

## **Group Policy on transactions on BOC financial instruments by persons in possession of inside information (Market Abuse) and Group-wide Dealing Policy**

The Group is committed to the highest standards in order to prevent market abuse on BOC financial instruments. In the content of this Policy certain general principles are set out in order to comply with the legal and regulatory framework regarding insider dealing (inside/privileged information) and market abuse and to protect the reputation of the Group as an issuer of financial instruments and the persons possessing inside information for the Group.

In Cyprus and the United Kingdom the market conduct regime is derived from the European Union Market Abuse Regulation (MAR, Regulation (EU) No 596/2014) and this Policy aims to ensure that the Group remains in compliance with MAR. The Policy defines the major roles and responsibilities that have been identified in relation to its implementation.

The Group maintains also a Group-wide Dealing Policy, which applies to all directors and employees of the Bank and its subsidiaries. It is a list of DOs and DON'Ts and it has been designed to ensure that these individuals do not misuse, or place themselves under suspicion of misusing information about the Group and its customers (public companies) which they have and which is not public (i.e. inside information).

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