



Code of Ethics

Ever since its founding, Alpha Bank has firmly believed that its success is the outcome of the conduct of each and every member of the Group. The Bank has applied best practices which promote effective Corporate Governance and appropriate individual behaviour within a framework of the highest level of ethics.

The Code of Ethics is addressed to:

- The Members of the Board of Directors of the Bank and of the Group Companies
- The General Managers, Senior Executives and Employees of the Group
- Third Parties transacting with the Alpha Bank Group
- Bank and Group Companies' Advisors

The Code of Ethics is applied in conjunction with the legal and regulatory requirements and Personnel Regulations/Manual.

The Group Companies' Boards of Directors adopt the Group Code of Ethics, following any necessary amendments imposed by the local legal and regulatory framework. The Companies' Management is responsible for informing all Employees accordingly.

In a constantly changing environment, with Customers and Regulatory Authorities demanding greater transparency and higher standards, the Bank's devotion to its principles and values will differentiate it from its peers.

Principles and Values

All the activities of Alpha Bank and its Group Companies ultimately aim to the growth and prosperity of the Group and are governed by principles enforced by ethics and laws such as:

- Integrity and honesty
- Objectivity and independence
- Discretion and confidentiality
- Disciplined and reasonable risk taking
- Transparency

Commitments

Alpha Bank and its Group base their business on the following fundamental commitments:

Towards the Customers, the Group grants priority to the satisfaction of their individual and business needs by providing quality services i.e.:

- The protection of customer information confidentiality
- The protection of personal data through secure and appropriate management thereof
- The provision of explicit information regarding offered services and products, regardless of the distribution channels
- The transparency in promoting its services throughout the relationship
- The diligent resolution of complaints and measuring of customer satisfaction
- The protection of the Customers' legitimate interests
- The establishment of the appropriate organisational structure, policies and procedures for the



avoidance of conflict of interest situations

- The implementation of appropriate policies and procedures, to ensure adequate controls against corruption, antitrust violations, abusive contractual terms, insider dealing, conflicts of interest, money laundering, bribery and generation of misleading financial information

By honouring these commitments, the Group maintains long-term relationships with its Customers, based on trust, expertise and respect for their rightful interests.

Towards the Shareholders, the Group is permanently committed to:

- Creating return for their investment
- Providing explicit information regarding their rights and obligations
- Providing transparency regarding the Group's financial performance, General Meetings, Share Capital Increases, stock market value and disclosure of information according to the law
- Providing prompt and continuous information regarding the Group Corporate Governance policies through constant communication and dialogue
- Applying best practices of Corporate Governance
- Implementing policies that generate high standards of ethical conduct
- Promoting the long-term interests of the Group

Towards its Personnel, the Group undertakes to:

- Ensure quality working conditions, advancement opportunities and fair remuneration, based on merit and equal treatment, free of any discrimination
- Respect and promote diversity (with regard to age, gender, ethnic origin, religion, disability/special capabilities, sexual orientation etc.)
- Provide continuous education and training
- Provide a healthy and safe working environment and help them achieve a balance between professional and personal life, recognising its importance for well-being and productivity
- Respect human rights and ban any form of social exclusion
- Have a zero-tolerance approach to any form of harassment or bullying

Towards the Community, the Group undertakes the commitment to contribute actively to progress and growth. It supports society and its citizens by giving priority to the promotion of human rights, diversity, health, education, culture and the protection of the environment.

Obligations

The Group Employees:

- Take cognizance of and strictly adhere to the Code of Ethics and avoid any action which is inconsistent with it
- Take cognizance of and comply with the articles of the Personnel Regulations/Manual which cover subjects such as the general duties of Employees, due discretion, conduct outside the business premises, discussions on political convictions, publishing articles, personal indebtedness and gambling
- Comply with the Conflict of Interest Policy
- Adhere to the policy of not accepting direct or indirect gifts on account of performing their service or obtaining other advantages or benefits
- Show diligence in performing their duties

The Group Employees may report possible breaches of the Code of Ethics following the procedures outlined in the Whistleblowing Policy.



Any possible breach of the Code of Ethics is examined in relation to the applicable legal framework and Personnel Regulations/Manual and may lead to disciplinary actions, according to the Group Policies.

Revision of the Code

The Code is revised, whenever necessary, by the Group Compliance Division and approved by the Board of Directors, upon the Audit Committee's endorsement.

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