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CORPORATE CULTURE

POLICY

	CORPORATE CULTURE POLICY	POL 15	<i>Edition 2</i>	
		<i>Approval date</i>	<i>Date of entry into force</i>	<i>Page 2/12</i>
		25.06.2026	03.07.2026	

CONTENT

CHAPTER 1. GENERAL OBJECTIVES	3
CHAPTER 2. PRINCIPLES OF THE BANK'S ACTIVITIES	3
CHAPTER 3. RELATIONSHIPS WITH CUSTOMERS	4
CHAPTER 4. BASIC CONDITIONS FOR ENSURING QUALITY CORPORATE GOVERNANCE	4
CHAPTER 5. RELATIONSHIPS BETWEEN MANAGERS AND SUBORDINATES	4
CHAPTER 6. BUSINESS ETHICS	5
CHAPTER 7. WORKING TIME AND ITS UTILIZATION	5
CHAPTER 8. OPPORTUNITIES FOR PROFESSIONAL DEVELOPMENT AND ADVANCEMENT OF BANK STAFF	6
CHAPTER 9. UNIFORM CORPORATE STYLE.....	6
CHAPTER 10. CORPORATE HOLIDAYS AND EVENTS.....	6
CHAPTER 11. GIFTS AND REWARDS.....	7
CHAPTER 12. CONFLICT OF INTEREST	7
CHAPTER 13. PREVENTION OF CORRUPTION.....	8
CHAPTER 14. EXCLUSION OF DISCRIMINATION AND HARASSMENT.....	8
CHAPTER 15. PROTECTION OF THE BANK'S PROPERTY.....	10
CHAPTER 16. POLITICAL ACTIVITY	10
CHAPTER 17. RELATIONS WITH THE MEDIA	10
CHAPTER 18. OTHER PROVISIONS.....	11
CHAPTER 19. RESPONSIBILITY	11
CHAPTER 20. TRANSITIONAL PROVISIONS.....	11

	CORPORATE CULTURE POLICY	POL 15	Edition 2	
		Approval date	Date of entry into force	Page 3/12
		25.06.2026	03.07.2026	

PURPOSE

The purpose of the "Corporate Culture Policy" (hereinafter referred to as the Policy) is to define the operational principles of "UNIBANK" OJSC (hereinafter referred to as the Bank), the relationships between management and staff, the rules of conduct for the Bank's employees, and the requirements presented to them.

SCOPE OF APPLICATION

The requirements of this Policy apply to all managers and employees of the Bank.

RELATED DOCUMENTS

Personnel Management Policy	POL 10
Personnel Management Procedure	

CHAPTER 1. GENERAL OBJECTIVES

1.1. The objective of this policy is to confirm the Bank's commitment to the preservation of ethics, principles, rules, and the provisions and requirements of RA (Republic of Armenia) legislation, which allow for the conduct of successful business.

1.2. Corporate culture is the integrity of material and spiritual values created during the work activities of the Bank's employees, which serves as the foundation for the organization's rules of conduct and professional culture. Corporate culture, as a systematic concept, is formed by both external and internal impulses.

1.2.1. The external impulse is the Bank's value system - the information intended for the external environment.

1.2.2. Internal impulses are professional customs, the Bank's internal standards and legal acts, protocols, organizational culture, and environment.

1.3. The Bank's employees must be informed of these rules and standards, act in accordance with them, and bear responsibility for non-compliance.

1.4. Division heads exercise supervision over the maintenance of ethical norms by the Bank's employees.

1.5. In case of violation of the provisions and requirements of this policy, disciplinary measures may be applied to the violating employees in accordance with the procedure established by Chapter 9 of the Bank's Personnel Management Procedure.

CHAPTER 2. PRINCIPLES OF THE BANK'S ACTIVITIES

2.1. The primary objective of the Bank's activity is the expansion of the customer base and the assurance of high profitability across all sectors of its operations. The Bank can achieve its goals by upholding the best banking practices and relying on the professionalism of its employees - incorporating new banking tools and modern technologies.

2.2. The Bank's strategic goal is to occupy a leading position in the banking services market of the Republic of Armenia.

2.3. Corporate Values:

2.3.1. **Relationships with Customers:** The Bank ensures high-quality customer service standards and protects the interests of every customer. The Bank is committed to establishing long-term relationships with its customers.

2.3.2. **Relationships with Shareholders:** The Bank implements an open policy in its relations with shareholders and is committed to corporate governance based on the following principles: respecting and ensuring equal rights for all shareholders, protecting their interests, ensuring the timely provision of relevant information, and improving transparency and information accessibility by enhancing the quality of reporting and accounting.

	CORPORATE CULTURE POLICY	POL 15	<i>Edition 2</i>	
		<i>Approval date</i>	<i>Date of entry into force</i>	<i>Page 4/12</i>
		25.06.2026	03.07.2026	

2.3.3. Relationships with Staff: The Bank's staff is the key to the Bank's successful operation. The Bank actively and consistently recruits the best employees into its ranks - regardless of age, gender, religion, beliefs, or nationality - and rewards them for their successes.

2.3.4. Relationships with State Bodies: As a financial institution, the Bank maintains impartiality toward political parties and organizations, conducting its activities in the best interest of its customers and investors.

2.4. The Bank upholds the following principles:

2.4.1. Profitability: The guarantee of the Bank's development is customer orientation and the execution of profitable transactions.

2.4.2. Fairness: The Bank complies with laws, ethical norms, and the rules of conducting fair business, and it performs its duties with due diligence.

2.4.3. High-quality Service: The primary task of all Bank employees is to ensure a high level of customer service.

2.4.4. Formation of a Qualified Staff: The Bank creates conditions for proper and timely communication with customers, a healthy working atmosphere, and compliance with safety rules.

CHAPTER 3. RELATIONSHIPS WITH CUSTOMERS

3.1. The customer is the Bank's primary value. The success of the Bank's operations depends on providing high-quality services to the customer. The Bank is interested in establishing long-term, professional relationships with its customers. When attracting and servicing new customers, the fundamental rule must be considered: "The customer chooses the Bank, and not vice versa."

3.2. The Bank bases its activities on providing individual attention to every customer. While the Bank allows for the existence of a VIP customer group, this should not be conspicuous or negatively affect the quality of service provided to other customers.

3.3. While performing their work duties, the Bank's employee must prioritize the customer's interests over their personal interests and avoid entering into any transaction that could negatively impact the customer's interests or image.

3.4. In contentious situations, it is necessary to be guided by the customer's interest and, whenever possible, resolve the issue in their favor.

3.5. Any information received from a customer is considered a banking secret, and the Bank's employees bear responsibility for its preservation and confidentiality.

CHAPTER 4. BASIC CONDITIONS FOR ENSURING QUALITY CORPORATE GOVERNANCE

4.1. The basic conditions for ensuring quality corporate governance are:

4.1.1. The existence of an understandable management structure, a clear separation of duties and rights, the scope of responsibility for each manager for a specific direction, the presence of transparent relationships between shareholders and management bodies, and a clear demarcation of powers.

4.1.2. The development of the Bank's strategic development goal and activities directed toward achieving it by all managers, consciousness of the Bank's mission in the service market, and the fulfillment of tasks set by the shareholders.

4.1.3. The implementation of a fair motivational system for staff in all divisions, and the periodic evaluation of each division's activities.

4.1.4. The building of a polite corporate culture and corporate style in both the Bank's internal and external environments.

CHAPTER 5. RELATIONSHIPS BETWEEN MANAGERS AND SUBORDINATES

5.1. The Bank's management creates the necessary conditions for employees to properly implement the tasks and responsibilities set before them.

5.2. The manager gives instructions to subordinates and ensures their engagement throughout the entire workday.

	CORPORATE CULTURE POLICY	POL 15	<i>Edition 2</i>	
		<i>Approval date</i>	<i>Date of entry into force</i>	<i>Page 5/12</i>
		25.06.2026	03.07.2026	

5.3. Management encourages and supports innovation and creativity while employees are performing their operations and duties.

5.4. Each employee's role and degree of responsibility are determined by their job description, the orders of their managers, and the regulations of their specific department.

5.5. The reward system is based on accounting for the results achieved by each employee and evaluating each employee's individual contribution to the overall results of the Bank's activities.

5.6. A Bank employee must work fairly and in good faith, properly perform their official duties, bear responsibility for the results of their work, maintain labor discipline, and adhere to corporate conduct. Employees must timely and correctly implement the orders of the Bank's management and their immediate supervisor, and refrain from incorrect or unprofessional behavior toward other employees.

5.7. If an employee has failed to execute the manager's instructions, the manager must take appropriate measures to exclude the recurrence of such phenomena and ensure the performance of all instructions and assignments in the future.

5.8. Every employee of the Bank bears responsibility for the preservation of the documents and material assets entrusted to them.

5.9. Staff management forms a personnel reserve from employees with various qualifications. The primary criteria for promotion are specific successes and the growth of professional capabilities.

5.10. Meetings and gatherings may be organized with the Bank's management and the heads of structural and territorial subdivisions. Additionally, various off-site workshops for middle management and work discussions in informal settings outside the Bank may be arranged. These provide excellent opportunities for colleagues working at the Bank to exchange experience, knowledge, and ideas, and to foster closer professional bonds.

CHAPTER 6. BUSINESS ETHICS

6.1. The Bank's management strives to develop a sense of participation in the Bank's successes among subordinates by creating a collective of like-minded individuals aimed at the implementation of strategic goals and tasks.

6.2. The manager must attempt to support employees to the maximum extent during the performance of their duties and provide advice to colleagues when necessary. The Bank's managers are obligated to respect the merits of their subordinates, show interest in their vital concerns, and acknowledge and encourage the success of each subdivision or employee.

6.3. Bank employees must not perform actions that could cause material damage to the Bank or lead to the discredit of the Bank's reputation and business standing.

6.4. Bank employees must plan their work and coordinate their actions with colleagues and interacting subdivisions.

6.5. In any situation, an employee must act and be guided by the principles of loyalty to the Bank and fairness.

6.6. Any question related to a standard transaction must be discussed with the immediate supervisor.

6.7. All information that an employee receives while working at the Bank is confidential and constitutes a banking secret, for the preservation of which the employee bears responsibility.

6.8. Employees are prohibited from using their own bank accounts or the accounts of affiliated persons for receiving, circulating, cashing, or performing similar actions with the funds of customers or other persons. Likewise, they are prohibited from receiving or sending funds belonging to customers or other persons in their own name or in the name of affiliated persons - with or without opening an account - for the purpose of subsequent circulation and/or providing them to the customer or another person.

CHAPTER 7. WORKING TIME AND ITS UTILIZATION

7.1. The executive body of the Bank determines the work regime (schedule) of the Bank's employees.

7.2. Primarily, a five-day workweek with two days off is established for employees at the Bank. For certain subdivisions or employees, a six-day workweek with one day off is established.

	CORPORATE CULTURE POLICY	POL 15	Edition 2	
		Approval date	Date of entry into force	Page 6/12
		25.06.2026	03.07.2026	

7.3. The Bank pays for employees' vacations and periods of temporary disability (sick leave) in accordance with the legislation of the Republic of Armenia.

CHAPTER 8. OPPORTUNITIES FOR PROFESSIONAL DEVELOPMENT AND ADVANCEMENT OF BANK STAFF

8.1. The Bank ensures equal economic and social opportunities for all employees, and respect for human dignity is a necessary condition for their development.

8.2. The Bank assumes obligations for the professional training and qualification enhancement of its core staff, the organization of professional rotation programs, the advancement of promising candidates, and the implementation of financial assistance programs for Bank employees.

8.3. The advancement of employees in the Bank depends on themselves - their abilities and experience - and is not related to nationality, gender, origin, age, or physical disabilities. The remuneration of employees is also carried out according to this principle.

CHAPTER 9. UNIFORM CORPORATE STYLE

9.1. The Bank is guided by the principle of maintaining a uniform, clear corporate style in all spheres of activity: office design, the appearance and attire of service personnel, the tools offered, and the attitude toward customers.

9.2. The corporate colors are yellow and blue.

9.3. Any rule regarding the appearance of the Bank's employees applies to everyone without exception.

9.4. All Bank employees involved in the customer service sector must adhere to a strict business dress code throughout the entire workday.

- For men: A business suit, tie, and shoes in non-bright tones.
- For women: A business suit, dress, white blouse, skirt, or trousers in dark tones.

The use of bright, conspicuous colored clothing is prohibited, with the exception of the Bank's corporate colors.

9.5. Bank employees not directly involved in customer service may present themselves at work in both business and semi-business (smart casual) attire.

- For men: The absence of a business suit and tie is permissible; shirts in non-bright tones, neat trousers without tears or holes (including jeans), and appropriate shoes are allowed.
- For women: Suits or dresses (skirts) in non-bright tones, blouses, and neat trousers without tears or holes (including jeans) are permissible. Large, conspicuous accessories should be avoided, and makeup should be subtle.

9.6. Periodically, rules for corporate clothing may be established at the Bank, such as declaring a "Corporate Shirt Day," which is mandatory for all Bank employees, including managers.

9.7. Office supplies or stationery advertising other competing organizations within the financial and banking sector must not be used in the Bank.

CHAPTER 10. CORPORATE HOLIDAYS AND EVENTS

10.1. One of the most important factors in forming corporate culture is the celebration of traditional holidays and the organization of festivities. The Bank may celebrate the Bank's Foundation Day, New Year and Christmas, International Women's Day, Bank Employee Day, Labor Day, Children's Protection Day, and International Savings Day. These events may be organized both on the Bank's premises and off-site, and may be attended not only by Bank employees but also by invited persons—the Bank's shareholders, customers, and representatives of partner organizations.

10.2. The program for corporate events is developed by the members of the Bank's Management Board in cooperation with the Human Resources Management Department, and it is approved by the Personnel Evaluation Committee.

10.3. All events and memorable moments of the Bank are photographed and posted on the internal corporate network, to which all employees have access.

	CORPORATE CULTURE POLICY	POL 15	<i>Edition 2</i>	
		<i>Approval date</i>	<i>Date of entry into force</i>	<i>Page 7/12</i>
		25.06.2026	03.07.2026	

10.4. Employees' birthdays may also be celebrated at the Bank; however, these are organized only during break hours, and only light celebrations are permitted.

10.5. The Bank's Human Resources Management Department, on behalf of the Bank, congratulates the respective employee on their birthday in advance via the internal network using a corporate electronic card.

CHAPTER 11. GIFTS AND REWARDS

11.1. It is prohibited to accept from or give to the Bank's customers, their representatives, or third parties any gifts or services of any kind as a token of gratitude for a provided service or advice. If a Bank employee is offered a gift (service) in a specific situation (for example, during a presentation or other major public event) and a refusal could lead to negative consequences for the work, the fact of accepting such a gift (service) must be reported to the immediate supervisor.

11.2. Meals, drinks, hotel and ticket expenses, as well as payments for various events (exhibitions, performances, etc.) that arise during the course of business meetings or consultations, may be paid for by a partner.

CHAPTER 12. CONFLICT OF INTEREST

12.1. The Bank's managers and employees must not engage in any activity that leads to a conflict of interest with the Bank. Furthermore, employees must not be involved in such activities directly or indirectly - whether in their own name, through a family member, or via any other person. Family members are considered to be: father, mother, spouse, spouse's parents, grandmother, grandfather, sister, brother, children, and the children of a sister or brother.

12.2. A Bank employee must not use the Bank's reputation for their own interests or for the interests of others.

12.3. The Bank's managers must not use their positions to secure employment for family members.

12.4. Family members employed at the Bank cannot work under each other's direct supervision. Family members of the Bank's Board and Management Board members cannot work at the Bank at all. Any exception to these provisions must be approved by the Bank's Board.

12.5. In the event that a family is formed during the course of employment at the Bank, the Bank's Management Board shall establish a timeframe for either transferring one of the family members to another position or terminating their employment contract.

12.6. Every new employee joining the Bank must complete a specialized employee card, which must include at least the following information:

- a. By whose recommendation they were hired;
- b. Data regarding their family members currently working at the Bank.

12.7. The following restrictions exist:

12.7.1. A Bank employee - acting in their own name, or on behalf of a family member or any other person as defined in clause 12.1 - cannot act as an owner, partner, or director of any organization without the prior written permission of the Bank's Management Board or the Board. When granting such permission, the following factors are taken into account:

When granting permission for an employee to hold external positions or ownership, the following criteria are evaluated:

- a. Whether it might interfere with the employee's ability to perform their duties and obligations to the Bank.
- b. Whether it would be beneficial for the employee and the Bank from a professional experience and skills acquisition standpoint.
- c. Whether there is a possibility that the relationship between the employee and the Bank could be exploited by another company to acquire capital or obtain other benefits/income.

12.7.2. A Bank employee may not own 50% or more of the shares of any organization that is a customer of the Bank, or have other investments in such an organization, if those investments could interfere with the employee's performance of their duties to the Bank or lead to a conflict of interest.

	CORPORATE CULTURE POLICY	POL 15	<i>Edition 2</i>	
		<i>Approval date</i>	<i>Date of entry into force</i>	<i>Page 8/12</i>
		25.06.2026	03.07.2026	

12.7.3. A Bank employee cannot be an owner, partner, director, or employee of an organization that is a customer of the Bank without the permission (verbal or written) of the Bank's Management Board or the Board.

12.8. Bank employees are prohibited from entering into business relationships with customers and/or taking any steps that could be viewed as mediation or as assistance to customers in bypassing the Bank's current internal legal acts or creating more favorable conditions for them.

12.9. Bank employees are prohibited from conducting monthly transactions exceeding 10 million AMD or the equivalent in foreign currency within the branch where they are employed. This restriction applies to all accounts, including those held as an individual entrepreneur or under any other type of business activity.

12.10. It is prohibited to sell property acquired through foreclosure via non-public notification or direct sale to any party where a potential conflict of interest may exist (including Bank employees, their family members, and third parties involved in the foreclosure process (agents)). This restriction does not apply if the property is sold through a public notification (auction) or if the property being sold is already owned by the Bank.

12.11. A Bank employee may not use the Bank's name, or lists of customers and employees, for non-work-related purposes.

12.12. In all cases where it is necessary to utilize the services of another person or company as a consultant, it must be ensured that there is no conflict of interest between that person or company and the Bank that could lead to a conflict.

12.13. Bank employees are obligated to inform their immediate supervisors regarding any other (overtime/secondary) work they perform.

12.14. If the Bank's Management Board decides that an employee's external activity violates the aforementioned conditions, the employee shall not have the right to combine that activity with their work at the Bank.

12.15. The main measures aimed at preventing conflicts of interest during the performance of banking activities are:

12.15.1. The maintenance and observance by the Bank's managers and employees of the requirements and procedures established by the Bank's Charter, regulations, and other internal legal documents governing banking operations and transactions.

12.15.2. The establishment and maintenance of an organizational structure that clearly segregates the duties, authorities, and accountability of employees and managers.

12.15.3. The exclusion of actions that may lead to a conflict of interest: the Bank's managers and employees must refrain from participating in or approving actions and transactions that are in any way related to themselves or their family members.

12.15.4. It is prohibited to use or transfer official (confidential) information to third parties for the purpose of concluding transactions.

CHAPTER 13. PREVENTION OF CORRUPTION

13.1. In its activities, the Bank is guided by the principle of preventing and combating corruption (the principle of zero tolerance).

13.2. The Bank also expects the application of the zero-tolerance principle toward corruption from its customers, partners, and suppliers.

13.3. The Bank has an Anti-Corruption Strategy implementation procedure, through which the control over defined anti-corruption measures and the abuse of official position is carried out by the Bank's Management Board.

CHAPTER 14. EXCLUSION OF DISCRIMINATION AND HARASSMENT

14.1. The Bank treats its employees and job applicants equally and without any discrimination.

14.2. Discrimination is defined as any direct or indirect distinction, exclusion, or restriction based on sex, race, skin color, ethnic or social origin, genetic characteristics, marital status, language, religion, worldview, political or other views, belonging to a national minority, property status, birth, disability, age, or other circumstances of a personal or social nature, the purpose or result of which is the manifestation

	CORPORATE CULTURE POLICY	POL 15	Edition 2	
		Approval date	Date of entry into force	Page 9/12
		25.06.2026	03.07.2026	

of less favorable treatment in the origin, change, and/or termination of collective and/or individual labor relations, or the obstruction or denial of the recognition and/or implementation of any right defined by labor legislation on an equal basis with others. An exception is made in cases where such distinction, exclusion, or restriction is objectively justified by a legitimate aim, and the means of achieving that aim are proportionate and necessary. Such a policy does not prevent the Bank from rewarding, transferring to another department, sending for training, or dismissing any employee based on their demonstrated performance results or shortcomings.

14.3. Discrimination and harassment can manifest in many forms and affect both the opportunity and accessibility of employment, as well as the treatment of employees after they are hired.

14.4. Discrimination and harassment can be direct or indirect and can arise in various situations and circumstances.

14.5. All managers and employees of the Bank are obligated to contribute to the creation of a fair, equal, and non-discriminatory culture.

14.6. All Bank employees must treat their colleagues with respect.

14.7. The Bank's managers and employees must oppose and prevent any direct or indirect intimidation, harassment, or discrimination.

14.8. In implementing measures aimed at excluding discrimination and harassment, the Bank is guided by the following core principles adopted by it:

1. **Equal Opportunities and Fair Treatment:** The Bank strives to ensure that the processes of employee recruitment and hiring, remuneration and compensation (including salary and benefits), employment, appointments, internal job rotations, promotion, employee training, general working conditions, and the conditions for termination of employment or retirement are fair, transparent, and inclusive for everyone.

1.1. The Bank expects all employees, especially management personnel, to actively support the implementation of the equal opportunity policy.

2. **Exclusion of Discrimination in the Recruitment Process:** Decisions in the Bank are made not on the basis of the applicant's personal characteristics, but on the principles of equal opportunities and fair treatment. The exclusion of discrimination and equal opportunities are based on the principle that all recruitment decisions must be based on the individual's ability to perform the given job, without considering personal characteristics unrelated to the internal requirements of the work.

2.1. The Bank prohibits discrimination against any employee or job applicant on the basis of age, including individuals aged 40 and older. Employment decisions—such as recruitment, compensation, training, benefits, and termination—shall be based exclusively on qualifications, performance, and business requirements, without regard to age.

2.2. Avoiding discrimination in the recruitment process does not only mean satisfying legal requirements, but also making decisions based on business characteristics and the qualifications, skills, and experience of individuals, which makes it possible to attract the strongest candidates.

2.3. The Bank does not ask applicants or its employees, nor does it require them, to undergo health or pregnancy tests, or directly or indirectly inquire about their HIV/AIDS status, except in cases where there is a genuine health and safety need strictly related to the requirements of the job. Furthermore, when there is a clear necessity to collect health-related information, measures are taken to ensure the confidentiality of employees' personal data and to protect their privacy rights.

3. **Absence of Discrimination in Remuneration and Promotion Decisions:** In the Bank, remuneration and promotion are based on performance, role, capabilities, and skills. The Bank avoids bias in setting or increasing salaries and ensures equal pay for equal work.

4. **Exclusion of Discrimination and Harassment in the Workplace:** The Bank does not tolerate any form of discrimination, harassment, or improper conduct in the workplace. Violence, insults, and/or humiliation against any person can damage a person's reputation, dignity, integrity, mindset, or jeopardize their professional future, and are strictly prohibited.

5. **Prohibition of Retaliation and Harassment:** The Bank does not excuse harassment or any undesirable conduct that has the purpose or effect of violating a person's dignity, creating a

	CORPORATE CULTURE POLICY	POL 15	Edition 2	
		Approval date	Date of entry into force	Page 10/12
		25.06.2026	03.07.2026	

hostile or offensive environment, or where it can be reasonably expected that an individual may experience discomfort, fear, threat, ridicule, humiliation, insult, belittlement, or suffering.

6. *Prohibition of Sexual Harassment:* The Bank does not tolerate sexual harassment or violence, whether explicit or disguised, or any verbal or non-verbal conduct of a sexual nature.

14.9. Every employee, regardless of their position or rank, must be aware that any complaint regarding dishonest or discriminatory treatment will be thoroughly investigated, and steps will be taken to eliminate them, up to and including the termination of the employment contract.

CHAPTER 15. PROTECTION OF THE BANK'S PROPERTY

15.1. The Chairman of the Management Board is responsible, in accordance with the Bank's Charter, for the protection of the Bank's property, the accuracy of facts and data, and the submitted financial statements.

15.2. The objective of current management activities is the preservation of the Bank's property and the achievement of quality financial indicators within the limits of acceptable business risk.

15.3. All transactions are carried out in accordance with the Bank's internal legal acts, approved by the Bank's Management Board or the Board, within the limits of the powers granted to them.

15.4. Each head of a subdivision of the Bank is responsible for the protection of the property of the subdivision (Directorate, Department, Division, Unit, Branch, etc.) managed by them.

15.5. Inventory records of registered property are periodically compared with the actual existing property, and in case of any discrepancies, appropriate measures are taken.

CHAPTER 16. POLITICAL ACTIVITY

16.1. The Bank encourages its employees to be informed voters; they are free in their political views.

16.2. Carrying out any type of agitation on the Bank's premises, including the posting of any type of advertising posters or the distribution of literature for the purpose of supporting party candidates, is prohibited.

16.3. The Bank and its employees cannot provide time for political activities while maintaining the employees' salaries, as this is viewed as a political contribution to the activities of a party.

CHAPTER 17. RELATIONS WITH THE MEDIA

17.1. Information regarding the Bank's internal policies, financial activities, customers, the quantity and quality of employees, their personal characteristics, and salaries constitutes the Bank's confidential information. The dissemination of such information outside the Bank is prohibited.

17.2. A Bank employee has the right to communicate with media representatives only with the permission or knowledge of the Bank's management. The Chairman of the Management Board, members of the Management Board, the Director of the Marketing Department, and the Head of the Public Relations Service have the right to official communication with the media.

17.3. A Bank employee must realize and always remember that any information or viewpoint presented by them is primarily associated with the Bank and its reputation as a serious financial organization in society.

17.4. During personal conversations with the media, a Bank employee provides only officially approved, brief information, which the journalist may verify through reliable sources such as the Bank's website, newsletters, or booklets. During the conversation, the Bank employee must not discuss or criticize the activities of competing banks, senior management, or state bodies; they must be polite in expressing views and opinions and respond to questions with caution and reservation.

17.5. In the event that a conversation concerns controversial information regarding the Bank and its services, distorted or unverified information by management, or confidential matters, the Bank employee is obligated to respectfully apologize to the media representatives, refrain from arguing, and politely advise them to contact the Bank's Public Relations Service.

	CORPORATE CULTURE POLICY	POL 15	<i>Edition 2</i>	
		<i>Approval date</i>	<i>Date of entry into force</i>	<i>Page</i>
		25.06.2026	03.07.2026	11/12

17.6. If a Bank employee is unsure of their competence regarding a specific question from a media representative, they undertake to provide clear, verified, and official information on the matter, approved by the signature of the Bank's management or by the Public Relations Service.

17.7. Bank employee does not have the right to disseminate internal/official information outside of the Bank.

CHAPTER 18. OTHER PROVISIONS

18.1. Bank employees are prohibited from organizing gambling, internet gambling, opening bookmakers, participating in gambling and/or internet gambling, and placing bets on sports or other events, in real-world settings or on online platforms.

18.2. Bank employees must exhibit the utmost restraint on social networks and should not specifically emphasize their workplace and/or position. It is prohibited to make offensive or indecent posts/comments, or to post and disseminate similar photos (videos) that could damage the Bank's reputation or business standing.

18.3. Bank employees are prohibited from engaging in any activity related to cryptocurrency (mining, cashing out, trading, creating a crypto wallet, etc.).

18.4. Bank employees are prohibited from using drugs and/or psychotropic medications, except in cases where such medication is prescribed by a physician. In the event of taking psychotropic medication by medical prescription, the employee must inform the Security Department within one working day, providing supporting documentation.

18.5. Bank employees are prohibited from reporting to work under the influence of alcohol, as well as abusing alcoholic beverages at the workplace and/or during the workday, except during events organized on the occasion of holidays or birthdays, during which the consumption of light alcoholic beverages within moderate limits is permissible.

18.6. A Bank employee must inform their immediate supervisor before applying for a loan at another bank or credit organization if the amount of the said loan exceeds five times their salary.

18.7. A Bank employee must inform their immediate supervisor within three days about the initiation of criminal proceedings against them, as well as the fact of obtaining the status of an accused within the scope of criminal proceedings.

CHAPTER 19. RESPONSIBILITY

19.1. If violations of the requirements defined by this Policy are committed by the employees of the Bank's territorial and structural subdivisions, then by the decision of the Chairman of the Management Board, measures of liability provided by the legislation of the Republic of Armenia and/or the internal legal acts of the Bank may be applied to them.

19.2. Every Bank employee must clearly realize that the violation of the provisions of this document may lead to the application of disciplinary measures, up to and including the termination of the employment contract.

CHAPTER 20. TRANSITIONAL PROVISIONS

20.1. The owner of this Policy is the Compliance Department.

20.2. This policy enters into force from July 3, 2026.

20.3. From the date of entry into force of this Policy, the Corporate Culture Policy, [POL 15.1](#), approved by the decision of the Bank's Board of Directors dated February 10, 2026, is repealed.

