



Eurobank



CODE OF
CONDUCT AND ETHICS

2020

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MESSAGE FROM MANAGEMENT

Eurobank's Code of Conduct of 2017 signaled the bank's resolve to be at the forefront of global developments in the sector which have foregrounded the importance of Professional Ethics. In recent years, promoting a new culture in banking, to serve the interests of all stakeholders, including clients, employees, management, shareholders and the communities we serve alike, has been a major challenge as well as a priority for all financial institutions around the world.

The introduction of a Code of Conduct has been instrumental to Eurobank's successful effort in this respect, at a time when the regulatory framework was becoming ever more detailed and demanding. Our deep-rooted culture of integrity and our unwavering commitment to principled banking, throughout the bank's 30-year history, has been key in efficiently and seamlessly integrating to our daily business, growing and evolving, regulatory requirements.

The last couple of years have seen significant new developments in the wider area of global regulation, resulting in the imminent need to reflect these in a revised and updated Code of Conduct and Ethics. Data protection has emerged to special prominence for banks and other financial institutions, as well as for every large organization with a wide client base. The introduction of an all-encompassing legislation in EU's GDPR meant that almost every aspect of our interaction with every single client needs to be viewed and scrutinized through this novel instrument, on top of all other existing regulations. The wealth of data our clients provide us with are both a precious tool for our business relations and a sign of their trust, which we must spare no effort in order to honour and protect.

Our goal is to build trust. We can only achieve it by adopting a risk-based approach to all our operations and adapting our behavior to prioritize risk mitigation, above all to safeguard Eurobank's hard-earned reputation. In this respect, fully implementing all relevant Greek, European and international legislation is paramount, along with putting the bar high in harmonizing Eurobank's internal structures and processes to the most up-to-date worldwide best practices in Corporate Governance. Yet, for us this is not enough. We aim for a deep culture of ethics, one which does not only entail to fully abide to laws and regulations but constitutes and springs from a deep understanding and adoption of the fundamental underlying principles of integrity, transparency and accountability.

Our new Code of Conduct and Ethics, highlights the importance Eurobank attaches to integrating principles in the way we behave as professionals and to the way we conduct business. This Code is for every Staff member of Eurobank, irrespective of segment, level or job description, a daily *vade mecum*. Compliance is at the end of the day the ability and the will to "do the right thing". In most cases, when we come to make a decision, we recognize and know which is the correct way to go. This Code is our guide to making such decisions. But in every instance, we should not forget that whenever even the slightest doubt remains, Eurobank has a solid array of internal institutions we can and need to turn to. Group Compliance is responsible and ready to advise, and act when needed, a function complemented by audit bodies. Cooperation is one of our core values and there is no aspect of our operations where we depend more on each other than in respecting regulations and embedding compliance to our work.

Sustainability is a key measure of success for any bank. Yet there is no sustainability without compliance. **A sustainable bank needs to be an ethical bank.** Our Code of Conduct and Ethics ensures that in Eurobank we integrate into our daily practices and business conduct, up-to-date directions concerning the new finance and technology landscape, including digital payments &

transactions, the enforcement of legislation to counter cybercrime and the highest standards to anti-money-laundering practices. Our Code reflects our belief in open communication, diversity and inclusion, the commitment in environmental responsibility and planet protection i.e. investing in green, sustainable and renewable energy, the enhancement of our health and safety standards under the Covid-19 impact and any future similar challenges.

The way our values and principles have been implemented in times most challenging, is a source of pride for Eurobank. Each one of us shares this pride and the obligation for Eurobank and its Staff members to live up to the expectations of our regulators, our clients, the public bodies we work with, the business community, and society-at-large. This Code is our compass to the best results through the best standards of Business Ethics.

We thank you



George Zantias
Chairman of the Board of Directors



Fokion Karavias
Chief Executive Officer



1

WHO IS AFFECTED BY
THE CODE OF
CONDUCT AND ETHICS
OF EUROBANK
AND HOW
TO APPLY IT



WHO IS AFFECTED BY THE CODE OF CONDUCT AND ETHICS OF EUROBANK AND HOW TO APPLY IT

The rules of the Code of Conduct and Ethics concern all Eurobank Staff. Eurobank means: all companies that comprise the Group of Eurobank Ergasias Services and Holdings S.A. including those that comprise the Group of Eurobank S.A..

Eurobank Staff (or “Staff”) is considered to be:

- all members of the Boards of Directors
- all managers
- all persons engaged in advisory positions
- all persons engaged as full, part-time and temporary employees
- all persons engaged by Eurobank on a contract basis (third persons collaborating with Eurobank within the context of either providing services or performing a project).

It is explicitly stated herein that although the wording of the Code of Conduct and Ethics may at several points be mostly focused on employees and Board members, all persons that may be assigned to perform a project or provide services for Eurobank are expected to follow and comply with the Code in connection with their work for Eurobank.

In essence, the Code of Conduct and Ethics concerns all of us that have a duty to preserve the integrity of Eurobank, in our capacity as employees, or as representatives and as associates.

The rules described in the Code of Conduct and Ethics apply irrespective of our mode of work (on-site presence, teleworking etc.). Furthermore, they apply throughout the exercise of our duties, but also beyond, in cases where behaviors and actions can be linked to Eurobank.

The Code of Conduct and Ethics acts as a regulatory framework for Eurobank and is complementary and subsidiary to existing legislation. These rules and principles may be broadened or strengthened, in accordance with the legal and regulatory framework in place. The legal and regulatory framework shall take precedence in the event that it conflicts with the present Code of Conduct and Ethics or it has stricter requirements. Moreover, the Code is complemented by specific policies that serve as a further point of reference for Eurobank Staff.

Members of our Staff should ensure that their immediate family members do not adopt behaviors that would affect the interests and integrity of Eurobank.



“ The Code of Conduct and Ethics applies to all those who are required to preserve the integrity of Eurobank, that is all of us who have an employer/employee relationship or act as its legal representatives or associates. ”

2

OUR GOAL

AND

OUR PROMISE



OUR GOAL AND OUR PROMISE

Our vision is to build long-term relationships of trust with our customers, providing access to cutting-edge digital opportunities, and creating added value for our clients, employees, shareholders and society. These make us the reference point of choice in the financial services sector, in customer service, in new technology, in efficient solutions, in certainty of prospects, for both the present and the future.

Our goal is to develop a dynamic presence in the Greek and European markets. At the same time, this goal forms a joint mission for all employees of Eurobank, which exceeds 12.300 persons and covers

a full range of services to Individuals and Businesses.

To achieve this objective our corporate values play a key role; they reflect the philosophy and principles of Eurobank and define the way we perform our work, creating a unique corporate culture. By exemplifying our values we formulate our corporate identity and stand out as Eurobank Staff.

Understanding our clients and colleagues, along with Cooperation, Trust, Dynamism, Innovation form the basis of our values. These contribute to our credibility and effectiveness, while at the same time they continuously inspire us in our daily interaction.

Enhancing **TRUST**: In all our relationships there is value in **“being able to look another in the eye”**. We act with professionalism and reliability towards our clients, partners and our colleagues. Building relationships of trust results in human co-operation. It allows us to interact spontaneously, with authenticity and efficiency. We treat every demanding situation calmly and responsibly with respect for the parties involved. Our actions display transparency, accountability and credibility.

Operating with **UNDERSTANDING**: in our daily activities **“we place ourselves in another person’s shoes”** so as to understand their needs and priorities, to handle situations proactively, to face their problems as if they were our own. A key component of building healthy relationships, with both internal and external clients, is to develop empathy and understanding. By showing sincere interest, listening carefully, and by proposing solutions that meet individual needs, we succeed in making a difference in the lives of those who need us. By improving our cooperation with others, we ensure long-term relationships of trust.

Acting with **DYNAMISM**: it is important to foster the belief in ourselves and our partners that **“it is up to me”**, that I am able and can handle it. We operate with

determination regardless of hierarchy. We commit to continuous action, daily mobilizations, utilization of resources available to Eurobank, undertaking initiatives and accepting our due responsibility. In this way, we respond to our clients’ requirements and produce tangible results with high standards.

Enhancing **INNOVATION**: there is a special place in our vision **“for building something new”**. Looking ahead, we take an active role in making the change, we propose innovative and feasible solutions, we constantly “expose” ourselves to learning environments, regardless of our past experience or our hierarchy. We become part of the evolution, which is a dynamic feature of our society and a central pursuit of both Eurobank and our client base.

Believing in **CO-OPERATION**: of primary importance in interacting with our colleagues is the belief that there is value **“in supporting my colleague”**. We place particular emphasis in building a strong team, which we actively support; we exploit the strengths of each member, listen to the diversity of opinions, and invest in dialogue and mutual trust. Our colleague’s failure is treated as our failure while success is also mutual. We thus create the ideal situation that has a multiplier effect for everyone’s success.

“ Understanding, Dynamism, Co-operation, Innovation, Trust. These are values that unite us, distinguish us as professionals and individuals, inspire us daily, and bring us closer to our Vision and Mission.

3

THE CODE OF CONDUCT AND ETHICS AT A GLANCE



THE CODE OF CONDUCT AND ETHICS AT A GLANCE

a. We cultivate a strong relationship of trust with clients

- By understanding their needs
- By treating them fairly and equitably
- By displaying confidentiality in their transactions
- By communicating transparently in product promotions
- By protecting the clients' personal data

b. We provide financial security

- By enforcing policies to combat fraud, corruption and money laundering, that are in compliance with international regulations for dealing with cases of violation of economic restrictions and sanctions
- By effectively managing potential conflicts of interest

c. We maintain professional ethics

- By not exploiting internal/confidential information when conducting our own transactions
- By avoiding situations in our external activities that may create conflicts of interest
- By taking measures against corruption and bribery

d. We act with respect towards our colleagues

- By applying high standards of professionalism
- By rejecting all forms of discrimination and harassment while promoting an inclusive workplace

- By respecting diversity
- By feeling that we can bring our authentic selves to work
- By feeling that we can express our ideas/views without any fear of negative consequences
- By following policies that maintain a safe work environment

e. We protect Eurobank and its reputation

- By protecting the information we receive
- By communicating responsibly within Social Media
- By adopting ethical codes of conduct in our collaboration with external partners
- By facing with particular responsibility the risks we encounter in our activities, in accordance with current policies
- By maintaining our confidentiality even after departing from Eurobank
- By protecting Eurobank's assets and by using them only for the conduct of Eurobank's business (except where otherwise provided for in the policies)


f. We operate with social responsibility

- By protecting Human Rights
- By protecting the Environment through environmental management programs and enhancing environmental culture
- By responding timely and responsibly to requests from Public Authorities
- By respecting competition rules



4

CRITERIA FOR PROPER DECISION MAKING IN OUR WORK PLACE

A red dot is positioned on a white curved line that starts from the bottom left and curves towards the right, ending near the word 'PLACE' in the main title.

CRITERIA FOR PROPER DECISION MAKING IN OUR WORK PLACE

The rules of the Code of Conduct and Ethics cover a variety of areas of our daily activities within Eurobank. They highlight points that shape our culture and become a valuable tool for making the right decisions even in cases where there is no specific reference.

With the aim of enhancing the personal responsibility of each member of our Staff, we have established a set of rules that define the correct, and in accordance with the Code, manner for decision making on every issue we handle. These rules are in essence a series of questions worth asking ourselves and answering in every situation that we face. As we are all aware, the responsibility for preserving the reputation of Eurobank is shared by all of us.

Before we make a decision, we should consider:

- *Is it in accordance with the Eurobank Code of Conduct and Ethics and Eurobank Policies?*
- *Is it legal?*
- *Does it feel right?*
- *What are the potential risks? Have they been evaluated?*
- *Is there a potential for negative impact on me personally or Eurobank?*
- *Am I positive that my decision will not raise trust or reputational issues for Eurobank?*
- *Would I be embarrassed if others were aware of my actions or decision?*
- *How would I feel if it was announced in the media?*
- *What would a responsible person think?*
- *Can I sleep at night?*




“Correct or wrong decision?”

Questions-criteria that help us minimize our doubts

These are indicative questions, which, if we answer them in total, they can safely lead us to a correct decision. If there is a negative answer to even one question, if there is doubt or a lack of clarity, then we must interrupt the decision-making process and refer the matter to the competent bodies of Eurobank, Legal Services or Compliance.

5

a. WE CULTIVATE
A STRONG
RELATIONSHIP
OF TRUST
WITH CLIENTS



WE CULTIVATE A STRONG RELATIONSHIP OF TRUST WITH CLIENTS

α1. We give priority to our clients by applying transparency principles

Honest communication with our clients is a top priority for Eurobank. That is why transparency in relationships with clients, Staff, shareholders, society is of strategic significance. Eurobank provides to all its clients comprehensive information of our products and services, clear and valid information in accordance with legislation, while at the same time establishes procedures and follows best practices in governance. Respecting transparency rules, helps our clients understand the services we provide and leads to reliable and effective cooperation with mutual trust.

In this context, Eurobank provides continuous training and certification of Staff in order to respond with professionalism and excellence to the needs of our clients. It also prepares and makes available the required pre-contractual material that provides extensive information on the characteristics and risks of the products provided and also ensures that the clients get properly informed throughout the term of their contractual relationship with Eurobank.

Our ultimate goal is to ensure that our clients receive accurate information and enjoy the degree of protection that is tailored to their individual choices and their particular profile. Therefore, client

classification in the categories provided by law is considered to be a basic prerequisite for their protection when conducting transactions concerning investment products and services.

At the same time, it is illegitimate to use our capacity as members of Eurobank Staff and the information we possess to ensure that we personally benefit from it. As members of Eurobank Staff, we must not participate in any sale, loan or donation of property or general provision of service of Eurobank as counterparties and in particular as recipients of assets/services or as authorized persons to conduct a transaction on terms not available to third parties or to other members of Eurobank Staff. In general, we must ensure that we abide by the rules established in the Conflicts of Interest Policy. In the event that we have doubts regarding actions that fall within the above context, we must make sure to obtain Eurobank's written approval, by submitting a request to Compliance, at the following address:

✉ COMPLIANCEPERSONNELU@eurobank.gr

In addition, in accordance with the Policy for the Prevention and Detection of Market Abuse and the Insider Dealing Guideline, we should avoid copying successful client investment transactions in order to reap the same benefit for ourselves or for the benefit of any third party.

“ Our guiding principle is client Priority and the Protection of their interests. We achieve this by fully applying the principles of transparency and adopting procedures and practices that lead to the creation of long-lasting relationships of trust.

α2. We evaluate our clients' requests and complaints

Our Staff is responsible for handling and evaluating our clients' requests and complaints. The purpose of this process is to enhance the quality of our client relationships. The management of their requests/complaints must always be handled in a transparent and irreproachable manner, on a timely basis and in full compliance with the rules as set out by the relevant provisions (BoGAct 2501/2002, Regulation (EU) 2016/679 - General Data Protection Regulation).

For the evaluation of client requests, as well as in our general cooperative relationships with them, with suppliers, and with employees, Eurobank follows anti-corruption policies where required and assists competent authorities in conducting investigations.

a3. We protect personal data

The protection of personal data is of paramount concern for Eurobank. All Staff is responsible for keeping current and showing maximum diligence and compliance towards applicable data protection laws and regulatory framework. A Personal Data Protection Policy has been issued describing the principles and framework governing the collection and processing of personal data in order to ensure high, secure and uniform protection of personal data across all Units. All those in managerial or supervisory roles throughout Eurobank have the overall responsibility for complying with the existing data protection policies/directives and ensuring that the Staff is informed about the data protection policies and the relevant legal and regulatory framework. In addition, they are responsible for ensuring that the processing of personal data in the Unit is conducted exclusively by authorized persons. The aforementioned responsibility of those in managerial or supervisory roles does not exempt the Staff from its own personal responsibility for complying with the data protection framework.

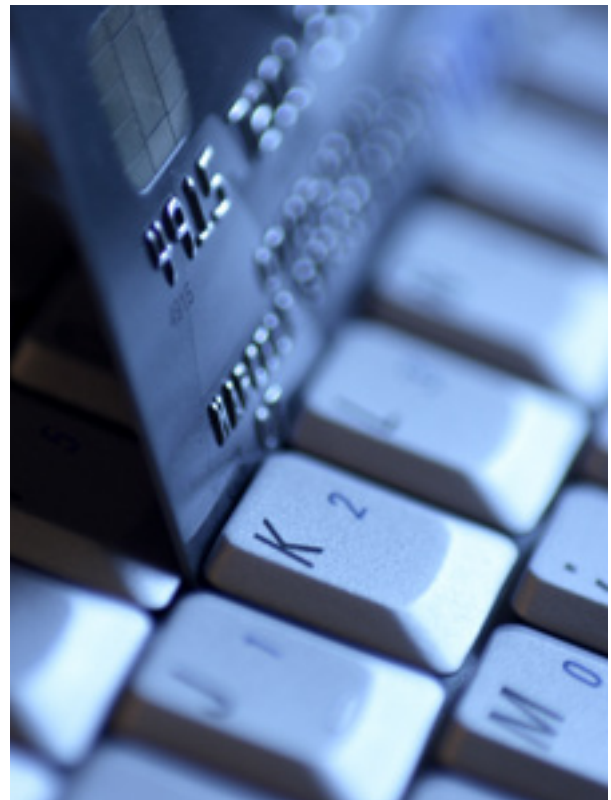
Staff must be aware that personal data should be collected in a fair, transparent and legitimate manner and for specific, explicit and legitimate purposes. Data collected is that which is appropriate, relevant and limited to what is absolutely necessary in relation to the processing purposes. It is also accurate and updated whenever necessary. All reasonable measures are taken to ensure that personal data

which is inappropriate or inaccurate having regard to the purposes for which it is processed is deleted or rectified without delay. Finally, personal data is kept in a form which permits identification of the persons to whom it relates for a period not exceeding that which is necessary for processing purposes. The processing of personal data only takes place lawfully, namely when the processing can be founded on a legal basis among those specifically mentioned in the applicable legal framework (processing that is necessary for the execution of contracts and pre-contractual measures at the request of the data subject, for the compliance with Eurobank's legal obligations, for serving Eurobank's own or third parties' legitimate interests, upon the data subjects' consent etc.) , it is confidential and is carried out by persons who are bound to confidentiality.

Eurobank takes appropriate measures to safeguard and protect data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and all other forms of unlawful processing. Finally, Eurobank ensures and demonstrates that each processing operation is in compliance with the provisions of the applicable legal and regulatory framework.

All personal data breaches and even alleged personal data breaches are reported immediately to the competent and relevant Data Protection Officer.

“The protection of personal data is our primary concern and it is our duty and responsibility to prevent leakage to third parties who are not entitled to the relevant information.”



a4. We operate with professional secrecy and protect banking secrecy

Staff commitment to prevent disclosure to third parties of any information acquired in the performance of our duties is explicit and absolute (Business, Professional and Banking Privacy). A third party is considered to be any person who is not legally entitled to know the above information. Third parties also include all Staff members whose access to such information is not required for the performance of their duties.

It is worth noting that the execution of searches on

accounts and client data through the central and peripheral systems of Eurobank and through the inter-bank information systems (TIRESIAS), performed outside the context and not in connection with the exercise of one's duties and tasks, is unethical, illegal and is also considered a violation of our Code of Conduct and Ethics.

Finally, it is important to be aware that the obligations of professional secrecy and banking secrecy exist even after our departure from Eurobank.

“ Safeguarding Banking Secrecy and Professional Secrecy is an explicit obligation of carrying out our duties, while our commitment applies even after our departure from Eurobank.

5

b. WE

PROVIDE

FINANCIAL

SECURITY



WE PROVIDE FINANCIAL SECURITY

b1. We communicate openly and have a duty to report dishonest and irregular behaviour

Eurobank operates on the basis of high ethical standards, integrity, transparency and accountability. Our strategic commitment is to safeguard our reputation and clientele.

For this reason, it is of primary concern for Staff to act with honesty, a high sense of responsibility and to ensure the safeguarding of the assets and resources under its responsibility.

In this context, we apply the rule of zero tolerance in cases of fraud, corruption, violation of legislation related to money-laundering and generally actions that cause material and reputational damage to Eurobank. Unit heads must ensure a work environment that creates security for Staff members to communicate freely and to report possible issues that come to their attention.

In any event, Staff has the ability to contact the competent bodies stating facts or circumstances that constitute indicatively:

- violation of law or other regulation
- violation of the Code of Conduct and Ethics
- violation of Eurobank Policies
- other forms of illegal, irregular, dishonest, unprofessional or unethical behavior, including but not limited to:
 - theft
 - embezzlement
 - bribery and corruption
 - conflict of interest
 - money laundering and terrorist financing
 - misappropriation and destruction of assets
 - misuse of confidential information
 - ethical / psychological / physical / sexual harassment
 - fraud attempts
 - transactions or conduct that can be interpreted as indications of fraud or attempted fraud.

Eurobank provides protection against reprisals and keeps confidential the identity of those who have submitted information they know and consider to be accurate and true. Malicious reports are not subject to protection and confidentiality and are considered to be unethical.

Reporting the above incidents can be made at either the e-mail address:

 ethicshotline@eurobank.gr



or the phone line:

214-4058990

Extensive listings of alternative channels for reporting are described in detail in the Policy for Reporting Unethical Conduct.

“ We implement a zero tolerance policy in all cases that cause harm to Eurobank and us as professionals. Such cases include: fraud, corruption, violation of legislation related to money-laundering as well as any other form of illegal, irregular, dishonest or unethical conduct.

b2. We avoid conflicts of interest

Eurobank Staff members need to be aware of, identify, manage and avoid situations that could give rise to a conflict of interest. Conflicts of interest may arise when the personal, business or financial interests of a Staff member deviate from the interests of Eurobank or key stakeholders (e.g. clients, shareholders, suppliers etc.). These situations primarily occur during the conduct of Eurobank's business for clients and in personal transactions carried out by Staff.

Provided below are some indicative conflicts of interest situations, when a Staff member:

- may derive an inappropriate financial gain, or avoid a financial loss, at the expense of a client
- has different interests from the client's interest regarding the outcome of a service provided or a transaction carried out on the client's behalf
- has a financial or other non-financial incentive in favor of the interests of another client or client group at the expense of the interests of the client/group of clients served
- carries on the same business activity as the client
- receives or will receive from a person other than the client a consideration, in the form of money, goods or services beyond the usual fees or commission, relating to the service provided to the client
- establishes a business relationship on behalf of Eurobank with a supplier that is a relative/family member or with whom the Staff member maintains a business relationship outside of Eurobank.

Eurobank recognizes that proper identification and handling of transactions that occur between Eurobank's related parties and Eurobank, enhances transparency, prevents any conflict of interest and ensures that Eurobank's financial statements and reports to the Regulatory Authorities contain the necessary disclosures required by the International Accounting Standard and the applicable regulatory framework.

Compliance is responsible for the monitoring, disclosure and evaluation of incidents that could give rise to conflicts of interest. In cases where there is doubt or a question arises about the handling of the situation or the assessment of the existence or absence of a conflict of interest, Eurobank Staff members must submit a written request to the relevant authority level of Eurobank, describing the characteristics of the specific case that can lead to conflicts of interest. Concerning the responsibilities of each approving body, the approval levels referred in the External Engagements Policy apply.

The request is forwarded to Compliance who determines the gravity of the case and formulates an opinion on the existence of a conflict of interest.

Each case of conflict of interest is considered independently and responded within 30 days.



“ We understand, identify, manage and prevent situations that may lead to conflicts of interest e.g. between Eurobank and our clients, between our interests and Eurobank's interests etc. When in doubt, we submit a request to Compliance. ”

b3. We prevent instances of bribery and corruption and promote integrity within the business environment

The primary commitment of Eurobank, is adherence to the highest ethical standards and show zero tolerance in cases of bribery and corruption. This commitment applies without saying to all Eurobank Staff.

Staff members and members of our family are not allowed to receive gifts, rebates, fees or benefits, whether monetary or otherwise, from clients of Eurobank or from third parties for the services we provide or intend to provide, as Staff members of Eurobank, as well as for services associated with our professional status. This restriction also applies to gift offering attempts.

It is noted that it is not prohibited to accept small, symbolic gifts in the context of courteous communication and relations between Staff and clients/suppliers provided they are common practice in the country and remain reasonable and acceptable, as well as legal and properly recorded. Moreover, such gifts must leave no grounds for negative criticism.

In particular, regarding gifts that fall under the “hospitality/entertainment” category, the recipient

should inform the unit’s General Manager. Gifts that are beyond those that are considered as symbolic/customary should be reported by the recipients to their immediate supervisor and Compliance. In the event of an attempt to offer gifts (other than customary) or in cases of doubt as to whether or not to accept a gift from a client, we must seek advice from Compliance.

Members of Staff involved directly or indirectly in the provision of investment services or activities (such as, indicatively and not exhaustively: the execution of client transactions, the reception/transmission of orders, investment advice, portfolio management) and ancillary investment services (such as, indicatively and not exhaustively, the safeguarding and administration of financial instruments, the granting of credit or loan to investors to carry out a transaction in one or more financial instrument), may not receive any additional rewards apart from the ones documented in Eurobank’s policies and procedures, as determined by Human Resources and which are linked to their duties.



“ We commit ourselves to upholding the highest ethical standards and display zero tolerance towards bribery and corruption by graciously refusing to accept gifts, discounts, fees or benefits for our services and our professional dealings. ”

b4. We enforce legislation on “anti-money laundering”

Eurobank ensures strict compliance with the existing legislative and regulatory framework for the prevention and combating of money laundering and terrorist financing (“anti-money laundering”). As members of Staff, we must not assist or co-operate with any client, or fail to report to the competent bodies any suspicious or unusual transactions that may be related to money laundering and terrorist financing.

Additionally, if we have sufficient cause for suspicion regarding a client or transaction relating to money laundering or terrorist financing, we must immediately notify Compliance either by telephone or through the relevant electronic platform.

Further, we should be aware that legislation requires Eurobank to follow the same stance towards its Staff when there is a violation of applicable laws.

b5. We follow international regulations on economic sanctions (“Sanctions and embargoes”)

Eurobank has developed policies, procedures and monitoring mechanisms to fully comply with current legislative and regulatory framework and to deal with violations of International Regulations, by prohibiting, interrupting and identifying any case of an economic entity/organization/country, associated with terrorist activities, human trafficking, drug trafficking and arms trafficking.

In particular, Eurobank trains us to understand and identify cases of financial sanctions and cases where a total or partial ban on economic activity is foreseen. Additionally, with regular updates and instructions, Eurobank is committed to and encourages Staff, and in particular authorized executives, to report all cases of financial offenses that are encountered.

“ Eurobank provides appropriate training and regular updates so as to immediately report cases of violation of the International Rules for the exclusion of economic units, entities, states, organizations associated with terrorism and human, drug and arms trafficking.

5

c. WE

MAINTAIN

PROFESSIONAL

ETHICS



WE MAINTAIN PROFESSIONAL ETHICS

c1. All senior executives lead by example - Tone at the Top

In Eurobank, Management Executives, Managers and Supervisors (those who have Staff under their responsibility, irrespective of their hierarchy level) lead by example, by applying the provisions of the Code of Conduct and Ethics with diligence and loyalty. In addition, they have the duty to communicate, explain and inspire all employees under their responsibility, as to the culture of Eurobank, so that they become stakeholders and ambassadors of the values advocated by Eurobank.

Indicatively, they need to:

- strengthen and promote respect and honest communication
- communicate the present Code and Eurobank's Policies in its letter and spirit
- to ensure understanding of the potential risks of each activity
- be an example and communicate with honesty and respect to customers, colleagues, business associates of Eurobank
- respond with speed, punctuality, and reliability to protests, comments and testimonials of clients and Staff of which they become aware

c2. We implement a relatives' employment policy

The intention of Eurobank is to ensure meritocracy and avoid the creation of conflicts of interest in the recruitment, promotion and transfer process between relatives. In this context, it is stipulated that Staff members who are relatives/family members (including fiancés, unmarried partners, former spouses, best men/godfathers etc.) may not be placed in positions whereby one can in any way control, assess, examine, approve or determine the work performed by the other or affect the salary escalation and promotion of the other.

We always keep in mind that conflicts of interest may arise where the personal interests of Staff take precedence over the interests of Eurobank.



“Executives and Managers lead by example, inspiring all employees under their responsibility.”

c3. We avoid participation and dependence in gambling activities

The formation of a particular corporate identity and culture may impact on various aspects of our individual activities. All the more so when each member of our Staff is required to be a model of professionalism, integrity and maturity and avoid behaviors that reflect dependencies that cause concern to Eurobank. For these reasons we should

abstain from personal activities that seriously hinder the smooth performance of our duties.

In particular, the systematic participation in gambling activities with the purpose of obtaining a financial reward is prohibited and constitutes a misconduct that is subject to administrative sanctions.

c4. We participate responsibly in social, political and voluntary activities

As Staff members, we belong to an organization that encourages participation in charitable and social activities and welcomes volunteering without requiring approval or notification. In any case, however, we must act responsibly so as to avoid any adverse effects on our daily duties. Our Staff is encouraged to discuss with their immediate supervisor any concern with regard to the impact of such activities.

Staff members have the right to participate in political activities such as supporting their local governments/ regional authorities or undertaking specific tasks within a political party. However, such political activities must be conducted as an individual rather than as a representative of Eurobank and must not create a conflict of interest, lead to any damage in the reputation of Eurobank, or interfere with the performance of our duties.

The External Engagements Policy recognizes that each individual has the right to participate in political activities and more generally in public life. However, prior to accepting any governmental position or elected office, we must inform our immediate supervisor, Human Resources and Compliance.



“ Our responsible participation in voluntary and social activities is encouraged by Eurobank. Political activities are welcome to the extent that they do not interfere with the performance of our professional duties, pose a reputational risk to Eurobank and/or create a conflict of interest.”

c5. What applies for our accounts and investments

For our bank accounts

All investment and financial accounts (securities/deposits), for both our personal and for our immediate family members' accounts, it is recommended that they be held with Eurobank. In order to ensure transparency in our transactions, it is recommended to avoid cash transactions and particularly large amounts of funds to third parties. In cases where large sums are handled, it is recommended that such transactions be performed through the issuance of checks or by electronic fund transfers.

In cases where we hold cash and/or investment accounts with other credit or financial institutions, we must submit to the Audit Functions copies of the statements of the transactions executed in the other financial institutions, if requested in the context of an investigation.

If we hold securities accounts with another Securities Company, even if it is a member of the Eurobank Group outside of Greece (e.g. Luxembourg and Cyprus), we need to inform Compliance by submitting copies of the statements of the transactions executed, if requested in the context of an investigation.

For holding joint accounts with third parties

Eurobank Staff members are allowed to hold joint accounts at Eurobank only with their spouses, relatives (blood relatives up to the 4th degree or relatives by marriage up to the 3rd degree) as well as with persons with whom they cohabit. In the event that we wish to open an account with persons not falling under the above categories or to continue to maintain such an account, we must first obtain permission from Compliance. This may be obtained by submitting a relevant application, accompanied by the written approval of the supervisor.

Similarly, a member of Staff is not allowed to perform any transaction on behalf of a client using a power of attorney (except for his/her spouse or a person with whom the Staff member has concluded a cohabitation agreement without marriage or is simply cohabiting without marriage or relatives of the degree mentioned above), without prior permission from Compliance, and after having obtained the relevant approval of the Staff member's supervisor.

We must be aware that no Staff member can act on behalf of a client as their authorized representative, especially in the cases regarding stock exchange transactions either on Greek or foreign securities.

For transactions on our own accounts

Eurobank Staff members are not allowed to perform any transactions on their individual accounts and accounts which they hold jointly (transaction examples include: account opening, transfers between their own accounts and third parties, liquidation of investment products, addition of account holders, etc.), through the central or peripheral systems of Eurobank to which they have access in the context of their duties. The prohibition includes any transaction they perform on their own behalf.

All such transactions must take place through the official channels of transaction performance (indicatively branches, ATM, Europhone Banking, E-Banking etc.).

For borrowing

Staff members need to pay particular attention in their exposure to loan obligations, either as debtors, or as guarantors. It goes without saying that excessive loan obligations are not allowed, and members of our Staff are obliged to have a prudent and consistent approach with regard to their debt burden.

“ To ensure transparency in our transactions, we follow the rules of the Code of Conduct and Ethics, relating to our accounts and investments, to holding joint accounts with third parties, to transactions in our own accounts, and to borrowing. ”

c6. What applies for our external employment-business interests

Regarding the possibility of our external engagement outside Eurobank, it is expected that we avoid any involvement in external activities, which could create a conflict of interest, or in any way compromise the integrity and reputation of Eurobank. In addition, we must ensure that any possible external appointment does not affect our ability to perform our duties as derived from our contract as employees, senior managers and board members.

We must remember that a conflict of interest may arise from our professional and personal activities when our actions and our personal interests hinder or may impede the impartial and effective fulfillment of our duties.

For example, we cannot without the prior written consent of Eurobank:

- acquire a significant interest in any external business activity or venture;
- undertake any obligation for an external business or venture;
- perform any remunerated activity, directly or indirectly for our own account or for the account of another natural or legal person;
- undertake employment either on a remunerated or non-remunerated basis for companies that have a commercial or other gainful activity;
- accept board membership positions in public or privately held companies;
- acquire a significant financial or other interest in a supplier, client or competitor of Eurobank.

In order to obtain authorization from Eurobank for external appointments, the decisions must be taken according to the procedure described in the External Engagements Policy.

It should be noted that with regard to the members of the Boards of Directors, the maximum number of positions on Boards that a member may simultaneously hold, is governed by the provisions of Law 4261/2014, as in force.

Lawyers and management advisors are excluded from seeking prior approval for their external engagements. In particular, at the end of each calendar year, lawyers and management advisors must submit to Compliance an attestation / statement that no conflict of interest has been identified in relation to their professional mandates outside Eurobank.

c7. We prevent activities that lead to market abuse

Of primary concern to Eurobank is to prevent its Staff from engaging in activities that may lead to market abuse, in violation of provisions laid down by the legal and regulatory framework in force. More specifically, for all of us who work in Eurobank, as well as for persons closely associated with Eurobank Staff, it is not permissible to engage in market abuse, according to Regulation 596/2014 and its implementation decisions, and in particular to:

- (i) engage or attempt to engage in insider dealing;
- (ii) recommend that another person engage in insider dealing or induce another person to engage in insider dealing;
- (iii) use recommendations or inducements of others, where we know or ought to know that the recommendation or inducement is based upon inside information;
- (iv) unlawfully disclose inside information;
- (v) engage or attempt to engage in market manipulation.

c8. We do not misuse inside information (“Insider Dealing”)

As members of Eurobank's Staff, we are obliged to avoid practices that constitute abuse of inside information. In particular, it is not permitted:

- to use inside information to acquire or dispose of, for our own account or for the account of a third party, directly or indirectly, financial instruments to which this information relates;
- to use inside information by cancelling or amending an order concerning a financial instrument to which the information relates where the order was placed before the person concerned possessed the inside information;
- to possess inside information and to recommend or induce on the basis of that information another person to a) acquire or dispose of financial instruments to which that information relates or b) cancel or amend an order concerning a financial instrument to which that information relates.

Categories of persons possessing inside information include:

- Persons involved in decision-making, implementation, or who have access to strategic matters (Strategic Actions Insiders).

- Persons who are involved or have access to Financial Information during the preparation of the Financial Results (Financial Results Insiders).
- Persons involved in any other way in individual events which include issues with inside information (Other Ad Hoc Insiders).



In order to ensure the confidentiality of important information among the Units of Eurobank, a system of Chinese Walls is implemented. Chinese Walls are implemented not only in information systems, but also extend to the physical separation of the units and the persons employed in the units or in Eurobank Companies, so as to avoid information leakage as well as to secure the physical access to records and information that is not part of their duties. In this manner, we ensure that communication and information leakage between the units is avoided and aim to prevent situations that create conflicts of interest.

“As members of Eurobank's Staff, we have a duty to refrain from activities that lead or may lead to Insider Dealing, Unlawful Disclosure of Inside Information or Market Manipulation.”

c9. What applies to our dealings

For investment transactions

It is recommended that Eurobank Staff execute their trading orders through Eurobank. Transactions in financial instruments should take place in a manner and frequency such that they do not impede the effective performance of our duties during working hours.

In cases where transactions on any shares (domestic and / or foreign) listed or unlisted in any regulated market are not carried out through Eurobank, we report the transaction in writing to Compliance. The notification is made within 5 working days of the transaction and only in cases where the total transaction value for the day exceeds the amount of EURO 10,000.

With regard to debt obligations issued by domestic or international issuers (e.g. corporate bonds and notes, government bonds etc.), buy/sell transactions shall be reported only where the transaction value is greater or equal to EURO 30,000 in total during the trading day. The notification is made within 5 working days of the transaction.

For other financial instruments (other than the above) traded on regulated markets or on a Multilateral Trading Facility (MTF) or on an Organized Trading Facility (OTF) or over-the-counter (OTC), reporting should be made for transactions amounting to or greater than EURO 10,000 within the day and no later than 5 working days after the transaction takes place.

In particular, persons discharging managerial responsibilities within an issuer are required to disclose transactions to the issuer and the Hellenic

Capital Market Commission, within 3 working days of the date of the transaction. The disclosure concerns EYPQB shares and Eurobank (issuer) instruments over EURO 5,000, within the calendar year. The limit of € 5,000 is calculated by simple addition, without offsetting transactions.

It should be noted that no disclosure of the aforementioned transactions (shares, debt securities and other financial instruments) to Compliance is required if they are carried out, as should be, through Eurobank. However, if the transactions are carried out through another bank or through another brokerage / investment services company, we are obliged to report these transactions in writing to Compliance.

Eurobank encourages Staff to carry out transactions in financial instruments in the context of normal investment/trading activity. It goes without saying that any transaction that aims at short-term gain and/or speculation is discouraged. For this reason, securities purchased on a regulated market or an MTF or an OTF or OTC, should be held by Staff for at least 24 hours. Bonds must be held for a period greater than or equal to three months after the transaction date. Short-term gains include foreign exchange transactions (for speculation purposes) and especially when linked to other investment products.

Moreover, it is recommended that continuous and repetitive intra-day transactions in financial instruments be avoided, particularly short selling. In addition, transactions with leverage in financial instruments are discouraged, except in cases where

such transactions are performed in the context of hedging long-term investment positions.

Taking into consideration the market condition at the time, transactions which have a long-term investment horizon or at least a medium term one are considered as acceptable investment practice. Our investments should be consistent with our financial knowledge and financial position.

Eurobank reserves the right to prohibit the performance of transactions on margin/collateral by Staff, in cases where the particular member appears to be over-lended or in cases where it is obvious that such service is performed for speculative purposes (taking advantage of market conditions or of conditions relating to the particular traded instruments). The use of such service is recommended for medium/long-term investment transactions. Moreover, in no instance shall a margin account be used for intra-day transaction purposes.

The non-executive members of the Board of Directors report as required, to the Audit Committee, in

accordance with current regulations.

Finally, transactions in the name of Eurobank are not permitted unless they are performed in the course of our duties or under special authorization given for the particular transactions.

For participation in auctions

Eurobank does not permit our participation, directly or indirectly (through surrogate persons) in auctions for the sale of movable or immovable property of debtors of Eurobank, as well as any related action that could create adverse consequences or have an adverse effect on the credibility and reputation of Eurobank. This prohibition does not include cases in which Eurobank invites its Staff to participate in the process as an interested party, in accordance with the applicable procedures of the relevant Unit of Eurobank. In particular, for staff members working in units that manage the relevant assets as well as the Remedial & Servicing Strategy Sector prior approval of the Unit Manager is required, as well as concurrent notification to Compliance.

“ All our investment transactions and our participation in auctions must comply with the rules of the Code of Conduct and Ethics and be consistent with the framework set by Eurobank for each case. ”

c10. We use staff rates properly

We work in an organization that provides us with a range of benefits, among which are favorable terms for services and products. We, as Staff, must take care for their proper use. As such, these favorable terms and personal accounts should not be used for the benefit of third parties who are not entitled to these, for example the business activities of a relative or other person, etc.

As members of Staff, we have favorable terms on products and services. These were created exclusively for us and we have an obligation to use them appropriately. ”

5

d. WE ACT
WITH RESPECT
TOWARDS
OUR COLLEAGUES



WE ACT WITH RESPECT TOWARDS OUR COLLEAGUES

d1. With dignity and high standards of professionalism in our workplace



Mutual respect and dignity are our core priorities. Each of us must show respect towards Eurobank and its clients as well as those with whom we cooperate internally and externally. Due care in our work, professionalism, honesty, integrity, impartiality, fair treatment and with value for our clients defend the interests of Eurobank in the most effective way, and ensure our excellence as professionals and people.

Eurobank recognizes the value of diversity and the benefits that derive from differences. Therefore, we have created a working environment that welcomes and supports people irrespective of age, marital status, maternity, paternity, gender identity and expression, sexual orientation, ethnicity, race, color, religion, disability or other status. This is reflected in our recruitment processes, as well as in the actions we take in order to develop and retain our Staff. Eurobank is committed to providing equal employment opportunities and development of its employees by treating each member of Staff with equity, meritocracy and objectivity.

It is important to remember that Understanding and Cooperation are two fundamental values of Eurobank. More specifically, “understanding” includes showing respect for the diversity of individuals and helping others feel comfortable in being themselves. At the same time, “cooperation” means that we support our colleagues, we encourage different opinions, dialogue and debate and we make good use of the advantages that emerge as a result of the diversity of the members of the Staff.

All forms of discrimination, harassment or intimidation relating to ethnicity, gender, motherhood, color, religion, health, sexual preference and any other distinction are behaviors incompatible with our culture and values. We show zero tolerance to such behaviors and we have established communication channels and processes through which any incident or suspected incident of discrimination, harassment or intimidation can be reported, examined and addressed. All Staff members are encouraged to raise issues of concern and speak up when they suspect potential wrongdoing or are faced with conduct or situations that may raise ethical, legal or regulatory concerns.

If you believe that you or someone else is a victim of harassment or discrimination, you can refer the matter to your Manager, the responsible HR Business Partner as well as other communication channels as described in the Policy for Reporting Unethical Conduct. More specifically you may:

- Contact the Head of Compliance
- Contact the Head of Internal Audit’s Forensic Audit Division
- Contact the Chief Audit Executive
- Send email to  ethicshotline@eurobank.gr
- Send letter to the mail address of Compliance, 2-6 Pesmazoglou, 105 59, Athens
- Call the relevant telephone line  (0030 2144058990) and either talk directly to one of the authorized staff that handle these calls or leave a message to the answering machine
- Inform an appropriate member of Management.



“ Dignity and respect are essential elements of our attitude in our workplace, where discrimination, harassment, rudeness and intimidation have no place.

In any case, for difficult situations encountered in the performance of our duties it is recommended to seek the advice and/or guidance of management or directly from Compliance.

We must be aware that in order to strengthen our working environment and promote an inclusive workplace each one of us is individually responsible for safeguarding and supporting diversity, abiding by the requirement, and creating an environment where there is no discrimination, intimidation, rudeness, and where respect, inclusion, solidarity, understanding, honesty and meritocracy dominate and prevail.

d2. With optimal levels of health and safety

One of the most important priorities for Eurobank and for us as Staff is to ensure our physical and mental health and safety in the workplace. That is why, in addition and above legislation, all necessary measures are taken, to prevent and deal with accidents and occupational illnesses. Furthermore, Eurobank is committed to maintaining high standards of prevention in the workplace in case of pandemics.

More specifically, Eurobank:

- implements programs to ensure a safe workplace and prevent risks associated with health and safety;
- possesses the appropriate infrastructure and equipment that is needed for a safe working environment;
- trains and informs the members of the Staff regarding health and safety issues.

Respectively, we as Staff, are committed to contributing to, complying with and following precisely the relevant directives, aiming at our complete protection.

More specifically, we, as Staff members:

- ensure, insofar as it is feasible, our own health and safety, as well as the health and safety of others in the workplace;
- comply with health and safety instructions given by Eurobank;
- report all incidents, conditions or behaviors that pose a threat to health and safety in the workplace.



“ Health and safety in the workplace are top priorities for Eurobank to which we all contribute by following precisely all regulations/directives intended for our protection. ”

5

e. WE PROTECT
EUROBANK
AND ITS
REPUTATION



WE PROTECT EUROBANK AND ITS REPUTATION

e1. Our attitude towards Eurobank's assets

We protect Eurobank's assets irrespective of our mode of work (on-site presence, teleworking etc.). Eurobank's assets include, but are not limited to, buildings and fixed assets (e.g. any type of machinery, computers, desks, drawers, filing cabinets, lockers, archives and in general any equipment used by Staff in the performance of their daily duties), software, communication networks, procedures, elements of corporate identity, information, customer base, supplier information, reports, regulatory documents, files, supplies, intellectual property rights. For all tangible and intangible assets, we must show due care and responsibility in safeguarding their integrity so as to properly serve the business purposes of Eurobank.

In addition, we must be aware that Eurobank's assets should not be used for personal benefit and for purely personal use, and that any concern regarding its

proper use should be reported to one's Supervisor or to the Security Officer.

It is important to remember that anything we do using Eurobank's assets (e.g. computers, mobile devices, network etc.) or store on Eurobank's premises might be disclosed to people inside or outside Eurobank (e.g. when this is required by law, in the context of an investigation, in the course of maintaining the security of resources and users etc.).

When Staff members have any reason to believe that the network security has been violated in cases they have lost their laptop or smart phone or think that their network password has been compromised, they are required to promptly report the incident to the Information Security.

Protecting Eurobank's assets is one of our priorities. Their proper use, the reporting of our concerns, and our due care contribute to the company's business goals and thus to our professional success.

e2. Our participation in social media

Eurobank recognizes our need to participate in Social Media Networks, the right to maintain personal accounts and to freely share our views on various subject matters. However, their responsible and correct use, in accordance with the applicable legal framework and the relevant regulatory and policy framework is recommended. In this respect, Eurobank has developed a Social Media Policy. According to that policy, we must be careful about our statements and show the necessary diligence when participating in social media. It is particularly important to behave with respect towards others and not to publish statements/comments that may be insulting or detrimental to others or to Eurobank. It is worth remembering that:

- 1. We do not reveal information relating to Eurobank.** Information Security is our central priority, and we are obliged to keep confidential information about our clients, our strategy, our colleagues and our suppliers, as well as documentation that is passing through our business network (Intranet) such as Management Acts, Announcements etc.
- 2. We do not post or make comments regarding Eurobank.** Only specific employees/board members are authorized to publicly represent Eurobank, therefore any opinion we express is our personal opinion and not related in any way to our position in Eurobank. Therefore, we need to make it clear in our postings, where necessary, that the views we express are our own. In addition, if we do not represent a competent body, we do not comment on issues about Eurobank that require legal advice.

3. We ensure that our Imprint and Communication Style are compatible with Eurobank's principles. We manage responsibly the content of our posts, knowing that it remains visible to a wide audience and for a long time. We respect our audience, copyrights, the privacy of third parties and make no petitions without the prior approval of the individuals concerned (especially clients and associates); we do not blame, use obscenities, intimidate, or insult other individuals or social groups.

4. We comply with our obligations to Eurobank. We follow the terms of our employment contract, especially those relating to Confidentiality, Non-Disclosure, Representation and the rules of the Code of Conduct and Ethics, even when using Social Networks in our own time.

5. We act responsibly even when we have the best intentions. Anything we publish regarding Eurobank may potentially harm it and be damaging to us personally. When publishing material about Eurobank we keep in mind that we are responsible for its image, and act so that Eurobank and we personally can only reap the benefits of digitalization.

It goes without saying that the use of Social Media Networks within the workplace is only allowed for business purposes. Personal use of social media should take place outside working hours and not affect our daily work activity.

As a general remark, we need to remember that our obligations not to reveal information relating to Eurobank and not to make comments regarding Eurobank, apply not only to our participation in social media, but also to other online posts, photos, communications with the press, public speaking engagements etc.



“ Our active participation in Social Media Networks must take place in a responsible manner: within business hours, exclusively for business needs – outside of business hours, with respect for human dignity and without exposing us as professionals and as representatives of Eurobank. ”

e3. Our participation in court or out-of-court cases

In cases where we are called upon or voluntarily decide to stand as a witness in cases related to clients, associates, other members of Staff or even ex-staff members, in legal proceeding or in out-of-court settlement proceedings, we must not take any action prior to informing and communicating with Legal Services or Compliance.

e4. We foster a culture of risk awareness

Eurobank aims to demonstrate a culture of strong risk awareness and ownership, where all Staff

members act as risk managers. It is our responsibility to be aware of the risks, which can result from our actions or decisions and to manage these risks appropriately.

Managers are also responsible for understanding the risks in their business and appropriately managing those risks within Eurobank's risk appetite.

The Risk Department is mandated to develop policies, procedures and processes to set the risk management framework for Eurobank. All Eurobank Staff members need to be aware of and adhere to these minimum risk management standards.

5

f. WE OPERATE

WITH

SOCIAL

RESPONSIBILITY



WE OPERATE WITH SOCIAL RESPONSIBILITY

f1. Following a business continuity plan

Eurobank has taken care to develop a Strategic Business Continuity Plan, which is in full compliance with the provisions of relevant Legislation and has international certifications.

Its main goal is to protect the life and the safety of Staff, provide uninterrupted service of our critical tasks and services to our clients, and safeguard our reputation and our property. Eurobank has carried out a thorough analysis of its operations, ensuring an assessment of emerging risks and developing strategies to address issues that may affect its day-to-day operations. The “Business Continuity Plan Policy” is published on the Intranet.

It goes without saying that we all comply, participate and follow closely directives aimed at the continuation of Eurobank’s business activity.

f2. By specifying relationships with our suppliers

Eurobank applies policies and procedures which take special care so that when entering into a contract between Eurobank and a Service Provider, the latter complies with Eurobank’s regulatory requirements and internal regulations and policies in order to avoid situations of Conflicts of interest.

Eurobank verifies the suitability, legitimacy and competence of the service provider in terms of its financial condition and its operating and control procedures to ensure that the provider is able to provide the required level of service. It also assesses the risks that may arise from the assignment, establishes mechanisms for risk control and takes special measures if it is found that the provider does not perform the functions assigned to him effectively and in accordance with the applicable legal and regulatory requirements.

In particular, the following rules of conduct governing the procurement of goods and services and the tendering process of technical and physical security projects in Eurobank in Greece are in force in order to ensure transparency and objectivity:

- Avoid transactions with Suppliers who use practices that Eurobank considers vulnerable.
- It is not permitted to accept gifts from Suppliers, except for those of a small value and customary.
- Avoid any personal relationship that may affect or be considered to affect the impartiality of Eurobank Staff members.
- Ensuring the confidentiality and the ethical business and trading principles of Eurobank, the transparency of procedures, the objectivity in the selection of Suppliers and the protection of the interests of Eurobank implies the confidential treatment of the evaluation of the tenders throughout the tendering process, and after their completion and contract award.

f3. By supporting sustainable development – demonstrating social responsibility

Corporate Responsibility is a fundamental and integral part of Eurobank’s strategy. Working with sensitivity, respect and high corporate responsibility, we strive to actively contribute to the improvement of the economic and social environment in which we are a part of and operate in. In this context, through various initiatives we support Innovation & Youth Entrepreneurship, Education, Culture, Sports, Social solidarity, and the Environment.

In particular, responding to the needs of society, we support actions that promote Innovation, Entrepreneurship and Extraversion. In addition, Eurobank with the program “Great Moment for Education” rewards the effort of young people to acquire knowledge and rewards those capable and deserving of prospects for the future.

We have also, been traditionally involved in the support and promotion of culture. We steadfastly support sports and top-level athletes, demonstrating in practice our particular interest in the development of athletic ideals.

Social contributions are an integral part of all subsidiaries in Greece and abroad. At the same time, Eurobank contributes annually, through donations and voluntary work, to the work of a significant number of non-profit organizations and institutions, mainly in areas concerning children and health.

With the aim of ensuring a high level of consumer protection in the promotion and advertising of financial products and services, Eurobank, has adopted the “Code of Conduct for the Promotion of Financial Products and Services Offered by Credit Institutions” as well as the “Code of Banking Conduct” issued by the Hellenic Bank Association.

In addition, in the context of our Corporate Social Responsibility strategy and aiming at enhancing the image and reputation of Eurobank, we have established procedures that ensure that we follow rules of conduct for all of the above actions.

“ Education, Culture, Sports, Economy, Society: The main pillars in our effort for Sustainable Development in Greece, and also evidence of our consistent and stable work on Corporate Responsibility. ”

f4. By having environmental responsibility in Eurobank

We believe that the need to protect the environment is of strategic importance and that environmentally and socially responsible action is an essential part of sustainable business growth. As a financial group we are aware of the environmental and social impacts of our own operations and we therefore endorse, and set specific objectives and targets for the optimum use of natural resources, the mitigation of waste production, the prevention of pollution, the mitigation of climate change and the protection of biodiversity and ecosystems, in a workplace where human and labor rights, as well as health and safety, are considered matters of utmost priority and in compliance with applicable environmental and social legislation. This behavior, is also, gradually, adopted towards our shareholders, our customers and suppliers, as well as towards society at large.

By committing to responsible energy management as part of our overall Environmental & Social Policy, we follow in all our installations the rationale of minimizing energy costs, harmful emissions, fossil fuels, and at the same time maintain our operational objectives and provide an acceptable working environment for our Staff.

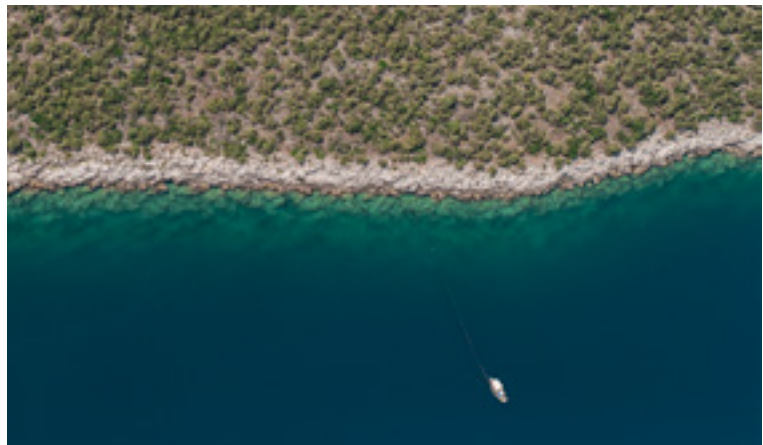
Within our Environmental Management, we implement a specialized Energy Management System to ensure proper implementation of the aforementioned policy and continuous improvement of our energy performance.

By making every effort to recycle and/or redirect the main waste generated, through special recycling programs, we aim at the safe management of all recyclable outgoing materials. Particular emphasis is placed on preserving the most important natural resource, water, by taking measures through specific programs.

At the same time, we aim at transmitting our environmental responsibility to clients and suppliers. We develop evaluation criteria for both individuals and legal persons with whom we cooperate and for the products and services that they provide.

In all cases, we encourage the participation of Staff both in Eurobank environmental projects and in adopting environmental behaviors that promote our personal growth, the spirit of volunteering and contribute to a better life for all of us.

“ Environmental Protection, Energy Saving, Participation in Voluntary Programs for a Better Life on a Better Planet: Liability and Commitment of Eurobank and its Staff. ”



f5. By respecting human rights

Within its framework of influence, Eurobank is committed to ensuring respect for human rights, and in particular among Staff members, suppliers and clients. In this context, we participate in Associations and Organizations that promote Sustainable Growth and Responsible Entrepreneurship.

Specifically, Eurobank:

- Accepts the UN Global Compact, an international voluntary initiative to promote sustainable and responsible business. The pact provides a framework of 10 internationally accepted principles in the areas of human rights, working conditions, environmental protection and anti-corruption, whereby participating companies commit to aligning their strategy and activities.
- Participates in the United Nations Environment Programme Finance Initiative (UNEP FI) to promote Sustainability.
- Is an ambassador to the Sustainable Greece 2020 Initiative, which aims in promoting Sustainability and Responsible Entrepreneurship.
- Is a member of the Greek Corporate Social Responsibility Network, which aims at promoting Corporate Responsibility of Greek businesses and organizations through a series of initiatives, good practices and actions that help to strengthen social cohesion and sustainable growth.
- Is a member of Global Sustain, which promotes corporate responsibility, green economy, sustainability, business ethics, excellence, responsible investment, transparency, human rights and accountability.
- Has instigated the formation of the Hellenic Bank Association's "Committee for Sustainable Growth", coordinating its activities to date.
- Is a member of the standing working group of experts of the Energy Efficiency Financial Institution Group (EEFIG) established by the European Commission to Finance Energy Efficiency.

f6. By promoting free and fair competition

Eurobank is an active member of an upstanding global economy. That is why we are committed to full compliance with the International, European and, by extension, Greek legal framework. Each of our activities forms part of the free economy and faithfully abides to practices of fair competition. As such, we do not seek to gain a competitive advantage through unethical, illegal means and unfair trade practices. In our daily activities, we work harmoniously with market regulators. In our dealings with customers and suppliers, we always act with integrity, transparency and fairness.

Eurobank understands the importance of the legal and regulatory framework on the protection of free competition and its benefits for consumers, competitors, as well as for the market as a whole. In this context, we take all appropriate measures in order to promote and protect free competition. Eurobank provides training to Staff members and raises awareness in order to prevent behaviors that aim or lead to the restriction or distortion of competition.

When Staff members have doubts as to whether a specific behavior could constitute a breach of free competition or fair competition laws, they should seek advice by contacting the Legal Services or Compliance.

Moreover, Eurobank informs Staff members that breaches of the free competition legal and regulatory framework may lead to heavy fines and reputational damage for Eurobank, as well as to administrative fines, penal sanctions and disciplinary sanctions for those natural persons liable for non-compliance with the competition rules and responsible for the violation.


In the case of a surprise inspection ("dawn raid"), Eurobank will cooperate fully and actively with the competent authorities.



“ By participating in Associations and Organizations that promote Sustainability and Responsible Entrepreneurship, Eurobank demonstrates its commitment to respecting the human rights of Staff members, clients and suppliers throughout our frame of influence.

6

THE CONTROL FUNCTION AND THE MONITORING OF THE CODE OF CONDUCT AND ETHICS



THE CONTROL FUNCTION AND THE MONITORING OF THE CODE OF CONDUCT AND ETHICS

Compliance as well as the other competent auditing and control bodies of Eurobank are responsible for monitoring Eurobank's Code of Conduct and Ethics. In this context, they are authorized to review transactions in savings and/or investment accounts, personal data available in computerized systems, e-mail, interbank information systems, files etc. Their purpose is to aid and support the application of the rules described, to defend Eurobank's interests, as well as fulfill their obligations as foreseen under applicable legislation.

Persons charged with the monitoring and implementation of the Code of Conduct and Ethics take appropriate organizational and technical measures to protect data and ensure their security, thus attaining the level of security based on the nature of the data being processed. Also, under measures of high security, information is provided to authorized third parties (e.g. Prosecutor's Offices, Bank of Greece, Tax Authorities, Hellenic Capital Market Commission etc.) when requested.

Compliance is also responsible, for handling questions that may arise, as well as our training on the proper application of the rules of the Code of Conduct and Ethics.


We note that any perceived violations of the provisions of this Code of Conduct and Ethics may be referred to the competent bodies of Eurobank and can even lead to administrative or disciplinary action including the resolution of the Eurobank Staff member's relationship with Eurobank.



“ Compliance and the relevant auditing bodies of Eurobank are responsible for monitoring and implementing the Code of Conduct and Ethics. Every action is performed with the highest level of security for the information and data they hold. ”

7

THE DURATION OF THE CODE OF CONDUCT AND ETHICS AND ITS REVISION



THE DURATION OF THE CODE OF CONDUCT AND ETHICS AND ITS REVISION

The Code of Conduct and Ethics is re-evaluated and updated every 3 years. Compliance is responsible for reviewing it, and undertakes to ensure that its content and rules are fully updated to possible changes in the current legislative/regulatory framework and/ or the principles of Eurobank.



8

OUR PERSONAL COMMITMENT TO PROFESSIONAL RESPONSIBILITY



OUR PERSONAL COMMITMENT TO PROFESSIONAL RESPONSIBILITY

On an annual basis, we confirm that we are aware of the terms of the Code of Conduct and Ethics, which is also posted on the Intranet site, as well as on Eurobank's website. The general issues developed in this Code of Conduct and Ethics are specified by policies, guidelines and procedures issued by the

relevant Business Units. These are posted on the Intranet site, distributed by electronic mail or any other means deemed appropriate by Eurobank. This enhances the knowledge of our Staff with regard to the procedures that we all must learn and be aware of.

Indicatively but not exclusively, we must be aware of:

- the Policy for the Prevention and Detection of Market Abuse
- the Insider Dealing Guideline
- the Management of Complaints Policy
- the Personal Data Protection Policy
- the Policy for Reporting Unethical Conduct
- the Conflicts of Interest Policy
- the Related Party Transactions Policy
- the Anti-bribery and Corruption Policy
- the Relatives Policy
- the Social Media Policy
- the Outsourcing Policy
- the External Engagements Policy
- the Anti-money laundering and combating the financing of terrorism Policy
- the Environmental & Social Policy
- the Fraud Risk Management Policy
- the Procurement Policy
- the Reputational Risk Management Framework
- the IT Security Responsibilities Guideline
- the Data Loss Prevention Guideline
- the Requirements for Data Classification, Labelling and Handling of information assets Guideline
- the Secure Paper Destruction and Disposal Guideline
- the Secure Adoption of Cloud Computing Guideline

9

TERMINOLOGY

AND

EXAMPLES



TERMINOLOGY AND EXAMPLES

“Conflict of Interest”

is defined as the situation that:

- could arise in any area of activity of Eurobank,
- within the context of its operations,
- when the personal interest of a member of Staff or relevant person competes with the interests of Eurobank and/or at the same time proves to be harmful to the interests of a client (of Eurobank).

More specifically, a Conflict of Interest may arise in any of the following cases (indicatively and not exhaustively):

- between Eurobank and a client or a member of Staff or relevant person
- between two or more units of Eurobank, or between Eurobank Companies
- between two or more clients, in the context of the provision of a service by Eurobank to those clients.

“Eurobank Staff” or “Staff”

means:

- a)** all members of the Boards of Directors
- b)** all managers
- c)** all persons engaged in advisory positions
- d)** all persons engaged as full, part time and temporary employees
- e)** all persons engaged by Eurobank on a contract basis (third persons collaborating with Eurobank within the context of either providing services or performing a project).

“Financial instruments”

As described in Annex I Section C of Law 4514/2018 and of Directive 2014/65/EU.

“Immediate family member”

means:

- a)** the Staff member’s spouse or a person with whom the Staff member has concluded a cohabitation agreement without marriage or is simply cohabiting without marriage,

- b)** the dependent children of the Staff member and the dependent adopted children of the Staff member and
- c)** all other relatives of the Staff member, who live together with the Staff member under the same roof.

“Inside information”

means information relating, directly or indirectly, to one or more issuers or to one or more financial instruments, that

- a)** is of a precise nature,
- b)** has not been made public and which,
- c)** if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments.

“Insider Dealing”

arises where a person possesses inside information and uses that information:

- 1)** by acquiring or disposing of, for its own account or for the account of a third party, directly or indirectly, financial instruments to which that information relates, or
- 2)** by cancelling or amending an order concerning a financial instrument, to which the information relates, where the order was placed before the person concerned possessed the inside information.

Recommending that another person engage in Insider Dealing, or inducing another person to engage in Insider Dealing, arises where the person possesses inside information and recommends, on the basis of that information, that another person:

- 1)** acquire or dispose of financial instruments to which that information relates or
- 2)** cancel or amend an order concerning a financial instrument to which that information relates,

or induces that person to make such an acquisition, disposal, cancellation or amendment.

The use of the recommendations or inducements referred to above amounts to insider dealing where the person using the recommendation or inducement knows or ought to know that it is based upon inside information.

“Market manipulation”

shall comprise the following activities:

a) entering into a transaction, placing an order to trade or any other behavior which:

i. gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of a financial instrument or

ii. secures, or is likely to secure, the price of one or several financial instruments at an abnormal or artificial level,

unless the person entering into that situation establishes that such transaction, order or behavior have been carried out for legitimate reasons, and conform with an accepted market practice;

b) entering into a transaction, placing an order to trade or any other activity or behavior which affects or is likely to affect the price of one or several financial instruments and which employs a fictitious device or any other form of deception or contrivance;

c) disseminating information, which gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of a financial instrument, or secures, or is likely to secure, the price of one or several financial instruments at an abnormal or artificial level, including the dissemination of rumors, where the person who made the dissemination knew, or ought to have known, that the information was false or misleading;

d) transmitting false or misleading information or providing false or misleading inputs in relation to a benchmark, where the person who made the transmission or provided the input knew or ought to have known that it was false or misleading, or any other behavior which manipulates the calculation of a benchmark.

“Multilateral trading facility” (“MTF”):

a multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments – in the system and in accordance with non-discretionary rules – in a way that results in a contract.

“Organized trading facility” (“OTF”):

a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract.

“Owner of inside information”

Any person who possesses inside information as a result of:

a) being a member of the administrative, management or supervisory bodies of the issuer;

b) having a holding in the capital of the issuer;

c) having access to the information through the exercise of his/her employment or duties (Indicative cases but not be limited to: Fund managers, financial analysts, any person receiving information on the strategic decisions of Eurobank, which could bring about a positive or negative impact on financial markets, the internal and external auditors of Eurobank as well as any person that, due to their work/assignment, is being informed about subjects related to financial instruments that will be or are listed in a regulated market or MTF or OTF).

In any case, it is meant the person who possesses inside information under circumstances other than those referred above, where that person knows or ought to know that it is inside information. Where the person is a legal person the above definition includes the natural persons who participate in the decision to carry out the acquisition, disposal, cancellation or amendment of an order for the account of the legal person concerned.

“Person closely associated to person discharging managerial responsibilities”

means one of the following:

a) a spouse, or a partner considered to be equivalent to a spouse in accordance with national law;

b) a dependent child, in accordance with national law;

c) a relative who has shared the same household for at least one year on the date of the transaction concerned; or

d) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a person discharging managerial responsibilities or by a person referred to in point (a), (b) or (c), which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person.

“Person discharging managerial responsibilities”

means a person within an issuer who is:

a) a member of the Board of Directors or of Management or supervisory body of that entity; or

b) a senior executive who is not a member of the bodies referred to in point (a), who has regular access to inside information relating directly or indirectly to that entity and power to take managerial decisions affecting the future developments and business prospects of that entity.

“Unit”:

all divisions of Eurobank Companies.

“Unlawful disclosure of inside information”

arises where a person possesses inside information and discloses that information to any other person, except where the disclosure is made in the normal exercise of the person’s employment or duties.

CONTACT INFORMATION

For any matter concerning the provisions of the Code of Conduct and Ethics and the submission of approval requests where required, the following e-mail address is available:

✉ COMPLIANCEPERSONNELU@eurobank.gr



● *Inspiration*

Our new Code of Conduct and Ethics highlights the importance Eurobank places integrating our ethics principles in the way we behave as professionals and in the way we conduct our business. Every one of us demonstrates our daily practices our values of social responsibility and transparency. For Eurobank, our Code of Conduct and Ethics is a constant compass pointing in the direction where the philosophy of ethics becomes practice.



Version:	6.0 – 09/2020
Responsible Unit:	Group Compliance
Head of Responsible Unit:	Athanasios Athanasopoulos
Approved by:	Audit Committee
Valid as of:	23/09/2020
Next revision date:	12/2023