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1.0. PURPOSE

The Code of Conduct as a set of rules constitutes a document of legal character and binding for all employees of the Bank, without exceptions. The Code summarises values and defines the fundamental principles of conduct on which the Bank's operations and actions are based. The purpose of the Code is to provide guidance to employees in their daily actions and help to understand what is expected of each employee and other actors.

The purpose of complying with the Code does not consist only in its implementation due to its binding nature or because such documents are an integral part of sound corporate governance, but that interested parties / persons expect to see them within the institution, because we in this way, what is decisive for the fulfilment of the Bank's long-term development strategy and the responsible way in which we must maintain the trust of our clients, employees, shareholders, and the environment in which we operate are determined. The Code of Conduct of Banka Ekonomike Sha:

- represents the basic values and principles of behaviour;
- defines the rules that every employee of the Bank must understand, respect, and implement;
- defines the expectations of each employee and defines the criteria we expect in our relationship with other actors.

The Code of Conduct of Banka Ekonomike Sha promotes:

- respect and implementation of all laws, policies, procedures, and other documents in force;
- integrity, mutuality, and ethical behaviour;
- respectful work environment by and for everyone;
- reporting on all violations identified within the Bank.

2.0. COMPLIANCE, MONITORING, AND REVIEW

Bank employees are expected to respect the hierarchy within the bank and to act and conduct their activities in compliance with the highest ethical standards and refrain from any form of behaviour contrary to applicable laws, regulations, and policies.

Bank employees are obliged to adhere to the basic principles and rules of the desired behaviour in their activities with business partners and other actors during communication and establishing relations with business partners and other actors.

Based on this, Banka Ekonomike Sha expects all business partners/clients and other actors to implement standards at least equal to those set forth in this Code, including their attitude towards employees. Banka Ekonomike Sha commits to respecting all relevant interests of involved parties in a transparent manner and in accordance with agreements.

Communication and provision of services by Bank employees in relation to business partners, clients, and all other actors, must be guided by high standards of ethics and conduct and that everyone must be treated equally without discrimination or animosity.



Violation of standards and rules of conduct defined by this Code may constitute a serious violation of work tasks of any employee and result in possible disciplinary measures that are imposed to eliminate the consequences of harmful behaviour.

Serious violations may result in other appropriate sanctions/measures and other actions (including Labour Law), which may lead to termination of employment. Therefore, the Code forms the basis for all other rules and activity guidelines, including organisational rules and procedures, existing authorisations, as well as decisions, agreements, and contracts entered into by the Bank.

3.0. LAW ENFORCEMENT

All Bank employees must refrain from harmful actions and behaviours to the extent that, acting in their personal favour/interest or that of third parties, violate the principles and rules of Banka Ekonomike, in which case they will expose the institution to legal and reputational risk.

We undertake to perform our duties acting in accordance with the approved principles and rules and in a way that ensures that our work and behaviour inside and outside the work environment does not damage the reputation of Banka Ekonomike Sha or any of its members, activity/banking and financial activity.

For this reason, we must all act in a responsible, positive, and professional manner, in accordance with the strategy, goals and commitments, laws, regulations, and good practices.

4.0. IMPLEMENTATION OF THE CODE OF CONDUCT

As employees of Banka Ekonomike Sha, we are responsible to familiarise ourselves with the Code and fully implement it in our conduct.

Every person at the Bank is committed to respecting the highest standards of moral integrity, professional and ethical behaviour, which is beneficial not only for the Bank but also for its clients, colleagues, business partners, shareholders, the financial system, and the community in general.

Regardless of the opportunity, all Bank employees must act with fairness, honesty, and integrity in everything they do, such as:

- They must always act in compliance with the rules of this Code, policies, procedures, and other applicable documents;
- We must prevent and eliminate all possibilities of corrupt practices within the institution, as well as all violations of applicable rules or basic ethical norms;
- Must judge fairly and act with integrity;
- Must act responsibly, positively, and constructively in accordance with the strategy, goals, and commitments;
- Must prevent and eliminate the risk of harmful actions;
- Must work in accordance with the law, regulations, and good practices.



Bank management in particular is responsible for setting an example that must be followed, thus encouraging open, fair, and honest relations among employees. It is everyone's responsibility to promote an ethical culture and not to demand of employees any behaviour that would be contrary to legislation, other regulations, or this Code.

5.0. CORPORATE STATEMENT

5.1. Vision

The vision of Banka Ekonomike is to be one of the best and largest providers of financial services in Kosovo.

5.2. Mission

- To be the best financial partner of our clients to achieve economic growth and stability.
- To be at the centre of demands and financial services of individual clients, businesses, corporations, and institutional clients.
- To support and align in all activities that affect economic growth and development of Kosovo.
- Our primary goal is to earn and maintain the public's trust, as well as adhere to the highest ethical standards.
- To be able to provide financial support, security, and optimism to our clients.

5.3. Our values

- In the long run, we invest in people, products, and technology.
- We constantly strive to improve our performance to perfection.

5.4. Employee values

5.4.1. Integrity and reliability

Every employee of the Bank must respect the highest standards of moral integrity, honesty and truthfulness, professional and ethical behaviour, which is beneficial not only for the Bank, but also for its clients, colleagues, business partners, shareholders, the financial system, and the community in general. Banka Ekonomike employees must maintain bank's integrity and independence.

Employees of Banka Ekonomike are respectable persons with high professional and moral integrity, and they always act in full compliance with the rules of this Code.

Listed below are some examples of behaviours that negatively affect the integrity and honesty of the staff:

- Non-compliance with working hours;
- Marking a fictitious, non-real date on internal or external documents (provided to clients, contractors, etc.)



- False statements for overtime compensation, mileage, or other expenses;
- Misuse of assets owned by the Bank (e.g., telephone, fax machine, printer/copier, etc.)
- Unauthorised distribution and use of Bank documents and information for personal use.

5.4.2. Professionalism and competence

During the performance of professional duties, the behaviour of bank staff and other bank employees towards clients without discrimination must be respectful, careful, patient, fair, conscientious, and within the time limits. Employees must refrain from unethical or unprofessional behaviour that would negatively impact one's professional image and result in the loss of dignity of the staff and would seriously damage the reputation of Banka Ekonomike. The employee will serve the bank with a sense of loyalty and accomplish professional duties in good faith and commitment to their responsibility in such a way as to promote public appreciation for services of Banka Ekonomike.

Employees shall always demonstrate professional competence and shall strive to pursue continuous professional development.

Employees are required to recognise the requirements arising from the policies, procedures, and other applicable documents depending on the position they hold at the bank. Employees must have knowledge of actions on changes to internal documents and decisions from the highest hierarchy that impact the work of each of them in the bank.

5.4.3. Protection from discrimination, harassment, and equal treatment

Banka Ekonomike is maximally committed to creating a respectful working environment for all employees, and does not in any case tolerate any type of discrimination, harassment, or unequal treatment, which contradicts the provisions of this code, as well as the relevant applicable legislation for protection against discrimination.

In order to avoid this occurrence, all employees of Banka Ekonomike shall be careful not to use offensive words towards their colleagues and not to display any behaviour that could be considered as discriminatory or unequal treatment towards a colleague.

All employees of Banka Ekonomike, when exercising their position, shall act in accordance with their duties and obligations, and at no time shall they use or misuse their position for their personal benefit or to realise any specific goal.

Employees of Banka Ekonomike respect the opinions of others, their personal dignity, privacy, and individual rights. Therefore, no discrimination and harassment is tolerated, such as on account of a person's nationality, culture, religion, skin colour, sexual orientation, age, or physical disability.

Hiring, advancement, promotion, and evaluation of employees is based exclusively on the criteria oriented towards the completion of tasks that are defined by labour regulations, including achieving agreed objectives or professional experience.



5.4.4. Quality customer service

Banka Ekonomike always ensures to offer its clients professional and quality banking services and protect their personal data in every situation in accordance with the applicable Law on the Protection of Personal Data, while ensuring to provide competitive banking services.

All bank employees are committed to getting to know their clients and developing reliable and long-term relationships with them, offering them professional services.

Customer service is one of the main principles on which Banka Ekonomike operates.

Every bank employee, in every case and to every request of a client related to the area of bank's activity, shall act with courtesy, high integrity, and professionalism, and shall protect client's privacy and personal data.

5.4.5. Impartiality

Bank employees shall be impartial in performing their professional duties and shall objectively apply the rights and guarantees of all parties.

Impartial treatment by employees shall take place regardless of the national affiliation, race, gender, religion, physical disability, age, economic status, or political interest of the person.

If a situation arises that may impact an employee causing them to exhibit a lack of impartiality, the employee is obliged to inform their direct supervisor or the General Compliance Department.

5.4.6. Prejudice

The staff shall perform their duties without prejudice and there will be no display of prejudiced words or behaviour based on national affiliation, race, gender, religion, or economic status.

6.0. CONFIDENTIALITY AND INFORMATION DISCLOSURE

It is the responsibility of all employees to keep information about the activities, clients, employees, shareholders, contractors and/or any type of information owned by Banka Ekonomike secure. No one can disclose and disseminate information that harms Banka Ekonomike, including business transactions, information of clients, employees, shareholders, and/or any type of information owned by Banka Ekonomike Sha.

In their job, an employee may come across information that is generally not intended for the general public as it is considered confidential. This may include information related to current and/or former clients, suppliers, and employees, or banks with which Banka Ekonomike has relations or has had relations in the past.

Information can be disclosed only when required by law and special policies; these documents regulate the process of disclosing information/data and the competent persons.



Information and data in the possession of each of us, based on the position we hold, must be treated as confidential and in no case shall it be shared with the rest of the staff or with third parties outside the Bank, except when dealing with legal and regulatory requests or when the disclosure of such information is permitted by Law or by special documents of the Bank.

The responsibility not to disclose confidential information classified as such by Bank documents applies even after an employee leaves (either through resignation or dismissal). This part is also regulated by the employment contract and the Confidentiality Statement.

Bank personnel is obliged to treat carefully and confidentially any information they receive from clients. The bank is committed to handling the personal data of clients in accordance with the Law on Personal Data Protection Law applicable in Kosovo.

Employees of Banka Ekonomike are prohibited from obtaining or attempting to obtain information that they are not authorised to possess or access.

Bank employees are prohibited from accessing the accounts of employees or customers without the necessary prior authorisation.

The duty to maintain confidentiality extends not only during working hours but also outside of these hours.

Confidentiality shall be maintained even after the staff is no longer an employee of Banka Ekonomike.

6.1. Abuse of power

Bank employees are prohibited from using their official position to gain privileges, exemptions, or advantages either for themselves or for others.

The staff shall not use or misuse assets, documents, or information entrusted to them to fulfil their professional duties.

It is forbidden for bank employees to use their position in the bank, directly or indirectly, for personal gain. This means using an employee's title or position (regardless of position) to sign for products, services, or enterprises other than Bank's products and services.

It is not permitted to select the suppliers of Banka Ekonomike based on personal connections.

6.2. Competition

Banka Ekonomike operates in an increasingly competitive environment. In no way can any agreement of any kind be created with any of the competitors regarding prices of services.

Bank employees are expected to refrain from making statements that call into question the professional behaviour of competitors of Banka Ekonomike.



7.0. CUSTOMER RELATIONS

7.1. Customer service

The basic principle of Banka Ekonomike is excellent customer service; therefore, we always offer quality service by meeting the expectations of our clients.

Banka Ekonomike offers its clients products and services that suit their needs; everything we do for them is based on our business principles.

When dealing with clients, we must behave according to the highest levels of integrity as clients are at the centre of our strategy.

At Banka Ekonomike, all clients must be treated fairly and appropriately, regardless of gender, race, religion, sexual orientation, and the like.

We treat clients fairly. Bank employees are obliged to treat customers fairly. Bank employees immediately report customer complaints to those in charge, resolve them quickly and efficiently, for the benefit of all parties involved.

7.2. Products and processes

Banka Ekonomike offers services and products in accordance with the demands of our clients.

Banka Ekonomike continuously designs and reviews bank products and processes, in order to adapt them to client needs. We try to respond in time to our client requests. We offer clients products and services depending on their needs and their financial capacity.

7.3. Transparency

Good corporate governance seeks to ensure that the board and managers are accountable for the performance, and for this to be effective, there must be a reasonable level of transparency. In fact, it is hoped that the implementation of this Code will help to ensure a high degree of transparency.

Moreover, due to its sensitivity and responsibility, the Bank must ensure high transparency for all interest groups regarding the way it manages money, runs the business, as well as the services provided. For this purpose, strict rules are applied regarding the publication of information where the Bank has the responsibility to provide adequate information to the public.

Banka Ekonomike regularly provides accurate, clear, and transparent information to its clients. Banka Ekonomike keeps clients informed about their rights and obligations, and the benefits and risks of the products it offers.

Being transparent means being always honest and fair with clients. Being transparent means complying with applicable laws, rules, and regulations.



7.4. Personal data protection

For the bank and data to be protected from access by unauthorised persons, business client confidentiality and professional secrets, client data, and other sensitive information must be kept in compliance with Kosovo laws and international standards, which regulate this issue. Banka Ekonomike will undertake the necessary measures and steps for the implementation of these provisions and accepted standards, in order to prevent data misuse by unauthorised persons.

Banka Ekonomike ensures that it is in harmony with the Law on the Protection of Personal Data, and provides assurance to its clients that their personal information they deposit at the bank will be safe and will not be disclosed to third parties that are not authorised to possess them by law.

The mission of the Personal Data Protection Officer is to ensure daily that each financial activity that includes the processing / collection of personal data is carried out in full compliance with the law and relevant international standards on the protection of personal data.

An important aspect of this is the full implementation of data subject information, purpose limitation and confidentiality obligations, in addition to the security of personal data, the provision of appropriate regular training, and the existence of internal oversight to ensure that each employee of the financial institution is not only aware of their responsibilities, but also implements them in their work.

We protect and confidentially use any client personal information.

Employees must not disclose or share client information with other bank employees who do not need to know that information. When dealing with client information, employees must act in compliance with all applicable laws.

7.5. Client referral

Sometimes, different individuals that are part of the bank may refer a potential client. In no way should the bank employee treat that client based on the referral when it comes to interest rates, other services, or even any other favour, which is different from those favours given to all other clients.

8.0. CONFLICT OF INTEREST

Banka Ekonomike offers a wide range of services and financial products to different clients. As Conflict of Interest may arise in the normal course of the Bank's business, Bank employees must ensure they will always act in the Bank's interest and in support of its vision and mission.

A conflict of interest arises when an employee's personal activities or their personal life relationships are related to the Bank's business interests and thus affect an employee's objectivity in adopting business decisions in accordance with the best interests of the Bank and its shareholders.



As employees of the Bank, we must always ensure that our actions as part of the Bank do not interfere with the interests of the Institution and do not influence our decision that would be contrary to its interests and goals. Bank employees have a duty to respect the internal criteria for the disclosure of activities, functions, or involvement in business activities and other circumstances that may present a conflict of interest and obtain approval in advance according to internal procedures.

Bank employees must take care of other activities outside the institution, in order to preserve the institution's reputation, and must refrain from engaging in any other activity that damages and interferes with our job. Bank employees should maximally avoid situations in which their individual comments or opinions could be interpreted as views of Banka Ekonomike; therefore, it is recommended that whatever the pronouncement, it should be emphasised that our point of view is personal. The employees of Banka Ekonomike are responsible to avoid any situation that may result in the occurrence of any conflict of interest.

8.1. Gifts and corruption / bribery

No employee of Banka Ekonomike shall accept any goods or personal gifts of modest value that could be construed as an attempt to influence the decisions of clients, existing, or potential suppliers.

Bank employees can only give gifts on special occasions, such as official holidays, only if the gift is symbolic and has no other purpose.

All employees of Banka Ekonomike are prohibited from accepting various gifts during working hours. Acceptance of any gift by the employee may be considered as an attempt to corrupt or exploit the situation to realise a certain goal.

Gifts are offered as bribes for favours to provide information or to carry out a business matter. Gifts are prohibited from being accepted by all persons without exception, from suppliers who do business with us or from potential customers.

Gifts can only be accepted on special occasions, such as:

- In case of official holidays, only if the gift is symbolic and has no other purpose;
- Business lunch related to business matters, only with prior approval.

8.2. Procurement and administration

The bank seeks to procure offers and goods of specific quality and, if possible, at most favourable prices. The procurement process must be done according to internal policies and procedures.

The Bank shall not work with bidders who violate the law or jeopardise the Bank's reputation.



9.0. SAFETY AND BUSINESS CONTINUITY

9.1. Environment, health, and safety

Banka Ekonomike conducts its business taking care of the environment, health, and safety in general. The bank and management shall ensure that each employee of the bank has a safe and healthy working environment and that all applicable legislation relating to the protection of health and safety is implemented.

The Bank recognises the fact that this task requires responsibility to provide the necessary organisation, equipment, training, and supervision in order to fulfil this obligation.

9.2. Business continuity

Business continuity is vital to our success as a bank. This allows us to plan and prepare for a variety of possible business interruptions. Employees understand their responsibilities to support specific plans to respond during a business interruption.

10.0. PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING

It is a policy of Banka Ekonomike to act in compliance with laws and regulations for the prevention of money laundering and terrorist financing. Banka Ekonomike is categorically against the use of bank's products and services for money laundering, or bank's activities for money laundering, or any other illegal activities. It is the responsibility of each bank employee to help ensure compliance with bank's anti-money laundering and terrorist financing policies.

11.0. SUSTAINABILITY

Sustainability is about looking at the long-term impact of a business activity and whether that impact is on the environment, society, or economy. This means that we carefully consider and assess the direct and indirect economic, social, and environmental impact of our decisions and behaviours on our stakeholders. We strive to increase positive impact to support a sustainable future for the society and the environment.

12.0. EMPLOYMENT

Equal employment opportunities mean equal consideration for a workplace, which must apply to all citizens, and equal treatment for all employees regardless of sex, race, religion, colour, creed, national origin or ancestry, age, disabilities, marital status, source of income, physical appearance, sexual orientation, or their political beliefs.

Banka Ekonomike emphasises that providing equal employment opportunities in a work environment is not only good management practice, but also makes good business sense. This will help all employees to develop their full potential, while the talents and resources of the workforce will be used to maximise the efficiency of the work of Banka Ekonomike.



12.1. Activities after termination of employment at Banka Ekonomike

Employees of Banka Ekonomike must not participate in any activity of the bank that affects the financial interests of any organisation or person with whom you have expressed an interest for work or made an agreement for future employment.

Former employees shall not disclose any information considered confidential by Banka Ekonomike. Confidential information (those in electronic, written, oral or other forms) must not be released outside the bank's premises.

13.0. COMMUNICATION WITH THE MEDIA

Banka Ekonomike communicates with the media through authorised persons.

The official authorised for communication with the media must put aside personal views and must always act in accordance with the provisions of this code.

The official authorised to communicate with the media is in no way allowed to use the media to advance their interests and complaints, reveal unauthorised information, or try to influence a decision-making policy.

14.0. VIOLATION OF THE CODE OF CONDUCT

14.1. Obligation to report violations

Banka Ekonomike employees are encouraged and obliged to report violations of the Code of Conduct and encourage clients to report if this Code of Conduct is violated during their business dealings with the Bank. Reports can be filed in any possible form of communication, including anonymous written reports, as well as at the email address whistleblowing@bekonomike.com.

