



Dear colleagues,

OTP banka is firmly on its way to fulfil our vision – to be the best bank in Slovenia. Our bank integration efforts in the past have allowed us to grow into a major, strong bank. Our vision is based on principles and values, but we're also aware that it is our employees who can contribute the most in bringing our successful story to life by shaping a positive corporate culture.

We build successful brands, grow the circle of satisfied clients, and improve services and financial products that bring us closer to our clients than ever; we're available to them practically anytime, anywhere. Yet in the background of everything we do, which is what our clients notice the most as well, lie our actions, our relationships, and our corporate culture.

Any integration of banks is always a sensitive process and we're immensely proud today that employees of all banks that have been gradually integrated in the past worked together to shape, step by step, our shared new values and guidance. This was done at all times

through dialogue, surveys, and plenty of teamwork. Our values are therefore truly ours and will accompany us on our journey as the leading principles of our actions. Values are an essential part of everything we do, our decisions, and our way of thought. But that's not all; our values are based on our awareness that we need to act responsibly – toward our clients, owners, the social and natural environment, and toward our colleagues.

The Code of Conduct is the most important internal act in OTP banka d.d. and OTP Group Slovenia and the fundamental document of our corporate culture and values. It provides guidance to employees on how to act in different situations and circumstances of business practice. It is connected to the vision and mission of OTP banka d.d. and OTP Group Slovenia and is an important part of governance and development processes and risk management.

John Denhof,

President of the Management Board

CODE OF CONDUCT 2



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6.

BRINGING TOGETHER THE BEST

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The Code of Conduct of OTP banka and OTP Group Slovenia outlines the principal ethical standards, values and rules of conduct that we as employees follow daily in our line of work and which we pursue in creating our corporate culture.

1.1. The Code Applies to All of Us

Provisions of the Code are morally and legally binding for all OTP banka employees. The Code defines what is regarded as acceptable and unacceptable behaviour of employees of OTP banka across all of its governance, hierarchical and organisational levels.

The Code was approved by the Management Board of OTP banka.

Every member of OTP Group Slovenia is obligated to appropriately implement or transpose the Code, taking into consideration its own corporate size as well as its organisational and business structure.

Any deviations from this rule regarding the implementation of the Code must be notified to the Ethical Compliance Officer at OTP banka's Compliance Office.

1.2. Zero-Tolerance for Conduct Counter to the Code

As described herein, OTP banka enforces a zero-tolerance policy towards actions of employees and other individuals that may either have a negative impact on OTP banka's reputation or are unacceptable from a legal, moral or ethical perspective.

1.3. External Stakeholders Respect the Code as Well

The Code is also an important guidance for our external stakeholders, business partners, vendors/suppliers, associates, and others who cooperate with the Bank in any other way.

1.4. Our Actions Impact Our Reputation

Although the Code covers a number of important ethical issues, it cannot anticipate all possible circumstances or determine the appropriate conduct for all situations. In situations not covered by the Code, we should act with the best intentions to protect the reputation and integrity of OTP banka and its stakeholders.

Compliance with the Code is easiest to ensure by using good judgement and seeking guidance when questions arise.







Our Mission

OTP banka's mission is to successfully implement all strategic pillars:

- 1. GROWTH AND PROFITABILITY,
- 2. CLIENT EXCELLENCE,
- 3. STRONG RISK MANAGEMENT AND COMPLIANCE,
- 4. OPERATIONAL EFFICIENCY,
- 5. ORGANISATIONAL CULTURE AND TALENT DEVELOPMENT.

Principles

- We follow the needs of our clients.
- We take responsibility for our actions.
- We are precise, diligent, sincere, and truthful.
- We act honestly and in line with our values, ethical and moral standards, and the law.
- We are a trustworthy partner.
- We provide clients with professional and useful solutions.
- We alert clients of possible risks.
- We protect the integrity and assets of OTP banka.

- We protect personal and confidential data of all stakeholders.
- The bank creates an environment conducive to employee development.
- Employees regularly take part in training.
- We strive for dialogue.
- We are respectful, professional, readily available, and neat in appearance.
- We avoid conflicts of interest.
- We strive for OTP banka to be successful.
- We identify and remedy violations and irregularities.

Core Values

We build and strengthen our corporate culture by pursuing positive values that determine our actions, decisions, and good practices.

We create an environment that welcomes open communication and everyday challenges, and have the responsibility to act, especially when detecting conduct that is counter to the Code.



Excellence



Trust and integrity



Continuous development



Collaboration



Client focus





Excellence

We are efficient and we strive to deliver the highest quality.

ALWAYS BETTER

We achieve excellence by consistently striving for the best. We optimize processes, ensure stability, achieve exceptional results and raise standards. Efficiency and quality intertwine—we don't compromise one for the other. Whether it's a small task or a grand project, we infuse it with excellence, leaving an indelible mark of achievement.



Trust and integrity

We are honest, transparent and we can rely on each other.

INFINITE HONESTY

Trust is our currency. We understand how difficult it is to gain and build trust, and how fragile it can be. We operate with infinite honesty, transparency, and reliability. Whether it's keeping promises to customers or supporting each other in a team, integrity is always our compass. We build bridges of trust, knowing that our strength lies in these unbreakable bonds.



Continuous development

We are curious, brave to innovate, learn and improve.

CURIOSITY UNLEASHED

Curiosity drives us forward.
We gladly accept changes, bravely innovate and yearn for knowledge.
Learning is a lifelong journey.
We accept challenges, fearlessly adapt and develop. This is how we become better versions of ourselves every day.





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Collaboration

We work respectfully together as one team towards common goals.

UNIFIED SYNERGY

Collaboration is our superpower.

As one harmonious team,
we strive to achieve common goals.
Respectful communication enhances
creativity, and different perspectives
they encourage innovation.
We are aware that together we
can achieve more.



Client focus

We understand clients, partners and colleagues, to serve them best.

EMPATHY IN ACTION

Our commitment to understanding our clients—both external partners and internal colleagues—fuels our success.

We listen and hear, empathize, and tailor solutions to meet their unique needs.

By putting clients at the heart of everything we do, we create lasting relationships and drive exceptional outcomes.







We have the duty to act in accordance with applicable legislation and internal regulations. Compliance of employees' actions with the provisions of the Code forms an integral part of the contractual obligations of each employee.

5.1. Duty to Comply

We have the duty to act in accordance with applicable legislation and internal regulations. Compliance of employees' actions with the provisions of the Code forms an integral part of the contractual obligations of each employee.

Given that each employee is responsible for their ethical conduct, we consider the values and principles set out in the Code to be of upmost importance. We consistently comply with all relevant legislation and internal regulations, always striving to act according to the highest applicable standards.

We need to confirm our awareness of provisions of this Code and take part in annual training to test our knowledge of the Code. All OTP banka employees have the right to consult directly with the Ethical Compliance Officer at the OTP banka Compliance Office, who can provide advice and act in line with the rules and values outlined in the Code.

All internal regulations of OTP banka need to be aligned with provisions of this Code.

5.2. Ethical Conduct

We are committed to ethical conduct across all areas of our operations and in relationships with all our stakeholders. Client relationships are at the core of our business. Good and mutual relationships that we strive to have with our clients, owners, business partners and external service providers are based on respect, trust, and consideration of the ethical values of OTP banka.

Taking ethical decisions also means seeking advice when necessary.

Ethical conduct starts with us.

5.3. Conscientious Objection

When we believe that an action required of us is unlawful, incorrect, or unethical or that we are being led or induced to violate the provisions of this Code, we have the right to make a written conscientious objection.

The objection is accepted, processed, and decided on by the Ethical Compliance Officer at the OTP banka Compliance Office in cooperation with other relevant support departments.



We take knowledge of confidential data in our line of work. Regardless of format, data is regarded as confidential when it is designated as such by internal regulations, but also if it is not designated as confidential by any internal regulation yet is not publicly available and would cause significant harm if it were disclosed to an unauthorized person.

5.4. Managerial Responsibility

The bank expects of its senior managers to lead their colleagues by example and in line with the bank's values, to ensure compliance with the Code of Conduct, to provide support to their employees and to maintain ethical working environment.

5.5. Data Protection Duty

We take knowledge of confidential data in our line of work. Regardless of format, data is regarded as confidential when it is designated as such by internal regulations, but also if it is not designated as confidential by any internal regulation yet is not publicly available and would cause significant harm if it were disclosed to an unauthorized person. This includes first and foremost any data about our clients, employees, and business secrets that we encounter in our line of work. We are aware that data are both an asset and a competitive advantage of the bank. We have the duty to protect all data that we take knowledge of in our line of work in accordance with applicable laws. Our duty to protect data extends even beyond our term of employment at the bank, as we need to protect and safeguard any data, we have taken knowledge of during our time in the bank even after we leave it.



We protect our clients' interests also by complying with anti-trust rules and by acting in accordance with applicable laws.

5.6. Anti-Trust

We protect our clients' interests also by complying with anti-trust rules and by acting in accordance with applicable laws. Anti-trust rules protect competition by regulating actions that denote, in particular, undue restriction of competition or are counter to market conventions.



We shall not use our positions or work at OTP banka to advance our personal interests or the personal interests of other persons.

5.7. Conflicts of Interest

A conflict of interest is a situation where private interests of an employee influence or appear to influence the impartial and objective performance of their duties.

It is the responsibility of each and every one of us when performing our duties to pay attention to any actual or potential conflict of interest and to do whatever is necessary to avoid it.

All situations or circumstances that denote conflict of interest must be reported to the Compliance Office at eticnavprasanja@otpbanka.si.

We shall not use our positions or work at OTP banka to advance our personal interests or the personal interests of other persons.

Members of OTP Group Slovenia are required to incorporate the rules governing conflicts of interest into their internal documents to a reasonable extent.

5.7.1. PRIVATE INTERESTS OF EMPLOYEES

All employees of the Bank shall make their business decisions independently and in accordance with commercial and ethical perspectives of the Bank. Own profitability, friendships or family ties with clients, vendors, suppliers, business partners and other persons shall not influence any business decisions.

5.7.2. PRIVATE FINANCIAL TRANSACTIONS

We must refrain from carrying out private financial transactions that could threaten our impartiality and independence, or transactions which constitute or could constitute conflict of interest.

In any private financial transactions OTP banka's employees must act as good and diligent managers and avoid excessive borrowing.



Personal relationships in the workplace may give rise to conflict of interest. We must therefore be careful to avoid any such situation.

5.7.3. PERSONAL RELATIONSHIPS AND RELATED PERSONS IN THE WORKPLACE

Personal relationships in the workplace may give rise to conflict of interest. We must therefore be careful to avoid any such situation.

Personal relationships between OTP banka employees are not forbidden, nor is it forbidden to hire a person related to an employee, but we must ensure that employees personally related to one another do not perform their work within the same organisational unit and, if possible, not even within the same organisational line of OTP banka.

In order to effectively manage conflicts of interest within OTP banka, we must notify the Compliance Office whether any person related to us is employed at OTP banka and, if so, in which position. The definition of related persons for the purpose of this Code is provided in the note below.¹

The Compliance Office will process these data only for the purpose of effectively managing conflicts of interest and will protect them as confidential and in accordance with the applicable legislation.

As part of the recruitment process and prior to selecting any candidate, the Human Capital and Development Sector is required to obtain information from each job applicant about any person related to them who is already employed at OTP banka.

Considering their respective organisational structures, members of OTP Group Slovenia other than OTP banka are required to incorporate into their internal documents the rules governing the work of related persons within the same organisational unit, as well as the rules applicable to the collection and processing of data concerning related persons employed by them.

¹ Related natural persons are close family members of an employee. A close family member means a person in one of the following relationships with another person:

[•] a spouse or a person with whom they live in a relationship that has the same rights in property as those arising out of a matrimonial relationship, or a person with whom they live in a same-sex civil partnership according to the law governing the registration of same-sex civil partnerships

[·] a child or adopted child of such a person or person from the previous point

[•] other persons under such a person's guardianship or the parents/grandparents of such a person or the person referred to in the first point

a direct blood relative to any degree (grandparents, parents, children, grandchildren, and great-grandchildren)

[•] an indirect relative up to and including the third degree (brothers, sisters, nephews, nieces, uncles, and aunts)

an in-law relative up to and including the second degree (fathers-in-law, mothers-in-law, sons-in-law, daughters-in-law, brother-in-law, sister-in-law, stepfathers, stepmothers and stepchildren)

any other person with whom the employee is privately related in a way that may lead to conflicts of interest.



In pursuing private activities, we must never give the appearance of acting on behalf or for the account of OTP banka.

5.7.4. EXTERNAL ACTIVITIES OF EMPLOYEES

During our employment relationship with OTP banka we must not, without appropriate written consent, engage in any for-profit or non-profit activity, conclude any transactions for our own account or for the account of a third party, or be involved in any legal entity if the respective activity falls within the category of activities carried out by OTP banka and is or could be competitive to OTP banka, nor should we engage in any for-profit or non-profit activity, or conclude any transactions for our own account or for the account of a third party, if the respective activity is identical or similar to the ones we perform at OTP banka, or if the performance of this activity is or could be competitive to OTP banka.

We are also required to obtain appropriate written consent for taking up a position in a supervisory or governance body and for publishing any written contributions, articles or books, or for engaging in publishing activities, as well as for carrying out educational or training activities or lectures if, in carrying out any of these activities, we use the name 'OTP banka' or non-public information obtained in performing our duties at OTP banka.

You are obligated to notify the OTP banka Compliance Office also if engaging in a business activity or holding a for-profit or non-profit function in a local body or environment that does not require the consent of the Management Board.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of OTP Group Slovenia and be complied with by employees of every Group member.



5.8. Anti-Bribery and Anti-Corruption

OTP banka is committed to complying with all applicable anti-bribery and corruption laws and regulations. Our bank expects transparency and the highest level of integrity in all of its business dealings to avoid any improper advantage, either in fact or appearance, as a result harmful practice. OTP banka expects of its employees and third parties who cooperate with the bank to act with the same level of integrity as the bank itself.

You are responsible for preventing, detecting, and reporting any attempted bribery and other forms of corruption in connection with our bank's business.

Bribery or corruption in any form is not tolerated by our bank – you and third parties associated with your business are prohibited from offering, promising, giving or authorising, any form of solicitation, agreement to receive, or accepting anything that constitutes, or could be perceived as constituting, bribery or corruption.



5.8.1. GIFTS AND ENTERTAINMENT

We should not accept gifts or entertainment from our customers, external service providers, business partners or any other persons, either for ourselves or for our colleagues. However, we are aware that exist social circumstances in which it would be impolite to refuse a gift or entertainment, or other occasions on which the acceptance of gifts or entertainment is justified. In any such circumstances or events, it is necessary to clearly justify the business reason for accepting a gift or entertainment, taking into consideration the restrictions and rules of OTP banka that are applicable to this issue.

The acceptance of any gift or entertainment does not affect, and should not affect, our business decisions.

We follow the internal rules on receiving and providing gift and/or entertainment.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of OTP Group Slovenia and be complied with by employees of every Group member.

Protecting the integrity of financial markets is a key factor in promoting fair and efficient markets and investor trust.

5.9. Prohibition of Market Abuse

Protecting the integrity of financial markets is a key factor in promoting fair and efficient markets and investor trust. Improper market conduct undermines market fairness, efficiency, and trust. Market manipulation/abuse may have a negative impact on our clients, financial markets, and our bank as a whole. In our line work we may take knowledge of information that is not public, the disclosure of which could impact developments on financial markets.

We thus have the duty to carefully safeguard such information as well, and we must not use any information that has the characteristics of inside information for any direct or indirect acquisition or disposal of a financial instrument for our own account or the account of persons related to us or disclose the information to third parties

The Bank has in place detailed internal rules in its financial instrument trading line that shall be complied with also when making private securities transactions.



5.10. Anti-Money Laundering and Counter-Terrorist Financing and Sanctions

Money laundering is an abuse of the financial system for the purpose of concealing the origin of funds, while terrorist financing refers to the direct or indirect financing of individuals and organisations involved in terrorism. Both are prohibited under the applicable legislation and internal regulations of OTP banka.

Within the line of our duties and responsibilities, we consistently perform the tasks set out in the applicable internal regulations and notify the relevant department of any deviation or suspicion of potential abuse in this field.

SANCTIONS

In its business operations OTP banka consistently complies with EU, UN, OFAC, and UK sanctions. Sanctions may be enforced either as a full business ban, financial sanctions (ban on cooperation or freezing of funds), or as other measures that restrict business operations of persons (natural or legal) subject to sanctions (a ban on financing certain raw materials or products, securities, etc).

5.11. Political Engagements

OTP banka is a politically neutral organisation and does not engage in political party campaigning or make any donations to any political parties or candidates running for office.

If you are involved in a political activity in private capacity, you are required to make sure that this is kept entirely separate from your duties as an employee and that our bank's funds or resources (including time) are not used for political purposes. OTP banka employees are prohibited from recruiting or convincing others to contribute to activities of political parties or other political organizations.

Prior to accepting a public office, employees need to notify their B-1 supervisor and the Compliance Office, and check for any incompatibilities or restrictions of holding this type of public office.



Every OTP banka employee has the duty and right to anonymously report any suspicion of harmful practice and any harmful practice undertaken by any of their colleagues.

5.12. Duty and Right to Report Wrongdoing (Whistleblowing)

Every OTP banka employee has the duty and right to anonymously report any suspicion of harmful practice and any harmful practice undertaken by any of their colleagues who, in their line of work, are or have been involved in an act of corruption or an act harmful to the bank's assets, or any other violations of the Code or other regulations. The report needs to be detailed enough to allow the bank to investigate the allegations. All reports are fully confidential. If an employee chooses to sign the report with their name, their employment will not be jeopardized, provided the report was made in good faith. Reports can also be made anonymously. Prohibited behaviour reports can be filed in different ways, as described at

www.otpbanka.si/sum-in-prijava-nedovoljenega-ravnanja.

The bank investigates all reports in a thorough, fair, discrete, and timely manner.

The bank puts great emphasis on preventing recurring harmful practice. For this purpose, the bank investigates not only the circumstances of a particular case, but also the status of existing processes and internal controls.

The obligations and procedures outlined above shall be reasonably incorporated into the internal documents of all members of the OTP Group Slovenia and be complied with by employees of every Group member.

5.13. Transparency of Accounts and Reports

We strive for transparency and accountability in all our reports and accounts. We always prepare, present, and disclose the financial reports in accordance with the International Financial Reporting Standards and applicable laws. Falsification of reports and records or misrepresentation or concealment of facts is not acceptable in our Group. The integrity and credibility of financial and non-financial records and reports are essential. The reports must give a true and fair view of the financial position and financial performance of our Group in all material respects, thereby ensuring that all stakeholders are correctly informed.





We communicate with each other in a respectful, professional, and efficient manner, thereby contributing to a positive corporate culture and the attainment of common goals.

6.1. Internal Communication

We communicate with each other in a respectful, professional, and efficient manner, thereby contributing to a positive corporate culture and the attainment of common goals. We encourage dialogue and the exchange of opinions, initiatives, and ideas. We continuously nurture, develop, and upgrade our knowledge and skills of internal communication.

These rules above shall be reasonably incorporated into the internal documents of all members of the OTP Group Slovenia and be complied with by employees of every Group member.

6.2. Employee Availability and Responsiveness

We communicate with our colleagues through different channels (telephone, Skype, Microsoft Teams or other appropriate software, email, meeting). We provide feedback in a quick and appropriate manner. In case of absence, we make sure that our colleagues are aware of it, and we provide feedback in the shortest possible time after returning.

6.3. Prohibition of Discrimination

OTP banka provides equal employment opportunities to all persons with the required qualifications and does not discriminate based on nationality, citizenship, political orientation, religion, age, marital status, sex, sexual orientation, sexual identity, disability, or any other status. Bullying, mobbing, and any other forms of workplace discrimination are prohibited.

6.4. Work-Life Balance

OTP banka strives to create a work environment where all employees can be productive at work and satisfied with their performance despite their family obligations.

Efficiently balancing private and professional life requires mutual cooperation and trust. With this in mind, OTP banka launched the process of obtaining the 'Family Friendly Enterprise' certificate and was awarded the full certificate.



OTP banka creates conditions that encourage and promote the development of its employees and balance between work and their private lives.

6.5. ESG

ESG is a commitment that we take very seriously and one of our most important goals is to transform the Bank in this area. We are aware of the expectations arising from the European Green Deal and we want to help our clients in their efforts to transition to a low or carbon neutral economy. But we are also aware of our own responsibility towards the environment, and we will continue our efforts to reduce our own impact on the natural environment. We also comply with all environmental regulations.

OTP banka's ESG strategy clearly reflects our ambitions in the area of environmental, social and governance (ESG) factors and supports and enables the achievement of the Bank's business and financial objectives. We act in line with OTP Group Slovenia's strategic objective to become the most important financial partner in financing green transformation in the region where it operates.

Our ESG principles are forward-looking, setting higher targets for environmental, social and governance factors.

We want to create an inclusive workplace that promotes equality and diversity and puts employee wellbeing and work-life balance first.

6.5. Respect for Human Rights

The Bank is aware of its responsibility to respect fundamental human rights, as stated in the international Universal Declaration of Human Rights and does not allow unjustified and illegal discrimination that violates human dignity. The integration of human rights into business relations is governed by international standards, to which the bank is committed, and builds upon them with relevant internal acts.





Reputation is an important part of OTP banka's assets, and we are the guardians of the bank's reputation.

7.1. Protection of Reputation

Reputation is an important part of OTP banka's assets, and we are the quardians of the bank's reputation. We always act in such a way as to avoid damaging the reputation of OTP banka, but rather to preserve, protect and strengthen it. We consider the applicable professional and ethical standards, act in accordance with our common values, and comply with the rules of proper conduct and communication. We have a responsibility to recognise, and as far as possible, to control any threats that could adversely affect the reputation of OTP banka. As its employees, we are also obligated to protect the reputation of OTP banka during our free time by refraining from activities or functions that may have a negative impact on OTP banka's performance or reputation or give the impression of abuse of power.

7.2. Using the OTP banka Brand Name

When performing activities, being part of transactions, or exercising a position or office outside the bank, we must never give the appearance of acting as a bank employee or use the bank's brand name in any of these engagements.

7.3. Responsible Use of Social Media

We use social networks, online chatrooms and public forums responsibly and we clearly separate private messages from business ones, always being aware that stakeholders associate our messages and actions, including those that we express and take in our free time, with the values and corporate culture of OTP banka. We therefore, always communicate in such a way as to avoid causing harm to the reputation of OTP banka, but rather to protect and strengthen it.



We communicate with clients, owners, business partners, external service providers, and other stakeholders in an open, responsive, accurate, respectful, and professional manner.

7.4. Appearance of Employees

The bank expects of its employees to take care of their appearance and wear business-appropriate attire particularly when dealing with clients and representing the bank.

7.5. External Communication

We communicate with clients, owners. business partners, external service providers, and other stakeholders in an open, responsive, accurate, respectful, and professional manner. We respect confidentiality and do not disclose confidential and private data or information that is regarded as proprietary information of OTP banka. Communication with the media and any public presentations of OTP banka is done exclusively by the Management Board and relevant departments authorised to do so. We do not communicate about matters for which we lack authorisation without the approval of competent authorities.

To ensure that inquiries from the media and other interested members of the public are dealt with properly, OTP banka has created the email address **pr@otpbanka.si**.

We use social networks, online chatrooms and public forums responsibly and we clearly separate private messages from business ones, always being aware that the stakeholders associate our messages and actions, including those that we express and take in our free time, with the values and corporate culture of OTP banka. We therefore, always communicate in such a way as to avoid causing harm to the reputation of OTP banka, but rather to protect and strengthen it.

The rules outlined above shall be reasonably incorporated into the internal documents of all members of the OTP Group Slovenia and be complied with by the employees of every Group member.

7.6. Relations with External Stakeholders

We expect of our business partners, service providers, vendors, advisors, and anyone cooperating with the bank in any way to act in accordance with provisions of this Code and relevant laws. We also expect of them to do business in an ethical manner, protect human rights, and consider regulations governing sustainable development. In dealing with external stakeholders, we need to avoid situations that cause or may cause conflict of interest. If such a situation does occur, it needs to be reported to the Compliance Office immediately.





We aim to provide our clients with the best service possible. We want to establish and nurture a long-term relationship with each client.

8.1. Client Focus

We aim to provide our clients with the best service possible. We want to establish and nurture a long-term relationship with each client. That is why our services are developed based on an individual and professional approach and are always focused on ensuring client satisfaction.

Client excellence is one of our most important strategic priorities and a programme based on core values. We strive to create a unique user experience and increase client satisfaction by seeking the most appropriate solutions and by streamlining our processes. We provide services to our clients with enthusiasm, proper communication, and teamwork.

8.2. Resolving Client Complaints

Client excellence is one of OTP banka's strategic business pillars and satisfied clients are one of our topmost priorities. An important aspect in this regard is efficient, quick, and successful resolution of complaints. Relevant departments of OTP banka process each complaint with due care and attempt to resolve it in cooperation with the client. It is therefore very important that we engage in any complaint resolution in a systematic manner and with the aim of resolving the matter as soon as possible. By carefully analysing all complaints it receives OTP banka ensures that any errors and issues in relationships with our clients are fully eliminated.

8.3. Client Protection

The protection of our clients' assets, personal data and confidential information is a principle on which we build client trust. OTP banka is obligated to treat client data as confidential and in accordance with the applicable legislation. In our relations with clients, we are committed to the highest standards of due care and therefore do not disclose any confidential information we have obtained or come across in performing our work to anyone.

We carefully protect personal data and disclose it to third parties only in accordance with the applicable legislation. We are obligated to protect personal data obtained during our employment even after the end of term of our employment.



Client excellence is one of our most important strategic priorities and a programme based on core values.





We handle assets in a prudent and responsible manner and protect them against damage, demolition, alienation, misuse, or loss.

9.1. Management and Protection of Assets

The assets of OTP banka consist of physical assets, comprising movable and immovable property, financial assets, and intellectual property rights. We handle these assets in a prudent and responsible manner and protect them against damage, demolition, alienation, misuse, or loss. We use the assets exclusively to attain the business goals of OTP banka. The assets shall not be used and for private purposes, for which we bear personal responsibility.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of the OTP Group Slovenia and be complied with by employees of every Group member.

9.2. Handling of Information Assets and Resources

Information resources of OTP banka shall be used for business purposes only.

Information resources and assets of OTP banka shall be used in a respectful and professional manner; responsibly and in accordance with OTP banka's policies and applicable internal regulations. Uploading contents that were not authorized by the responsible person is not permitted.

Any use of OTP banka's information resources and assets, including for private purposes, brings the risk that OTP banka will take knowledge of the contents of a message or electronic data. We can eliminate this risk by using OTP banka's information resources and assets solely for business purposes.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of the OTP Group Slovenia and be complied with by employees of every Group member.



A healthy and safe work environment is important for the wellbeing of our employees. During our work we follow and honour internal regulations that govern work health and safety.

9.3. Healthy and Safe Work Environment

A healthy and safe work environment is important for the wellbeing of our employees. During our work we follow and honour internal regulations that govern work health and safety. We treat our colleagues with respect, and we respect diversity.

We are aware that consumption of alcohol and illicit substances, both at the workplace and during working hours, is prohibited. An occasional toast during working hours is allowed only if there is a justified business reason for this and the toast is considered to be part of the business protocol and good manners.

9.4. Clean Desk and Clear Screen

Employees have the duty to safeguard the Bank's confidential information and electronic devices, handle their private information, and lock their electronic devices when they are left unattended.

The Bank can conduct control checks to ensure data safety. Employees will be made aware of control checks and consequences for unauthorized conduct. The clear desk and clear screen rule reduce the risks of unauthorized access, loss, and damage to information during and outside normal working hours.

The clear desk rule mandates that all documents designated as Business Secret – Confidential and all documents labelled Business Secret – Top Secret are removed from the desk and locked away when the items are not in use, or when an employee leaves their workstation.

The clear screen rule requires of all employees to lock their computers and other media when leaving their desk for an extended period of time (more than 10 minutes), and to log off at the end of the working day. This ensures that the contents stored on the media are protected from unauthorized use, modification, input, or deletion.

9.5. Fraud Prevention

Zero tolerance towards fraud is a fundamental principle that all employees are familiar with. The Group has in place a system to detect, identify, and manage fraud risk. We are aware of the material importance of raising awareness among clients and employees, as this is one of the key activities of fraud prevention. Preventing fraud and protecting our customers and employees against fraud risk is of utmost importance to preserve trust in the bank.



Any wilful or negligent breach or neglect of one's duties and responsibilities set out in the provisions of the Code will be treated as a breach of work obligations.

10.1. Questions Regarding the Code

Any questions may be addressed to the Ethical Compliance Officer at the Compliance Office of OTP banka, either via email at eticnavprasanja@otpbanka.si.

10.2. Breach of the Code

Employees of OTP banka or any OTP Group Slovenia member are required to report any suspected breach of provisions of the Code to the Ethical Compliance Officer at the Compliance Office of OTP banka, either via email at eticnavprasanja@otpbanka.si.

Any wilful or negligent breach or neglect of one's duties and responsibilities set out in the provisions of the Code will be treated as a breach of work obligations in accordance with the relevant legislation, the collective bargaining agreement, and the applicable internal regulations.

10.3. Entry into Force

This Code of Conduct enters into f orce on 10 October 2024.

As of the date of enactment of this Code, the Code of 3 May 2024 shall cease to apply.

