



БАНК ЛЬВІВ

APPROVED

By decision of the Supervisory Board

JSC BANK "Lviv"

Protocol № 020/2020 dated 15.06.2020

Chairman of the Supervisory Board \_\_\_\_\_ A. Pospelovsky

CODE OF CONDUCT JSC BANK "LVIV"



## CONTENT

1. GENERAL PROVISIONS.....	3
1.1. Positioning.....	3
1.2. Our customers.....	3
1.3. Our employees.....	4
1.4. Our shareholders.....	4
1.5. Values.....	4
2. OBLIGATORY NORMS OF CONDUCT. RESPONSIBILITY FOR VIOLATION OF THESE NORMS.....	5
2.1. Mandatory rules of conduct.....	5
2.2. Responsibility.....	6
3. STANDARDS ON THE PROHIBITION OF ILLEGAL ACTIVITIES.....	6
3.1. Submission of unreliable financial and statistical reports.....	6
3.2. Official crime, economic crime (fraud).....	6
3.3. Violation of sanctions, counteraction to legalization (laundering) of proceeds from crime, financing of terrorism and financing of proliferation of weapons of mass destruction.....	6
3.4. Non-competitive practice.....	7
4. RISK MANAGEMENT CULTURE POLICY.....	7
5. PREVENTION OF VIOLATION OF CONSUMER RIGHTS.....	7
6. PREVENTION OF DAMAGE TO THE PROPERTY OF THE BANK.....	7
7. PROHIBITION OF USE OF OFFICIAL POSITION. PREVENTION OF CONFLICT OF INTEREST.....	8
8. PREVENTION OF CORRUPTION AND BRIBERY.....	8
9. GUARANTEES OF EQUALITY OF RELATIONS BETWEEN THE BANK AND ITS CLIENTS, EMPLOYEES, SUPPLIERS AND COMPETITORS.....	9
10. GIFTS RESTRICTIONS.....	10
11. PRINCIPLES OF PROCESSING, STORAGE AND DISSEMINATION OF CONFIDENTIAL AND INSIDER INFORMATION.....	10
12. ENVIRONMENTAL PROTECTION.....	11
Appendix №1.....	12



## PREFACE

The success and reputation of the Bank depend on the ethical behavior of our employees, and they are responsible for building trust in the bank from both the market and the public. This Code of Conduct (hereinafter - Code) outlines the basic principles of conduct and social interaction of the Bank's employees and reflects our commitment to the highest standards of employee conduct. The principles enshrined in the Code are binding on all employees.

Adherence to this Code is the personal responsibility of each employee, and disregarding or not adhering to the Code may result in disciplinary action, including termination of employment. Standards based on the principles described in the relevant Code should guide the employee to understand acceptable behavior. In case of uncertainty about the application or interpretation of any situation, the employee should inform the immediate supervisor or HR department and, if necessary, Management, from the standpoint of receiving advice and consultation.

This Code is in full compliance with applicable law and is an integral part of personnel, employment and job description policies.

## 1. GENERAL PROVISIONS

### 1.1. Positioning

JSC Bank Lviv (hereinafter - the Bank) has always remained with its customers in the Western region of Ukraine both in prosperity and in times of crisis, providing services to individuals and legal entities with traditional Lviv commitment to European standards, promoting the development of our customers and the region in general. We, as a responsible bank with a balanced approach of doing business, provide high quality services, promote a culture of bank savings, guarantee effective corporate governance, efficiency of all operations and continuous development.

Our shareholders are convinced that a professional bank should avoid conflicts of interest, as well as serve all customers who share its principles of sustainable development and act responsibly and transparently in all matters.

Customer service at this level is possible only due to the strong motivation and full dedication of the Bank's staff, who are constantly developing professionally and receive a decent reward. The bank's strategy is to be an interesting and reliable employer-partner, which promotes the development of its employees and provides an atmosphere for professional and personal growth, responsibility and initiative.

### 1.2. Our customers

Bank offers services to individuals and legal entities that share its principles of long-term economic growth and development of Western Ukraine. The main focus is on servicing Small and Medium Business. Due to their flexibility, innovation and connection with the local culture, such enterprises are the drivers of economic growth and provide jobs. Particular emphasis is placed on the manufacturing sector, in particular on agricultural producers, who make a significant contribution to the economy of Ukraine in terms of production and number of jobs. Our bank does not work with companies whose activities harm the environment or society.

Bank serves individuals, including employees, retirees, students, and business owners, offering convenient and reliable financial services according to their needs. The bank's flexible and attractive deposit products guide investment in the region's real economy and prosperity. The Bank offers services of financing individuals, including loans to improve housing conditions and energy efficiency projects.

We work to ensure that our customers quickly receive modern services based on the best banking traditions.

Attention to customers is a basic principle of the Bank, our services and methods of doing business are aimed at meeting customer needs. Efficiency, transparency and legality of processes, simplicity and convenience of



banking services and minimal bureaucracy are the basis of our approach to banking. As a regional bank close to its clients, our bank strives to promptly serve each client using an individual approach.

### 1.3. Our employees

Bank is headed by an experienced and efficient team of professionals who are doing everything possible to meet customer needs. For those who adhere to the principles of responsibility, transparency and openness, the bank offers long-term, reliable employment, which provides effective development programs at all levels, and a decent reward. The main provisions of the Code of our employees are customer loyalty, respect for colleagues, professional growth, team spirit. The spirit of the company is the energy of business!

Bank attracts and evaluates staff based on the principle of equality. All employees have the same opportunities throughout their careers at the Bank.

### 1.4. Our shareholders

Our shareholders are convinced that the bank should exist as a financial institution with a long-term vision for the development of Western Ukraine. Our main goal is continuous organic growth, servicing the local economy and stimulating its development, as well as a healthy structural profitability of the bank, which ensures stability and reliability. Shareholders want the Bank to become a regional leader in the market of banking services for small and medium-sized businesses due to systematic investments in the economy of Western Ukraine.

### 1.5. Values

Bank strives for certain principles and values that set standards and guide our thinking, determine our behavior, support business operations. Our core values are:

**People** - we value people above all else. We strive for personal development and dignity. We listen carefully to everyone to learn how we can become better every day. Our success is determined by the focus and energy that our team puts into the work.

Our business model is customer-focused because we are service providers. We are responsible and strive to add value to our customers: by supporting customers in achieving new opportunities or in improving their quality of life.

**Quality** - we understand the needs and expectations of our customers, stakeholders and external partners. We constantly remember this and set ourselves a greater goal. We strive to go beyond expectations. Our employees are personally responsible for the quality of their work. We also expect our employees to be results-oriented and provide high-quality customer service. We consider the main quality criteria as:

Quality communication, quality of information, speed and quality of decisions and customer service. The professionalism of our employees is one of the key success factors in achieving this goal.

**Sustainability** - we define sustainability as the Bank's ability to withstand stressful situations while maintaining its core functions. This also applies to the ability to recover quickly and effectively from destructive events and the ability to withstand stressful situations. Bank has its own history and identity, which has been building strong "muscles" for many years. Working in unpredictable and unstable economic conditions, we continue to set new goals and achieve our goals. Difficulties make us better.

**Responsibility** - by taking responsibility, we adhere to the highest ethical standards in every policy, procedure and agreement. Social responsibility and tolerance apply to colleagues and business relationships with clients. In our daily activities, responsibility can be observed in the following areas:



- Responsible lending operations. We do not lend to customers' debts. We assess and finance the real needs of the Client.
- We use a win-win approach for all parties involved. We do not enter into an agreement if one of the parties does not benefit from the agreement.
- We do not seek to maximize profits at any cost.
- We do not fund: activities related to harmful or exploitative forms of forced labor; production or trade in any product or activity recognized as illegal in accordance with laws, regulations; dangerous industry; gambling, casinos;

We are responsible for our actions.

**Transparency.** We provide transparent information to our customers, the general public and our employees. Within the Bank, we have an open door policy. All necessary information is available. Transparency concerns not only the content but also the way information is provided.

## **2. OBLIGATORY NORMS OF CONDUCT. RESPONSIBILITY FOR VIOLATION OF THESE NORMS**

### **2.1. Mandatory rules of conduct.**

All employees of the Bank, including managers, adhere to the highest standards in their own behavior. The highest standards include a strong personal commitment to act with unquestioning honesty, integrity and respect in all dealings with colleagues, clients and the public. Employees must act in accordance with applicable law and all internal procedures of the Bank. By their actions, employees must not violate the rules governing the activities of the bank and this Code. The actions of employees should not create a conflict of interest or damage their reputation, colleagues and shareholders of the Bank.

All customers, third parties and employees have the right to fair and equal treatment, regardless of race, color, language, political or religious affiliation, gender, sexual orientation, national origin or culture. Our employees must always act fairly, decently, honestly and openly, respect the views of others and treat everyone with equality and dignity, regardless of gender, race, color, language, political beliefs, religion, marital status, disability, age or sexual orientation. Discrimination and persecution are unacceptable.

In the performance of their professional duties, employees must be guided by common sense. The Bank's employees must strictly adhere to the generally accepted ethical norms of behavior, etiquette of business communication in daily cooperation with clients, partners and colleagues.

The Bank's employees must:

- competently, timely, effectively, honestly and responsibly perform their duties, decisions and instructions of the Bank's Management;
- refrain from executing decisions or instructions if they contradict the requirements of the legislation or the Bank's documents, and notify the Compliance Department of such cases;
- immediately report any possible risks to the Bank's immediate supervisor, the Compliance Department or the employees responsible for risk management;
- facilitate internal or external official inspections, not conceal, distort information or refuse to provide the information necessary for the proper conduct of such inspections.

Mandatory code of conduct for Managers:

- be an example to others and act in accordance with the highest standards of corporate ethics and professional conduct;
- regularly remind their subordinates about the importance of corporate culture and the need to comply with it;



- pay special attention to situations or actions that may violate the requirements of this Code or internal regulations;
- not to commit and not to allow persecution of any of the employees on behalf of the Bank and to inform their subordinates about the prohibition of persecution in the Bank.

## **2.2. Responsibility.**

Compliance with the standards set out in this Code and the Bank's internal regulations is a prerequisite for working in the Bank. Therefore, each employee of the Bank carefully studies and strictly adheres to the provisions of this Code, internal regulations of the Bank and the requirements of the legislation.

Upon hiring, each Employee must sign a commitment of the Bank's employee to familiarize himself with the Code.

Each employee of the Bank is personally responsible for strict compliance with the requirements of this Code. Violation of the rules of the Code, internal regulations may lead to disciplinary action, including the immediate termination of employment with the Bank. In addition, employees are personally liable for any illegal actions they perform while working at the Bank. Employees may also be liable for the actions (or omissions) of others if the employee knew or should have known about their misconduct or actions.

## **3. STANDARDS ON THE PROHIBITION OF ILLEGAL ACTIVITIES**

### **3.1. Submission of unreliable financial and statistical reports.**

The Bank prepares, submits and publishes its financial statements in accordance with generally accepted accounting principles and in accordance with the current legislation of Ukraine. The reports should contain the financial position of the Bank and the results of its operations in all relevant respects, thereby providing reliable information to its investors. The Bank reflects all financial transactions in strict compliance with accounting and reporting requirements, including the exclusion of forged primary accounting documents and unreliable accounting entries. An employee of the Bank who has information about violations of the principles of accounting and reporting, including waste of funds, property of the Bank, must immediately notify the immediate supervisor, the Compliance Department, the Internal Audit Department and the Management and relevant departments of the Bank.

### **3.2. Official crime, economic crime (fraud).**

The Bank will not tolerate fraud or abuse in any form or under any circumstances. If employees become aware of any cases of fraud and dishonesty, they must immediately notify the Compliance Department, Internal Audit Department and the Bank's Management in order to enable the Bank to take the necessary measures. Responsibility for avoiding fraud and adherence to any type of fraud or abuse extends to all staff, regardless of position or experience.

### **3.3. Violation of sanctions, counteraction to legalization (laundering) of proceeds from crime, financing of terrorism and financing of proliferation of weapons of mass destruction.**

As the Bank acts as an intermediary or recipient in the provision of financial services in fast and secure transactions for individuals and legal entities, there is a high risk that certain individuals will attempt to conduct transactions through the Bank illegally and / or by committing criminal acts. Prevention of such actions and knowledge of our clients is especially important not only for the Bank, but also in terms of perception of the financial market and capital market. As a result, any illegal action may have unintended consequences for the Bank and the market in terms of negative impact on reputation and potential financial risks. Therefore, the Bank and its employees should take all possible steps to prevent and combat money laundering, terrorist financing and the proliferation of weapons of mass destruction and to obtain complete customer information in accordance with the "Know Your Customer" principle. In their work, the Bank's employees must comply with the provisions of the Law of Ukraine "On Prevention and Counteraction to Legalization (Laundering) of Proceeds from Crime, Financing of Terrorism and Financing of Proliferation of



Weapons of Mass Destruction", Law of Ukraine "On Banks and Banking", Criminal Code of Ukraine, recommendations FATF and the Basel Committee on Banking Supervision, and the Bank's internal policies.

Business relations with individuals or legal entities engaged in trade in certain goods and technologies (including financial services) that are under the influence of sanctions or embargoes may be maintained only in strict accordance with applicable laws on sanctions and embargoes. The Bank has policies, procedures and internal control tools in place to ensure compliance with the law. Each employee is responsible for applying the relevant rules in their daily work.

#### **3.4. Non-competitive practice.**

The bank has many competitors, and employees must achieve their business goals through professional conduct, while avoiding derogatory statements against competitors. The Bank's employees must refrain from making statements that disparage competitors and will not disclose pricing policies under any circumstances. The Bank does not enter into unfair agreements that do not comply with the pricing policy and adheres to the requirements of fair competition practice.

### **4. RISK MANAGEMENT CULTURE POLICY**

The Bank has an effective system for managing the risks that arise in the day-to-day operations of the Bank.

The Bank constantly maintains a high culture of risk management. We require that every employee be prudent and proactively manage risks in their daily work.

The Bank's employees comply with the requirements of the implemented risk management system, including risk management strategy and policy, risk management culture, procedures, methods and other measures of effective risk management.

The Bank provides training and awareness of the Bank's employees on compliance with the law, relevant standards of professional associations, which apply to the Bank, risk management culture, taking into account this Code. All employees of the Bank are trained in compliance with the Code and risk management culture.

### **5. PREVENTION OF VIOLATION OF CONSUMER RIGHTS**

All customers must be treated fairly by the Bank's employees, with the highest standards of customer service. The Bank ensures the observance of consumers' rights in the conditions of fulfillment of the established norms and rules of financial or operational nature by providing the appropriate level of services, as well as by ensuring the inviolability of the rights of consumers of financial services.

The Bank does not provide, without the Client's consent, paid services not stipulated by the terms of the agreements, public rules and tariffs of the Bank.

### **6. PREVENTION OF DAMAGE TO THE PROPERTY OF THE BANK**

Employees must protect and preserve the Bank's assets, use them for their intended purpose and in an appropriate manner.

The Bank's funds and all other assets are used exclusively for the purposes of the Bank and may not serve the personal preferences of any of the employees.

All operations with the Bank's funds must fully comply with the procedures and rules established by the Bank.

The Bank's property should be treated with care and diligence, and employees should prevent damage and aggravation of all emergencies in order to eliminate them in a timely manner. Consumables must be used efficiently.

Employees are required to exercise caution with respect to real estate, equipment and other types of assets (including information, intellectual property, trade secrets and other confidential information) owned by the Bank, customers, suppliers and third parties. Employees must follow established procedures to prevent access to and / or the possibility of using, altering or destroying such assets by unauthorized persons.



Bank employees:

- refrain from using the property and information of the Bank for their own benefit, do not use computers for illegal activities and gambling, and do not access, store, send, post or publish information containing pornography, materials containing promote violence, hatred, terrorism, discrimination, intimidation, and obscene and degrading material;
- do not share their username or passwords with others, use the Bank's computer systems and equipment in compliance with current security measures, do not violate the Bank's security system when transmitting data over the network (for example, by e-mail);

#### **7. PROHIBITION OF USE OF OFFICIAL POSITION. PREVENTION OF CONFLICT OF INTEREST**

None of the employees should use their position or information obtained as a result of their position for private or personal use.

All business decisions must be made in favor of the Bank. Employees should avoid using their rights or administrative powers to obtain personal benefits. In addition, they should make sure that all their actions must be honest, and in any case they should not be qualified or treated as negligence.

All employees are responsible for the positive image of the Bank and the positioning of the Bank to the public.

All external activities of employees should not damage the reputation of the Bank. Before engaging in any external activity for which the employee receives remuneration, or in any public activity, this should be discussed with the immediate supervisor, or employees of the Human Resources Department, or the Bank's management.

The employee has no right to engage in political activity while working or on the Bank's premises. Any political activity of employees should not be related to the activities of the Bank, be advertised or published on its behalf.

Employees must perform their duties honestly, fairly and in accordance with the interests of the Bank. They are responsible for avoiding situations that could lead to a conflict of interest or be interpreted as such.

A conflict of interest is a set of circumstances that creates the risk that a professional judgment or action on a primary interest (the Bank's interest) will undoubtedly affect an additional interest (secondary interest). Secondary interest includes personal gain and is not limited to financial gain, but also to motives such as the desire for professional advancement or the desire to provide services to family and friends.

Regardless of the circumstances, if employees believe that the course of events entails a conflict of interest with their employer, they must immediately report all the facts to their manager and avoid participating in such events. Employees should avoid situations that create obligations or interests that could interfere with an independent valuation in the interests of the Bank.

Each employee must report any interests, debts, or methods of cooperation associated with another organization that may give rise to a conflict of interest. When hiring, all employees must complete and sign a form (Appendix 1), which discloses information about the facilities in which they or close family members have a financial interest, as well as about affiliation or cooperation with third parties and creditors. Every employee must update this form as soon as and when their situation changes.

During their activity on social networks, employees should refrain from any statements that may have a negative impact on the Bank's reputation. The Bank expects its employees to behave in a social manner on behalf of a private individual and to comply with the provisions of this Code, especially when their actions or they may be associated with the Bank, or their opinion or action may be considered as the official position of the Bank

#### **8. PREVENTION OF CORRUPTION AND BRIBERY**

The Bank has adopted the principle of zero tolerance for corruption and bribery, taking a clear stand against non-acceptance of all forms of corruption and providing full support in the fight against corruption.



An employee of the Bank shall not give or accept gifts (money or other material things, services, etc.) for his own incentive to act in the interests of the person who transfers them, or in the interests of third parties, or in circumstances when third parties may regard such an act as an opportunity to influence a business decision or when such an act may be considered a bribe. Employees of the Bank and the Bank as a whole, in carrying out their activities, should avoid situations where it is even possible to suspect that the Bank or its employees influence or try to influence the authorities.

An employee of the Bank should not use his official position to promote (favoring cooperation) the interests of individual partners of the Bank (insurance companies, notaries, property appraisers, etc.), including for the purpose of obtaining additional benefits from the partner.

Bribery or corruption by staff, suppliers or others with whom we do business or who act on our behalf are unacceptable. We do not participate in any transaction if we have reason to believe that it is related to bribery or corruption.

#### **9. GUARANTEES OF EQUALITY OF RELATIONS BETWEEN THE BANK AND ITS CLIENTS, EMPLOYEES, SUPPLIERS AND COMPETITORS**

All customers should be treated fairly, with the highest standards of customer service.

Under no circumstances should customers receive special rates or any other favorable attention that goes beyond what is provided to any other customer.

The Bank strives to meet the expectations of customers and ensure their full satisfaction with the services and products of the Bank.

The Bank's employees provide customers with reliable and comprehensive information, acquaint customers with the benefits and risks associated with the purchase of certain products and services. The Bank's employees adhere to the highest standards of customer service, create a friendly atmosphere in which each customer will be comfortable. Bank employees do not discuss personal issues with colleagues at work or by phone in the presence of the client.

In the process of customer service, no preferences are allowed: the following "queue" approach is established - who applied first, should be provided by banking services first.

The Bank complies with the laws, regulations of Ukraine, as well as international norms on human rights, freedom of association, equal opportunities in employment and the prohibition of forced and child labor.

The Bank adheres to competitive remuneration conditions that support business strategy, values and long-term goals, and provides for measures to avoid conflicts of interest.

Honest and fair recruitment practices not only ensure that the Bank complies with applicable labor laws, but also foster a culture of respect. The bank strives to be a company with the best staff, where people are hired and promoted according to their merits (depending on work results and professional experience), where there are opportunities for development, and where a reasonable balance of work and personal life can be achieved.

The Bank adheres to the principle of providing transparent information to suppliers, the public, regulatory authorities and shareholders.

The Bank provides the public with the most objective and reliable information about the financial condition, achievements and prospects of the Bank's development on the basis of official and approved financial statements.

The Bank strives to promote free and competitive markets and adheres to the rules of fair competition, as well as the rules governing market behavior at the international level.



## 10. GIFTS RESTRICTIONS

Employees of the Bank are not allowed to receive gifts, except for gifts and invitations that are acceptable in certain circumstances, do not affect the objectivity of the recipient's decisions, do not cause a conflict of interest. As an example, such a gift can be corporate products of customers, gifts for the New Year holidays. If the value of the gift is more than the equivalent of UAH 1,000, the recipient is obliged to notify his / her immediate chief and the Compliance Department. In case of receiving gifts, the Bank welcomes the use of the gift together with other colleagues at work, and not for personal use.

If it is impossible to avoid accepting an unauthorized gift or it is uncertain whether such a gift is acceptable in a given situation, the employee is obliged to contact the Head of the Compliance Department and report such a situation. Otherwise, such disputes will be considered by the bank as a violation.

Gifts in the form of cash / cash equivalents (gift certificates, discount cards), bank and precious metals, jewelry, etc. cannot be offered or received under any circumstances. Under no circumstances should corporate gifts, invitations or expenses be such as to be considered (or the intent behind them) a bribe or other inappropriate form of compensation or payment.

## 11. PRINCIPLES OF PROCESSING, STORAGE AND DISSEMINATION OF CONFIDENTIAL AND INSIDER INFORMATION

Employees must comply with bank secrecy requirements. Banking secrecy shall not be disclosed, except in cases and in the manner prescribed by law. Employees are required not to disclose confidential information.

Confidential information is used for commercial purposes only. Discussion of information constituting confidential information is allowed only in cases of collegial decision-making, or when documents containing confidential information are required to obtain a professional / expert opinion drawn up by another employee.

Inside information is prohibited for any purpose other than the Bank's business.

Employees are responsible for the professional processing of information - customer files and all confidential information are stored securely, printed documents are stored on shelves and closed, a "clean table" policy is applied to avoid unintentional disclosure of confidential information, computers must be locked with a password if the employee is far from the workplace.

In cases where the employee requires the use of confidential information during the client's visit or for work outside the office, the employee must ensure that a third party will not be able to access this information.

All electronic communications should be for commercial purposes only.

The Bank monitors the use of electronic means of communication, and will have access to and the right to disclose the content of employee messages, including attachments. Using communication tools, employees agree to disclose to the management and other responsible employees of the Bank any stored electronic files.

Failure to comply with any requirements of this Code regarding electronic communications may result in management taking disciplinary action, including termination of employment.

Employees should not discuss wages or any other confidential information.

Employees are not allowed to send corporate special documents (procedures, customer information, reports, etc.) to external users or other colleagues who do not have the authority to access such documents.

Employees must not use the Bank's electronic channels of communication for personal gain (such as doing business) or any illegal or criminal activity.

An employee should not send information to his private e-mail address, even in order to be able to work outside the office.



When leaving the workplace at the end or during the day, the employee must make sure that confidential information is not left freely available. Documents must be locked, computers turned off or protected by a code.

## **12. ENVIRONMENTAL PROTECTION**

The Bank cares about the environment, and therefore pays attention to the impact of its activities on the environment. Preference is given to businesses that use technologies that do not pollute the environment, as well as suppliers that pay attention to the ecological balance and measurement of relevant indicators.

The Bank takes measures to ensure safe operations, minimizing the negative impact on the environment and reducing carbon emissions. We expect our service and product providers to comply with our standards. We try to do business with environmentally friendly companies. Funding or participating in any operations or projects that pose a risk of long-term significant adverse environmental effects does not correspond to our business conduct.

In making any decision on operations or projects - in particular on financing - the Bank's employees must take into account the potential adverse effects on the environment and the associated potential risk of damage to the Bank's reputation.



## Appendix №1

Surname of the employee	
Name	
Position	
Structural unit	

I. Financial liabilities		
Financial institution (bank)	Debt balance, currency	Monthly payment

II. Financial income (other than the Bank)		
Company	Source of income *	Activity

\*Source of income - wages, dividends, family income from doing business

**I certify that the above information is complete and accurate.**

**I am acquainted with the Code of Conduct and undertake to fully comply with its norms.**

\_\_\_\_\_

*date*

\_\_\_\_\_

*signature*