



Code of conduct BNG Bank

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Driven by social impact

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1 What is this code of conduct for?

Confidence depends on integrity

To realise our ambitions and preserve our reputation, it is essential that our stakeholders have confidence in us as a bank. That confidence depends on our integrity. This means, for example, that we carefully weigh up the interests of stakeholders and act in a stable, transparent way. Acting with integrity is ingrained in our core values: Sustainable, Reliable and Professional. Needless to say, we comply with laws, rules and internal standards (including this Code of Conduct).

This Code of Conduct is intended to:



Maintain public confidence in BNG Bank. In this document, we provide clarity on a number of the 'quality standards' that are important to BNG Bank;



Guide staff in their work;



Let stakeholders know what they can expect from BNG Bank.

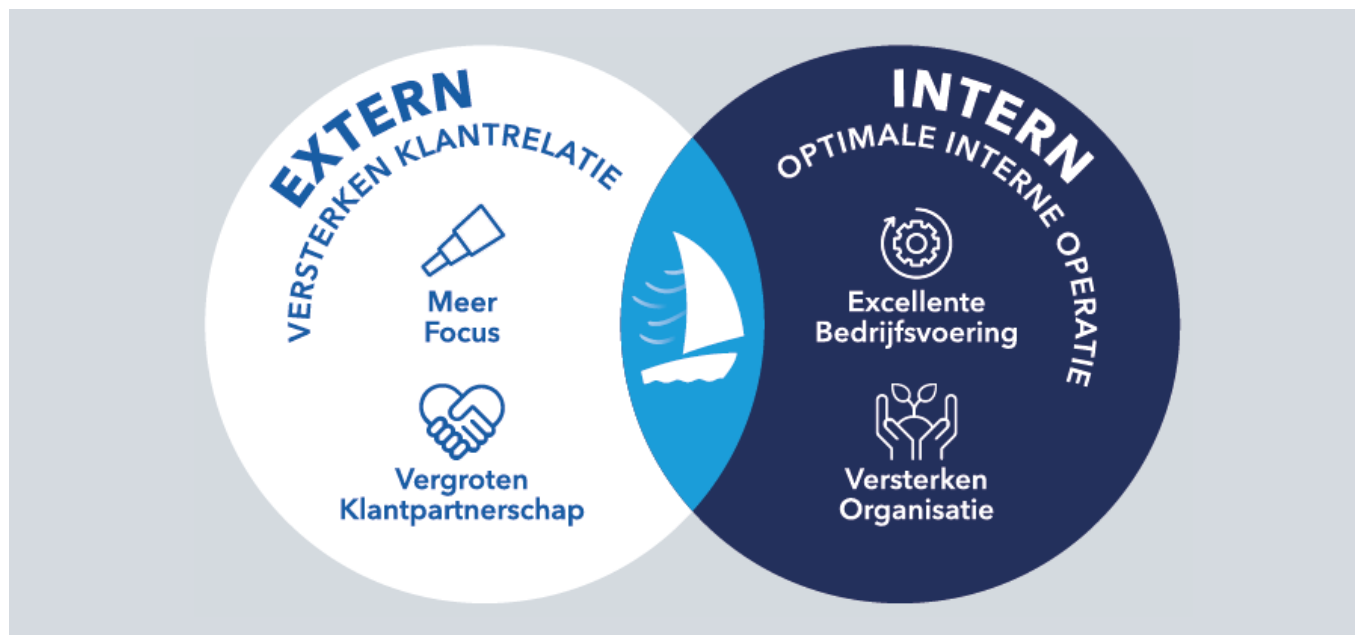
2 We are guided by our core values

At BNG Bank, we value sustainability, reliability and professionalism. Our core values are interwoven with our professional attitude and culture. Naturally, BNG Bank staff have a crucial role to play. Together, they make up BNG Bank.

Organisational culture

We are driven by social impact, and our work with our clients is characterised by sustainability, reliability and professionalism. We connect with one another, we develop as people and professionals and we value who you are and what you contribute.

BNG Bank assumes you will comply with this Code of Conduct. In the unlikely event that you do not, it may lead to a serious conversation with your manager, an official warning, a reprimand or even far-reaching employment law measures. This will be recorded in your personnel file. In the event of a serious breach, you may be dismissed. In the most serious cases, the matter will be referred to the police. A breach may also be recorded in the interbank incident register. Finally, the matter may be reported to the Banking Disciplinary Committee.



3 This is how we interact with our shareholders, clients and other stakeholders

As a bank, BNG Bank performs an important social function, both for our clients and for the public sector. We help improve the sustainability of the public sector by supporting our clients with their financing needs. Some of BNG Bank's clients are also our shareholders. This is one of the special characteristics of BNG Bank. Coordination with our stakeholders (clients, shareholders and staff) is important to us.

Shareholders

- We provide our shareholders with a reasonable return.
- We have a reliable corporate governance structure based on openness and accountability.
- As a bank, we aim to have a social impact.

Clients

- In our work, we always put the client's interests first, even with indirect client contact. We do that by always striking a careful balance in our work between the interests of the client, society, BNG Bank itself, staff members, our investors and other stakeholders.
- We are transparent with our clients about our products and services, and we inform them of the associated costs and risks.
- We know our clients well. Our products are tailored to the needs and profile of the specific client. To do this, we use knowledge obtained from long-term client relationships and from the sectors.
- To be able to serve our clients effectively, we keep our knowledge and experience up to date. We monitor developments in our clients' businesses and sectors and adjust our service delivery accordingly.
- We handle client complaints with care and follow up on them in accordance with our complaints procedure. We see this as an opportunity to improve our service provision.
- Client satisfaction is regularly assessed to improve our service provision.

Suppliers

- We protect fair competition and thus do not make unfair agreements with competitors, particularly concerning prices.
- BNG Bank carries out procurement in accordance with its procurement policy. In the procurement process, we make a careful consideration before selecting or retaining a supplier.
- Outsourcing of services is done in accordance with the outsourcing policy. We make a careful consideration before selecting or retaining an outsourcing partner.

4 We avoid conflicts of interest and corruption in our work

Corruption

- Any form of active or passive corruption is unacceptable.
- Active corruption means that you personally bribe someone. Passive corruption means that you are bribed. For example, you might be given tickets to a football match and in return turn a blind eye to a financing issue.
- We comply with our Anti-Corruption and Conflicts of Interest Policy.

Conflicts of interest

- We do not give or accept business gifts (or invitations to events) worth more than 50 euros or if there is any suspicion of a conflict of interest.
- We do not enter into private agreements with suppliers on terms that are not in line with the market.
- Locations for BNG Bank events are selected according to a policy.
- Ancillary positions are reported and recorded in accordance with our policy, and if there is any conflict of interest, or the appearance of a conflict, they are terminated or performed differently.
- We do not give advantages to acquaintances (whether private or business acquaintances). You can follow this rule by being open about how you work and by raising any potential conflict of interest with your manager in a timely manner.

5 We handle confidential and sensitive information with professionalism

Handling confidential information

- When we join the bank, we take the Banker's Oath and sign a confidentiality agreement.
- We make sure that the data we use in our work are and will remain secure.
- We act in accordance with our privacy policy.
- We report incidents involving personal data and discuss those incidents with our:
 - ✓ Privacy Officers
 - ✓ Data Protection Officer
 - ✓ Security
- We do not act on the basis of information obtained in confidence and/or sensitive information. We follow the Insider Trading Rules.

6 This is how we work together

We are BNG Bank – a bank with a heart. Our employees make an impact on society every day. We work with respect for each other, together and on the basis of trust. Our focus is on simply doing our job well. We are always driven by social impact. We challenge ourselves to continuously develop, as people, as professionals and as an organisation. We do this by working together and keeping in close contact with our clients.

Things we do

- We hold each other accountable, even when this is difficult.
- We give each other both solicited and unsolicited feedback.
- We make sure everyone can speak out safely.
- At BNG Bank, you can be who you really are.
- We value new ideas and fresh perspectives.
- Mistakes and incidents are discussed.
- We perform work for our clients with the necessary competence and dedication. In doing so, we act honestly and with integrity.

Things we don't do

- Undesirable social behaviour is not acceptable. Keep in mind that how the person on the receiving end interprets it is what matters, not how you meant it.
- By 'undesirable behaviour', we mean direct or indirect undesirable remarks or actions that are expressed through verbal, non-verbal or physical behaviour towards another person and are perceived by that person as undesirable and as a violation of their integrity.
- Possible causes of undesirable behaviour include intimidation, sexual harassment, discrimination, aggression, violence and bullying.
- Any form of discrimination is unacceptable. This means that you must treat everyone the same, regardless of appearance, sexual orientation, cultural background, religion, disability or anything else.

If you experience **undesirable behaviour** as a staff member, there are several options for talking about it.

- Confidential advisers (Undesirable Behaviour Complaints Rules and Policy)
- Compliance Misconduct Regulations

7 Together, we bring this code to life

Things we do

- Everyone who comes to work for BNG Bank or performs external activities for our bank receives a copy of our Code of Conduct and this presentation.
- As an organisation, we draw attention to the importance of this code through education and presentations. In doing so, we create awareness of the code and bring it to life.
- How we work with each other and our stakeholders and how we handle confidential information and avoid conflicts of interest should also be topics of discussion within departments and between managers and staff members in the Ongoing Performance Dialogue.
- The Works Council and our confidential advisers also acknowledge the importance of experiencing this code.

And finally:

- Have you found yourself in a situation where you didn't know what to do? Talk it over with your colleagues. This will bring the code to life.
- If you have any questions about this Code of Conduct, contact the Human Resources Department.



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