



The Code of Ethics

of Bank Ochrony Środowiska S.A.

Introduction

1. Bank Ochrony Środowiska S.A. (hereinafter “the Bank” or “we”) has been focusing for over thirty years on providing access to financial resources for ecological projects.
2. For many years, we have consistently pursued our mission and developed our activities in the areas of environmental and climate protection. In our operations.
3. We act in accordance with applicable laws and regulations.
4. We build public trust and shape our reputation by promoting and adhering to ethical standards and good banking practices.
5. We are a specialised Bank serving clients who are undertaking or planning to undertake environmentally friendly investments.
6. The actions we take are in line with the Banking Code of Ethics adopted by the Polish Bank Association.

The Purpose of introducing the Code of Ethics

1. The Code of Ethics is a collection of values, principles, and standards that guide our conduct in business and social activities, and in building relationships with employees, clients, business partners, as well as other stakeholders.
2. The principles outlined in the Code of Ethics serve as a confirmation of our organisational culture, which is based on ethics, honesty, integrity, and responsibility.

Applicability of the Code of Ethics

1. The Code of Ethics applies to all individuals employed by the Bank, regardless of their position or form of employment (hereinafter: employees), as well as to persons acting on behalf of or for the Bank.
2. The principles set out in the Code of Ethics are applied in our relationships with business partners and stakeholders.
3. We ensure the application of consistent ethical standards in our dependent entity.

Corporate governance

1. The principles that corporate Governance consists of, aim to balance the interests of various parties, such as shareholders, the management board, employees, clients, and other stakeholders. Its purpose is to ensure transparency of actions, protect shareholders' rights, ensure the accountability of management, and enable effective governance.
2. The principles set out in the Code of Ethics allow us to build a strong company reputation, reduce the risk of misconduct, and ensure the Bank's stability through:
 - 1) ethical conduct by employees and members of the Bank's governing bodies,
 - 2) prevention of corruption,
 - 3) respect for fair competition, fulfillment of obligations regarding anti-money laundering and counter-terrorism financing,
 - 4) reporting of violations and appropriate remuneration and tax policies,
 - 5) relationships with stakeholders.
3. Key elements of corporate governance also include effective internal control and risk management systems.
4. An effectively functioning corporate governance system also contributes to the reduction of the risks we are exposed to, including operational and conduct risks.

Our values

1. The Bank's Code of Ethics also serves as a confirmation of our organisational culture, which is based on the Bank's values, such as:
 - **collaboration**
 - **commitment,**
 - **professionalism,**
 - **respect for others and for the environment.**
2. Our values support us in achieving the Bank's business objectives and set the standards for our conduct toward colleagues, clients, and business partners.



Human Rights

1. We respect universal human rights and freedoms.
2. In our relationships with employees, colleagues, clients, and business partners, we act ethically and transparently.
3. We conduct our activities honestly and openly, maintaining an open dialogue with our environment.
4. We oppose forced labor and the exploitation of child labor.
5. We respect our employees' right to freedom of association.
6. We create safe and stable working conditions that support the professional and personal development of our employees.
7. We maintain a transparent policy regarding the employment and remuneration of our employees.
8. Employees well-being is very important to us. We provide support for physical and mental health and promote a balance between professional and private life.
9. We provide a system of social benefits.
10. We strive to be a good employer; therefore, we systematically assess the level of employees satisfaction at work.

Diversity and Inclusion Policy

1. Our Employees Are Treated Equally:
 - 1) in terms of establishing and terminating employment relationships,
 - 2) Employment conditions, promotions, and access to training for professional development, in particular regardless of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, faith or lack of faith, sexual orientation, as well as fixed-term or permanent employment, and full-time or part-time employment.
2. Our Diversity and Inclusion Policy focuses on:
 - 1) Employees – we recruit and build diverse teams that demonstrate engagement, where every employee can fulfill their potential,
 - 2) The Workplace – we develop an organisational culture based on mutual respect, where every employee feels valued, respected, and can be themselves,
 - 3) The Community and the Market – we create a community of professionals who respect their environment and full of green energy, collaborate with BOŚ stakeholders.
3. We build and maintain relationships based on honesty, trust and shared responsibility for business practices in the areas of occupational health and safety, human rights, business ethics, employee care, and environmental protection at all stages of our operations.
4. We undertake actions aimed at equalising opportunities for employees with special needs and managing diversity in the workplace.
5. We implement solutions to ensure accessibility for people with special needs, including in employment, adapting buildings by removing architectural barriers and eliminating communication and digital obstacles.

Respect in the Workplace

1. Our employees are provided with a fair, safe, productive, friendly and sustainable work environment, where everyone is valued for the contribution they make to its development.
2. We treat employees, colleagues, clients, and business partners with dignity, respect, and professionalism.
3. We conduct our HR policy based on clear principles and criteria. We provide employees with equal opportunities for promotion, development, and remuneration. We provide job candidates with equal employment opportunities.

Prevention of Mobbing and Discrimination

1. We do not tolerate bullying, discrimination or harassment against employees, colleagues, clients, or business partners.
2. We conduct educational activities to raise employee awareness regarding the prevention of bullying and discrimination.
3. We provide reporting channels for irregularities and protection for employees who report them.

Protection of the Bank's Assets

We protect and properly use the Bank's assets, as well as the property of third parties held by the Bank, against:

1. loss,
2. theft,
3. damage,
4. misuse and unauthorized use, access or disposal (including use in a manner that is illegal or otherwise considered inappropriate).



Relations with Clients

1. We aim to provide clients with attractive financial products, appropriately designed to meet their needs, through efficient distribution channels.
2. We strive to meet clients' expectations and ensure their satisfaction with the products and services we offer.
3. We provide clients with high-quality products and in their development, we seek to protect clients interests from potential harm while ensuring the highest standards of legal compliance.
4. In the process of implementing new products and services, we consider ethical aspects and sustainable development factors.
5. In designing products and services, offering them and servicing clients, we take into account the needs of different client groups, including people with disabilities.
6. We provide high standards of client service.
7. We provide reliable information about the products and services offered, taking into account both the benefits and risks associated with each product or service.
8. Both, when offering products and services to our clients and during post-sales service, we follow the principles of honesty and integrity, providing comprehensive information adjusted to the clients knowledge and understanding, allowing an informed choice of product or service.
9. We act in accordance with the contracts concluded, taking clients interests into account. We communicate using clear language, in compliance with legal requirements and market standards.
10. We ensure that marketing materials are understandable to clients, do not raise doubts and do not mislead clients.

Customer Complaints and Claims

1. Clients opinions, comments, suggestions, complaints and claims are an important source of information for us. Based on them, we improve the quality of the services provided and the products offered.
2. We make the principles for submitting and handling complaints and claims available to clients on our website and at our branches.
3. Complaints and claims are carefully reviewed without undue delay. We provide responses within the timeframes specified by law.

Relations with business partners

1. We conduct a responsible procurement policy and expect our business partners to:
 - 1) undertake and implement actions to comply with ethical principles,
 - 2) respect working conditions and meet social and environmental criteria in accordance with the Bank's Standards of conduct for suppliers, which a potential business partner/supplier confirms by submitting an appropriate statement together with their offer.
2. We maintain ongoing contact with business partners and suppliers. We build and sustain relationships based on honesty, trust, and shared responsibility for business practices in the areas of occupational health and safety, human rights, business ethics, employee care, and environmental protection.

Preventing money laundering

1. In order to mitigate the risk of the Bank being used for criminal activities, all employees are responsible, within the scope of their duties, for complying with regulations on anti-money laundering, counter-terrorism financing, and Sanctions.
2. We apply appropriate control mechanisms aimed at identifying gaps, and if any are identified, we take appropriate actions.
3. To ensure proper task execution, we provide access to training for employees.

Sponsorship

1. To build a positive image and promote our brand, we conduct a sponsorship policy that takes into account corporate social responsibility.
2. The principles for managing sponsorship activities in the Bank define their scope as well as the rights and obligations of the parties involved.
3. A contract is signed for each sponsorship undertaking.

Conflicts of Interest and Competitive Activities

1. The Bank has a Policy on Prevention and Management of Conflicts of Interest which defines standards of conduct to avoid, properly identify, and manage conflicts of interest.
2. Bank employees are required to submit and update a statement regarding additional professional activities in the following areas:
 1. being employed in another workplace,
 2. holding positions in management or supervisory bodies,
 3. conducting business activities,
 4. engaging in academic or teaching activities.
3. Any additional employee activity, beyond their official duties, must not be performed during working hours.
4. As a general rule, our employees are prohibited from:
 1. conducting activities that compete with the Bank's business,
 2. performing work for an entity engaged in competitive activities,
 3. holding a majority stake or shares in an entity engaged in competitive activities.
5. Exceptions are possible only when the employee has obtained written consent from the employer—the conditions for obtaining such consent are specified in the Policy on Prevention and Management of Conflicts of Interest
6. Any doubts regarding conflicts of interest or competitive activities of our employees are consulted with the Compliance Department.

Gift Policy

1. The Bank has in place Rules for Receiving and Giving Gifts, which define the procedures for:
 - 1) receiving gifts at the Bank, including from clients or entities cooperating with the Bank;
 - 2) giving gifts on behalf of the Bank, including clients or entities cooperating with the Bank, as well as from clients and business partners.
2. The acceptance of a gift must not affect the independence of the employee or the Bank, their impartiality and integrity and must not lead to conflicts of interest or corrupt behavior.

Anti-Corruption and Financial Fraud Prevention

1. We apply a zero-tolerance policy towards corruption in all aspects of our operations.
2. The Bank identifies areas of activity that are particularly exposed to this risk, which is reflected in the Anti-Corruption Policy.
3. The Bank safeguards its image, reputation and the trust of clients and business partners, among other things, by conducting activities aimed at effective prevention of all forms of corruption.

Participation in External Events

1. We build and maintain business relationships. We may participate in:
 1. conferences, training sessions, or seminars aimed at presenting services provided to the Bank,
 2. business meetings related to the performance of official duties,
 3. social or ceremonial events that serve to maintain business relationships.
2. Participation in the above events must not lead to a conflict of interest.



Confidentiality and Personal Data Protection

1. As a public trust institution, we recognize the principles of maintaining banking secrecy, trade secrets, as well as the protection of confidential information and personal data as key.
2. We process information securely, including information covered by banking secrecy, trade secrets, professional secrecy, as well as classified information, personal data, and confidential information.
3. We process clients personal data in accordance with the law, in good faith, carefully, and in compliance with security principles.
4. We protect personal data, in particular by not disclosing it to unauthorized persons and preventing its misuse.
5. We comply with the prohibition on conducting personal transactions using confidential information.
6. The obligation to maintain the confidentiality of protected information continues even after employment with the Bank ends. We exercise due diligence in informing about personal data processing and when processing personal data, we follow the principles of legality, purpose limitation, data minimization, accuracy, time limitation, integrity and confidentiality, as well as accountability.
7. We conduct periodic training on information security and personal data protection.
8. We have appointed a Data Protection Officer, who serves as a point of contact for the Bank's stakeholders regarding the processing and protection of personal data.

Reporting violations

1. We provide the possibility to report breaches and potential breaches of the Code of Ethics, legal regulations, and the Bank's internal regulations.
2. Reports can be made:
 1. anonymously, via an electronic platform available on the intranet or by correspondence,
 2. openly, via an external application available on the Bank's website.
3. The person reporting irregularities is guaranteed protection and confidentiality of the data provided in the report.
4. An employee who has information or reasonable suspicion that a violation of the law, applicable procedures or ethical standards has occurred should immediately report it in accordance with the Bank's internal regulations.
5. In addition, an employee who believes they have been subjected to bullying may submit a written complaint to the Bank's CEO or the Director of the organisational unit at the Head Office responsible for HR matters.
6. We thoroughly analyze all reports of unethical behavior and the conclusions from these analyses are used to prevent their occurrence in the future.

Compliance with the Code of Ethics

1. Employees are required to review and follow the Code of Ethics.
2. Employees are informed about any changes to the Code of Ethics.
3. The Bank organises mandatory training related to the Code of Ethics.
4. Violation of the provisions of the Code of Ethics may result in disciplinary or legal liability.



Final provisions

1. The Code of Ethics is reviewed at least once a year and the results are submitted to the Bank's Management Board.
2. The Bank's Management Board informs the Supervisory Board of the Bank about the results of the review.
3. Questions or concerns regarding the submission of reports on legal violations, as well as the Bank's applicable procedures and ethical standards, can be addressed to the Compliance Department.