



CODE OF ETHICS

2024

Kent Bank	Code of ethics	Version: 6.2
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1. INTRODUCTION

The Code of Ethics is the framework by which KentBank d.d. (hereinafter referred to as the Bank) promotes responsible business conduct. The Bank is not limited exclusively to making a profit but assumes responsibility that necessarily includes not only its clients, but also all other entities that in any way affect its operations.

As the Code of Ethics (hereinafter: the Code) cannot predict in advance all ethical and morally dubious situations to which the Bank's employees may be exposed in the performance of their work tasks and in this regard prescribe rules of conduct for each ethically dubious situation, the Bank relies on employees and believes that it will assess any ethically dubious situation with due care and that it will ultimately act in accordance with generally accepted ethical norms and standards.

The Bank shall ensure that all its employees are promptly and appropriately acquainted with the contents of this Code.

2. PURPOSE

The purpose of this Code is to establish high ethical standards, promote and adhere to them and ensure their implementation. The Code defines the basic principles and rules of acceptable behaviour in order to develop awareness of the importance of ethics in professional conduct and performance of business obligations. The Code promotes the honesty, ethics, lawful conduct and conduct of its employees and defines its business culture, communication with customers, business partners, regulatory bodies and conduct among its employees.

3. USAGE

The provisions of this Code must be accepted by all employees and must be woven into the way the Bank operates and does business. The Code applies equally to all employees of the Bank, as well as to members of the Supervisory Board of the Bank. In order to preserve and further develop conscientious and fair treatment in the Bank, members of the Bank's Management Board are required to influence the correct behaviour of all employees of the Bank by the example of their behaviour. Also, the Bank's Management Board is expected to assume responsibility for the actions of its employees and to ensure that all employees understand the ethical and other principles defined by this Code.

The Bank's employees are obliged to read this Code and become acquainted with its provisions and apply them in their daily operations. Also, the Bank's employees are expected to act honestly and with integrity in the daily performance of their business obligations and to perform their obligations with appropriate skills, due diligence and dedication.

4. VIOLATION OF THE CODE

The Bank's activities should be conducted in accordance with the applicable law and corporate values contained in this Code. Violations of legal provisions and internal rules defined by the Bank's acts represent a risk that may result in legal consequences for the Bank and / or its employees and affect the Bank's reputation.

In case of violation of duties and provisions of this Code and unacceptable behavior by the Bank's employees, depending on the severity of the violation, internal and external disciplinary proceedings, court proceedings and penalties are possible (advice, reprimand, referral to education, request for

correction of the violation, financial penalty, dismissal with an offer of an amended employment contract, termination of the employment contract).

With respect to violations of the provisions of this Code (intentional violation of the provisions or violation due to negligence), the Bank shall act in accordance with the policy of zero tolerance.

Employees of the Bank are authorized and obliged to notify the superior and / or the Compliance Department and the Confidential Person of any violation of the provisions of this Code in accordance with the Whistleblowing Rulebook. A report on a violation of the provisions of the Code may be submitted in writing (Kentbank d.d. Radnička cesta 50, 10000 Zagreb, For the Compliance Department), by e-mail to uskladjenost@kentbank.hr or orally.

Reports of violations of the provisions of this Code are considered strictly confidential, and the Bank guarantees anonymity to employees who report violations. Also, employees who report violations of the provisions of this Code will not be exposed to obstacles in their career development due to the report, nor will they be placed in an unfavourable position and situation in relation to other employees of the Bank.

If a report of a violation of the provisions of this Code or the law is found to be unfounded, and if it is proved that the unfoundedness was known to the person who nevertheless filed it, such person shall be liable to sanctions.

5. BANK'S VALUES

The Code defines the values of the Bank in which it believes and to which it is committed. The values are an expression of business culture, and at the same time they are the basis for drafting the Bank's internal acts. In accordance to the defined values, the Bank uses them to observe and interpret individual situations, and they are also the goal that the Bank strives for.

The Bank's values are:

- **Responsibility**

The Bank's Management Board and directors are obliged to set an example of ethics in the daily business of their employees and follow ethical principles of business, build a culture of open communication with its employees, ensure that business and financial results do not surpass ethical behaviour and compliance with law, internal law and Bank's acts. They are also obliged to take the necessary measures and actions to eliminate violations of any provisions of this Code. All employees of the Bank are responsible for compliance with the provisions of this Code.

- **Integrity**

The Bank fulfils its obligations honestly, correctly and responsibly, while adhering to professional ethics.

- **Excellence**

The Bank's goal is constant improvement and advancement, as well as innovation, with rewards for achieved results.

- **Transparency**

The Bank is committed to transparency in its operations with all its partners and business associates.

- **Equality**

The Bank applies equal opportunities and equal treatment of men and women in matters of employment and work as well as non-discrimination of workers on the grounds of sex,

race, colour, ethnic or social origin, genetic characteristics, language, religion or belief, political or any other opinion, belonging to a national minority, property, birth, disability, age or sexual orientation.

- **Compliance with the law**

The Bank is determined to act in accordance with the rules, regulations, laws and other positive regulations. The Bank believes that regulatory provisions are the foundation of successful and safe operations, and our ethics goes beyond compliance, it integrates the norms of good corporate governance, practices and expectations of society.

- **Respect for others**

The Bank treats everyone with respect and at the same time respects everyone's human dignity, autonomy, privacy, rights and interests. The bank treats others the way it wants others to treat it.

- **Reliability**

The Bank strives to achieve excellence at all times and constantly strives to increase the trust of its customers by providing quality products and services. We want to incorporate our values into the behaviour of our employees. The Bank is determined to fulfil all its promises and obligations.

The Code does not describe all the ethical and morally questionable situations to which the Bank's employees may be exposed in the performance of their duties, the aim is to support everyone in the performance of their duties and to encourage them to behave in accordance with ethical norms and standards.

The Bank expects from its employees:

- compliance with the provisions of this Code
- compliance with laws, internal acts of the Bank and other positive regulations
- treating colleagues with respect
- helping and collegiality towards new colleagues
- notifying the Compliance Department of violations of the provisions of the Code
- communication with the Bank's clients with respect, tolerance and responsibility
- protection of the Bank's image
- timely, accurate and understandable delivery of information and data to the regulator
- detection of potential and actual conflicts of interest to the superior and / or the Compliance Department
- avoiding conflicts, where possible, between personal and professional interests
- providing complete, accurate and timely information in the course of fulfilling business obligations
- consultation with colleagues and superiors whenever necessary.

6. ORGANIZATION OF THE BANK AND RESPONSIBILITIES OF MANAGEMENT AND EMPLOYEES

The Bank independently regulates the internal organization and defines the behaviour of its employees. Also, the Bank has established an organizational structure that enables the establishment of strategic goals and which leads to the realization of set strategic goals. The established organizational structure

ensures clear lines of responsibility in the Bank and a relationship of transparency and cooperation between the Management Board and the Bank's Supervisory Board, as well as between all bodies of the Bank, employees, management, shareholders, clients and the public.

Employees, members of the Management Board and the Supervisory Board and other associates are obliged to professionally perform the tasks to which they are assigned and to promote the Bank's business interests. This includes protecting and caring for the Bank's tangible and intangible assets, including all forms of ownership, maintaining confidential business information, and caring for reputation and relationships with business partners, government agencies and the general public.

Each organizational part of the Bank maintains and guarantees the compliance of its actions and operations with the principles and values set out in this Code of Ethics.

The Bank's Supervisory Board supervises the work of the Bank's Management Board and for that purpose the Bank's Management Board provides it with information and data on the basis of which the work of the Management Board is assessed. The Supervisory Board holds regular meetings and meets regularly with the Bank's Management Board and the Audit and Risk Committee.

The Bank establishes and implements an effective system of internal controls in all areas of business activities, which includes at least:

- established organizational structure in accordance with relevant legal regulations
- organizational culture and ethics in conducting business activities
- appropriate control activities and division of responsibilities of appropriate internal controls integrated into all business processes and activities of the Bank
- appropriate accounting and administrative procedures and policies
- activities within the scope of the Bank's control functions

The Bank has established three control functions:

- Compliance monitoring function
- Risk control function
- Internal audit function

These control functions assist the Management Board and directors in establishing an efficient and effective control environment and ensure the stability of the Bank's operations.

The Bank's employees are obliged to act in accordance with laws and other positive regulations, internal acts that regulate the Bank's operations and at the same time perform their obligations in a timely, quality manner and be responsible for the results of their work and application of ethical standards.

In case of doubts or questions related to the provisions of this Code, the application of ethical principles and / or conduct, the employee is obliged to seek assistance from a superior or the Compliance Department. Also, the employees are required to undergo training on ethics.

7. PRINCIPLES

With the Code, the Bank defines and expresses its values and wants to harmonize the behaviour of its employees with it. Employees of the Bank and others acting on behalf of the Bank are obliged to adhere to the following principles in their daily operations:

- legality
- professionalism
- equality and justice
- prohibition of discrimination and harassment
- respect for fundamental human rights

7.1. LEGISLATION

When performing their daily business obligations, the Bank's employees are obliged to act in accordance with the law and other positive regulations of the Republic of Croatia, the European Union and the Bank's internal acts.

Violation of the aforementioned laws and other positive regulations and internal acts exposes the Bank and you to misdemeanour and / or criminal sanctions and loss of the Bank's reputation. The Bank requires its employees to be accountable and to respect the law and internal acts and to protect their reputation.

By their actions, the Bank's employees ensure the good reputation of the Bank as well as compliance with the provisions of this Code. Therefore, notifying the Supervisor and / or the Compliance Department of violations of the provisions of this Code, laws and other positive regulations, as well as the Bank's internal acts are inherent in successful compliance and business ethics.

In case of suspicion of lawful conduct and business ethics, it is necessary to seek advice or opinion from the immediate superior and / or the Compliance Department.

Preventing bribery and corruption

The Bank has established a Bribery and Corruption Prevention Policy and applies a zero tolerance rate to bribery and corruption. The Bank's employees are obliged to adhere to the provisions of the aforementioned Policy in their daily operations.

The Bank prohibits any form of bribery and corruption in any possible form, direct or indirect, and will not tolerate its employees' involvement in any form of bribery or corruption.

The Bank will investigate all facts regarding the possible giving and receiving of bribes or corruption and conduct an investigation and take appropriate action with possible sanctions defined by the relevant regulations. No employee of the Bank shall be punished and / or suffer the consequences of refusal to give / receive bribes and corruption, even if such refusal would be unfavourable to the Bank in any sense.

Bank employees are allowed to receive gifts of symbolic, minor value. Acceptance of such gifts must not condition the conclusion of the transaction or be associated with placing the donor in a privileged position in relation to other clients.

Also, it is not acceptable to receive or give inappropriate benefits or incentives, regardless of whether the person offering or seeking such benefits works in the public or private sector.

The form and value of gifts received or donated must be in accordance with accepted business practice. Every employee of the Bank who receives a gift or a gift in excess of € 150 is obliged to report the receipt of a gift or gift to the Human Resources Management Sector. The Human Resources Management Sector is obliged to archive all related documentation for a minimum of three years. **Employees are prohibited from accepting gifts valued at more than €200.**

Prevention of money laundering and terrorist financing

Money laundering and terrorist financing is a serious problem on a global scale. The Bank has implemented legal provisions regulating the area of prevention of money laundering and terrorist financing in order to

prevent it from being used as a lever that enables money laundering or returning money of illegal origin to regular business activities and processes and thus be used to cover up criminal activities.

In order to prevent clients from acting that could significantly damage the Bank's integrity and negatively affect its reputation, the Bank continuously conducts inspections of its clients' operations, in order to be aware of the client's sources of assets and thus avoid participating in potentially suspicious transactions.

All employees of the Bank are obliged to take appropriate measures and actions necessary to prevent the use of the Bank for the purpose of money laundering and terrorist financing.

Accordingly, the Bank expects its employees to:

- harmonize their operations in accordance with the regulations governing the prevention of money laundering and terrorist financing
- take appropriate measures and actions to identify and verify the integrity of the client in accordance with the law on the prevention of money laundering and relevant internal acts of the bank
- For all information on the prevention of money laundering and terrorist financing, employees can contact the Department for the Prevention of Money Laundering and Terrorist Financing.

Sanctions and embargoes

The Bank is committed to complying with all applicable sanctions and embargo regimes.

Market abuse

Confidential information is information that may be known to the Bank's employees and that has not been made public and may affect the price of financial instruments. Employees of the Bank are strictly prohibited from any attempt to manipulate the market through direct or indirect financial fraud. Also, it is prohibited to buy or sell shares or securities of any legal entity, whose shares are listed on the stock exchange during the possession of inside information related to the said company, it is prohibited to disclose inside information to any other employee of the Bank or any other person except in the event that this is necessary for the performance of its duties in the Bank.

Such trafficking is a criminal offense and has direct consequences under criminal law as well as disciplinary consequences.

7.2. PRINCIPLE OF PROFESSIONALITY

All employees of the Bank are expected to act responsibly, conscientiously, ethically and professionally in fulfilling their obligations. Also, the Bank's employees are obliged to act in a way that will not conflict with their professional obligations to the Bank and will not affect the Bank's reputation.

Conflict of interest

Conflict of interest is any situation in which the Employee does not act on behalf of the Bank from a neutral and objective position in relation to the Client, Third Party, and using his position may be in a situation where his interest is contrary to the interests of Client, Third Party and others.

All employees of the Bank are obliged to take care that their personal interests do not conflict with their obligations to the Bank or its clients.

Bank employees are expected to have high ethical standards in their actions on behalf of the Bank, but also for their activities outside it. It is therefore important to ensure that there are no adverse consequences for the Bank's interest that could result in a conflict of interest and any personal or business interests that a Bank employee may have.

All employees of the Bank are obliged to find out about the existing or potential conflict of interest, who are in a possible conflict of interest or have a knowledge of a possible conflict of interest of another employee, to report to the Compliance Department in writing.

Employees of the Bank are expected to report and obtain the Bank's approval for their external affairs, ownership interest in companies and special duties in the manner prescribed by the Conflict of Interest Management Policy.

In case of obtaining the Bank's consent to perform foreign affairs, the Bank's employee may engage in its activities exclusively outside the Bank's working hours and is obliged to ensure that these activities do not affect its obligations and duties in the Bank and do not affect the Bank's reputation and damage. The employee is obliged to adhere to the rules on confidentiality of information and data entrusted to him/her or in whose possession he came in the performance of its duties in the Bank. Also, the employee may establish business cooperation with companies that do not provide any services to the Bank and may not recommend the services of other Banks.

Protection of data and information confidentiality

In carrying out their day-to-day responsibilities, the Bank's employees will have access to confidential information and data. Accordingly, the Bank's employees are obliged to use such confidential information and data exclusively for the purpose for which they are intended and to keep them secret. In doing so, they are obliged to ensure confidentiality and secrecy, as well as the protection of information and data in accordance with the relevant internal acts of the Bank.

Employees of the Bank may not disclose confidential information outside the scope of the Bank's official tasks, use it for personal needs or for the benefit of third parties, natural and / or legal persons, and use it in a way that would jeopardize the Bank's reputation, position and results.

The Bank's employees are obliged to refrain from exchanging information related to the Bank's operations and activities and are obliged to keep it as a banking secret in accordance with relevant laws and other positive regulations.

7.3. EQUALITY AND JUSTICE

In the performance of their day-to-day business duties, the Bank's staff shall act in accordance with the principles of equality and fairness, excluding any form of harassment, exploitation or discrimination.

Employees of the Bank are strictly prohibited from abusing their authority and must not allow personal interests to result in situations that could lead to biased judgment and failure to comply with ethical and professional standards.

7.4. PROHIBITION OF DISCRIMINATION AND HARASSMENT

In its operations, the Bank will not tolerate any form of discrimination, threats and any form of physical and / or psychological violence and harassment.

It is strictly forbidden to possess or distribute any promotional materials related to racist, sexist and similar materials that are offensive and contrary to the values and ethical principles of the Bank.

In the performance of their day-to-day duties, the Bank's employees may not discriminate against clients on the basis of sex, race, color, ethnic or social origin, genetic characteristics, language, religion or belief, political or any other opinion, nationality, minority, property, birth, disability, age, sexual orientation or on any other basis that is contrary to the laws and other positive regulations of the Republic of Croatia.

7.5. TREATMENT OF OTHERS

The Bank respects internationally recognized human rights and at the same time respects the fundamental human rights of its colleagues, but also clients, suppliers and other business partners. It also expects the same from all those who act on its behalf.

With this Code, the Bank expresses its values and strives to achieve employee compliance with them, aware that adherence to ethical and socially accepted norms reduces the possibility of compliance risk and strengthens its reputation.

Relationship with clients

The client is always at the center of our attention and we base our relationship with him on transparent communication that allows him to understand the properties and values of our products and services. The Bank does not discriminate against clients on the basis of their nationality, religion or gender.

The Bank takes care of the protection of the security of its clients, their funds and confidential information by providing services that meet the criteria of reliability, continuity, confidentiality, while ensuring compliance with all laws and other positive regulations.

In its relations with clients, the Bank expects all its employees to meet the criteria of decency, cooperation, correctness and transparency, and is obliged to provide them with complete and accurate information while avoiding the use of inconsistent and inappropriate practices that could cause condemnation by the client.

Employees of the Bank are prohibited from abusing the incompetence of clients and their ignorance of business in order to obtain personal and / or business benefits of the Bank.

The Bank's employees must act calmly, interested and kind in communication with clients. Also in performing their duties and behaving in public, employees must be careful not to harm the interests and reputation of the Bank.

Attitude towards business entities

The Bank encourages partnership and transparent relations with all its partners and business associates. Business associates are selected on the basis of clear, objective and law-based criteria.

When selecting business associates and advisors, the Bank avoids the legal position as well as factual situations that may lead to any conflict of interest.

In contractual relations with other business entities, the Bank takes an equal position and takes care of the fairness of contractual provisions, especially with regard to deadlines for payment of services and compliance of contractual provisions with positive regulations of the Republic of Croatia.

The failure of another market participant to comply with generally accepted ethical principles and standards in doing business will not release the Bank from the obligation to comply with these principles towards the same entity.

Attitude towards employees

The Bank believes that respect for the personality and dignity of each employee is the basis for the development of a positive work environment and will not tolerate any form of discrimination and

harassment of employees based on gender, ethnicity, religion, race, culture, sex, age or physical handicap of an individual employee.

The Bank gives all its employees the opportunity to express their individuality and creativity in their work, while encouraging policies that facilitate private and professional life. Also, the Bank encourages the development of skills and abilities for teamwork of employees, in order to best contribute to the achievement of its business goals.

The system of hiring, promoting and rewarding employees is based on business achievements and the achievement of set goals, as well as on the professional experience of each employee.

The Bank protects personal data on employees or job candidates in accordance with the regulations in force in the Republic of Croatia. Employees have the right to be informed about the procedures for collecting and using information about them and their activities.

The sale, exchange or transfer of personal data of employees to third parties is not allowed, unless otherwise regulated by law.

It is strictly forbidden:

- insight into the balance or turnover on the accounts of the Bank's employees (insight is allowed only to employees who are authorized to do so by a special decision of the Management Board),
- defamation and unprofessional treatment (in speech or writing) towards other employees, as well as abusive and threatening treatment towards others,
- giving false information to colleagues or superiors intentionally (so-called deliberate deception),
- immoral and indecent behaviour,
- participation in games of chance to an extent beyond the entertainment category,
- coming to work under the influence of alcohol or drugs.

Relationship with the wider community

The Bank encourages cooperation with the wider community and assesses the very important role of the non-profit sector in the overall development of society.

Through its work, the Bank determines the material and other needs of the community and supports them through donations and sponsorships. The Bank will not make donations or support charitable activities and sponsorships in a way that circumvents the rules on accepting and giving gifts, bribes, illegal payments, benefits to political parties and politically exposed persons.

8. ACCEPTABLE AND UNACCEPTABLE BEHAVIOUR

Acceptable behaviour

Acceptable conduct is any conduct that complies with the provisions of this Code, which protects the reputation of the Bank, conduct that preserves professional secrecy and confidential information, and any other conduct that results from this Code.

Examples of acceptable behaviour are:

- ❖ Preventing corruption and bribery
- ❖ Prevention of money laundering and terrorist financing
- ❖ Avoiding conflicts of interest
- ❖ Refusal to accept gifts of illicit value

❖ ***Preventing corruption and bribery***

The Bank is actively fighting the fight against bribery and corruption by promoting ethics and professionalism in day-to-day operations where bribery and corruption are prohibited. The Bank requires its employees to have the highest degree of compliance where bribery and corruption have no place, and also requires employees to respect fundamental values that include honesty, transparency, responsibility and ethics in their daily operations .

Employees are obliged to refrain from any activities that raise suspicion or create the impression that it is a case of bribery and corruption or fraud in any form. The Bank also expects its clients and business partners and all others acting on its behalf to comply with anti-bribery and anti-corruption regulations. The Bank maintains a zero tolerance rate for incomplete, contradictory, untimely and erroneous reports and prohibits forgery of documents, fraud related to transactions and other actions and transactions.

❖ ***Prevention of money laundering and terrorist financing***

All employees of the Bank are obliged to actively participate in the prevention of money laundering and terrorist financing and must not allow the Bank to be used as an instrument for money laundering and terrorist financing. In accordance with the above, the Bank's employees are obliged to act in accordance with internal acts regulating the prevention of money laundering and financing, as well as in accordance with the Law on the Prevention of Money Laundering and Terrorist Financing.

❖ ***Avoiding conflict of interest***

In accordance with the Conflict of Interest Management Policy and legal regulations, employees are obliged to avoid situations in which conflicts of interest may arise and to take care that their personal interests do not conflict with their obligations to the Bank or its clients.

Employees of the Bank may not execute transactions if they or their related party act as a client of the Bank in a particular transaction.

Employees of the Bank are responsible for identifying situations of potential and actual conflicts of interest and avoiding them, ie for reporting without delay to the Compliance Department on the existence of situations and / or relationships in which conflicts of interest may arise in order to monitor and manage them.

Employees are obliged to abstain from voting or deciding on any decision or case when they are or could be in a conflict of interest or when their objectivity or ability to properly perform their duties in the Bank is endangered.

❖ ***Refusal to accept gifts of illicit value***

Employees of the Bank are prohibited from requesting gifts, as well as encouraging the giving and receiving of gifts, either for themselves or any other person when there is a presumption that this could affect their objectivity and professional performance of daily duties.

Employees are prohibited from giving or receiving gifts when the other party could interpret this in a way that affects the business decision and that the same can be considered bribery, bribery and corruption.

Unacceptable behaviour

Unacceptable conduct is any conduct that violates the provisions and values of this Code and that violates basic ethical principles.

Examples of unacceptable behaviour are:

- ❖ Prejudice and discrimination
- ❖ Harassment (mental or physical harassment)
- ❖ Gambling and / or betting (or any activity that could impair the financial stability of employees)
- ❖ Scams
- ❖ Violations of duty
- ❖ Economic and financial crimes
- ❖ Market manipulation
- ❖ Violation of consumer protection law
- ❖ Tax offenses
- ❖ Performing transactions that exceed the assigned authority
- ❖ Exceeding the debt limit (loans, mortgages and the like by borrowing through other intermediaries and thus jeopardizing the ability to repay debts)
- ❖ Use of the official designation of the Bank or the authority of the workplace for private purposes
- ❖ Discussing via the Internet and social networks any information and activities of the Bank
- ❖ Use of a position in the Bank or the name of the Bank in political, religious or other public activities in his / her free time, unless approved by the Management Board of the Bank,
- ❖ Providing loans or other forms of benefits for themselves or for clients who are the employee's spouse, partner or relative up to the fourth degree (this provision also applies when the client is a legal entity),
- ❖ Carrying out a transaction on accounts in respect of which they or their spouse, persons who by law have a status equal to the status of a marital union or relatives up to the fourth degree have a role owner or proxy. In these situations, the transaction is performed by another employee of the Bank with the approval of the superior.

9. PROTECTION OF CONFIDENTIALITY OF DATA AND INFORMATION

In accordance with the relevant legal regulations, the Bank keeps as bank secrecy all data and information on clients that it has obtained while maintaining business relations with the client.

Exceptions to the obligation to maintain bank secrecy are allowed only in cases where the law prescribes the obligation to submit data to the competent authorities and in the event that the client approves the submission of data constituting a bank secret in writing.

Accordingly, the Bank, when receiving, processing and keeping orders containing information about the client, which is a bank secret, acts with the care required of a good businessman.

10. ACCOUNTING AND AUDIT

In the decision-making process, the Bank relies on the accuracy and timeliness of accounting records. All business transactions must be entered in the Bank's books of account in accordance with legal regulations,

accounting standards and the Bank's internal acts. Transaction records contain all the necessary information about an individual transaction.

In accordance with the relevant legal regulations in force in the Republic of Croatia, the Bank's operations are controlled by Internal Audit, and in accordance with the law, selected external, independent audit firms and supervisory bodies in the Republic of Croatia.

11. PUBLIC ANNOUNCEMENT OF INFORMATION

The Bank undertakes to timely provide complete, accurate, precise and comprehensible information to the competent authorities, clients and the general public through the means of communication and to the extent of its obligations to publish information to the competent authorities and the public. The publication of financial data corresponds to the prescribed standards of banking activity.

Knowingly giving false information for the purpose of misleading a business partner or the public is not permitted. It is strictly forbidden to give any information to the media without the prior written approval of the Management.

12. ENVIRONMENTAL PROTECTION

The Bank will not participate in the financing of projects or transactions for which it is aware that they may potentially endanger the environment with long-term consequences (for example, environmental and water pollution).

When deciding whether to execute a transaction or finance a project that may be harmful to the environment, the Bank's employees and management must keep in mind the potential negative consequences for the Bank's reputation.

In case of any doubts about the direct or indirect impact that the transaction may have on the environmental objectives that the Bank wishes to promote through its business practice in accordance with relevant environmental regulations in the Republic of Croatia, Bank employees are authorized to seek advice from the Compliance Department.

13. INFRINGEMENT REPORT

An employee of the Bank who is witnessing to illegal actions or violations of any provision of this Code shall contact the superior and/or Compliance department and Confidential person in accordance with the internal reporting of violations of regulations. A report of violation of the provisions of the Code can be filed in writing (KentBank d.d., Radnička cesta 50, 10000 Zagreb, for the Compliance Department), by e-mail to the address [uskladjenost@kentbank.hr](mailto:uskладjenost@kentbank.hr) or in oral form. The Department will prepare a report on violations of the provisions of the Code and inform the Bank's Management Board and the Bank's Supervisory Board about it as part of the semi-annual report. The Department will also monitor and verify the adoption, promotion, adherence and implementation of high ethical standards and report regularly to the Management Board and the Supervisory Board of the Bank.

14. FINAL PROVISIONS

All employees of the Bank must be familiar with the provisions of this Code. The Compliance Department is responsible for interpreting the provisions of this Code as well as for conducting supervision and control and compliance with its provisions.

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Failure to comply with the provisions of this Code constitutes a violation of the work obligation and is subject to sanctions.

With the entry into force of this Code of Ethics, the Code of Ethics version 6.1 ceases to be valid. This Code shall be applied on the day of its adoption by the Bank's Management Board.