



Code of Conduct

Haitong Bank

2025

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Haitong Bank's Code of Conduct

*This Code of Conduct (hereinafter the “**Code**”) embodies a commitment of Haitong Bank, S.A. (hereinafter the “**Bank**”) to the highest ethical and professional standards, in a way to foster a corporate culture aligned with the industry’s best practices.*

This Code aims to disclose the values and principles that are our strong foundation and promote an ethical conduct among our people. By providing transparent and clear guidance on what is expected from each one of us, this Code encourages respect for the Bank’s culture and applicable laws and regulations.

Recipients

This Code applies to the members of corporate bodies, employees and service providers of the Bank, as defined below, including the Bank’s branches, subsidiaries, and representative offices (hereinafter the “Addressees”).

When the service providers render services to the Bank that constitute outsourced functions and when duly justified, the Bank shall ensure that they respect the ethical principles and best commercial practices expressed in this Code, by requiring that they expressly confirm their acknowledgement of, and agreement with, this Code.

Obligations

All Addressees are responsible for understanding and adhering to this Code and considering the Code’s rules when deciding how to act.

All Addressees are expected to use good judgement in their conduct and to comply with the spirit and the rules of the Code at all times, being that a condition to be able to operate on behalf of the Bank.

Specifically, the Addressees conduct should be aligned with the Bank’s risk tolerance levels, as periodically conveyed internally by the Bank.

Liability

Without prejudice to the possible relevance of such conduct in terms of civil and/or criminal liability and/or administrative offences, breach of the rules that make up this Code constitutes an infraction subject to disciplinary proceedings, potentially resulting in the application of disciplinary sanctions foreseen in the Labour Code, in the Collective Baking Agreement and the Bank’s internal procedures. The consequences of breaching this Code will be proportional to the severity of the conduct.

Protection to the Addressees that fully comply with this Code and respect its spirit will be ensured by the Bank, so that Addressees are able to exercise their duties diligently and free from undue pressure by third parties, namely, but not limited, by threat of litigation. Consequently, the Bank

undertakes to guarantee legal protection to such Addressees regarding criminal, civil and administrative claims, in particular by covering the costs and expenses incurred in own defence in the course of individual proceedings brought against them.

Approval and Review

This Code was approved by the Bank's Shareholder, further to its approval by the Bank's competent internal corporate bodies.

This Code shall be reviewed at least every two years or whenever necessary in order to accommodate potential relevant legal or regulatory changes.

The Compliance Department advises the Bank's Shareholder in relation to any required updates to this Code.

This Code is available at all times for consultation on the Bank's intranet and corporate website.

New employees should sign a statement confirming acknowledgement and agreement with the Code. Subsequent updates to the Code are disclosed and explained to the employees, who will attend periodical updating sessions.

Monitoring

The Compliance Department is responsible for monitoring the application and observance of this Code and the Addressees' compliance therewith. The Compliance Department assists with the investigations of any actual or potential breaches of this Code and advises the Management Body and the Human Resources Department regarding any measures deemed appropriate to stop any wrongdoing, to repair any damage that may have been caused, and to prevent new incidents.

The Compliance Department regularly reports to the Management and Supervisory Bodies any failures to comply with this Code.

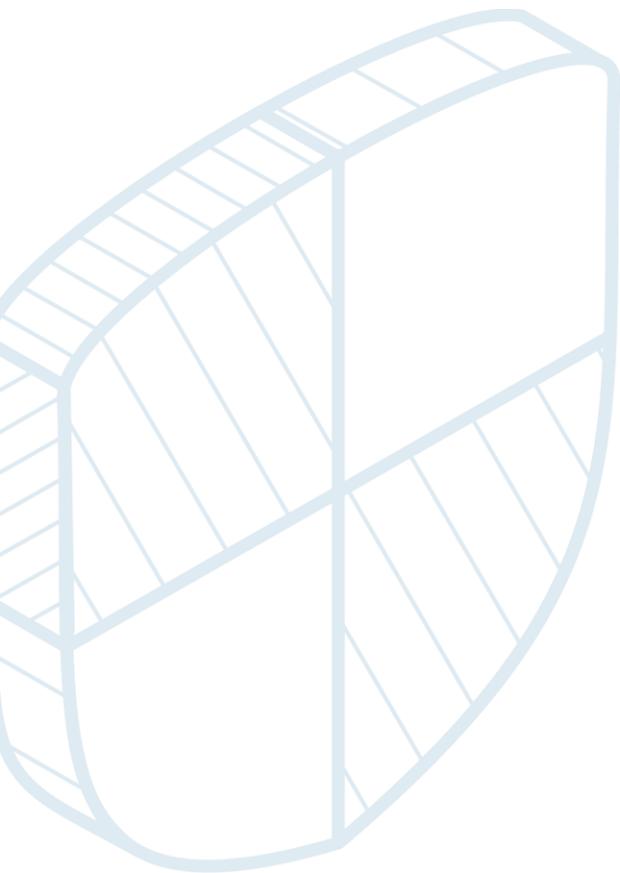
Other Internal Rules

The Bank's Internal Control System involves a set of policies, regulations and supporting procedures governing personal and corporate conduct, further detailing specific conduct rules, as well as the applicable legal framework, that should be interpreted and executed in close articulation with this Code and acknowledged at all times by Addressees, namely:

- Anti-Bribery Regulation (document number R08)
- Anti-Money Laundering and Terrorist Financing Regulation (document number R05)
- Communications Monitoring and Filing Regulation (document number R18)
- Conflicts of Interest Prevention and Management Regulation (document number R02)
- Global Restrictions Regulation (document number R19)
- Information Classification Regulation (document number R17)
- Market Control Regulation (document number R45)
- Personal Data Privacy Regulation (document number R24)
- Selection and Assessment Policy (document number P06)

- Reputational Risk Regulation (document number R13)
- Social and Solidarity Economy Support Regulation (document number R44)
- Whistleblowing Regulation (document number R16)

In case of any concerns or doubts in relation to this Code, please contact the Compliance Department.



Corporate Values

We conduct our activities guided by a corporate culture shaped by our 4 Core Values: **Transparency, Meritocracy, Perseverance, and Integrity**. The strict adherence to this Code safeguards the commitment to act according to these Core Values, building strong foundations for the development of a long-term reputable and sustainable business.

Transparency

Earning the trust and respect of Clients and other stakeholders is the cornerstone of our collective goal for success. Transparency builds that trust. Transparency is supported by a coherent rules-based organization, with a clear strategy and where information flows in an effective manner.

Meritocracy

The backbone of our organizational structure is based on Meritocracy. We encourage individual achievement through career opportunities and mobility. We foster talent and equal opportunities to build the hierarchical ladder.

Perseverance

Our business success requires the right fortitude and resilience to overcome challenges and break new ground. Perseverance stems from an entrepreneurial spirit to deal with risks. It requires the boldness to believe beyond the difficulties, standing up in the face of fear or failure.

Integrity

Our individual behaviour is shaped by righteous values regardless of our different cultural backgrounds. We conduct our business under universal ethical standards, cherishing honesty and moral character. We also act in respect of the applicable laws, regulations and internal policies. Integrity builds credibility.

Haitong Bank's Mission

The corporate mission defines a direction to deliver the Bank's long-term vision, underpinned by our corporate values.

The Bank and the Group

The Bank's mission is to provide excellent service to Clients and create Shareholder value in full compliance with rules and regulations.

As part of a multinational organization, the Bank is committed to contributing to the overall Group's strategy through the following objectives:

- ⌘ to increase the weight of the Group's international activities outside the Chinese market;
- ⌘ to elevate the Haitong brand on a global scale;
- ⌘ to broaden the Group's expertise in corporate investment banking and institutional business;
- ⌘ to operate seamlessly in multiple regions and regulatory environments.

Delivering shareholder value encompasses capital preservation and consistent profitability driven by a careful risk-taking approach, as the Bank expands the size of the balance-sheet, and an effective cost base. Alongside this, the Bank pursues its stand-alone sustainability in terms of revenue generation and funding.

Business

Our mission is to support our Clients in their domestic markets and in cross-border transactions.

The Bank's strategy is to connect clients and business opportunities across its broad network, combining long-standing expertise in Europe and Latin America with a cross-border origination capacity and a Chinese angle.

The Bank's strategy leverages on its competitive differentiator based on 30 years of experience in Europe and Latin America with a unique Chinese heritage.

Our business model combines expertise in areas such as structured finance, capital markets, merger and acquisitions advisory, corporate derivatives, fixed income, and asset management.

Clients and Market

Our business stems from our historical franchises in Europe and Latin America, our China access and a cross-border overlay among all these regions.

Clients are our priority. The Bank's Client franchise is our most prized asset. We endeavour to build long-term commercial relationships based on dedication and trust.

Our product mix and competitive position shape our addressable market. We should be conscious and transparent about our capabilities.

The Bank promotes free and efficient private and public markets, acting in respect of all market participants, including counterparties, brokers and competitors.

Employees

The Bank recognizes engagement and initiative, combining individual performance and an entrepreneurial spirit with a broad sense of unity under the principle of 'Succeeding Together'.

The Bank recognizes Human Capital as a core asset for its growth. We believe in developing talent, promoting teamwork, and upholding open communication channels.

The Bank follows a business culture that rewards performance based on KPIs that are clearly defined and communicated.

We foster a common sense of belonging by always standing by those that act under these standards of Conduct.

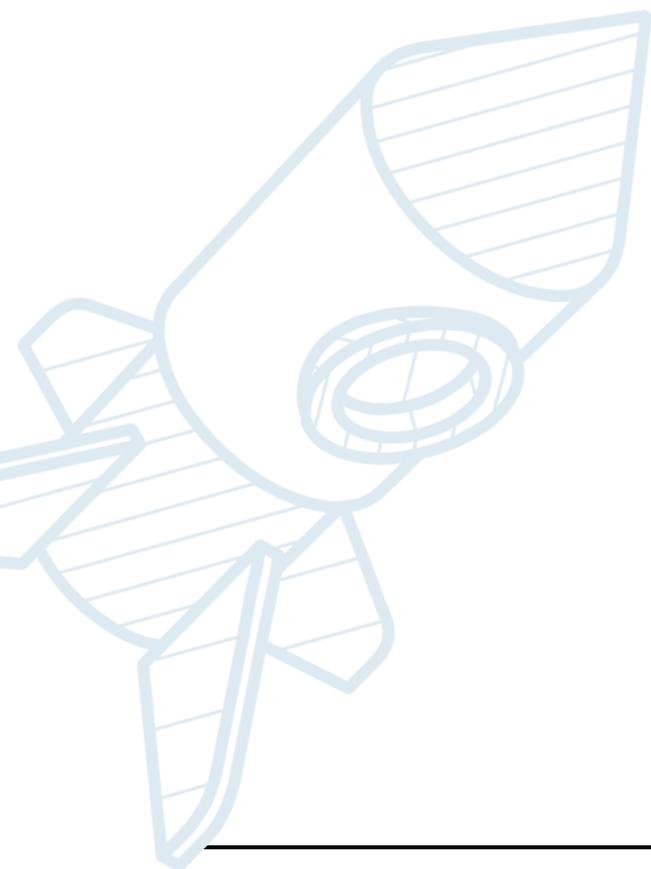
Environment and Community

The Bank incorporates Environment, Social and Governance (ESG) principles in its business activities.

The Bank is committed to sustainable growth, not only in terms of the support to our Clients' activities that promote sustainable solutions but also within the Bank's operations.

We embrace diversity and inclusion, working together to support the communities in the various regions where the Bank operates.

The Bank, with the support of the Shareholder, promotes the best standards of Governance, supported by robust risk management and controls, alongside a culture of checks and balances and independence among corporate bodies.



Rules of Conduct

The Bank and the Bank's Group

Addressees must be professional, competent, diligent, and loyal and act with integrity and mutual respect in all dealings with others, with the utmost regard for the values, heritage and reputation of the Bank and the Bank's Group.

Addressees must act in a correct, conscientious, polite, accessible and available manner when performing their duties.

The Bank actively rejects all forms of corruption and reinforces that Addressees must not compromise the Bank's reputation for integrity. All Addressees must not engage, or appear to engage, in any form of corruption. The Bank's activity is subject to strict internal control mechanisms, which include internal regulations aimed at preventing and combating corruption.

Addressees must use the resources made available to them by the Bank appropriately and respectfully.

Specifically, Addressees must:

- ⌘ Protect and safeguard the assets (tangible and intangible) of the Bank and the Bank's Group and avoid using them beyond the scope required to undertake their duties at the Bank;
- ⌘ Not steal nor intentionally take any Bank assets without permission or consent, use carelessly and waste any assets of the Bank;
- ⌘ Employ their best efforts to minimise the materialization of risks to the Bank and the Bank's Group;
- ⌘ Keep and maintain all business data and documentation confidential and in good order;
- ⌘ Respect intellectual property rights and the Bank's and Bank's Group inherent usage rights with respect to projects, IT systems and programs, hardware, manuals, videos, CD-ROMs, DVDs and related technology, in addition to any work created and developed in general by the Bank and the Bank's Group;
- ⌘ Not use the Bank's or Bank's Group image, name or brand, nor use their relationship with the Bank or the Bank's Group other than in the exercise of their duties;
- ⌘ Not make use of their position in the Bank or in any of its subsidiaries, branches, or representative offices to obtain any special advantage for themselves, their family or third parties;
- ⌘ Not use a business opportunity presented by a Client or supplier for personal gain;
- ⌘ Not compete with the Bank or the Bank's Group.

Addressees must use their technical and professional capabilities with appropriate prudence and care in the performance of their duties within the Bank or the Bank's Group.

Specifically, Addressees must:

- ⌘ Seek regular professional training to best perform their job;
- ⌘ Behave in a manner consistent with all applicable laws, regulations, guidelines and best practices, abstaining from any kind of behaviour that may impair the fit and properness of the Addressees to operate in Banking and Financial Intermediation, as per the applicable legal and regulatory standards;

- ⌘ Comply (and encourage others to comply) with the internal rules of the Bank;
- ⌘ Comply with internal security instructions regarding the use of the Bank's assets, particularly IT;
- ⌘ must use the bank's communication and technology tools, in particular email systems and internet access, exclusively for professional purposes or in accordance with established internal rules;
- ⌘ Not infringe the applicable laws and rules, namely those focused primarily on Banking and Financial Intermediation sensitive topics, such as conflicts of interest, insider trading, bank secrecy, related parties' transactions and market protection;
- ⌘ Immediately notify the Compliance Department of any current or potential infringement of law or internal rules, particularly regarding facts that may be classified as a securities market or other financial instrument's crime. To this effect, Addressees should acknowledge at all times that any form of retaliation, discrimination or any other type of unfair treatment against whistle-blowers is strictly forbidden.

A conflict of interest occurs whenever a private interest of an Addressee interferes with or may interfere with the performance of his/her duties at the Bank. The existence of a conflict of interests prevents the Addressee from acting impartially or objectively and may damage the interests of the Bank and the Bank's Group. Addressees must not participate in any transaction that may be related in any way to their private interests. In particular, Addressees must not:

- ⌘ Develop any business activity with the Bank or the Bank's Group, other than those conducted under normal market conditions according to the internal regulations and procedures of the Bank;
- ⌘ Give preferential treatment or privileged working terms based on personal reasons, family interests or interests of any other related persons;
- ⌘ Intervene in the appraisal of or in the decision-making process where they, their family or related persons may have a direct or indirect interest;
- ⌘ Acquire directly or through related persons, assets or goods belonging to the Bank or the Bank's Group, unless previously and expressly authorized in writing by the Management Body;
- ⌘ Accept any kind of payment or fee for transactions carried out on behalf of the Bank or the Bank's Group, and from profiting in any way from using one's position in the Bank;
- ⌘ Accept gifts, hospitality or other benefits arising from their professional activity at the Bank or the Bank's Group, except in the situations specifically allowed in internal rules of the Bank;
- ⌘ Request a loan, in any form, from Clients, suppliers, or other employees of the Bank or the Bank's Group.

Addressees owe a duty to the Bank and the Bank's Group to protect their business interests.

An Addressee who learns about a business or an investment opportunity through their position at the Bank or the Bank's Group must not use such information for their personal interests.

Addressees must not accept nor undertake any position or role in governing bodies in any third company not belonging to the Bank's Group without notification to the Compliance Department and relevant internal approvals according to the Bank's internal rules.

Addressees must notify the Compliance Department in advance before accepting any membership, affiliation or role at any political party, sovereign body, executive body of central,

regional and local government, at institutions or associations. Such membership, affiliation or role must always be pursued at a personal level and unrelated to the Bank or the Bank's Group, which must be clearly disclosed by the Addressee to the public.

Addressees shall ensure the protection of personal data that they may have access to within the scope of their professional activities at the Bank or the Bank's Group. All personal data must only be processed for the purposes foreseen in the law.

Addressees cannot disclose or use any information or data about the Bank or the Bank's Group unless allowed by law. This duty of professional confidentiality does not lapse on termination of contract, mandate or provision of services.

Addressees must not provide on their own account or at the request of a third party any news or information about the Bank or the Bank's Group.

Addressees must not make any communication or issue opinions about the Bank or the Bank's Group without prior approval from the Bank.

Addressees must not spread rumours or comments about the Bank or the Bank's Group.

Addressees must cooperate with public authorities and supervisory entities upon request and to the extent required by law.

Addressees must immediately notify the Compliance Department if they are or become:

- ⊕ Under criminal investigation from any state body or supervisory entity that may impair, restrict or influence their ability to perform their activities at the Bank;
- ⊕ Called as a witness, or to supply documents, by any state body or supervisory entity in relation to any action or proceeding involving the Bank, the Bank's Group, a Client or any other Addressee;
- ⊕ Made a suspect, defendant or respondent in any civil, administrative, arbitration or other action or proceedings that may impair the fit and properness of the Addressees to operate in Banking and Financial Intermediation, as per the applicable legal and regulatory standards;
- ⊕ Subject to any legal sentence imposed by any public body;
- ⊕ Subject of a written complaint or a legal compensation case filed by a Client;
- ⊕ Party to any insolvency procedure;
- ⊕ Imprisoned, sentenced, or accused in any criminal process.

Our Clients and the Market

All Addressees must ensure that all Clients are treated equally and not discriminate unfairly among them.

All Addressees must ensure the protection of the Clients' legal interests.

All Addressees must act with diligence, neutrality, loyalty, prudence and discretion.

All Addressees must abide by the Bank's internal rules and comply with all instructions received from the Compliance Department, including following the highest standards in relation to Know Your Customer ("KYC") procedures.

All Addressees must respect the confidentiality of Clients' issues, data and information (such as, amongst others, account numbers, names, banking and credit operations, trading room operations or transactions involving securities) and the legal duty of secrecy. They must not

disclose or use information about facts or elements related to Clients, unless expressly authorised by Clients or required by law.

Addressees cannot disclose any information or data related to Clients of the Bank or the Bank's Group.

All Addressees must keep high internal standards of technical capability by providing a high-quality and efficient service to Clients.

Employees will seek to offer Clients only those products and services that are appropriate to their classification according to legal rules, adequate to their needs and which correspond to their expectations, and will inform Clients in advance of the cost and risks inherent to any transaction to be undertaken.

Employees will inform Clients about the nature of financial instruments and the risks associated with such financial instruments for duly informed decision-making. Employees will also ensure that the conditions agreed with Clients will be met.

Employees will not provide any advice or consideration on any legal, fiscal or financial issue, which exceeds the remit on information they are obliged to provide Clients in the marketing of financial products.

Employees must inform Clients, upon request, of the details of any transaction they have been a part of, in a clear and precise manner.

Employees must avoid directing Clients to engage in transactions that are aimed solely at generating fees without anticipated benefits for the Client.

In case of a conflict of interests, the Client's interests take precedence over any other interest, either of the Bank, the Bank's Group or Employees.

No Addressee will accept, unless expressly authorised by the Compliance Department, mandates or powers-of-attorney granted by Clients.

The Bank and the Bank's Group will avoid exclusivity agreements between Employees and Clients, which may lead to a personal or financial dependency or limit the Client's access to other Employees or to the Bank.

Employees will avoid encouraging a transaction which privileges one Client versus another unless both are aware of their respective positions and agree to such transaction.

Employees will always inform Clients of any interests that may conflict with their intended transaction or their general interests.

Addressees are strictly forbidden from trading in stocks or other securities, of any company, based on material information that is privileged, confidential or in any way not generally known or available to the public. Addressees are strictly forbidden from trading in stock or other securities, of any company, while in possession of material non-public information about such company or about any other company of the same group. Addressees are strictly forbidden from passing material non-public information onto others without express authorization from the Bank or from recommending trading transactions in stock or other securities based on material non-public information. Violation of these rules is both illegal and against the Bank's regulations and may have severe consequences, such as heavy fines and imprisonment.

The disclosure of false, incomplete, exaggerated or distorted information is strictly forbidden to all Addressees, as are fictitious transactions or the execution of other fraudulent practices that could artificially alter the normal operation of the securities or other financial instruments market.

The Addressees must act in such a way as to ensure compliance with the law, statutory regulation and internal rules and regulations concerning the prevention of fraud and money laundering. In

particular, Employees carrying out business activities must comply with established legal procedures on Client identification, monitor business relations on an ongoing basis, analyse transactions undertaken by and with the Client, and cross-check the information previously obtained from the Client and their knowledge of the Client vis-à-vis any significant changes to the pattern of transactions undertaken within the Client account and to the Client's profile.

All Addressees shall comply with market rules, promoting fair competition and avoiding any practice that might hinder, falsify or restrict the competition.

When carrying out operations and providing services that are likely to have tax effects, Addressees must comply with the law and regulations, and must not engage in any acts that may associate the Bank with situations that are likely to be considered fiscal infractions.

The Bank provides information on its products, services and associated costs, including tax-related ones, written in a clear, correct, safe and accessible way, so that the Clients can make free and conscious choices.

Advertising and marketing campaigns carried out by the Bank and focused on its activities, products and/or services are implemented in compliance with all applicable legal and regulatory standards, as well as with the principles of identification, truthfulness, transparency, balance, and clarity.

The acquisition of goods and services by the Bank and its relationships with suppliers, agents, intermediaries, and partners are guided by principles of effectiveness, operability, and economy, ensuring transparency, impartiality, equal opportunities and equity in its relationships with the various counterparties.

The Bank has in place all internal procedures, resources and channels to ensure that Clients' complaints are handled in a diligent, impartial and fair manner.

Workplace environment

The Bank promotes mutual respect and equal treatment and opportunities among all Employees, valuing diversity within the organization.

The Bank implements internal regulations and procedures that aim at preventing and combating harassment in the workplace.

The Addressees shall not practice any type of discrimination, based on criteria such as ethnicity, gender identity, sexual orientation, religion, creed, culture, nationality, disability, political or ideological orientation, education, marital status or others, accepting and respecting the right to difference.

The Addressees must act with the highest ethical standards and refrain from any behaviour that may be considered offensive to others.

The Addressees must reject any abusive behaviour whose purpose or effect is disturbing or embarrassing a person, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

The Addressees must reject any unwanted sexual behaviour, whether verbal, non-verbal or physical, with the purpose or effect referred to in the above paragraph.

All Addressees are encouraged to report any wrongdoings of which they may become aware of or have a well-founded suspicion. The reception and treatment of any wrongdoing reports is made in accordance with the Bank's internal procedures and must at all times be independent and anonymous.

Environment and Community

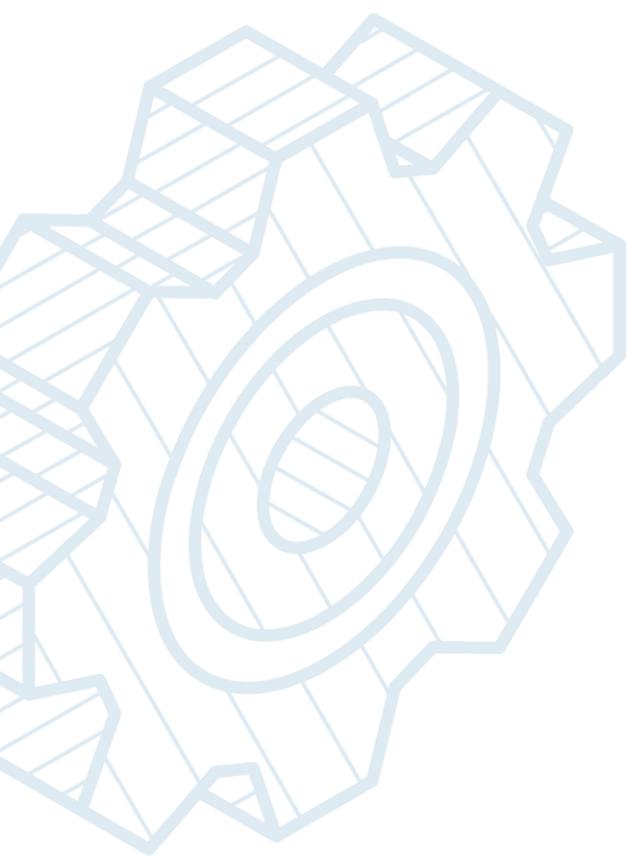
From an ESG point of view, the Bank develops its activity in accordance with international principles and best practices in the field of Social Responsibility, respecting and fulfilling management commitments with regard to contributing to a more sustainable development.

The Bank is committed to respecting internationally recognized human rights in the development of its relationships with its Clients, suppliers, partners and communities where it operates, seeking to avoid or mitigate the direct or indirect adverse impacts of its activity.

The Bank is strongly committed to complying with social and environmental regulations and best practices for the industry.

The Bank supports and encourages all Employees to become involved with charitable work, provided that their participation does not interfere with their jobs at the Bank.

Charitable contributions may not be awarded in order to influence a business decision.



Control of Versions

Table 1: Information about the Document

Name of the Document	Code of Conduct
Version	Version 10.0
Prepared by (Name/Department)	Compliance Department
Endorsed on (Committee name)	Corporate Governance on 28/02/2025 ; Board of Directors on 13/03/2025 , including the Supervisory Body's prior opinion (07/03/2025).
Approved by (Committee name)	Shareholder on 30/04/2025

Table 2: Versions' update

Update and Approval Date	Main Changes
Version 7.0 approved by BoD in 2017	-
Version 8.0 approved by BoD on 25/02/2021	Updated according with Notice 3/2020
Version 9.0 approved by the Shareholder on 26/07/2021	General review of structure and update
Version 10.0 approved by the Shareholder on 28/12/2023	<ul style="list-style-type: none"> • Annual revision; • Clarification regarding Outsourcers and Service providers and their acknowledgement of the Code of Conduct; • Haitong Bank's Mission and Strategy updates; • The inclusion of the Paris Representative Office; • Updates according to Improvement Opportunities/Recommendations pointed out by the external auditors; • Other minor revisions.
Version 11.0 approved by the Shareholder on 30/04/2025	<ul style="list-style-type: none"> • Annual revision; • Updates according to Improvement Opportunities/Recommendations pointed out by the Bank of Portugal (Ref. CEX/2024/0000161992); • Other minor revisions.

ANNEX I: Examples of acceptable and non-acceptable behaviours and preventive measures

This list is merely illustrative and not exhaustive

<i>The definition of acceptable and non-acceptable behaviours</i>		<i>Measures and procedures for prevention and monitoring</i>
Confidentiality	<p>Addressees cannot disclose or use information about facts or concepts concerning the Bank or Clients in any circumstance.</p> <p>Addressees comply with rules regarding classification of information.</p> <p>They shall be cautious of sending emails with confidential information and always double check the identity of addressees.</p> <p>Addressees shall not send confidential emails to unsecure addresses nor carry copies of confidential information outside of the Bank's premises.</p> <p>This duty of professional confidentiality does not lapse on termination of contract or provision of services.</p> <p>Facts or data subject to confidentiality may only be disclosed to third parties under the terms allowed by law. In case of doubt please always double check with the Compliance Department.</p>	<ul style="list-style-type: none"> ⌘ Implementation of internal rules regarding classification of information, personal data protection and procedures for the management of security incidents ⌘ Monitoring chats and other records with an adequate periodicity and ensure that all alerts are investigated. For this purpose, specific monitoring systems can be used, which may act randomly or via alerts generated according to pre-determined signals ⌘ E-mail journaling ⌘ Regular training sessions provided by the Compliance Department ⌘ Email classification procedures ⌘ Controlling accesses ⌘ Disable printers and computers' USB portals
Prohibition of the use of privileged information / insider trading	<p>Addressees must not use privileged information they access within the scope of their professional activities at the Bank for their own benefit or for the benefit of a third party.</p> <p>Addressees (and related persons) must not acquire or sell securities based on privileged information.</p> <p>Addressees must not spread rumours about companies with securities listed on regulated market.</p>	<ul style="list-style-type: none"> ⌘ Information barriers: the information is limited to services, employees and members of the Management Body that are directly involved in the transactions ⌘ Maintaining control lists of access to privileged information and sending insider trading letters to Employees identified in such lists ⌘ Mechanisms to protect archives, files, and databases (password and other security mechanisms) ⌘ Using a software to register all people with access to privileged information

		<ul style="list-style-type: none"> ⌘ Controlling personal transactions ⌘ Regular Training Sessions ⌘ Ad-hoc monitoring actions
Loyalty duties	<p>Employees must always put Clients' interests first.</p> <p>Employees may not take advantage of Clients' lack of knowledge or experience regarding financial instruments or financial markets to persuade them to make decisions that are not beneficial to them.</p>	<ul style="list-style-type: none"> ⌘ Monitoring records with an adequate periodicity and ensure that all alerts are investigated ⌘ Regular training sessions directed at all Employees, including members of management and supervisory bodies
Prevention of conflicts of interest and transactions with related parties	<p>Addressees shall disclose all positions they hold in other companies to the Compliance Department.</p> <p>Addressees shall abstain from advising on deals or becoming in any way involved on issues in relation to which they have or may potentially have a conflicting interest.</p>	<ul style="list-style-type: none"> ⌘ Internal regulations and procedures regarding prevention of conflicts of interests ⌘ Regular training sessions ⌘ Annual questionnaire to Employees and members of corporate bodies on other positions and holdings ⌘ Use of a specific software to register and monitor conflicts of interest ⌘ Compliance Department control of new transactions in the Bank's committees ⌘ Managing a list of related parties ⌘ Ad-hoc monitoring actions
Activities carried out in accumulation with positions at the Bank	<p>Addressees shall not get involved in activities outside of the Bank that may negatively influence their responsibilities at the Bank or create a conflict of interest.</p>	<ul style="list-style-type: none"> ⌘ Mandatory disclosure to the Compliance Department ⌘ Authorization by the Management Body ⌘ Regular training sessions ⌘ Annual questionnaire to Employees on other positions and holdings ⌘ Ad-hoc monitoring actions
Liberalities, offers, and benefits	<p>It is forbidden to accept any kind of payment or fee for transactions carried out on behalf of the Bank and from profiting in any way from using one's position in the Bank.</p>	<ul style="list-style-type: none"> ⌘ Regular training sessions ⌘ Specific form for requesting authorization to receive gifts or liberalities

<p>Contacts with the media and other external entities</p>	<p>Addressees must not provide on their own account or at the request of a third party any news or information about the Bank without prior authorisation to do so.</p> <p>Addressees must refrain from publicly issuing opinions related with Clients or any services or activities involving the Bank.</p> <p>Addressees must always disclose the personal nature of public interventions or academic initiatives.</p>	<p>🌐 The Investor Relations / CEO Office is responsible for carrying out communications to the public/market/media</p>
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