

RU-1910.0.01

RULES OF BUSINESS ETHICS AND CORPORATE CODE OF CONDUCT FOR EMPLOYEES OF ARDSHININVESTBANK

1. PRINCIPLES OF THE BANK'S BUSINESS ETHICS

- 1.1. The Bank shall, in exercising its regular activity, be guided by the following principles:
 - 1.1.1. demonstrating an unbiased and fair attitude in all processes of personnel management;
 - 1.1.2. ruling out any form of discrimination on the grounds of ethnic origins, race, gender, religious or social background, class affiliation, national or ethnic roots or limited employability, political or other beliefs and party affiliation in both the relationship with the personnel and the personnel-customer relations;
 - 1.1.3. observing all the employee's rights and demonstrating a respectful attitude to each:
 - 1.1.4. demonstrating a polite and considerate attitude towards customers and partners;
 - 1.1.5. The "Customer-Oriented Approach" shall be among the key principles of personnel management
 - 1.1.6. The Bank attaches importance to an agreeable and considerate atitude to each and every customer, and the provision of quality services with the understanding that it is necessary for the realization of the Bank's mission and vision.
- 1.2. The Bank's common goal is to uphold the Bank's high business reputation; hence every member of the staff shall demonstrate common sense

in their daily activity, exercising efforts towards reducing reputational risks in the relationship with the colleagues and customers.

OBLIGATIONS OF THE EMPLOYEE

- 2.1. Employees shall:
- 2.1.1. refrain from any actions which may obstruct the Bank's activity (regular process of work);
- 2.1.2. be governed by the principles of equitability, good faith and honesty;
- 2.1.3. be governed by the principle of the supremacy of the customer's interest;
- 2.1.4. respect human dignity regardless of national or ethnic background, race, gender, religious, belief, social origin, class affiliation age, political orientations or other beliefs;
- 2.1.5. be impartial, unbiased and restrained, and serve as a role model;
- 2.1.6. pursue a code of conduct conducive to the formation and maintenance of the conviction and belief that the Bank's activity is anchored on the ideas of impartiality, integrity and equitability;
- 2.1.7. avoid any form of cronyism;
- 2.1.8. read and understand the Rules and be governed by them in daily work, avoid any conduct beyond the frameworks of the Rules that would not befit an employee of ARDSHININVESTBANK.

3. CONFLICT OF INTEREST, ANTI-CORRUPTION MEASURES, MONEY LAUNDERING AND TERRORISM FINANCING

- 3.1. Each member of the staff realizes that they shall not permit that the impartiality of their professional judgements and decisions be influenced by their personal interests, preferences and other individuals and that they shall abstain from situations where their personal interests run counter to the interests of the Bank and the Customers, potentially leading to a conflict of interests.
- 3.2. The Bank has adopted a conflict of interests policy, and each employee shall be guided by the principles thereof, adhering to the "Procedure of Preventing and Managing a Conflict of Interests" in a conflict of interests situation.
- 3.3. The Bank shall, in its daily activity, be committed to the principle of abstaining from any currupt practice (zero corruption tolerance) and shall play its role in the development of an anti-corruption culture in the society.
- 3.4. A member of the Bank personnel shall be prohibited, in a direct or indirect manner whether personally or via third persons, from offering, promising, requesting or receiving a bribe or making any undue payments (not defined, beyond he established tariffs) in any situation in an effort to circumvent or reduce any regular process, transaction or other matters pertaining to the Bank.

- 3.5. The Bank expects its customers, partners and other external structures to observe the corresponding rules aimed at counteracting corruption.
- 3.6. The Bank has its effective anti-corruption policy obliging each and every employee to guide themselves with the provisions thereeof and, in case of corruption-related phenomena and signals, be governed by the "Anti-Corruption Policy".
- 3.7. The Bank shall unconditionally move to comply with the requirements of legislative acts in the field of combating money laundering and terrorism financing.
- 3.8. The Bank shall undertake measures towards establishing partnership relations only with reliable partners engaging in a legitimate activity.