

Code of Conduct & Ethics Policy

Version 1.0 | Effective: January 2025

1. Purpose

The Code of Conduct defines the ethical standards and behavioral expectations for all employees, officers, and directors of Global Dot Bank.

2. Core Ethical Standards

- **Integrity:** Act honestly, fairly, and transparently
- **Accountability:** Take responsibility for actions and decisions
- **Fair Dealing:** Treat all clients and colleagues with respect and impartiality
- **Confidentiality:** Protect customer and institutional information
- **Compliance:** Uphold all applicable laws and internal policies

3. Conflict of Interest

Employees must avoid any situation where personal interests conflict with the Bank's interests. All potential conflicts must be disclosed to Compliance.

4. Anti-Bribery & Corruption

Bribes, facilitation payments, and improper advantages are strictly prohibited. GDB complies with the U.K. Bribery Act, U.S. FCPA, and global anti-corruption laws.

5. Whistleblower Protection

GDB maintains a Whistleblower Policy enabling staff and third parties to report misconduct confidentially without fear of retaliation. Reports go directly to the Audit Committee.

6. Compliance with Laws

Every employee must comply with financial, data protection, AML, employment, and environmental laws applicable to their jurisdiction.

7. Enforcement

Violations of this Code may result in disciplinary action, including dismissal, prosecution, or regulatory reporting.

Approved by:
Board of Directors, Global Dot Bank
Date: January 10, 2025