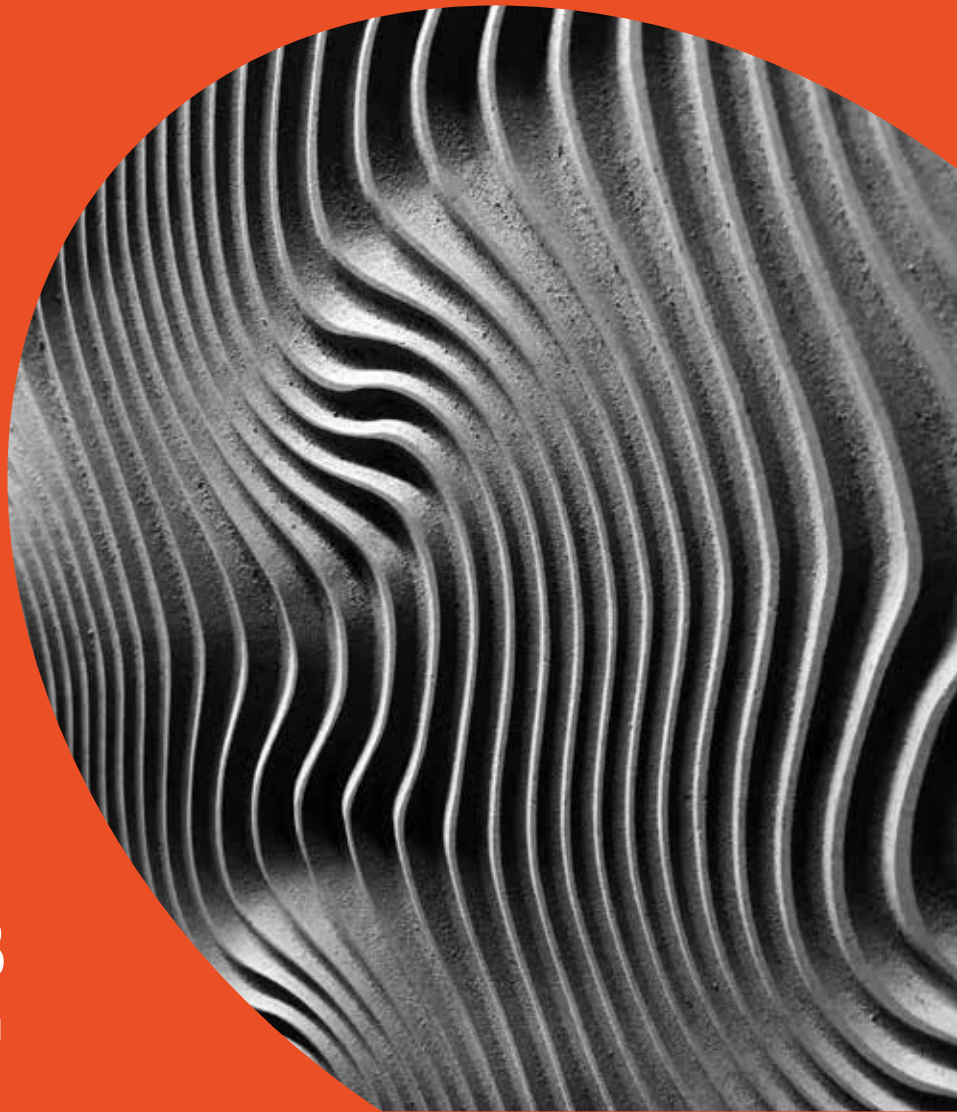


CODE OF CONDUCT

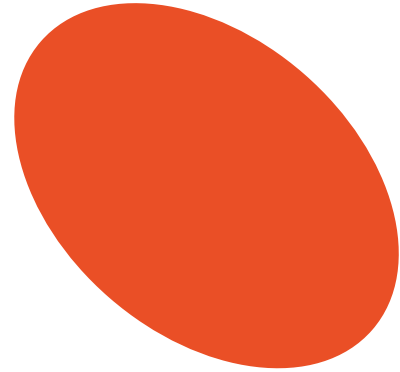


BPB

Banka e vendit tënd

TABLE OF CONTENTS

Purpose of our Code of Conduct _____	03
Implementation of our Code of Conduct _____	04
Mission _____	05
Vision _____	06
Core Values _____	07
Rules and Principles _____	10
Employee Relationship _____	11
Health and Safety at Work _____	12
Protecting Bank Assets _____	13
Bribery, Corruption and Acceptance of Gifts _____	14
Client Relationships _____	15
Security and Privacy of Clients _____	16
Data Protection _____	16
Conflict of Interest _____	16
Compliance with Laws and Regulations _____	17
Fight Against Financial Crime _____	17
Communication with other Parties _____	18
Rules of Conduct in relation to Competitors _____	18
Social and Environmental Responsibility _____	19
Responsibility to report Misconduct _____	19



PURPOSE OF OUR CODE OF CONDUCT

Banka për Biznes (BPB) is committed to the highest standards of ethical and professional behavior. The Code of Conduct (“the Code”), defines the principles and practices of conduct, emphasizing our ethical standards, the way we operate and is set out to be implemented by all employees at BPB.

At BPB, we set clear standards and we require our employee to act with utmost integrity, ethical behaviour, honesty and fairness.

Our Code of Conduct applies to everything and everyone at BPB. It is owned by everyone at BPB and each of us is responsible for understanding, respecting and applying it in relation to one another, our customers, regulators, business partners, shareholders, competitors, and other parties.

This Code is basis for all BPB's policies, procedures, and guidelines, and is aligned with local and international practices. Needless to say, the Code cannot describe every possible situation the Bank faces, but aims to establish the basic practices of our behavior.



IMPLEMENTATION OF THE CODE OF CONDUCT

All employees of the Bank must act according to the rules and standards set out in the Code of Conduct. The rules and standards defined in this Code consist a part of the general employment terms. In addition to this, certain obligations set out in this code are applicable after the termination of employment with the Bank.

Potential issues and violations of the Code of Conduct, will be examined and measures will be taken based on the Bank's internal procedures. BPB encourages employees to raise concerns, questions or possible legal or ethical problems to HR Department.

OUR MISSION

“We make an impact”



We believe that every individual and business deserve an outstanding service. Premium service is not reserved for a privileged group in our Bank, it is what we do every day in meeting the financial needs of every business and individual we serve. Our services are delivered in an easy and convenient manner, and they meet the capacity and actual need of the client.

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OUR VISION

“The power of humans”



BPB's vision is to become a first-choice bank for individuals and enterprises in Kosovo, delivering convenience and on sight support. We aim to become a key player in Kosovo banking sector that offers an outstanding service to its clients, sustainable profit to its shareholders and an inspiring working environment to the employees.

While we consider the technology “a must”, we believe in the power of human factor in meeting the demand of our clients and stakeholders.

OUR VALUES



Our values guide us in all our actions, from strategic decisions to day-to-day interactions with customers and each other. They form the foundation of our organizational culture and set the standards of our behavior.

BPB is defined by two core elements of our being, that is

deliver excellence
&
do the right thing

we are customer oriented

Our commitment to providing efficient and appropriate solutions for the customer, demonstrates our customer-centric approach. We consider access to financial services a basic utility. Therefore, our service is available to any individual and/or business fulfilling regulatory requirements for access to a bank account, and Bank conditions and standards of cooperation.

We ensure that customers we serve get the products and services based on their needs, in the most practical and economical manner, pertaining to their financial behavior. This implies accurately understanding client needs and adequate fulfillment of their expectations. By doing so we deliver excellence, through open communication and timely addressing of any demand. This culture improves customer satisfaction, trust in the institution and building of strong and long-term relationships that promote the growth of the institution.

We invest in innovative technologies and communication channels to meet an increasing demand for digital banking. We ensure that our customer receive services from our employees by providing them with appropriate advice and options according to their preferences.

we act with integrity

By acting with integrity, we ensure that every decision we make is based on ethical principles. Trust and honesty comprise the basis of our operations. We expect all employees to act with integrity, be accountable and reliable, and treat co-workers, stakeholders and customers with respect.

we take responsibility

We act responsibly in relations to our clients, staff and community as a whole. While we are a for-profit organization, we seek to achieve our business imperatives in conjunction with delivering value to our customers. We ensure this by advising our clients in providing the best choice based on their interests. In relation to our staff, we treat them fairly, invest continuously in their training and development, and ensure an environment where they can contribute to the Bank's objectives, while at the same time mastering their skills and achieving their professional goals. We promote a "work-life" balance and ensure sufficient staff

capacities to achieve the same. In regards to the community, we see our impact in mostly three pillars: ensure easy and economical access to financial services to every member of the community; increase financial literacy and businesses financial advice; and act as an active member of the community by supporting different activities through volunteer work and direct financial contribution.

we constantly embrace development and advancement

We are an agile and adaptable institution that promotes a culture of systematic reflection on development possibilities that ultimately leads to the internal capacity growth, our brand enhancement, and an increased market presence. Our main development components are: the continuous improvement of services offered to our customers and investing in the employee capacity building to ensure swift adaptation to a changing environment.

we are committed to making transparency the basis of our actions and encouraging open communication

Our goal is to have a work environment where trusting one another is a key element of healthy and sound cooperation. To achieve this, we are transparent to each other as well as to third parties, disclosing the information needed clearly and timely.

The common objective is to create a trusted environment, where everyone feels free to express their opinion, differences are tolerated and diversity is promoted. Employees are encouraged to speak up and report actual or suspected wrongdoing and any violation of this Code. In doing so, they are assured that they will not be punished for such an act, even in situations where the perceived situation is not based to qualify as a violation.

RULES AND principles

We are committed to fostering the right behavior by defining principles and frameworks of behaviour. The rules and principles established in the Code enable us living our values. It is important that we ensure our actions are in line with the values of the Bank, and avoid situations where our actions undermine the principles of doing the right thing.

To help our employees in making the right decisions when faced with uncertainty, we encourage our employees to refer to a simple model of inspecting their choices of behavior/decision. The code cannot foresee every situation, however answers to the following questions will assist our employees make the right choices:

- Is the decision or action legal?
- Is it in line with the Bank's established policies, procedures and/or guidelines?
Does it support the Bank's values?
- Would you be comfortable explaining the rationale for this action to your colleagues, managers and family?
- Is it a good example for your fellow employees at the Bank?
- Would you feel content if other people knew about the action you have taken?

In case of concerns with any of the questions above (the answer no being "Yes"), the employee is referred to contact the immediate supervisor.



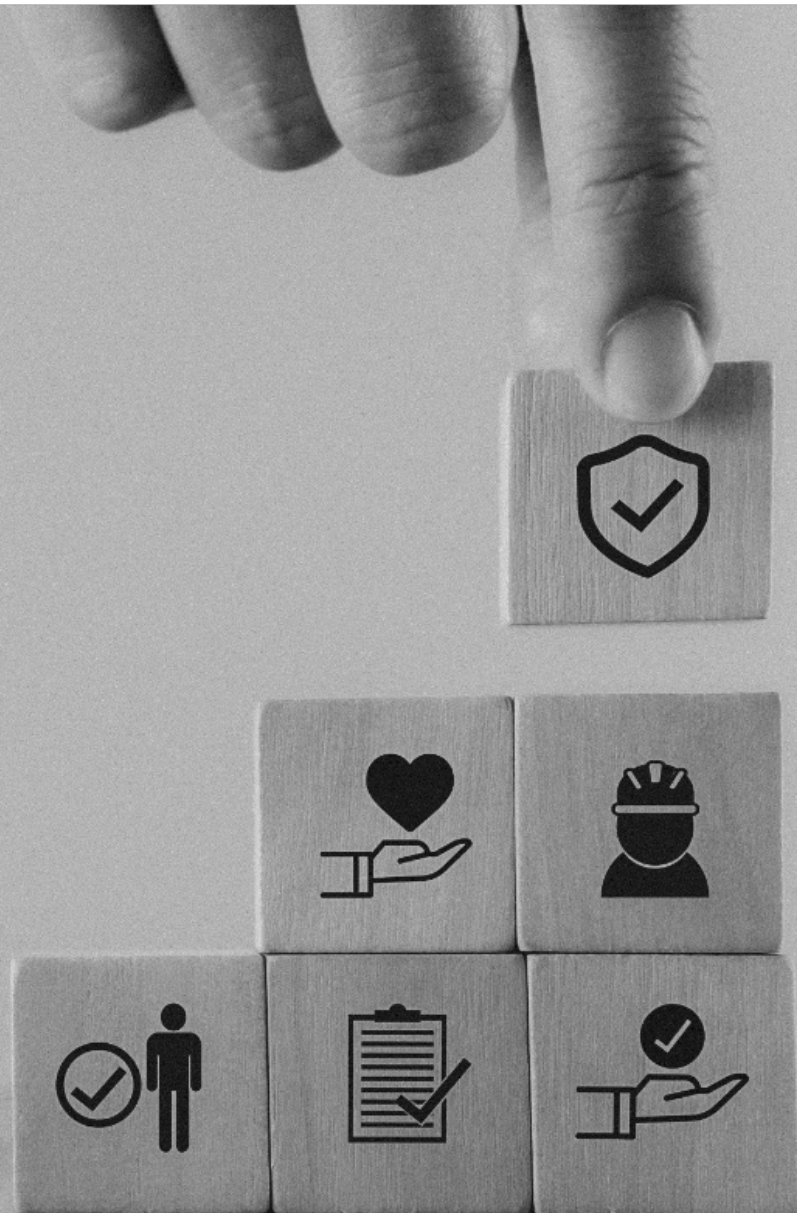
EMPLOYEE RELATIONSHIP

At BPB, we value change, endorse diversity, and embrace inclusion. BPB is committed to open communication and equal opportunity for everyone. We require our employee to treat one another with dignity and respect, creating an inclusive environment. BPB does not tolerate any form of retaliation, discrimination, harassment on any grounds, victimisation, or bullying, and any kind of threatening, hostile or abusive behavior. Any similar action will be treated based on the disciplinary procedures.

We are committed to collaborating without discrimination based on race, color, gender, national origin, ethnicity, age, religion, disability, marital status, pregnancy, sexual orientation, gender identity, nationality, or any other characteristic protected by law. Our culture is based on welcoming, respecting, and valuing all our employees, as well as establishing an environment where everyone has the opportunity to thrive.

HEALTH AND SAFETY AT WORK






The attention to health and safety in the workplace for our employees, is a matter of great importance. We are committed to a work environment that protects the health, safety, and well-being of everyone. Thus, we avoid any actions that could potentially endanger or harm anyone, and we do not place our strategic objectives as more important than the health and well-being of those with whom we work.



PROTECTING BANK ASSETS

Every employee at BPB is required to handle all the assets, equipment, property, and data of the bank with full responsibility. We are committed to protecting all forms of data, information, and assets by using them sensibly and in accordance with the procedures and rules for their utilization. Each user of the bank's assets must ensure that their use is as economical as possible and in the function of fulfilling the duties and responsibilities of the bank.

The bank's assets include physical and information assets, including but not limited to hardware and software equipment, various work and transportation tools, cash, internal bank documents, client information, various analyses, work methodologies, business plans, and similar items. As a basis for protecting the bank assets below some of the most important rules:

-  The copying, selling, unauthorized access, or distribution of information, software, and other intellectual forms without a proper license is prohibited
-  The use of emails, telephones, and other communication tools should be for business purposes. Private communications should be kept to a minimum.
-  Any suspicion of loss or misuse of the bank's assets should be reported.
-  The bank's information assets are provided only for achieving the operational/business objectives of the bank and should not be used for any other purpose, except where such use is approved by the decision-making authority or when such assets are made available to law enforcement or the courts.
-  In the event of a temporary or permanent termination of the employment contract, all assets made available must be returned.
The bank's intellectual assets, including the brand, should only be used to achieve the bank's goals and not for any other unofficial/personal purpose.

- The bank's intellectual assets, including the brand, should only be used to achieve the bank's goals and not for any other unofficial/personal purpose.
- All employees must strictly adhere to the privacy policy regarding the information in our possession, whether it pertains to clients, colleagues, or other parties with whom we interact.
- The use of the bank's name, services, or position within the bank for private goals, personal benefits, or to support any product, organization, or purpose not related to the bank's business is not allowed.

BRIBERY, CORRUPTION AND ACCEPTANCE OF GIFTS

We prohibit any form of corruption or bribery such as offering, promising, authorising, soliciting or accepting, directly or indirectly anything of value to any government official or private person for the purpose of improperly obtaining or retaining business.

It is prohibited acceptance or offering of any personal benefits (monetary or in kind) that may conflict with the duties of employees. This includes money, gifts, travel, prizes, entertainment, recreation, events, or similar. Employees may only accept or offer symbolic gifts, subject to the criteria and approvals set out in our internal regulations. Cash gifts are not allowed to be given or received under any circumstances.

CLIENT RELATIONSHIPS

As a Bank, we have defined ourselves as client centric institution. Our clients are at the core of how we run our business. Part of our success is through creating value for our clients by the solutions we provide and the services we offer. We work diligently to meet our customers' needs by acting honestly, fairly, professionally, and in alignment with our clients' best interests.

The Bank's employees have the necessary experience and are trained to provide clients with appropriate solutions that lead to the right outcomes and timely delivery. Clear and transparent communication (be it oral or written) is very important when dealing with our clients. All Bank employees are guided to have transparent communications with our clients and handle any requests or potential complaints that may arise from them.



SECURITY AND PRIVACY OF CLIENTS, DATA AND CONFIDENTIALITY

We store and handle with utmost care any personal and confidential data, information, or assets that customers have shared with us. Whilst performing their duties, all employees must treat the information entrusted to BPB by our customers and other employees as confidential. This includes any information such as data related to financial status, business management, customers' future business plans, or other information obtained during the period of employment.

Employees must not disclose confidential information to anyone inside or outside BPB, unless it is in accordance with the procedures and policies for the protection of personal data, the applicable laws and regulations, or in cases where it is specifically permitted by them. Our employees' individual obligations to maintain the confidentiality of information continue even after they leave the institution.

DATA PROTECTION

During the course of their duties, some employees collect, use, and receive personal information about other employees, our customers, or partners. These pieces of information must be preserved and handled in accordance with data protection laws, our policies, and any contractual obligations.

CONFLICT OF INTEREST

A conflict of interest refers to situations where our various personal, friendly, family, or political interests put us in a position that could compromise or create the perception of compromising our decision-making or actions at work.

At BPB, we are committed to holding ourselves accountable for identifying and managing potential conflicts of interest, by reviewing and addressing them immediately. Each of us must ensure that personal interests are not in conflict or perceived to be in conflict with our duties and obligations to the bank and its clients.

Employees should not be involved in any transaction, negotiation, or contract with an entity in which the employee or any related party has an interest, except where such involvement has been specifically approved after disclosing the conflict of interest situation. We avoid conflicts between personal, social, financial, or political interests. For example, we will not participate in the approval of sponsorship for a club where we are members, or in the approval of a business loan where we have previously worked. If an employee, during their employment at BPB, encounters a potential conflict of interest, they must declare it.

COMPLIANCE WITH LAWS AND REGULATIONS

Our aim is to grow and implement our business strategy in a fair and consistent manner in relation to the market, and applicable laws and regulations. We are also committed to always cooperating with the relevant regulatory bodies. Bank employees must respect the applicable local laws and be informed about the regulatory requirements that apply to the field they cover in the Bank.

FIGHT AGAINST FINANCIAL CRIME

BPB encourages the development of sound rules and internal procedures to combat financial crime. We take care to comply with all laws and regulations that prevent actions such as money laundering and the financing of terrorism. Facilitating or neglecting any act that could enable the laundering of illegally

BPB encourages the development of sound rules and internal procedures to combat financial crime. We take care to comply with all laws and regulations that prevent actions such as money laundering and the financing of terrorism. Facilitating or neglecting any act that could enable the laundering of illegally obtained money is prohibited. Preventing money laundering activities and the financing of terrorism requires increased diligence in the following aspects: be informed and implement the AML policy and procedures, as well as the instructions received during regular AML training; be vigilant in the knowledge of the client/supplier or other party with whom we cooperate, as well as in the judgment of transactions carried out in the bank; report in a timely manner any concerns or information that we may have that could prevent such activity.

COMMUNICATION WITH OTHER PARTIES

Official communication with the media or similar can only be done by certain employees of the Bank. Other employees are not allowed to engage on behalf of BPB in any public activity or statement without approval of the appropriate public relation officer. If any employee is directly contacted by any media for a statement on any issue related to the Bank, then they are obliged to obtain approval from the responsible persons in advance and only authorized persons can communicate with the media on behalf of the Bank.

RULES OF CONDUCT IN RELATION TO COMPETITORS

Employees of the Bank are instructed to act professionally, fairly, and with high integrity in relation to all competitors. As such, we commit to compete in a manner with the best practices for performance and good conduct, in compliance with the rules of fair competition.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

In accordance with one of our values and based on the principles of our sustainability, we are committed to considering the long-term effects of our activities and to producing sustainable value for clients, employees, shareholders, and society as a whole.

This means that we consider and evaluate the direct and indirect economic, social, and environmental aspects and impacts of our decisions. We strive to increase the positive impact of our business decisions and to support a sustainable future for society and the environment.

RESPONSIBILITY TO REPORT MISCONDUCT

It is the responsibility of every employee to speak up when suspecting a behaviour that is unlawful, unethical or simply in breach of this Code or any other policy of the Bank. Disregarding if this is something you are experiencing yourself, or an information you have received from someone else, it is your duty to speak up in order to enable the Bank handle possible misconduct. There are several ways you can raise your concerns:

- Report your concern/issue to your immediate Supervisor;
- Report your concern/issue to the Head of HR, Head of Compliance Department, Head of Audit Department or a Management Board Member; or
- Follow the Whistleblowing Policy.

No retaliation or adverse action will be taken against an employee who reports, complains about or participates in an investigation of a possible violation of the Code of Conduct, applicable law or company policy.

Ukshin Hoti Str. nr. 128,
Prishtinë 10000, Kosovë

informata@bpbbank.com
038 620 620 | 0800 50000

www.bpbbank.com



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