



INTERBANKING SYSTEMS S.A.

CODE OF ETHICS & CONDUCT

Document Information

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History of Changes

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1.0	28-9-2023	Create the document
2.0	19-02-2026	Addition of improvements, modification following the subordination of the Compliance Function to the Legal and Compliance Department

Related Documents

1. Personal Data Protection Policy
2. Anti-Fraud & Corruption Policy
3. Acceptance and Benefit Offering Policy
4. Anti-Discrimination, Violence & Harassment Policy
5. Report Management Policy
6. Conflict of Interest Prevention and Management Policy
7. Employment Regulation
8. Regulation of Teleworking and Use of Personal Devices (B.Y.O.D.)
9. Procurement Regulation

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Message from the Company's Management

The main concern of DIAS Management and its constant pursuit is the existence of a culture intertwined with the principles of ethics, integrity, transparency and compliance, in full alignment with our principles and values. Our long-term course depends primarily on consistency in relation to our values, principles and ethics, always in relation to the high goals of the services provided by the payment system.

This Code reflects the fundamental principles and rules of professional conduct as it sets a reliable and transparent operating framework, the observance of which by all of us – regardless of area of responsibility and hierarchical level - is a prerequisite for the healthy development of the Company and is the responsibility of all of us.

By putting our values into practice and acting with honesty, impartiality and integrity, we will continue to make DIAS a Company we can be proud of. Our strength is our people and our value system.

Christina Papakonstantinou
Chairman of the Board of
Directors

Stavroula Kampouridou
Chief Executive Officer

I. Introduction

This Code of Ethics & Conduct ("Code") of the Company "Interbanking Systems S.A." (hereinafter: "DIAS" or the "Company") and the relevant rules of ethics and conduct apply to the members of the Board of Directors and all DIAS' personnel, including third parties acting on its behalf. Where reference is hereinafter made to Employees of the Company, all the aforementioned persons are meant, unless the Code contains an explicit provision to the contrary. Every Employee has an obligation to understand the Code and comply with it. Employees also undertake the obligation to comply with the relevant obligations by signing the Employment Contract.

The implementation of the Code aims to:

- strengthening the credibility, solvency and reputation of the Company;
- enhancing the efficiency of its operations;
- further enhancing the quality of the services it provides,
- ensuring a healthy working environment and
- maintaining high standards of behavior for the benefit of both the Employees and the Company.

II. Our Values

The operation of DIAS is governed by the following values, the observance of which contributes to the preservation of its reputation and image, as well as to the fulfillment of its purpose, in the best possible way. The Management is committed to the full compliance of DIAS with the Greek and European legislative and regulatory framework, always following ethical business practices of a high level.

Our Values
• Responsibility, respect for the environment and the principle of sustainable development • Innovation • Team Spirit • Customer-centricity • Non-discrimination/ Equal treatment

1. **Responsibility, respect for the environment and the principle of sustainable development:** Mutual respect, professional conduct and compliance with rules and regulations related to the environment and sustainable development are vital for the protection of the Company's purpose and values. DIAS is an active member of society and supports activities and initiatives of a social nature. A fundamental value for DIAS is the health and safety of its employees, as well as respect for the environment and the cultivation of a culture that promotes sustainability.

2. **Innovation:** The Company uses state-of-the-art, proven technologies and methodologies to develop the service portfolio, not being satisfied with existing practices and perceptions but moving forward with innovative ideas and new approaches.
3. **Team spirit:** The Management encourages and supports the Company's executives to cooperate, to utilize their potential and to achieve results, through teamwork, in an environment of job security.
4. **Customer-Centricity:** The Company is driven by a constant desire to understand and respond to the needs of its customers, providing a friendly and secure financial payment environment.
5. **Non-discrimination/Equal treatment:** The Company fully respects diversity and the right to equal opportunities, while at the same time demonstrating zero tolerance to any form of discrimination. Also, the Company opposes any form of physical, verbal, sexual, psychological or other harassment or violence.

III. Corporate Governance & Compliance

The Company adheres to high standards of corporate governance and transparency and complies with all legal requirements governing the management and control of a public limited company operating in the field of payment systems.

The members of the Board of Directors, the Chief Executive Officer of the Company as well as the executives who have been assigned positions of responsibility must:

- act as role models,
- to ensure compliance with this Code by the Employees and
- To create a work environment where complaints, concerns, thoughts and suggestions are freely expressed.

IV. Human Rights & Labor Practices

The Company respects and supports human rights in accordance with national , European and international law. The Company, within its sphere of influence, supports and respects the protection of human rights and ensures that any kind of discrimination, violation or violation of human rights is avoided.

Any offensive behavior that may diminish the employee's personality and individual integrity is expressly prohibited. Under no circumstances are verbal or physical violence of any kind such as sexual, psychological and moral (mobbing) or situations of bullying of any kind allowed within the workplace.

The Company recruits, evaluates and manages its human resources in a manner consistent with its principles and values and based on objective and meritocratic criteria, without discrimination related to race, gender, religion, age, sexual orientation, ethnicity, political beliefs, trade unionism, social or national origin. It condemns any act originating from its Employees, which may be considered hostile or insulting to the personality of their colleagues or third parties.

In the context of respect for human rights and the constitutionally guaranteed right to health (art. 5 par. 5 S) and in accordance with the requirements and specifications of the provisions of Law 4633/2019, smoking and the consumption of tobacco products in general is prohibited in all the Company's indoor areas without exception. In addition,

DIAS Employees must refrain from consuming alcoholic products or other substances, in all areas of the Company, internal and external, and throughout the performance of their duties.

V. Behavior Standards – Goals

The Company seeks to cultivate a stable, modern and healthy climate both within the corporate environment and in its relations with counterparties, Authorities, external partners and in general all those who come into contact with the Company.

To this end, the Company's Employees, depending on the position and duties assigned to them and regardless of the work they perform, must develop their abilities and skills, in accordance with the following principles, to the extent that corresponds to the nature and location of each one's work:

Orientation the result	in	The orientation to the achievement of the intended results, with persistence and dedication to the achievement of individual, group and operational goals.
Planning		Organize and carry out the work methodically and within the set schedule.
Professional conduct		Demonstration of professional and ethical behavior towards the Company's colleagues, partners and counterparties in accordance with the principles and values of DIAS.
Problem-solving and decision-making		Vigilance to diagnose problems and boldness to highlight possible pathogens, Willingness to seek solutions and any alternative possibilities to deal with the issues with a willingness to change approach, after evaluating the benefits and risks of each option, within the organizational framework of the Company, with the aim of making correct and timely decisions, having rational criteria.
Teamwork/Collaboration		Developing and encouraging a spirit of cooperation, teamwork and solidarity through communication, participation, support and information of colleagues and partners.

Effective Communication	Oral and written communication and exchange of views accurately, clearly and persuasively, rapid and effective listening and responding to questions and requests of Colleagues, partners and counterparties.
Respect of hierarchical structures and the emergence of leadership and administrative skills	Each Employee must follow the instructions of his superiors and show appropriate behavior respecting the hierarchy. Supervisors and managers must demonstrate behavior that inspires, activates and motivates their subordinates and set an example for them, guiding them to improve their performance and achieve optimal results.
Innovation and creativity	Identifying opportunities and taking initiatives to develop and implement new ideas and solutions.
Subject Matter Knowledge	Responding to the requirements of the position, with all possible diligence, so as to ensure that the knowledge and skills required exist to respond to the tasks and execute the projects.

The Supervisors, regardless of the level of responsibility, are required to respect the people they supervise, support and motivate them, so that together they can contribute to the achievement of DIAS' objectives. The example of leadership and the right guidance can ensure the effectiveness of this Code.

VI. Conflict of interest

A conflict of interest means any situation in which personal interests conflict with the interests of the Company, so that they may unfairly and significantly influence the professional judgment, decisions or other actions. It includes any personal or professional case, which could unfairly and significantly affect a person's ability to make a decision based solely on the interests of the Company.

The members of the Board of Directors as well as the executives of DIAS must:

- understand when a conflict of interest situation may arise
- report any actual or potential conflict of interest situation
- are able to make their own prudent, objective and independent decisions and judgments without being influenced by conflicts of interest
- respect the priority of the Company's interests, mainly in relation to their personal interests or the interests of third parties;

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- not pursue their own interests that run counter to the interests of the Company;
 - refrain from taking decisions in cases of conflict of interest

More information can be found in the Conflict of Interest Prevention and Management Policy.

VII. Publicity in the media and social media

The image of the Company is directly linked to the behavior shown by each Employee. Therefore, each Employee must operate in accordance with the values and principles of the Company. In particular, the following are not allowed:

- The disclosure of corporate information that is not publicly available
- Inappropriate comments to social media that could undermine the Company's reputation

Only the Chief Executive Officer or executives expressly authorized by them may communicate with media representatives, or send letters or announcements concerning the company for publication.

Employees must use social media and the internet in a way that does not affect the interests of DIAS. They must ensure when using social media, websites or engaging in online activity that confidential information of DIAS or its customers is not disclosed.

VIII. Remote work

Employees should maintain the confidentiality of information when working remotely and comply with the provisions of the Regulation on Teleworking and Use of Personal Devices (B.Y.O.D.).

IX. Prevention and Combating of Corruption and Bribery

Integrity is a fundamental principle for the Company. All transactions must be conducted in a lawful and ethical manner and in accordance with applicable legislation. DIAS implements a zero-tolerance policy against corruption and fraud. Therefore, any form of corruption or behaviors, acts or omissions that could expose the Company or its reputation to danger or even cause the mere suspicion of corruption is not accepted. The Company's Employees must refrain from any act or omission that could create conditions of unfair activity.

The promise, offer or acceptance of any benefit, in any form whatsoever, directly or indirectly, for the purpose of obtaining financial or any personal or other advantage, to/from a public and/or private employee, with the aim of securing preferential treatment or business advantage is prohibited.

The Company's Employees must immediately report either to the Internal Audit Service or to the Regulatory Compliance Function any incident of possible corruption and bribery. The Company will take the required corrective measures and, if necessary, will impose the relevant sanctions in accordance with the nature of the violation, the applicable law and the employment/cooperation contracts.

For this purpose, the Company has adopted a Fraud & Corruption Policy which specifies these issues.

X. Gifts, Hospitality and Entertainment

Exchanging gifts, hospitality or entertainment with external partners, consultants and other third parties is something that is common in the business world, but it is very important to maintain an equal distance relationship based on objective criteria.

For this purpose, the Company has adopted a Policy on the acceptance and offer of benefits, which sets the relevant framework and regulates the obligations of the Company's Employees.

XI. Equivalent Treatment and elimination of bullying and harassment incidents at the workplace

In accordance with the Employment Regulations of DIAS and the corresponding Policy for combating discrimination, violence and harassment, any form of violence, harassment and discrimination that occurs during work is prohibited whether it is related to or resulting from it, including gender-based violence and harassment and sexual harassment.

XII. Management Information, Data Protection and Business Privacy

Maintaining the confidentiality of information and data is of paramount importance to the Company. The Company's Employees undertake to maintain any professional secrecy that binds them and the confidentiality of any information they receive and to preserve the confidentiality of non-publicly available information concerning the Company as well as information entrusted to the Company by third parties. Finally, it is important for Employees to be aware that business confidentiality obligations exist even after their departure from the Company or the termination of their cooperation with it.

The reporting process is provided by the Reporting Management Policy. In the event that the report is related to a violation of the legislation on personal data, the Data Protection Officer is immediately informed and in accordance with what is stated in the Personal Data Protection Policy.

XIII. Record retention

The correct and accurate keeping of records is a necessary condition for the smooth operation of the Company. In the records, all the information created and used in the context and for the needs of the Company's activity is kept and stored.. The Employees that, due to the nature of the work provided by them, keep records, must ensure their accuracy and completeness. Records are kept in electronic form, with the only exceptions being cases where the keeping of documentary/paper records is required for practical or legal reasons.

XIV. Business Meetings and Conferences

Employees, during their meetings and contacts with third parties (external partners, suppliers, representatives of partner companies or others), must constantly keep in mind that they are acting in their corporate capacity and therefore should behave with decency, professionalism and respect for the hierarchical structure of the Company.

It is the duty of the Directors in particular to always keep the Chief Executive Officer informed of the external communication and cooperation of their Divisions with third parties, in order to ensure that the latter is able to coordinate and monitor the Company's policy on a per-subject basis.

An employee who wishes to participate in a conference or seminar informs his supervisor in advance about the date, the topic and the purpose of his participation. In the case of Directors, the information is addressed to the Chief Executive Officer. During their participation, the participant expresses views that are in accordance with the positions of the Company, as reflected in its administrative decisions and Policies. In the event that personal views are expressed, it is expressly clarified that these are personal positions, which are in no way binding on the Company.

XV. Protection and Use of the Company's assets

The Company's assets and resources should be managed diligently, prudently and responsibly and used solely for its intended business purposes and not for personal gain.

Assets include the Company's tangible (buildings, fixed equipment, consumables) and intangible (information, trade secrets, studies, intellectual property) assets and any other assets at the disposal of the Company's executives and employees for the execution of their work, regardless of the person to whom they belong.

Any text, document and file produced by the Company's Employees or communicated to them, in any form, relating to the Company's activity, belongs to its exclusive ownership. Upon termination or expiration of the employment or cooperation contract or whenever requested by the Company, employees and associates are obliged to hand over the relevant material in their possession.

XVI. Integrity and completeness of financial data and reports

The Company applies high standards for the accurate, correct and complete maintenance of its financial data and reports and seeks and ensures transparency in its financial reports in order to fully reflect the true picture of its financial position and performance. The financial statements are prepared and published in accordance with the relevant Greek legislation and the International Financial Reporting Standards.

XVII. Relations with shareholders

The Company ensures that its shareholders and Investors are provided with reliable and fair information in relation to its activity, operations, growth and objectives.

Through the competent bodies and Divisions, the Company ensures the provision to shareholders of all necessary information and assistance regarding the legal exercise of their rights.

XVIII. Customers and suppliers

Relations with customers and suppliers are governed by a regime of transparency, respect, honesty and integrity.

The treatment of suppliers is equal and impartial and in accordance with the Company's Procurement Manual.

XIX. Environmental Responsibility

The protection and respect of the natural environment are a commitment for the Company. The Company is systematically looking for ways to reduce its environmental footprint, through recycling and control of energy consumption and natural resources.

The Company's Employees are obliged to show particular sensitivity to environmental protection issues and to make every effort to save natural resources where possible. In this context, it is expected to:

- They ensure the reduction of paper prints, making use of the possibilities provided by the system of electronic document handling
- They take care of saving electricity by turning off the office equipment in case of non-use
- They make use of the recycling means provided by the Company.

XX. Adherence to and Compliance with the Code and Corporate Policies

Compliance with the Code is the responsibility of all persons governed by this Code, who must comply with the individual Policies , Regulations and Procedures of the Company and accept and adhere to the principles and rules provided. The Compliance Officer is responsible for monitoring the proper implementation of the Code.

The Code is available on the Company's website as well as in the Company's ESS system where all employees have access and is communicated to the Employees at the time of their recruitment.

Employees, when it comes to their attention, must report any concerns, misconduct, possible violations of the Law, the Code, relevant Policies and in general, any act or omission that could potentially damage DIAS or its reputation to the Whistleblowing Officer W.O.), through the Company's available communication channels and in accordance with the Report Management Policy.

XXI. Penalties

In the event that a violation of the Code actually occurs, the Company proceeds to impose disciplinary penalties as provided for by the DIAS Employment Regulations.

XXII. Education

DIAS is responsible for educating and informing Employees on the issues referred to in the Code of Ethics & Conduct and related Policies, through the preparation of the employee development & training plan.

XXIII. Revision of the Code

The Code is reviewed annually. It is approved and enters into force by the Board of Directors as well as all its amendments or additions and is uploaded on the

Company's website. In case of modification of the Code, the Company ensures that the staff is immediately informed in any appropriate way.

Disclaimer: This is an English translation of the official company text originally drafted in Greek, provided for informational purposes only. In the event of any discrepancy between the Greek and the English versions, the Greek version shall prevail.