



# Partner Code of Ethics

of OTP banka d.d. in OTP Group Slovenija





## TABLE OF CONTENT

1. The Content and Purpose of The Code	4
2. Compliance with laws, regulations and official requirements	4
3. Transparency of accounts and reports	4
4. Compliance with competition law and consumer protection rules	4
5. Conflict of interest	5
6. Anti-corruption	5
7. Avoiding insider dealing	5
8. Confidentiality, protection of personal data	5
9. Activities against money laundering and terrorist financing, international sanctions and restrictive measures	5
10. Safe and healthy working environment	6
11. Respecting human rights, ensuring workers' rights	6
12. Protection of the OTP Group's assets and interests	6
13. Sustainability	6
14. Ethical use of Artificial Intelligence (AI)	6





The purpose of the Partner Code of Ethics is to provide clear and unambiguous guidelines and expectations for those who have a relationship with the Bank on ethical business conduct in order to protect the values of the Bank.

## 1. The Content and Purpose of The Code

Transparency and ethical business conduct are of paramount importance to OTP banka Slovenia (hereinafter: Bank) and its subsidiaries. A prerequisite for long-term success is to operate with integrity and to maintain a reputation based on trust, which helps to build stable partnerships and to achieve long-term business goals.

The purpose of the Partner Code of Ethics is to provide clear and unambiguous guidelines and expectations for those who have a relationship with the Bank on ethical business conduct in order to protect the values of the Bank.

The Bank endeavours to ensure that all its suppliers, business partners, agents and other contractual partners undertake to comply with the provisions of the Partner Code of Ethics (or equivalent own regulations) by signing the declaration applicable to them or by including the contractual clause relating to the Code of Ethics as, which form an integral part of the contract with the Bank.

If a manager or employee of a partner company knows or has reasonable grounds to suspect that the values set out in the Partner Code of Ethics have been violated in the partnership with the Bank or any OTP Group Slovenia member, or if they have any questions about the Code, please indicate them to the Compliance Office of the Bank Plc.

- in person during working hours (by appointment) or by letter: OTP banka d.d., Slovenska 58, 1000 Ljubljana, "Compliance - PERSONALLY –
- by telephone, Mondays-Fridays, 8:00 a.m. – 8:00 p.m., +36 02 229 2371, supported by an automatic calling machine, available 7 days a week, 24 hours a day.
- by electronic mail" to the e-mail address of the person responsible in the Compliance Office.
- by entering the data on a suspicion of prohibited behaviour in the web form on the internet site of the bank: <https://www.otpbanka.si/sum-in-prijava-nedovoljenega-ravnanja> or <https://www.otpgroup.info/ethical-breach-and-whistleblowing/form>.

Reports can also be made anonymously. Notifications, requests and investigations will always be treated confidentially by the OTP banka or any OTP Group Slovenia member, in observance of the applicable statutory regulations and internal rules, protecting the whistleblower.

## **2. Compliance with laws, regulations and official requirements**

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

## **3. Transparency of accounts and reports**

The Bank's partners are required to prepare and publish their accounts and financial reports in accordance with generally accepted accounting principles and applicable laws.

## **4. Compliance with competition law and consumer protection rules**

Bank's partners are expected to adhere to the principle of fair competition and to comply with applicable competition laws. Partners act ethically and fairly in compliance with competition law, and refrain from any conduct that could result in an unfair restriction of competition or abuse of a dominant position. Unfair price-fixing, collusion in tendering, market-sharing agreements or abuse of dominant position are prohibited.

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

## **5. Conflict of interest**

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

## **6. Anti-corruption**

The Bank is committed to combatting corruption and declared zero tolerance towards all forms of corruption and the gaining of unfair advantages. The Bank ensures that all applicable anti-bribery and corruption laws and regulations on the prevention of corruption is fully enforced and expects its employees and contractual partners to comply with it.

The Bank expects its partners not to: promise, demand, expect, give or offer any benefits or advantages to employees of the Bank with the intention of obtaining business advantages; obtaining or realising business opportunities with the Bank or soliciting violation of due conduct by employees of the Bank.

## **7. Avoiding insider dealing**

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





## **8. Confidentiality, protection of personal data**

The Bank's partners are expected to protect and safeguard trade secrets, banking secrecy and securities secrecy in accordance with the applicable laws, to keep confidential business data relating to the Bank secure, without time limit and not to use or disclose them to third parties without prior consent.

The Bank's partners must ensure an adequate level of protection of personal data processed by them and must take appropriate security measures to ensure the confidentiality, integrity and availability of the data to the authorized parties in accordance with the General Data Protection Regulation and the applicable national legislation.

## **9. Activities against money laundering and terrorist financing, international sanctions and restrictive measures**

The Bank expects its partners to act in the strongest possible way to prevent and deter money laundering and terrorist financing, to apply sanctioning rules and, by following the "Know Your Customer" principle, to obtain exhaustive customer information.

The Bank's partners are committed to complying with the economic, financial, trade sanctions and embargo laws and regulations adopted by the European Union and the United Nations and, to the extent as can be expected from them, the sanctions and laws of other applicable jurisdictions in particular those of the United States of America and the United Kingdom.

## 10. Safe and healthy working environment

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

## 11. Respecting human rights, ensuring workers' rights

The partners of the Bank are obliged to protect the universal human rights enshrined in Universal Declaration of Human Rights and other relevant international conventions and to firmly reject child labour, the employment of minors and forced labour. All employees must be treated fairly and with respect. The rights relating to personality, dignity and privacy of workers must also be respected.

In the exercise of workers' rights partners shall ensure all applicable standards and regulations.

## 12. Protection of the OTP Group Slovenia's assets and interests

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

The Bank's partners will also avoid any situation that could adversely affect the business interests or reputation of the OTP Group Slovenia.

## 13. Sustainability

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

## 14. Ethical use of Artificial Intelligence (AI)

The Bank expects its partners subject to Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence (the "AI Act") to apply the principles and expectations of the Partner Code of Ethics set out above during the development and use of AI systems, furthermore Bank's partners should strive to ensure that the principles of transparency, explainability, accountability, fairness, equity and non-discrimination are applied throughout the lifecycle of the AI systems it use and that they will not use AI solutions that are classified as posing an unacceptable risk under the AI Act definition.

The background is a solid green color. On the left side, there are several overlapping geometric shapes: a large light green circle, a smaller medium green circle above it, and a light green square below the medium circle. These shapes are partially cut off by the left edge of the frame.

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**of OTP banka d.d. in OTP Group Slovenija**

**2025**