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Introduction

Nowadays, Ethics in Business serves as a mechanism for success. Therefore, a large company should understand that self-esteem and respect of its clients is very important for business development.

Business ethics deals with a set of rules established within a company, which express its moral values and principles. These rules are based on individual values, which must be clearly reflected by its employees, both in the relationship with the client and with each-other. Society as a whole may dictate what is right or wrong, but the ethics of the company is characterized by our values and actions. Given that business life is highly complicated, there is no possibility to create adequate rules comprising all the situations arising in our day-to-day work, therefore, development of specific rules in a code is quite difficult.

Code of Conduct at Credins bank Kosovo represents a set of principles and values that characterize our bank. This Code relies on Credins Bank Kosovo employees and shall reflect the values characterizing our relations with the client, third parties and our colleagues. Any bank employee is aware of the core values of Credins Bank and is cautious in observing these values throughout his day-to-day work. This Code cannot define the appropriate behaviour that each employee may have in each situation, but it relies on each of us in order to provide careful judgement of what is right and adequate for each particular situation.

Our Vision and Mission

The vision of CREDINS Bank Kosovo is to be part of a regional banking network that operates on the commercial principles of performance and sustainability and to be recognized as the Bank with the best service in Kosovo.

CREDINS KOSOVO Bank's mission in Kosovo is to provide quality customer service and build a business with excellent, active people and values that improve living standards.

Our principles and Values

Credins Bank as an institution that operates in coherence with its vision and defined mission, based on written acts, regulations and policies, seeks to promote inherited values to its employees, values that are in compliance with the standards and culture of Credins Bank Kosovo. Therefore, this Code outlines the profile of successful employees at Credins Bank Kosovo, who carry these values, considering this profile as an image to be followed during the career building process of the employee.

At Credins Bank Kosovo, inherited values in the Profile of the Successful Employee identified as "Credins Employee", detailed there-in-after shall not only serve as a guide in mastering these values while progressing in career at Credins Bank, but also as an indicator of the work culture in conformity with the standards required by the Bank. "Credins Employee" is an open and honest person with himself, the colleagues, and Senior Management as well as bank clients, always behaving in such a manner that the trust of the others in his/her honesty, impartiality and effectiveness of service at work, will be maintained and increased.

"Credins Employee" should reflect an individual culture and values based on truth, knowledge, constructive debate, passion for being successful and courage to face or fix the errors. He must be ready for improvement, should have common sense to do the right thing, being totally conscientious for competition, always updated with current developments to increase performance and meet expectations. In the conditions of a modern and competitive banking system, "Credins employee", should be capable

not only in following the highest professional standards and work ethic, but also to increase the contribution in putting added value to banking service. Furthermore, Credins employee should be capable to work under pressure and also offer quick, effective and innovative solutions, in conformity to the dynamic market economy.

With the efforts, contribution, success at the work position “Credins Employee” should feel proud to work in Credins Bank. To accomplish the above mentioned principles all the Bank employees should behave in compliance with some of individual values, which are important for the profile of “Credins Employee”.

Professionalism

Credins bank Kosovo employee should behave in a professional manner. The bank expects high levels of competence and capability to provide the clients with the best service possible. Based on the expertise gained during training and Bank experience, expectation for a professional behavior from Credins Bank Kosovo employee is very high.

Integrity

Credins Bank Kosovo employees should maintain the highest standards of integrity with each other, the company and its clients. Bank employees have access to sensitive information; mutual and strong trust is fundamental for effective team work. Observance of rules, professional ethics and cooperation spirit shall lead to the achievement of our strategic objectives.

Sedulity

Credins Bank Kosovo aims at achieving high standards in its activity. All the employees of the bank should contribute to the achievement of this aim by completing their tasks with honesty and by offering the best of their skills and abilities. Professional and conscientious accomplishment of assignments and duties consists in correct implementation of the rules relating to the activity of the bank. Efforts to achieve the highest possible standards of performance constitute another sedulity standard that employees of Credins Bank Kosovo should possess.

Absolute Honesty

Absolute honesty is another virtue that employees of Credins Kosovo must have both with their interaction with the clients and each-other. Policies of our bank punish harshly false testimonies given by the bank employees, as they are considered as a serious violation of the Code of Conduct and the actions taken may result in immediate termination of the employment contract. Absolute honesty is very important virtue in the business development of Credins Bank Kosovo.

Impartiality

Every employee of Credins Bank Kosovo must act impartially and they should be very cautious that their personal views and beliefs, shall not compromise or appear to compromise the results of the tasks assigned or in the interest of the Bank. Official conduct should always be characterized by objectivity and professionalism.

Conflict of interest

The bank employee should avoid any situation where there is a conflict of interest, as in such situation the loyalty of the employee is divided between the interests of the bank and other personal interests. In compliance with “Policy on the management of the conflicts of interest and the protection of the confidential information”, every employee must sign the “Declaration of conflict of interest”.

Independence

Credins Bank Kosovo employees must represent the bank only and no other institution, business or authority, when in contact with bank clients. If an employee wants to participate in activities beyond the framework of the bank, then, it should have the approval of the CEO, through the Head of the Human Resources Department. The Bank aims that its employees are independent when in contact with the Bank clients.

Trust

Information on the business relations of the bank, negotiations, clients, correspondence, structure, policies, procedures etc. are the property of the bank and consequently no member of the personnel is allowed to disclose this information without proper authorization. In addition, the bank requires sensitive information from the clients in order to make sound business decisions; therefore clients should have maximum trust in the capacity of the bank to protect this good faith. Violation of good faith brings about serious negative consequences in the relationship with the client and for the general objective of the organization. Therefore, it is a very important issue.

Competitors

Employees of Credins Bank Kosovo should not share its policies or the strategy with competitors or any other person out of the bank. Policies and procedures belong to the bank, therefore, sharing bank information with our competitors in the market is a sound reason to terminate immediately the employment contract.

Any violation or alleged violation of good will should be reported as soon as possible to the managing bodies, in order to anticipate any damage that may be caused to the Bank. Furthermore, every case of cheating or alleged cheating should be reported as soon as possible to the governing bodies.

The "Bank employee" should show these qualities both in relation to bank clients and his colleagues, so that the bank provides a good working environment and the relationship with clients be as open and as useful for the bank's business.

Relation with Clients and Third Parties

We at Credins Bank Kosovo are aware that the client and business relationships we have with third parties are extremely important. Therefore, the services we provide should be as efficient as possible for them. Consequently, our values and principles are entirely in the function of providing this service and respecting our relationship with clients and third parties.

Dialogue with the client

Credins Bank Kosovo pays particular importance to continuous and constructive dialogue with the client. Dialogue is necessary, as it enables the Bank to understand what clients expect from the products and services offered and at the same time if the bank can meet the needs of clients. Moreover, dialogue serves as a reliable communication bridge in order to provide the best customer service and establish a mutual trust with clients.

Customer service

The reliable and professional customer service reflects what the bank offers. As a consequence, we at Credins bank Kosovo pay special attention to customer service, which is also observed in the positive evaluations of our clients. Credins Bank Kosovo employees try to meet customer demands whenever possible. At the same time, Credins Bank Kosovo employees should keep the Bank's promises in relation to each client by not differentiating or discriminating anyone.

A good customer service is characterized by professional communication with the client, which is evident when communicating with them. Employees should smile; provide accurate, complete, objective and

simple information, so that it could be understood by all the clients. Communication is very important, as it establishes an excellent business relation and builds mutual trust between the Bank and the clients.

Transparency

Transparency is another important aspect that defines the relationship between Credins Bank Kosovo employees and the clients. We are confident that this transparent relationship provides the possibility of developing a successful and long-term business relationship. Being transparent at Credins Bank means that communication with the client is sincere and direct, enabling him to obtain accurate information for all the products and services offered by the Bank. Employees are aware that they should provide complete, clear and simple information about the products offered by the Bank, and they should enable clients to easily understand the contracts they sign, in order to avoid any misunderstandings.

Inclusion

Policies at Credins Bank Kosovo consider clients equal, without judging them by skin color, nationality, gender, religion, or sexual orientation. Access to our products is valid for all persons who meet the qualifying criteria for the products offered by the Bank. At Credins Bank Kosovo we provide comprehensive opportunities to all social strata of the society, offering products with mitigating criteria, and helping the social strata in need. We believe that the possibility of granting loans to socially vulnerable groups, expresses an essential way of social commitment, giving this category the opportunity to develop.

Confidentiality and data protection

Protection of our clients' data is an aspect of particular importance. Credins Bank Kosovo employees are obliged to treat client information as highly sensitive and confidential. Our Bank does not have available the clients' data for third parties. Our clients' data are disclosed only in the cases when the client has given its prior consent in writing or in cases when the information is required by the supervisory authorities or the judicial system and is protected by law.

Based on the above-mentioned reasons, Credins Bank Kosovo operates with caution during the process of collecting, reviewing, and storing the information. Regarding this issue, the Bank has available high standards of information storage, provided for in the procedures that prevent unauthorized persons from seeing, altering and destroying the information owned by the Bank.

Relationship with Institutions

Credins Bank Kosovo maintains significant relationships with local government institutions and international organizations. The scope of these relationships are communication forms for assessing the implied legal or administrative activity related to the reputation of our Bank. Credins Bank Kosovo responds to any request submitted by trade unions, whether formal or informal, specifying in any case the positions of the bank in relation to important issues. These issues deal with the establishment of dedicated channels for public institutions and international organizations, in order to facilitate our cooperation. At the same time, the Bank represents its interests transparently in all its relations with the institutions. Credins Bank, through special models, ensures prevention of crime against public administration protecting at any time its interests. In addition, Credins Bank Kosovo has given active contribution to initiatives undertaken by state institutions, aiming at the development, stability and fairness of the banking and financial system.

Dealing with customer complaints

Credins Bank Kosovo pays special attention to the issue of dealing with customer complaints. The Book of Complaints is found at every branch of the bank, where clients can write any complaint, dissatisfaction or their opinion. Clients can submit their complaints also via social networks, e-mail address on the bank's

website. Credins Bank Kosovo handles seriously customer complaints taking into account any remarks that serve to improve customer service.

Anti-money laundering and terrorism financing

We at Credins Bank Kosovo give special importance to anti money laundering and terrorism financing. It is the policy of the Bank Credins to exercise its activities in compliance with all laws and regulations against money laundering, financing of terrorism and corruption. In addition, the Bank is responsible for protecting its products and services against the use of money laundering or other unlawful activities. It is the responsibility of each employee of Credins Bank Kosovo to help implement the "Policy on anti-money laundering and terrorism financing of Credins Bank".

Bribery

Credins Bank Kosovo does not tolerate any form of bribery or corruption that may favour certain decisions. Our bank is extremely strict in combating this phenomenon, setting forth strict disciplinary actions for each employee, who favours corruption. Policies at Credins Bank Kosovo do not accept any kind of favour, regardless of the public status of the person offering it. Moreover, Credins Bank Kosovo ensures that all consultants, intermediaries or third parties acting in the interest of the bank, are not involved in bribery or payments for facilitating their business scope with our bank.

Relationship with the Employee

At Credins Bank Kosovo we believe that another important aspect is establishment of a good relationship between colleagues. Since the Bank is a dynamic working environment, it is essential to provide a premise where values and dignity of an individual are respected.

Mutual faith and respect

The main feature of a premise where values and dignity of the individual are respected, are faith and respect. At Credins bank Kosovo there is an environment where colleagues respect the personality and dignity of each person, so that at the bank there is a spirit of mutual trust and loyalty, created by the contribution of each individual. Furthermore, we encourage our employees to avoid personalized conversations, in order to prevent any rumours that may disturb the harmony of the work premise.

Team work

Another main feature having an impact on the establishment of good relationships between colleagues is teamwork. Teamwork provides the possibility of strengthening peer confidence and allows creation of an environment that respects the values and dignity of the individual. We at Credins Bank Kosovo are aware that good communication with colleagues and close cooperation in group, leads to efficiency and facilitates performance of work processes. Exchange of peer experience is another aspect that helps teamwork and provides a collaborative work environment. Given that some colleagues have more experience, an efficient teamwork helps solving out difficult issues and situations we may face during our day-to-day work. We encourage our employees to closely interact with each-other.

Communication

Communication is part of the day-to-day work in a dynamic environment. Communication between colleagues at Credins Bank Kosovo is essential, as work process go through chain links closely related to one another. Employees are required to have professional communication through e-mail correspondence and during the various meetings.

Employment and professional growth

All procedures of Credins Bank Kosovo that cover employment and career of employees are based on justice and professional conduct. These policies prevent any abuse or favoritism that may arise during the

recruitment processes. Our Bank is open to professional development providing training opportunities to improve the staff skills. Employment and professional growth policies of Credins Bank enable the employees to express their individuality and creativity, by getting the best out of them. This is another fundamental aspect that characterizes our bank.

Harassments, threats and violence

Harassment of employees is not tolerated by Credins Bank Kosovo. Undesirable behaviour that is seen by a person as threatening, worrisome, shameful, humiliating or offensive will not be tolerated. It is also important to differentiate harassment from relationship freely established and acceptable to parties. Any form of disgraceful behavior must be seriously taken into consideration because it may lead to poor results and performance and to an unpleasant working environment. In the event of a harassment or threat, employees cannot give their best or work better in a team because of fear of harassment, worries and further abuse. Everyone should feel responsible to challenge any form of harassment and degradation of personal dignity. In case of harassment or discrimination in the bank, all the steps that the employees should follow are well defined at the "Credins Bank grievance policy and procedure".

Another action that will not be tolerated in relationship with the colleagues is violence or threatening behavior's. Violence is an act that is punishable by the law and therefore, Credins Bank Kosovo cannot tolerate or be party of such action. All employees who feel threatened or frightened from violent situation should immediately notify the human Resource Department about their concern.

Abuse of narcotic substances

At Credins Bank Kosovo, it is strictly forbidden the use or possession of narcotic substances during the working hours, at the work place or out of the work place. Possession and use of narcotic substances is illegal and constitutes a reason for immediate termination of the employment contract. Employees are encouraged to discuss any problem they may have with narcotic substances with the Head of Human Resources Department who may help them find the right counselling or take other relevant steps to solve the problem.

At Credins Bank Kosovo, it is strictly prohibited the use of alcohol during working hours or in the workplace.

Relationship with environment and community

Environmental protection is one of our key commitments to fulfil the responsibilities of our bank. We are convinced that Credins Bank Kosovo, through its activity, affects the the environment directly due to the resource consumption and waste emissions, and in our indirect activities which are beyond our direct control.

Given this point, we guarantee full and comprehensive compliance with all legal provisions on environmental protection. Credins Bank Kosovo is a regular contributor to the search of effective solutions for protecting and improving the environment, and to support best practices regarding environmental responsibilities. Credins Bank Kosovo offers lending facilities for businesses which activity is focused on improving the environment.

At Credins bank Kosovo we believe that dialogue with companies has a significant impact on business development. We listen carefully and take into consideration any remarks and opinions about our activity by keeping open the channels of communication aiming at cooperating for common interests.

Implementation of the Code of Conduct

The Code of Conduct is published in the Bank's website, which is accessible for the public. A copy is sent by e-mail to any manager, employee and external co-operator at the moment of appointment or upon the initiation of the work relationship.

We are convinced that public confidence in the honesty and integrity of all staff of Credins Bank Kosovo is crucial. For this reason, the Bank expects its employees to support and promote the principles of this Code. Each employee will be requested to sign a certification form, which confirms the understanding and observance of this Code. Moreover, the Human Resources Department conducts various trainings aiming at delivering the values and principles represented by the Bank, and it also provides means of awareness and information regarding the principals of conduct, which shall be implemented in the day-to-day activity.

Bank encourages all employees to report violations of this Code to the manager of the relevant unit, Head of Human Resources Department or to the person dedicated for the whistleblowers' protection. Employers may choose to report the cases anonymously to the person responsible for the protection of whistleblowers and all reports shall be handled in confidence by him. Pursuant to the policy on whistleblowers' protection, the Bank ensures that employees reporting violation of the Code of Conduct shall be protected and will not suffer any career penalties.

If employees violate any provision of this Code of Conduct, he will be subject to disciplinary action provided for in the Human Resource Manual and Employment Contract.