

## **Compliance Unit**

The Cooperative Bank of Epirus implements a Compliance Policy which aims at the introduction and recording of rules that will contribute to the lawful, proper and uninterrupted operation thereof.

It has been harmonized with the provisions of the Articles of Association of the Bank, as in force, the provisions of its Board of Directors Operation Regulation, as well as the best practices of the principles of corporate governance.

The Bank Management has adopted, through the Compliance Policy, the provisions of the Act of the Governor of the Bank of Greece 2577/2006, as well as the decisions of the Basel Commission concerning the compliance with the terms and rules regulating transactions with customers and proper information of all parties involved. It also follows the instructions of the EBA Guidelines on Corporate Governance.

The Cooperative Bank of Epirus, in implementation of the Act 2577/06 of the Governor of the Bank of Greece and the EBA guidelines, in accordance with the principle of proportionality, decided to optionally establish a **Compliance Unit (CU)** in order to operate as an independent unit and a second line of defense for the rules and procedures for the purposes of timely and continuous compliance of the institution with the applicable regulatory framework at each time and its internal operation regulations.

The Bank assigned to the Head of the CU the implementation of the procedure and the effectiveness relating to the prevention and combat against money laundering and terrorism financing (hereinafter “money laundering”), the powers in respect of this matter are described indicatively in this regulation and in the “Money Laundering” manual in detail. The purpose of the CU is to deal with all kinds of impacts due to any failure of the Bank to comply with the applicable legislative and regulatory framework, the codes of conduct and the self-regulation rules (hereinafter “regulatory framework”).

The CU aims at overcoming the non-compliance risk and makes every effort in order to integrate compliance in the corporate culture (Compliance culture).

The CU is administratively independent in the exercise of its activities and is subject to the Management, reporting to the executive members of the BoD, as defined in the approved organizational chart of the Bank, while the prevention of conflict of interest in the exercise of its powers is ensured and it has unrestricted access to all data and information that is required for fulfilling its mandate.

The CU contact concerns bidirectional information inside and outside of the Organization. The CU is also responsible for the preparation and recommendation to the BoD of the following policies:

- Conflict of Interests Policy
- Record Keeping & Periodic Revisions
- GDPR & Personal Data Protection Legal Framework
- Code of Conduct
- Consumer Protection
- Complaints & Reports Handling Policy (Whistle Blowing)
- Market Manipulation, Secret/Confidential Information Management
- Application of Limited Access Between Business Units (CHINESE WALL)
- Gifts & Personal Benefits
- Personal Transactions
- Transactions with Persons with Special Relationship with the Bank
- Customer complaints and reports handling
- Policies implementation audits
- Outsourcing Policy