Bank International AG (RBI), which operates in several Central and Eastern European countries.

The basic principles governing the RBI Group are derived from the philosophy of F. W. Raiffeisen, who felt that all economic activities should be based on social solidarity, self-help and sustainability.

Besides ensuring compliance with the applicable legal regulations, in their work, RBI Group employees are also obliged to comply with the RBI Group Code of Conduct (the “Code”) adopted by and adhered to by Tatra banka. The Code sets out the common values and minimum standards for ethical business conduct that are binding on all Group employees, including Tatra banka employees. Employees are expected to understand and comply with the Code in any dealings with internal and external stakeholders.

These Principles of Ethical Conduct at Tatra banka Group are in accordance with the above rules while also reflecting local conditions and the bank’s philosophy.

The wording of the document is approved and adopted by the Managing Board of the bank and commits all employees to act in compliance with the ethical conduct principles set out herein. Any waiver or amendment of these rules must be based on a decision by the Managing Board of the bank.

Employees are required to act responsibly and shall not engage in inappropriate behavior of any kind, especially willfully or purposefully ignoring, violating, or asking others to violate these principles.

The Principles of Ethical Conduct at Tatra banka form an integral part of the Employment Rules. Each new employee is advised of the existence and binding nature of these ethical principles when starting employment. They are also available to the general public on [www.tatrabanka.sk](http://www.tatrabanka.sk) in the Important Documents section.

Any breach of the Principles of Ethical Conduct at Tatra banka may have consequences under labor law, including early termination of employment.

