

**PRAVILNIK O NOTRANJEM SISTEMU ZA PRIJAVO KRŠITEV
(ŽVIŽGAŠTVO)**

**RULES ON INTERNAL SYSTEM FOR REPORTING VIOLATIONS
(WHISTLEBLOWING)**

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Na podlagi 26. in 31. člena statuta Banke Intesa Sanpaolo d.d. (v nadaljevanju: banke) je uprava banke v soglasju z nadzornim svetom sprejela:

Pursuant to Article 26 and 31 of the Articles of Association of Banca Intesa Sanpaolo d.d. (hereinafter: the Bank), the Management Board of the Bank with the consent of the Supervisory Board has adopted:

Pravilnik o notranjem sistemu za prijavo kršitev (žvižgaštvo)

Rules on internal system for reporting violations (Whistleblowing)

1. Uvod / Introduction

V skladu z Zakonom o zaščiti prijaviteljev (ZZPri) - prenos Direktive EU št. 2019/1937 o zaščiti posameznikov, ki prijavijo kršitve prava Evropske Unije in vsebuje določbe o zaščiti posameznikov, ki prijavijo kršitve nacionalnih predpisov (v nadaljevanju: ZZPri) - in z določbami Pravil skupine Intesa Sanpaolo o notranjih sistemih za prijavo kršitev, je pravilnik namenjen urejanju in spodbujanju prijav posameznikov, kot je podrobneje opredeljeno v nadaljevanju.

Te prijave se nanašajo na kršitve evropskih in nacionalnih predpisov, ki škodijo javnemu interesu ali integriteti Banke Intesa Sanpaolo d.d. (v nadaljevanju: Banka) ali Skupine Intesa Sanpaolo (v nadaljevanju: Skupina ISP) in s katerimi se posamezniki seznanijo v delovnem okolju ali zaradi svojega pravno-ekonomskega razmerja z Banko.

Učinkovit notranji sistem za prijavo kršitev (t.i. žvižgaštvo) podpira širjenje kulture zakonitosti in je priložnost za izboljšanje poslovnega okolja tako z organizacijskega kot etičnega vidika.

Notranji sistem za prijavo kršitev, ki ga ureja ta pravilnik, zagotavlja zaupnost prijavitelja in oseb, ki so vpletene in navedene v prijavi, kot je opredeljeno v nadaljevanju, ter jih ščiti pred povračilnimi in diskriminatornimi ravnanji.

Pravilnik o notranjem sistemu za prijavo kršitev je sprejela Uprava Banke Intesa Sanpaolo d.d. s soglasjem Nadzornega sveta Banke Intesa Sanpaolo d.d.

Dokument opisuje metode in kanale komuniciranja, ki jih prijavitelj lahko uporablja, ter postopek poročanja, ki je izveden ob prejeti prijavi. Navaja tudi različne stopnje postopka, vpletene osebe, vključno z njihovimi vlogami in odgovornostmi, ter primere, v katerih mora vodja notranjega sistema za prijavo kršitev takoj obvestiti korporativne organe.

In compliance with the Reporting Persons Protection Act (ZZPri) - transposing EU Directive no. 2019/1937 concerning the protection of individuals who report violations of the European Union law and containing provisions on the protection of individuals who report violation of national regulations (hereinafter: the ZZPri) - and with provisions of the Intesa Sanpaolo Group Rules on Internal Systems for Reporting Violations, these Rules are aimed at regulating and encouraging reports sent by the individuals, as defined below in details.

These reports pertain to violation of European and national regulations, that damage the public interest or the integrity of Banca Intesa Sanpaolo d.d. (hereinafter: the Bank) or Intesa Sanpaolo Group (hereinafter: the ISP Group) and of which the individuals become aware within the working environment, or as a result of their legal-economic relationship existing with the Bank.

An effective internal system for reporting violations (i.e. Whistleblowing) supports the spread of a culture of legality and is an opportunity to improve the business environment both from an organizational and ethical perspective.

The internal system for reporting violations governed by these Rules ensures the confidentiality of the whistleblower and of persons involved and mentioned in the report, as defined below, protecting them from retaliatory and discriminatory conduct.

These Rules on internal system for reporting violations have been adopted by the Management Board of Banka Intesa Sanpaolo d.d. and Supervisory Board of Banka Intesa Sanpaolo d.d.

The document describes the methods and channels of communication which the whistleblower may use, and the reporting process which take place when a report is submitted. It also indicates the various stages of the process, the persons involved, including their roles and responsibilities, as well as the cases in which the Head of Internal Reporting System is required to provide immediate notice to the Corporate Bodies.

2. Zakonodajni okvir / Law of reference

Notranji sistem za prijavo kršitev ureja več pravil, med katerimi v nadaljevanju izpostavljamo glavna.

Na evropski ravni:

- Direktiva (EU) 2019/1937 o zaščiti posameznikov, ki prijavijo kršitve prava Evropske unije in vsebuje določbe o zaščiti posameznikov, ki prijavijo kršitve nacionalnih predpisov;
- Člen 71 Direktive 2013/36/EU (CRD IV) o dostopu do dejavnosti kreditnih institucij in bonitetnem nadzoru kreditnih institucij in investicijskih podjetij;
- Člen 32 Uredbe (EU) 596/2014 (MAR) o zlorabi trga;
- Člen 24 Uredbe (EU) 2015/2365 (Uredba o transakcijah financiranja vrednostnih papirjev SFTR) o preglednosti transakcij financiranja vrednostnih papirjev in ponovne uporabe;
- Člen 61 Direktive 2015/849 (Četrta direktiva o preprečevanju pranja denarja) o preprečevanju uporabe finančnega sistema za pranje denarja ali financiranje terorizma;
- Uredba (EU) 2016/679 (GDPR) o varstvu posameznikov pri obdelavi osebnih podatkov in o prostem pretoku takih podatkov;
- Uredba (EU) 468/2014 Evropske centralne banke, ki vzpostavlja okvir sodelovanja v okviru enotnega mehanizma nadzora med Evropsko centralno banko in nacionalnimi pristojnimi organi ter z nacionalnimi imenovanimi organi (okvirna uredba o EMN / SSM).

Na slovenski ravni:

- Zakon o zaščiti prijaviteljev (ZZPri), prenos Direktive (EU) 2019/1937;
- 160. člen Zakona o bančništvu (Zban-3), prenos Direktive 2013/36/EU;
- 174. člen Zakona o preprečevanju pranja denarja in financiranja terorizma (ZPPDFT-2), prenos Direktive 2015/849.

Pravila skupine:

- ISP Group rules on internal systems for reporting violations (Whistleblowing);
- PBZ Rules on Internal Reporting Violation (Whistleblowing).

The internal system for reporting violations is governed by a plurality of rules, among which we highlight the principal ones below.

European regulations:

- Directive (EU) 2019/1937 concerning the protection of individuals who report violations of European Union law and containing provisions on the protection of individuals who report violations of national regulations;
- Article 71 of Directive 2013/36/EU (CRD IV) on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms;
- Article 32 of Regulation (EU) No. 596/2014 (MAR) on market abuse;

- Article 24 of Regulation (EU) 2015/2365 (Securities Financing Transactions Regulation - SFTR) on transparency of securities financing transactions and of reuse;
- Article 61 of the Directive 2015/849 (Fourth Anti-Money Laundering Directive) on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing;
- Regulation (EU) 2016/679 (GDPR) on the protection of individuals with regard to the processing of personal data, as well as on free movement of such data;
- Regulation (EU) 468/2014 of European Central Bank that establishes the cooperation framework within the scope of the Single Supervisory Mechanism between the European Central Bank and the national competent authorities and with national designated authorities (SSM Framework Regulation).

Slovenian regulations:

- Reporting Persons Protection Act (ZZPri), transposition of the Directive (EU) 2019/1937;
- Article 160 of the Banking Act (Zban-3), transposition of the Directive 2013/36/EU;
- Article 174 of the Prevention of Money Laundering and Terrorist Financing Act (ZPPDFT-2), transposition of the Directive (EU) 2015/849.

Group rules:

- ISP Group rules on internal systems for reporting violations (Whistleblowing);
- PBZ Rules on Internal Reporting Violation (Whistleblowing).

3. Uporaba / Scope of application

Ta pravilnik se uporablja za Banko Intesa Sanpaolo d.d., vse zaposlene in ostale osebe v podobnem razmerju ter za zunanje sodelavce, ki so v poslovnem razmerju z Banko, kot je opredeljeno v poglavju 4.1. tega pravilnika.

These Rules apply to Banka Intesa Sanpaolo d.d., to all employees and other persons in a similar relationship, as well as to external partners who have a business relationship with the Bank, as defined in chapter 4.1. of these Rules.

4. Osebe, ki lahko podajo prijavo in ostale osebe deležne zaščite / Individuals who can report and other subjects recipients of protection measures

4.1. Osebe, ki lahko podajo prijavo / Individuals who can report violations

Za posameznike, ki lahko podajo prijavo kršitve (v nadaljevanju: prijavitelj), se po tem pravilniku štejejo:

- zaposleni in samozaposleni, ki delajo ali so delali v Banki,
- nosilci strokovnega sodelovanja (npr. agencijsko razmerje, sodelovanje v organizaciji naročnika),
- študenti, prostovoljci, vajenci (plačani in neplačani),
- osebe, ki sodelujejo v razpisnih postopkih kot kandidati,
- delavci ali zunanji sodelavci, ki dobavljajo blago ali storitve ali izvajajo dela za tretje osebe in opravljajo ali so opravljali svoje delo za Banko,
- samostojni delavci in svetovalci, ki delajo ali so delali v Banki,
- delničarji (fizične osebe),
- posamezniki z upravnimi, nadzornimi ali zastopniškimi funkcijami (predstavniki Banke).

Natančneje, prijave se lahko nanašajo na nezakonita ravnanja, s katerimi se prijavitelji seznanijo v delovnem okolju ali zaradi svojega pravno-ekonomskega razmerja z Banko.

According to these Rules, the following shall be regarded as individuals who can make a report on a violation (hereinafter: "whistleblowers"):

- employees and self-employed workers who work or have worked for the Bank,
- holders of a professional collaboration relationship (e.g. agency relationship, collaborations organized by the client),
- students, volunteers, apprentices (paid and not paid),
- persons who participate in tendering procedures as candidates,
- workers or external collaborators, who supply goods or services or implement works for third parties and perform or have performed their work for the Bank,
- freelancers and consultants, who work or have worked for the Bank,
- shareholders (natural persons),
- individuals with administrative, supervisory, or representative functions (representatives).

More specifically, reports can be referred to illegal behaviors, of which whistleblowers got to know within their job or as a result of their legal-economic relationship existing with the Bank.

4.2. Ostale osebe deležne zaščite / Other subjects recipients of protection measures

Ostale osebe, ki so deležne zaščite so:

- posrednik - fizična oseba, ki pomaga prijavitelju v postopku prijave v delovnem okolju in katere pomoč bi morala biti zaupna,
- povezana oseba – fizična oseba, ki je ali bi lahko utrpela povračilne ukrepe v delovnem okolju zaradi povezave s prijaviteljem, kot so sodelavci ali sorodniki prijavitelja, ter pravni subjekti, ki so v lasti prijavitelja, za katere prijavitelj dela ali so z njim drugače povezani v delovnem okolju.

Other subjects who are entitled to protection measures are:

- Facilitator - a natural person who helps the whistleblower in the reporting process in working environment and whose assistance should be confidential;
- Related party - a natural person who has suffered or is likely to suffer retaliation in the workplace because of a connection to the whistleblower, such as co-workers or relatives of the whistleblower, as well as legal entities owned by the whistleblower for which the whistleblower works or is otherwise connected to the whistleblower in the working environment.

5. Kršitve, o katerih se poroča / Violations subject to reporting

Pravilnik je namenjen prijavi kršitev, ki so se zgodile v delovnem okolju banke.

Lahko se prijavijo kršitve tako nacionalnih kot evropskih predpisov.

Še posebej:

- Kršitve nacionalnih predpisov, kot so: i) upravna, računovodska, civilna ali kazenska dejanja; ii) nezakonito vedenje ali kršitve modelov organizacije in upravljanja;
- Kršitve evropskih in nacionalnih predpisov, ki zadevajo več sektorjev: Tisti, ki so za banko pomembnejši, so na primer: javna naročila, produkti in storitve, finančni trg, preprečevanje pranja denarja in financiranja terorizma, varstvo okolja, varstvo potrošnikov, varovanje zasebnega življenja, varstvo osebnih podatkov ter varnost omrežij in računalniškega sistema;
- Kršitve evropskih pravil, ki škodijo finančnim interesom EU ali notranjega trga ali kršijo določbe aktov EU v zgoraj navedenih sektorjih (npr. vedenje, ki ga je mogoče pripisati nezakonitim dejanjem);
- Vse kršitve predpisov, ki urejajo bančno dejavnost, torej vse kršitve povezane z opravljanjem bančnih in finančnih storitev kot so opredeljene v Zakonu o bančništvu (ZBan-3), kot na primer kršitve povezane z varčevanjem (npr. prodaja bančnih produktov ali storitev), kreditnimi posli (npr. odobravanje ali potrjevanje kreditov), finančnimi dejavnostmi (npr. zagotavljanje investicijskih storitev) kot tudi vse kršitve v zvezi z dejavnostmi, ki so povezane z banko ali so pomembne zanjo (kot so lastniški deleži);
- Kakršna koli kršitev v zvezi z notranjimi politikami in/ali postopki banke, kot so interni kodeks ravnanja, smernice za boj proti korupciji, pravila vezana na nabavo blaga in storitev, preglednostjo pri promociji produktov in storitev ter upravljanjem daril in stroškov podjetja;

f) Kakršno koli ravnanje, ki vodi v navzkrižje interesov, ki izhaja iz neupoštevanja pravil in kontrolnih postopkov za takšne situacije (na primer navzkrižje zaposlenega pri kreditnem poslu, kjer gre za osebni interes).

Pravilnik ni namenjen prijavi:

- Sporov, pritožb ali zahtev v zvezi z osebnim interesom ali medosebnimi vprašanji in mobinga, ki morajo slediti za to namenjenim postopkom (npr. preko vodje organizacijske enote, Sektorja kadrovskih zadev in organizacije);
- Kršitev nacionalne varnosti, ki so v izključni pristojnosti nacionalnega zakonodajalca.

These Rules are designed for reporting violations that have occurred in the working environment of the Bank.

Violations of both national and European regulations can be reported.

In particular:

a) Violations of national regulations, such as: i) administrative, accounting, civil or criminal offenses; ii) illegal behavior or violations of organization and management models;

b) Violations of European and national regulations concerning several sectors:

Those that are more significant for the Bank are, for example: public contracts, products and services, financial market, prevention of money laundering and terrorist financing, environmental protection, consumer protection, private life safeguard, personal data protection and security of networks and computer system;

c) Violations of European rules that harm the financial interests of the EU or of the internal market or that frustrate the provisions of the EU acts in the above sectors (e.g., behavior attributable to illicit acts);

d) All violations of the regulations governing banking activities, i.e. all violations related to the provision of banking and financial services as defined in the Banking Act (ZBan-3), such as violations related to savings (e.g., the sale of banking products or services), credit transactions (e.g., granting loans or credit endorsement), financial activities (e.g., provision of investment services) as well as any violations relating to activities connected with or instrumental to the bank (such as shareholdings stake);

e) Any violation related to Bank's internal policies and/or procedures, such as the Internal Code of Conduct, the Anti-Corruption Guidelines, rules related to procurement, transparency in promoting products and service as well as managing gifts and company expenses;

f) Any conduct that leads to a conflict of interest arising from the nonobservance of the rules and control procedures for such situations (e.g., an employee's conflict in a credit transaction where a personal interest is involved).

These Rules are not designed for reporting:

- Disputes, claims or requests related to a personal interest or involving interpersonal issues and mobbing that must follow the dedicated procedures (e.g., line manager, HR & Organization Department);
- Violations within the national security, as a matter of exclusive competence of the national legislator.

6. Zaščitni ukrepi / Protection measures

6.1. Zaupnost in obdelava osebnih podatkov / Confidentiality and processing of personal data

Banka izvaja ustrezne zaščitne ukrepe za zagotavljanje zaupnosti osebnih podatkov prijavitelja, domnevnega kršitelja in ostalih oseb, kot je opredeljeno v poglavju 4.2. (Ostale osebe deležne zaščite).

Informacije in vsi drugi osebni podatki, pridobljeni na podlagi tega pravilnika, se obravnavajo v skladu z Uredbo (EU) 2016/679 o varstvu osebnih podatkov (v nadaljevanju: Uredba GDPR), Zakonom o varstvu osebnih podatkov in internimi akti s področja varstva osebnih podatkov (v nadaljevanju: Zakoni in predpisi o zasebnosti).

V skladu s 5. in 25. členom Uredbe GDPR mora biti obdelava osebnih podatkov za namene tega pravilnika:

- ustrezna, relevantna in omejena na podatke, ki so nujno potrebni, da se preveri veljavnost prijave in za njeno upravljanje;
- zakonita, pravilna in pregledna, pri čemer je potrebno uskladiti zaščito zaupnosti, zagotovljeno prijavitelju in preiskovani osebi, da se oba zaščiti pred tveganji, ki sta jim v praksi izpostavljeni, pri čemer se ta vidik posebej upošteva pri posredovanju informacij tretjim osebam.

Osebe, ki obravnavajo prijavo in ki so pooblaščenice za odpravo kršitev, smejo v ta namen obdelovati osebne podatke, ki so potrebni za preiskovanje kršitve, za obvladovanje posledic kršitve in za odpravo kršitve ter zaščito prijavitelja.

Ob predpostavki, da se obdelava osebnih podatkov v zvezi z prijavo kršitev izvaja kot izpolnjevanje zakonskih zahtev, je vsak zaposleni predhodno obveščen o pogojih navedene obdelave v okviru informacij o zasebnosti, povezanih z delovnim razmerjem, vključno s hipotezo, v kateri so vsebina prijave.

V skladu s členoma 13 in 14 Uredbe GDPR vsi prijavitelji po prejemu potrdila o sprejemu prijave na sledljiv način prejmejo informacije o namenih in metodah, s katerimi upravljavec podatkov obdeluje njihove osebne podatke.

V vsakem primeru ostaja nespremenjena potreba po spoštovanju določb iz teh pravil ter zakonov in predpisov o zasebnosti, zlasti glede zagotovil o zaupnosti: (i) identitete prijavitelja, (ii) vpletenih in v prijavi navedenih oseb, (iii) vseh drugih osebnih podatkov, ki so lahko vsebovani v prijavi in pripadajoči podporni dokumentaciji.

Informacije o kršitvi, ki vključujejo poslovno skrivnost ali drugo zakonsko določeno tajnost, se lahko uporabljajo ali razkrivajo le v okviru nadaljnjega ukrepanja.

Osebe, ki prejemajo, preučujejo in preiskujejo prijave, vodja notranjega sistema za prijavo kršitev in vse druge osebe, vključene v postopek, so dolžni zagotoviti zaupnost informacij in identitete prijavitelja, ki ga je treba ustrezno zaščititi pred povračilnimi in diskriminatornimi posledicami zaradi prijave.

Vodstvo banke in ostali zaposleni ne smejo ugotavljati identitete prijavitelja.

Pravic iz členov od 15 do 22 Uredbe GDPR ni mogoče uveljavljati, med drugim zahtevo upravljavcu podatkov, če bi uveljavljanje teh pravic lahko povzročilo dejansko in konkretno škodo zaupnosti identitete prijavitelja.

Razume se, da v primeru sprožitve disciplinskega postopka, identitete prijavitelja ni mogoče razkriti, kadar spor glede disciplinske obtožbe temelji na ločenih in dodatnih presojah v zvezi s prijavo, tudi če izhajajo iz iste. Če spor v celoti ali delno temelji na prijavi in je za zaščito osebe, na katero se prijava nanaša, nujno poznavanje identitete prijavitelja, bo prijava uporabljena v disciplinske namene, le če je prijavitelj podal soglasje k razkritju svoje identitete.

Ne glede na prejšnje navedbe se sme identiteto prijavitelja in druge informacije vezane na prijavo razkriti, kadar to zahteva državni tožilec, če je to nujno potrebno zaradi preiskovanja kaznivih dejanj, ali sodišče, če je to potrebno zaradi sodnih postopkov, vključno s sodnimi postopki zaradi zaščite pravice osebe, ki jo prijava zadeva.

V primeru razkritja identitete iz prejšnjega odstavka je treba pred tem pisno obvestiti prijavitelja o nameravanim razkritju z navedbo razlogov za razkritje, razen če državni tožilec ali sodišče presodi, da bi takšno obvestilo ogrozilo povezane preiskave ali sodne postopke.

Ne glede na prejšnje odstavke nihče ne sme razkriti identitete prijavitelja, če bi razkritje ogrozilo življenje ali resno ogrozilo javni interes, varnost ali obrambo države.

Osebni podatki v prijavah se hranijo toliko časa, kot je potrebno za njihovo obdelavo, v nobenem primeru pa ne več kot 5 let od datuma sporočila o končnem izidu postopka prijave.

Osebni podatki, za katere je očitno, da niso potrebni za obravnavo prijave, se ne smejo zbirati. Če se takšni podatki zberejo pomotoma, se brez nepotrebnega odlašanja izbrijejo.

Opis obdelave osebnih podatkov je bolj podrobno opredeljen v poglavju 8.2. (Evidentiranje prijave).

The Bank implements appropriate safeguards to ensure the confidentiality of personal data for the whistleblower, for the alleged perpetrator and for the other subjects as described in chapter 4.2. (Other subjects recipients of protection measures).

The information and all other personal data acquired through the procedures carried out on the basis of these Rules are treated in compliance with EU Regulation 2016/679 on the protection of personal data (hereinafter: GDPR), Personal Data Protection Act and internal acts covering personal data protection area (hereinafter: Privacy Laws and Regulations).

Pursuant to art. 5 and 25 of GDPR, the processing of personal data for the purposes of these Rules should be:

- adequate, relevant and limited to data strictly necessary to verify the validity of the report and for its management;
- lawful, correct and transparent, calibrating the protection of confidentiality granted to the whistleblower and to the person being investigated, in order to protect both from the risks to which, in practice, these subjects are exposed, having particular regard to this aspect when forwarding information to third parties.

The persons who investigate the report and who are authorized to eliminate violations may process personal data that is necessary to investigate the violation, to manage the consequences of the violation, and to eliminate the violation and protect the whistleblower.

Assuming that the processing of personal data related to Whistleblowing is carried out as fulfillment of regulatory requirements, each employee is preemptively informed about terms of the above processing within the scope of privacy information related to the employment relationship, including the hypothesis in which they are the content of a report.

In compliance with art. 13 and 14 of GDPR all whistleblowers upon getting the acknowledgement of receipt, receive in a traceable way specific information on the purposes and methods with which their personal data are processed by the Data Controller.

In any case, the need to observe the provisions contained in these Rules and in the Privacy Laws and Regulations remain unaffected, with particular regard to the guarantees of confidentiality about: (i) the whistleblower identity, (ii) persons involved and mentioned into the report, (iii) any other personal data that may be contained in the report and the related supporting documentation.

Information about a breach that involves a business confidentiality or other legal confidentiality may be used or disclosed only in the context of a follow-up action.

The persons who receive, examine and investigate the reports, the Head of Internal Reporting Systems and any other person involved in the process have an obligation to ensure the confidentiality of information, as well as of the whistleblower identity which must be conveniently protected from retaliatory, discriminatory repercussions as a result of reporting.

The Bank's representatives and other employees are not allowed to search for the identity of the whistleblower.

The rights referred to in articles from 15 to 22 of the GDPR cannot be exercised, among others, with a request to the data controller, if the exercise of these rights could result in an actual and concrete prejudice to the confidentiality of the whistleblower identity.

It is understood that in the event of disciplinary proceedings being activated, the identity of the whistleblower cannot be revealed, where the dispute regarding the disciplinary charge is based on separate and additional assessments with respect to the report, even if consequent to the same. Should the dispute be based, in whole or in part, on the reporting and the knowledge of the whistleblower identity is necessary for defending the accused, the reporting will be usable for disciplinary purposes, only whether the whistleblower released his consent to the disclosure of his identity.

Notwithstanding the preceding paragraphs, the identity of the whistleblower and other information related to the report may also be disclosed when requested by the public prosecutor, if it is absolutely necessary for the investigation of criminal offenses, or by the court, if it is necessary for legal proceedings, including legal proceedings for protection of the rights of the person to whom the violation report concerns.

In the case of disclosure of the identity referred to in the preceding paragraph, prior written notice of the intended disclosure shall be given to the whistleblower, stating the reasons for the disclosure, unless the Judicial Authority considers that such notice would jeopardize related investigations or judicial proceedings.

Notwithstanding the preceding paragraphs, no person may disclose the identity of a whistleblower if disclosure would endanger life or seriously jeopardize the public interest, security or national defense.

The personal data contained in the reports are kept for the time necessary to process them and, in any case, not more than 5 years from the communication date about the final outcome of the reporting process.

Personal data manifestly useless for the processing of a report must not be collected or – in the hypothesis in which they have been acquired – they shall be deleted without undue delay.

The description of the processing of personal data is defined in more detail in chapter 8.2. (Report registering).

6.2. Prepoved povračilnih ukrepov in zaščita / Prohibition of retaliation and protection measures

Za prijavitelje in ostale osebe deležne zaščite (kot so opredeljeni v poglavju 4.2.) se uporabljajo ukrepi za zaščito pred povračilnimi in diskriminatornimi dejanji, tudi če se zaradi prijave le poskuša ali grozi z njimi. Povračilne ukrepe je treba razumeti kot vsako ravnanje, dejanje ali opustitev, tudi če gre le za poskus ali grožnjo, izvedeno v zvezi s prijavo, ki prijavitelju in ostalim osebam neposredno ali posredno povzroči ali lahko povzroči škodo, ki jo je treba razumeti kot neupravičeno škodo. Za dodaten opis povračilnih ukrepov glej Prilogo 1 k tem Pravilniku (Obrazec »Notranja prijava kršitve«).

Prijavitelj je do zaščite po ZZPri, ki jo nudijo zunanje institucije, upravičen, če je podal prijavo kršitve zakonodajnega predpisa, če je na podlagi utemeljenih razlogov menil, da so bile prijavljene informacije o kršitvi ob prijavi resnične, in je podal notranjo prijavo v skladu s tem Pravilnikom ali zunanjo prijavo v skladu s 13. členom ZZPri. Prijavitelj do zaščite po ZZPri ni upravičen, če je prijavo podal dve leti ali več po prenehanju kršitve.

Do zaščite po ZZPri so upravičeni tudi posredniki in povezane osebe, če je verjetno, da so ali bi lahko bili zaradi povezanosti s prijaviteljem zoper njih uvedeni povračilni ukrepi.

Zaščita velja po opravljeni triazi in potrditvi sprejema prijave v preiskavo.

Zaščita prijaviteljev je predvidena tudi v naslednjih fazah: (i) ko se pravno razmerje še ni začelo, če so bile informacije o kršitvah pridobljene med postopkom izbire ali v drugih fazah pred sklenitvijo pogodbe; (ii) v poskusni dobi; (iii) po prenehanju delovnega razmerja, če so bile informacije o kršitvah pridobljene med delovnim razmerjem.

Prijavitelj in ostale osebe lahko zaprosijo zaupnike (poglavje 7.3.) za pojasnila o zaščiti v primeru prepovedanih povračilnih ukrepov.

Prijavitelj in ostale osebe lahko Komisiji za preprečevanje korupcije sporočijo povračilne ukrepe, za katere menijo, da so jih doživeli.

V primeru, da je prijavitelj soodgovoren za kršitve, se presoja možnost prednostne obravnave slednjega glede na druge soodgovorne osebe, skladno z veljavnimi predpisi.

Zaščitni ukrepi ne veljajo za prijavitelje:

- če je ugotovljena kazenska odgovornost prijavitelja za kazniva dejanja razžalitve ali obrekovanja, povezana s prijavljenimi dejstvi, tudi s prvostopenjsko sodbo, ali če so ta kazniva dejanja storjena s prijavo sodnim ali računovodskim organom;
- v primeru civilne odgovornosti za namerno kršitev ali hudo malomarnost, ugotovljeno tudi s prvostopenjsko sodbo, ki je nastala zaradi kaznivih dejanj obrekovanja ali žaljive obdolžitve.

V obeh primerih si Banka pridržuje pravico, da oceni disciplinske ukrepe.

Measures aimed at protecting them from retaliatory, discriminatory conduct, even if only attempted or threatened, consequent to the report, are applied to the whistleblowers and to the other subjects (as defined in chapter 4.2.). Retaliation is to be understood as any behavior, act or omission, even if only attempted or threatened, carried out in connection with the reporting, which causes or may cause, directly or indirectly, damage to the whistleblower and to the other subjects, to be understood as unjustified damage. For additional description of retaliation see Annex 1 to these Rules (Form "Internal violation report").

The whistleblower is entitled to protection under the ZZPri, offered by external institutions, if he has reported a violation of a legislative regulation, if the whistleblower believed on reasonable grounds that the reported information about the violation was true at the time of violation reporting and made an internal violation report in accordance with these Rules or an external violation report under Article 13 of the ZZPri. The whistleblower is not entitled to protection under the ZZPri if the whistleblower has submitted a violation report two years or more after the violation ceased.

Facilitators and related parties are also entitled to protection under ZZPri if it is likely that they are or may be subject to retaliatory measures as a result of their association with the whistleblower.

Protection is valid after the performed report triage and confirmation of receipt of the report.

The protection of reporting parties is also envisaged during the following phases: i) when the legal relationship has not yet begun, if the information on the violations has been acquired during the selection process or in other pre-contractual phases; ii) during the trial period; iii) after the termination of the employment relationship if the information on the violations was acquired during the employment relationship.

The whistleblower and the other subjects may ask to the Trustees (see chapter 7.3.) for clarifications on protection in case of prohibited retaliation.

The whistleblower and the other subjects can communicate to the Commission for preventing corruption the retaliations that they believe they have suffered.

In the event that the whistleblower is co-responsible for the violations, the possibility of adopting a preferential treatment for the latter with respect to the other co-responsible parties is assessed, compatibly with the applicable regulations.

The protection measures do not apply to the whistleblowers:

- if the criminal liability of the whistleblower for the crimes of defamation or slander connected to the facts being reported is ascertained, even with a first instance sentence, or if these crimes are committed by reporting to the judicial or accounting authorities;
- in the event of civil liability for willful misconduct or gross negligence, also ascertained with a first-instance sentence, which occurred for the crimes of defamation or slander.

In both cases, the Company reserves the right to evaluate disciplinary actions.

7. Udeleženci / Players involved

7.1. Prijavitelj / Whistleblower

Prijavitelj je fizična oseba navedena v poglavju 4.1., ki izve za protipravno ravnanje na delovnem mestu ali na podlagi pravno-ekonomskega razmerja z Banko in poda prijavo po vzpostavljenih postopkih za prijavo kršitev.

Whistleblower is a natural person indicated in chapter 4.1. who becomes aware of unlawful conduct in the workplace or as a result of a legal-economic relationship existing with the Bank and makes a report according to the established procedures for reporting violations.

7.2. Vodja notranjega sistema za prijavo kršitev / Head of Internal Reporting System

Vodja notranjega sistema za prijavo kršitev, ki je direktor/ica Sektorja notranje revizije, imenuje uprava. Vodja notranjega sistema za prijavo kršitev zagotavlja celovitost procesa skladno z regulatornimi določili, ima vlogo in odgovornosti zaupnika ter poroča organom Banke.

Vodja notranjega sistema za prijavo kršitev izbere izmed zaposlenih Sektorja notranje revizije ekipo zaupnikov, ki so zadolženi za upravljanje in izvedbo procesa notranje prijave kršitev, kot je opredeljeno v naslednjih poglavjih.

The Head of Internal Reporting System, who is the Director of the Internal Audit Department, is appointed by the Management Board. The Head of Internal Reporting System ensures the integrity of the process in accordance with regulatory provisions, has the role and responsibilities of a Trustee and reports to the Bank's Corporate Bodies.

The Head of Internal Reporting System selects a team of Trustees (Whistleblowing team) from among the employees of the Internal Audit Department, who are in charge of managing and implementing the internal violation reporting process, as defined in the following chapters.

7.3. Zaupniki (ekipa zaupnikov) / Trustees (Whistleblowing Team)

Zaupnike imenuje uprava. Zaupniki glavnega kanala notranjega sistema za prijavo kršitev so imenovani izmed zaposlenih Sektorja notranje revizije. Uprava imenuje tudi zaupnika alternativnega kanala notranjega sistema za prijavo kršitev, ki se uporablja v primeru, ko prijavitelj meni, da je Sektor notranje revizije v navzkrižju interesov glede prijave. Zaupnik alternativnega kanala je vodja Službe skladnosti.

Zaupniki (ekipa zaupnikov):

- sprejemajo in evidentirajo prijave;
- zagotovijo zaupnost podatkov in identitete prijavitelja, da bi zaščitili njega in ostale osebe deležne zaščite pred nepoštenimi, povračilnimi ali diskriminatornimi posledicami, ki bi lahko bile posledica prijave (neposredne ali posredne);
- opravijo predhodni preizkus prijave (triažo), ocenijo pogoje in se odločijo, ali nadaljujejo s preiskavo oz. ali prijavo vložijo;
- preiskavo izvajajo skrbno, zaupno in neodvisno ter v nobenem primeru niso vezani na navodila v posamezni zadevi;
- od prijavitelja in osebe, na katero se prijava nanaša, pridobijo podatke, ki so potrebni za oblikovanje predlogov ukrepov za prenehanje kršitve, odpravo posledic kršitve ali preprečitev kršitev v prihodnje;
- prijavitelju pošljejo potrdilo o prejemu prijave v 7 dneh po prejemu prijave;
- najpozneje 3 mesece po prejemu prijave obvestijo prijavitelja o utemeljenosti prijave, predlaganih in izvedenih korektivnih ukrepih, izidu postopka notranje prijave ali, če korektivni ukrepi po 3 mesecih niso bili zaključeni, o statusu postopka notranje prijave.

Zaupniki svoje delo organizirajo tako, da zagotavljajo pravočasno izvajanje nalog in nadomeščanje v času odsotnosti v okviru imenovanih zaupnikov. Zaupniki imajo pri delu polni dostop do gradiva in informacij relevantnih za preiskavo prijave. Vsi zaposleni so zaupnikom dolžni nuditi informacije, ki so potrebne za delo zaupnikov. Zaupniki pri pridobivanju informacij ne smejo razkriti identitete prijavitelja. Zaupniki podatke, s katerimi se seznanijo, uporabljajo le za namene preiskave prijave, določanja korektivnih ukrepov ter odprave kršitve.

Zaupniki se redno udeležujejo specializiranih in ustreznih izobraževanj s področja prijav kršitev.

Trustees are appointed by the Management Board. Trustees of the main channel of the internal system for reporting violations are appointed from the employees of the Internal Audit Department. The Management Board appoints also a Trustee of the alternative channel of the internal system for reporting violations, which is used in the event that the whistleblower believes that the Internal Audit Department is in a conflict of interest regarding the report. The trustee of the alternative channel is the Head of the Compliance Office.

Trustees (Whistleblowing Team):

- receive and record the reports submitted;
- ensure the confidentiality of the information and the identity of the whistleblower in order to protect him and the other subjects that are recipients of protection from unfair, retaliatory or discriminatory repercussions which may result from the reporting (direct or non direct);
- carry out an initial feasibility examination (triage), assessing the conditions to decide whether to proceed with the appropriate investigation or file the report;
- carry out an investigation diligently, confidentially and independently, and are not bound by instructions in any case;
- obtain information from the whistleblower and the person to whom the report relates, which is necessary to formulate proposals for measures aimed at ending the violation, eliminating the consequences of the violation or preventing future violations;
- communicate the acknowledgment of receipt to the whistleblower within 7 days of receipt of the report;
- communicate no later than 3 months of receiving the violation report the justification of the violation report, the corrective measures proposed and implemented, the outcome of the internal violation reporting process, or, if the corrective measures have not been completed after 3 months, of the status of the internal violation reporting process.

Trustees organize their work in such a way as to ensure timely performance of tasks and replacement during absences within the appointed Trustees. Trustees have full access to material and information relevant to the investigation of the violation report. All employees are obliged to provide Trustees with the information necessary for Trustees work. When obtaining information, Trustees must not reveal

the identity of the whistleblower. Trustees use the received information only for the investigation of the violation report, defining corrective measures and remediation of the violation.

Trustees are subject to specific and adequate training on reporting violations.

7.4. Sektor kadrovskih zadev in organizacije / HR & Organization Department

Sektor za kadrovske zadeve in organizacijo, ki ga angažirajo zaupniki, oceni in odloči, kot zahtevajo pravila Banke, ali obstajajo razlogi za izvedbo kakršnih koli potrebnih disciplinskih ukrepov, in o tem obvesti preiskovano osebo, če ni bila predhodno obveščena.

The HR & Organization Department, engaged by the Trustees, evaluates and decides, as required by Bank's regulations, if there are grounds to implement any necessary disciplinary measures and informs the person under investigation if not previously informed.

7.5. Ostale organizacijske enote potrebne za korektivne ukrepe / Other Organizational Units necessary for remediation

Pristojne organizacijske enote, ki jih angažirajo zaupniki, ocenjujejo in izvajajo možne korektivne ukrepe za zmanjševanje tveganj, ki jih določijo zaupniki. Korektivni ukrepi so usmerjeni v prenehanje kršitve, odpravo posledic kršitve ali preprečevanje prihodnje kršitve.

The competent organizational units, engaged by the Trustees, evaluate and implement the possible risk mitigation measures as defined by the Trustees. The mitigation measures are aimed at stopping the violation, eliminating the consequences of the violation, or preventing future violations.

8. Postopek notranje prijave kršitev / Internal violation reporting process

Postopek notranje prijave kršitev, ki jo podajo upravičeni posamezniki, kot so opredeljeni v poglavju 4.1., je razčlenjen v nadaljevanju. Poglavja 8.8. in 8.9. posebej urejata postopek v zvezi s prijavo delničarjev in članov korporativnih organov (predstavnikov Banke).

The process of internal violation reporting made by the legitimated subjects, as indicated in chapter 4.1., is broken down below. Chapters 8.8. and 8.9. specifically regulate the process relating to reports from shareholders and members of the Corporate Bodies (Bank's representatives).

8.1. Notranja prijava / Internal Reporting

Kadar prijavitelj sumi, da je prišlo ali bi lahko prišlo do kršitve, za katero je izvedel na delovnem mestu, lahko prijavi kršitev po notranji poti z obrazcem »Notranja prijava kršitve« (Priloga 1).

Uporaba glavnega kanala:

- Prijavitelj lahko poda prijavo pisno, tako da pošlje e-pošto z izpolnjenim obrazcem na naslov prijava.krsitev@intesasampaolobank.si s stopnjo zaupnosti **STROGO ZAUPNO** (sensitivity **STRICTLY CONFIDENTIAL**), prejemniki e-pošte so samo vodja notranjega sistema za prijavo kršitev ter imenovani zaupniki iz Sektorja notranje revizije;
- Prijavitelj lahko poda prijavo pisno, s pošiljanjem izpolnjenega obrazca po pošti na naslov banke:
Banka Intesa Sanpaolo d.d.
Sektor notranje revizije - Zaupnik
Pristaniška 14
6000 Koper
s pripisom »**NE ODPIRAJ**«, »**STROGO ZAUPNO**« in »**V ROKE NASLOVNIKU**«;

- Prijavitelj lahko poda prijavo ustno zaupniku preko MS Teams, telefona ali Webex-a, v tem primeru zaupnik skliče sestanek preko MS Teams ter sestanek posname po predhodnem obvestilu in s soglasjem prijavitelja, izpolni obrazec na podlagi podanih informacij ter ga prijavitelju pošlje v pregled in potrditev, enako naredi v kolikor snemanje ni mogoče;
- Prijavitelj lahko poda prijavo ustno zaupniku osebno v pisarni zaupnika po predhodnem dogovoru (prijavitelj ima možnost podati prijavo osebno v pisarni zaupnika v Kopru ali Ljubljani), v tem primeru zaupnik izpolni obrazec na podlagi podanih informacij ter ga prijavitelju da v pregled in potrditev.

Osebe, ki nimajo dostopa do intraneta Banke, kot so zunanji sodelavci ali osebe v podobnem razmerju, lahko podajo prijavo le pisno na obrazcu »Notranja prijava kršitve« (Priloga 1) po e-pošti na naslov prijava.krsitev@intesasanpaolobank.si ali s pošiljanjem izpolnjenega obrazca po pošti na naslov banke, kot navedeno v prejšnjih odstavkih.

Uporaba alternativnega kanala:

- Kadar prijavitelj meni, da bi lahko bil Sektor notranje revizije v navzkrižju interesov glede prijave, lahko poda prijavo vodji Službe skladnosti pisno na obrazcu »Notranja prijava kršitve« (Priloga 1) po e-pošti na e-naslov prijava.krsitev.alter@intesasanpaolobank.si ali s pošiljanjem izpolnjenega obrazca po pošti na naslov:
 Banka Intesa Sanpaolo d.d.
 Vodja Službe skladnosti - Zaupnik
 Pristaniška 14
 6000 Koper
 s pripisom **»NE ODPIRAJ«, »STROGO ZAUPNO« in »V ROKE NASLOVNIKU«.**

Prijavitelj lahko poda prijavo tudi anonimno, brez razkritja svojih osebnih podatkov. V tem primeru dobi povratne informacije le, če na obrazcu »Notranja prijava kršitve« opredeli, na kakšen način oz. kam lahko zaupnik pošlje povratne informacije.

Sprejeti bodo ustrezni ukrepi za učinkovito zaščito identitete prijavitelja in ostalih oseb deležnih zaščite ter zagotovitev zaupnosti.

Ob prijavi mora prijavitelj utemeljeno domnevati, da so informacije o prijavljenih kršitvah resnične.

Prijava mora vsebovati podroben opis dejstev in ravnanj, za katera se šteje, da so v nasprotju z zakonodajnimi predpisi ali internimi pravili, ter na specifičen in jasen način navesti pravila, za katera se šteje, da so bila kršena, ter druge ugotovitve in dokumente, ki so koristni za preiskavo spornih dejstev. Prijavitelj se je dolžan izjaviti, ali ima osebni interes v zvezi s prijavo.

Kadar prijavitelj meni, da prijave kršitve ne bi bilo mogoče učinkovito preiskati po notranji poti ali da obstaja tveganje povračilnih ukrepov, lahko prijavitelj poda prijavo kršitve pristojnemu organu za zunanjo prijavo iz 14. člena ZZPri.

Whenever a whistleblower suspects that a violation occurred, or could potentially occur, of which he has come to know in the workplace, he can internally report with the form "Internal violation report" (Annex 1).

Use of the main channel:

- The whistleblower may submit the report in writing by sending an e-mail with the fulfilled form to the address prijava.krsitev@intesasanpaolobank.si with the sensitivity level **STRICTLY CONFIDENTIAL**, the recipients of e-mails are only the Head of Internal Reporting System and appointed Trustees from the Internal Audit Department;
- The whistleblower may submit the report in writing by sending the fulfilled form by post to the Bank's address:

Banka Intesa Sanpaolo d.d.
Internal Audit Department – Trustee
Pristaniška 14
6000 Koper

with the notes **“DO NOT OPEN”, “STRICTLY CONFIDENTIAL” and “HAND DELIVERY”**;

- The whistleblower may submit the report orally to the Trustee via MS Teams, telephone or Webex, in which case the Trustee convenes a meeting via MS Teams and records the meeting after prior notice and with the consent of the whistleblower, completes the form on the basis of the information provided and sends it to the whistleblower for review and confirmation, and does the same if recording is not possible;
- The whistleblower may submit the report orally to the Trustee in person at the Trustee's office by prior arrangement (the whistleblower has the option of submitting his report in person at the Trustee's office in Koper or Ljubljana), in which case the Trustee completes the form on the basis of the information provided and gives it to the whistleblower for review and confirmation.

Persons who do not have access to the Bank's intranet, such as external partners or persons in a similar relationship, may submit a violation report only in writing on the form "Internal report of a violation" (Annex 1) by e-mail to the address prijava.krsitev@intesasanpaolobank.si or by sending the fulfilled form by post to the Bank's address, as defined in previous paragraphs.

Use of the alternative channel:

- When the whistleblower feels that the Internal Audit Department could be in conflict of interest with respect to the report, he may submit a violation report to the Head of Compliance Office in writing on the form "Internal report of a violation" (Annex 1) by e-mail to the address prijava.krsitev.alter@intesasanpaolobank.si or by sending the fulfilled form by post to the Bank's address:

Banka Intesa Sanpaolo d.d.
Head of Compliance Office – Trustee
Pristaniška 14
6000 Koper

with the notes **“DO NOT OPEN”, “STRICTLY CONFIDENTIAL” and “HAND DELIVERY”**.

The whistleblower may submit a violation report also anonymously, without disclosing his personal data. In this case, he receives feedback if he defines in what way or where the Trustees can send the feedback.

Appropriate measures will be taken to effectively protect the whistleblower's and the other subjects' identities and ensure confidentiality.

At the time of reporting, the whistleblower must have reasonable grounds to believe that the information about the reported violations is true.

The report should contain a detailed description of the facts and behaviours considered in breach with the legislations or internal regulations, indicating in a specific and clear way the rules that are considered violated and the other findings and documents useful for conducting the investigation of the contested facts. The whistleblower is obligated to declare if he has any personal interest linked to the reporting.

When the whistleblower considers that the internal violation report could not be effectively investigated internally or that there is a risk of retaliatory measures, he may submit a violation report to the competent Authority for external violation reporting referred to in Article 14 of the ZZPri.

8.2. Evidentiranje prijave / Report registering

Zaupniki po prejemu prijavo s prilogami evidentirajo v informacijski sistem v posebno podmapo, do katere lahko dostopajo samo vodja notranjega sistema za prijavo kršitev ter imenovani zaupniki. Vsi dokumenti prijave so označeni s stopnjo zaupnosti »Strogo zaupno«.

Evidenca prejetih prijav je sestavljena iz dveh delov z namenom, da se zagotovi enostavno kasnejše brisanje.

Prvi del vsebuje evidenčne podatke: številka prijave, datum prejema prijave, delovno področje kršitve, datum potrditve prejema prijave, datum povratne informacije prijavitelju, datum poročila upravi in revizijski komisiji.

Drugi del s povezovalnim znakom številke prijave pa vsebuje: podatke o prijavitelju, posredniku, povezanih osebah, osebi, ki jo prijava zadeva, in osebah, ki lahko pomagajo pri preiskavi prijavljene kršitve (osebno ime ali psevdonim, poštni naslov, naslov elektronske pošte, telefonsko številko in druge naslove za navezavo stika), prijavo kršitve, morebiten posnetek klica ter gradivo, ki so ga predložile navedene osebe, in gradivo, ki je nastalo v postopku preiskave prijave.

Elektronska prijava s prilogami se hrani v informacijskem sistemu v posebni podmapi, do katere lahko dostopajo samo imenovani zaupniki. Fizična prijava s prilogami se hrani v zaklenjeni omari, do katere lahko dostopajo le imenovani zaupniki. Dokumente se obravnava s stopnjo zaupnosti »Strogo zaupno«.

Drugi del evidence prijav se hrani pet let. Prvi del evidence prijav se hrani deset let. Poročila upravi ter revizijski komisiji se hranijo trajno.

Upon receiving the violation report and its attachments are registered by Trustees in the information system in a special sub-folder to which only the Head of Internal Reporting System and appointed Trustees have access. All violation report documents are marked 'Strictly confidential'.

The register of received violation reports consists of two parts to ensure easy deletion at a later date.

The first part contains register data: the violation report number, the date of received violation report, the work area of the violation, the confirmation date of the violation report, the feedback date to the whistleblower, the date of the report to the Management Board and Audit Committee.

The second part with the connecting sign of the violation report number contains: information about the whistleblower, the facilitator, related parties, the person to whom the report concerns and persons who can assist in the investigation of the reported violation (personal name or pseudonym, postal address, e-mail address, telephone number and other contact addresses), violation report, possible call recording and material, which was submitted by the mentioned persons, and the material that was created within the investigation.

The electronic violation report and its attachments are stored in the information system in a special sub-folder to which only the appointed Trustees have access. Violation report and its attachments in the physical form are stored in a locked cabinet to which only appointed Trustees have access. The documents are treated with the confidentiality "Strictly confidential".

The second part of the register of received violation reports is kept for five years. The first part of the register is kept for ten years. Reports to the Management Board and the Audit Committee are kept permanently.

8.3. Predhodni preizkus prijave / Report triage

Zaupniki po prejemu in evidentiranju prijavo preizkusijo, ali so izpolnjeni pogoji za njeno preiskavo (pogoji iz kontrolnega seznama iz Priloge 2 tega pravilnika).

Kadar pogoji niso izpolnjeni, zaupniki prijave ne preiskujejo, prijavitelju pa v 7 koledarskih dneh od prejema prijave sporočijo, da prijave ne bodo sprejeli v preiskavo in pojasnijo razloge. Zaupniki lahko na lastno pobudo preiskujejo prijavo kljub neizpolnjevanju pogojev, če tako ocenijo zaradi teže posledic kršitve.

Kadar zaupniki prijavo sprejmejo v preiskavo, zaupniki prijavitelju v 7 koledarskih dneh od prejema prijave sporočijo, da so prijavo sprejeli v preiskavo. Zaupniki prijavitelju izdajo potrdilo o sprejemu prijave, ki vključuje datum in čas prejema ter informacije glede obdelave osebnih podatkov kot je opredeljeno v poglavju 6.1. tega pravilnika.

Če je prijavitelj anonimen, se potrdilo o prejemu prijave oziroma obrazložitev razlogov, zaradi katerih prijava ne bo preiskana, pošlje, če je prijavitelj opredelil naslov za povratna sporočila.

V primeru ustne prijave, kadar je že ob sprejemu prijave očitno, da prijave ni mogoče preiskati v okviru postopkov notranje prijave v skladu s tem pravilnikom, lahko zaupniki prijavitelja usmerijo na ustrezno pot za zunanjo prijavo ali na drug ustrezen postopek. V takem primeru ne pride niti do prijave kršitve niti do preiskave.

After receiving and recording the report, the Trustees check whether the conditions for its investigation are fulfilled (conditions from the checklist in Annex 2 of these regulations).

The Trustees do not investigate the violation report if the conditions are not fulfilled and notify the whistleblower that the violation report will not be accepted for investigation and provide the reasons. The Trustees can, on their own initiative, investigate the violation report despite the non-fulfillment of the conditions, if they so assess due to the seriousness of the consequences of the violation.

When the Trustees accept the report for investigation, the Trustees notify the whistleblower within 7 calendar days of receiving the report that the report has been accepted for investigation. The Trustees issue to the whistleblower a confirmation of receipt of the report, which includes the date and time of receipt and the information regarding processing of personal data as stipulated in chapter 6.1. of these Rules.

In case of an anonymous whistleblower, a confirmation of acceptance of the violation report or an explanation of the reasons why the violation report will not be investigated is sent if the whistleblower has specified an address for return messages.

In the case of an oral report, when it is already evident upon receipt of the report that the report cannot be investigated under the internal procedures in accordance with these Rules, the Trustees may direct the whistleblower to the appropriate external system for reporting violations or to another appropriate reporting system. In such a case, neither the violation report nor the investigation will take place.

8.4. Preiskava / Investigation

Zaupniki prijave preiskujejo po vrstnem redu njihovega prejema, razen, ko ocenijo, da je kršitev potrebno prednostno preiskati zaradi teže posledic.

Zaupniki preiskujejo prijavo skrbno, zaupno in samostojno ter pri tem niso vezani na navodila v posamezni zadevi. Zaupniki od prijavitelja in osebe, na katero se prijava nanaša, pridobijo informacije, ki so potrebne za oblikovanje predlogov ukrepov, ki so usmerjeni v prenehanje kršitve, odpravo posledic kršitve ali preprečevanje prihodnje kršitve.

Zaupniki ukrenejo, kar je potrebno za prenehanje kršitve.

Zaupniki:

- formalizirajo dokaze o izvedeni preiskavi, ugotovitvah in morebitni potrebi po sprejetju disciplinskih ukrepov ali ukrepov za zmanjšanje tveganja;
- skupaj s pristojnimi organizacijskimi enotami identificirajo morebitne ukrepe za zmanjšanje tveganja (organizacijske, informacijske itd.);
- v primeru storjene kršitve vključijo v sodelovanje Sektor pravnih poslov;
- za morebitne disciplinske ukrepe vključijo Sektor kadrovske zadeve in organizacije.

Pri vključitvi drugih organizacijskih enot morajo zaupniki zagotoviti zaupnost podatkov in identitete prijavitelja, da bi zaščitili njega in ostale osebe deležne zaščite pred nepoštenimi, povračilnimi ali diskriminatornimi posledicami.

Zaupniki končajo preiskavo v 3 mesecih od njenega prejema s poročilom, v katerem navedejo, ali in iz katerih razlogov je prijava utemeljena ali ne. Če je prijava utemeljena, v poročilu navedejo zlasti predlagane in izvedene ukrepe za prenehanje kršitve, odpravo posledic kršitve ali preprečevanje prihodnje kršitve, svoje ugotovitve o uspešnosti izvedbe predlaganih ukrepov ter morebitne predlagane in izvedene ukrepe za zaščito prijavitelja.

Vodja notranjega sistema za prijavo kršitev ob upoštevanju zaščite identitete prijavitelja z ugotovitvami iz poročila seznanj upravo in revizijsko komisijo vsaj četrtletno.

Zaupniki ob koncu preiskave prijave, najpozneje pa v 3 mesecih od prejema prijave prijavitelja obvestijo o utemeljenosti prijave, predlaganih in izvedenih ukrepih, izidu postopka notranje prijave, oziroma o statusu postopka notranje prijave, če postopki za odpravo kršitev po 3 mesecih še niso končani.

Zaupniki postopajo v skladu s prejšnjim odstavkom tudi v primeru anonimne prijave, če je prijavitelj opredelil naslov za povratna sporočila.

The Trustees investigate violation reports in the order in which they are received, except when they assess that the violation needs to be investigated with as a matter of priority due to the severity of the consequences.

The Trustees investigate the violation report diligently, confidentially and independently and are not bound by the instructions in any case. The Trustees obtain information from the whistleblower and the person to whom the violation report relates, which is necessary for formulating proposals for measures aimed at ending the violation, eliminating the consequences of the violation or preventing future violation.

The Trustees shall take any necessary action to stop the violation.

The Trustees:

- formalize the evidence of the investigation carried out, of the findings, and of the possible need of adoption of disciplinary measures or risk mitigation measures;
- identify together with the competent organizational units the eventual risk mitigation measures (organizational, IT etc.);
- involve the Legal Department in the event of any violation committed;
- engage the HR & Organization Department for any disciplinary actions to be taken;

When involving other organizational units, Trustees must ensure the confidentiality of the whistleblower's data and identity in order to protect him and other subjects that are recipients of protection from unfair, retaliatory or discriminatory consequences.

The Trustees complete the investigation within 3 months of its receipt with a report stating whether and for what reasons the violation report is justified or not. If the violation report is justified, the report state, in particular, the proposed and implemented measures to stop the violation, eliminate the

consequences of the violation or prevent future violations, their findings on the effectiveness of the implementation of the proposed measures, and any proposed and implemented measures to protect the whistleblower.

The Head of Internal Reporting System, taking into account the protection of the identity of the whistleblower, communicate the findings of the report to the Management Board and the Audit Committee at least on a quarterly basis.

At the end of the investigation of the violation report, and no later than 3 months of receiving the violation report, the Trustees inform the whistleblower of the justification of the violation report, the corrective measures proposed and implemented, the outcome of the internal violation reporting process, or, if the corrective measures have not been completed after 3 months, of the status of the internal violation reporting process.

The Trustees also proceed in accordance with the previous paragraph in the case of an anonymous violation report, if the whistleblower has specified an address for return messages.

8.5. Komunikacija do prijavitelja / Communication to the whistleblower

Prijavitelj prejme od zaupnikov potrditev prejema prijave v 7 koledarskih dneh od njenega prejema, ki vključuje datum in čas prejema ter informacije glede obdelave osebnih podatkov kot je opredeljeno v poglavju 6.1. tega pravilnika. V kolikor pogoji za sprejem v preiskavo niso izpolnjeni, zaupniki prijave ne preiskujejo, prijavitelju pa v 7 koledarskih dneh od prejema prijave sporočijo, da prijave ne bodo sprejeli v preiskavo in pojasnijo razloge.

Zaupniki stopijo v stik s prijaviteljem za pridobitev informacij, ki so potrebne za preiskavo in oblikovanje predlogov ukrepov za prenehanje kršitve, odpravo posledic kršitve ali preprečitev prihodnjih kršitev.

Prijavitelj od zaupnikov prejme povratno informacijo o izidu notranjega postopka prijave kršitev v 3 mesecih po prejemu prijave. V povratni informaciji zaupniki prijavitelja obvestijo o utemeljenosti prijave, predlaganih in izvedenih ukrepih, izidu postopka notranje prijave, oziroma o statusu postopka notranje prijave, če postopki za odpravo kršitev po 3 mesecih še niso končani.

The whistleblower receives from the Trustees an acknowledgement of receipt of the report within 7 days of its receipt, which includes the date and time of receipt and the information regarding processing of personal data as stipulated in chapter 6.1. of these Rules. If the conditions for acceptance into the investigation are not fulfilled the Trustees notify the whistleblower that the violation report will not be accepted for investigation and provide the reasons.

The Trustees contact the whistleblower to obtain information, that are needed for investigation and formulation of proposals for measures aimed at ending the violation, eliminating the consequences of the violation or preventing future violation.

The whistleblower receives from the Trustees feedback on the outcome of the internal violation reporting process within 3 months of its receipt. The feedback provides information of the justification of the violation report, the corrective measures proposed and implemented, the outcome of the internal violation reporting process, or, if the corrective measures have not been completed after 3 months, of the status of the internal violation reporting process.

The Trustees also proceed in accordance with the previous paragraphs in the case of an anonymous violation report, if the whistleblower has specified an address for return messages.

8.6. Komunikacija do osebe v preiskavi / Communication to the person being investigated

Če ugotovitve preiskave pokažejo kritične elemente in odgovornosti, ki jih je mogoče pripisati preiskovani osebi, se to obvesti, da je bila preiskava uvedena na podlagi prijave kršitve, ter o rezultatih opravljenih preiskav.

Preiskovano osebo se lahko zasliši ustno, tudi na njeno zahtevo, ali s pridobitvijo pisnih opazanj in dokumentov.

If the findings of the investigation show critical elements and responsibilities attributable to the person under investigation, he shall be informed that the investigation was initiated following a whistleblowing report, as well on the results of the investigations carried out.

The person being investigated can be questioned orally, even at his request, or through the acquisition of written observations and documents.

8.7. Sprejeti nadaljnji ukrepi / Follow up actions adopted

Sektor kadrovskih zadev in organizacije, ki ga angažirajo zaupniki, oceni, ali obstajajo pogoji za morebitne disciplinske ukrepe, in po potrebi nadaljuje z uradno komunikacijo s preiskovano osebo, pri čemer navede, da je prijava posledica prijave kršitve.

Pristojne organizacijske enote, ki jih angažirajo zaupniki, ocenijo in izvajajo potrebne ukrepe za zmanjšanje tveganja (npr. okrepitev procesov, kontrol, sistemov itd.), kot jih opredelijo zaupniki.

The HR & Organization Department, engaged by the Trustees, evaluates whether the conditions for any disciplinary actions exist and, if necessary, proceeds to formally communicate as such, to the person under investigation, specifying that the report stems from whistleblowing.

The competent organizational units, engaged by the Trustees, evaluate and implement the necessary risk mitigation measures (e.g., reinforcement of the processes, controls, systems etc.), as defined by the Trustees.

8.8. Poročanje delničarjev Banke o kršitvah in s tem povezan postopek pregleda in povratnih informacij / Shareholder violations reporting and related review and feedback process

Brez poseganja v zaščitne ukrepe, ki jih že predvideva veljavna zakonodaja, lahko delničar Banke vsakršen prekršek, za katerega izve (kot je opredeljeno v 5. poglavju), glede na pravno-ekonomsko razmerje, ki ga veže z Banko, prijavi z uporabo glavnih kanalov (kot je opredeljeno v poglavju 8.1., v pisni obliki preko e-pošte na naslov prijava.krsitev@intesasanpaolobank.si, do katerega imajo dostop vodja notranjega sistema za prijavo kršitev ter imenovani zaupniki iz Sektorja notranje revizije ali po pošti na naslov:

Banka Intesa Sanpaolo d.d.
Sektor notranje revizije - Zaupnik
Pristaniška 14
6000 Koper

s pripisom »**NE ODPIRAJ**«, »**STROGO ZAUPNO**« in »**V ROKE NASLOVNIKU**«.

Delničar je dolžan zaradi identifikacije ob prijavi od svojega posrednika zahtevati potrdilo o upravičenosti do uveljavljanja pravice in ga priložiti elektronskemu sporočilu prijave. Delničar lahko poda prijavo kršitve tudi anonimno, brez razkritja svojih osebnih podatkov.

Ob prijavi mora prijavitelj utemeljeno domnevati, da so informacije o prijavljenih kršitvah resnične.

Prijava mora vsebovati podroben opis dejstev in ravnanj, za katera se šteje, da so v nasprotju z zakonodajnimi predpisi, ter na specifičen in jasen način navesti pravila, za katera se šteje, da so bila kršena, ter druge ugotovitve in dokumente, ki so koristni za preiskavo spornih dejstev. Prijavitelj se je dolžan izjaviti, ali ima osebni interes v zvezi s prijavo.

Zaupniki prijavo vodijo podobno kot običajni postopek prijave kršitve, pri čemer po potrebi sodelujejo pristojne organizacijske enote in korporativni organi ter zagotavljajo potrebne informacijske tokove.

Without prejudice to the protection measures already provided for by current legislation, the Bank's shareholder can report any offenses of which he becomes aware (as regulated in chapter 5.) depending on the legal-economic relationship that binds him to the Bank, using the main channels (as described in chapter 8.1., in written by e-mail to address prijava.krsitev@intesianpaolobank.si, to which the Head of Internal Reporting System and the appointed Trustees from Internal Audit Department have access or by post to the Bank's address:

Banka Intesa Sanpaolo d.d.
Internal Audit Department - Trustee
Pristaniška 14
6000 Koper

with the notes **“DO NOT OPEN”, “STRICTLY CONFIDENTIAL” and “HAND DELIVERY”**.

For identification purposes at the time of the reporting, the shareholder is required to request to his intermediary, the certification of the legitimacy to exercise the right and attach it to the reporting e-mail. The shareholder may submit a violation report also anonymously, without disclosing his personal data.

At the time of reporting, the whistleblower must have reasonable grounds to believe that the information about the reported violations is true.

The report must contain a detailed description of the facts and behaviours considered to be in violation of the legislation, indicating in a specific and clear way the rules that are considered to have been violated and the other findings and documents useful for conducting the investigation of the contested facts. The whistleblower is obliged to declare whether he has a personal interest connected to the report.

The Trustees manage the report in analogy to the ordinary Whistleblowing process, with the involvement, if appropriate and required, of the relevant Organizational Units and the Corporate Bodies, as well ensure the necessary information flows.

8.9. Poročanje predstavnikov Banke o kršitvah in s tem povezan postopek pregleda in povratnih informacij / Representatives violations reporting and related review and feedback process

Brez poseganja v pooblastila, ki jih imajo člani organov družbe na podlagi veljavne zakonodaje in internih predpisov, lahko člani uprave in nadzornega sveta, ki sumijo, da je prišlo ali bi lahko prišlo do kršitve, kot je opredeljeno v poglavju 5., lahko podajo prijavo vodji notranjega sistema za prijavo kršitev (direktorju Sektorja notranje revizije), v obliki:

- pisno, s pošiljanjem e-pošte direktno na naslov vodje notranjega sistema za prijavo kršitev;
- ustno, preko morebitnega za to namenjenega sestanka, ki bo organiziran v razumnem roku.

Vodja notranjega sistema za prijavo kršitev izpolni obrazec »Notranja prijava kršitev« na podlagi podanih informacij ter ga prijavitelju predstavniku Banke da v pregled in potrditev.

Ob prijavi mora prijavitelj utemeljeno domnevati, da so informacije o prijavljenih kršitvah resnične.

Prijava mora vsebovati podroben opis dejstev in ravnanj, za katera se šteje, da so v nasprotju z zakonodajnimi predpisi ali internimi pravili, ter na specifičen in jasen način navesti pravila, za katera se šteje, da so kršena, ter druge ugotovitve in dokumente, ki so koristni za preiskavo spornih dejstev. Prijavitelj se je dolžan izjaviti, ali ima osebni interes v zvezi s prijavo.

Vodja notranjega sistema za prijavo kršitev v roku 7 dni od dneva prejema prijave prijavitelju predstavniku Banke pošlje potrdilo o prejemu prijave.

Vodja notranjega sistema za prijavo kršitev pregleda prejeto prijavo in opredeli najprimernejše načine za izvedbo potrebnih preiskav. Na podlagi opravljenih preiskav vodja notranjega sistema za prijavo kršitev določi morebitne potrebne korektivne ukrepe in o ugotovljenih pomanjkljivostih in izvedbi korektivnih ukrepov obvešča upravo in revizijsko komisijo.

Po opravljeni preiskavi – v vsakem primeru pa v roku največ 3 mesecev od datuma prejema prijave kršitve – vodja notranjega sistema za prijavo kršitev pošlje odgovor prijavitelju predstavniku Banke.

Prijavitelj predstavnik Banke lahko poda prijavo kršitve tudi anonimno, brez razkritja svojih osebnih podatkov, z uporabo kanalov iz poglavja 8.1.

Kadar prijavitelj meni, da bi lahko bil vodja notranjega sistema za prijavo kršitev (direktor Sektorja notranje revizije) v navzkrižju interesov glede prijave, lahko poda prijavo vodji Službe skladnosti.

Kadar prijavitelj meni, da prijave kršitve ne bi bilo mogoče učinkovito preiskati po notranji poti ali da obstaja tveganje povračilnih ukrepov, lahko prijavitelj poda prijavo kršitve pristojnemu organu za zunanjo prijavo iz 14. člena ZZPri.

Without prejudice to the powers reserved to the members of the Corporate Bodies on the basis of current legislation and internal regulations, the members of the Management Board and Supervisory Board, who suspect that a violation, as described in chapter 5., has occurred or may occur, can make a report to the Head of Internal Reporting System (the Director of Internal Audit Department), in the following form:

- written, by sending an e-mail directly to the address of the Head of Internal Reporting System;
- oral, through an eventual dedicated meeting, which will be set within a reasonable time.

The Head of Internal Reporting System completes the form "Internal violation report" on the basis of the information provided and gives it to the whistleblower representative for review and confirmation.

At the time of reporting, the whistleblower must have reasonable grounds to believe that the information about the reported violations is true.

The report should contain a detailed description of the facts and behaviours considered in breach with the legislations or internal regulations, indicating in a specific and clear way the rules that are considered violated and the other findings and documents useful for conducting the investigation of the contested facts. The whistleblower is obligated to declare if he has any personal interest linked to the reporting.

Within 7 days from the date of receipt of the report, the Head of Internal Reporting System sends an acknowledgement of receipt to the whistleblower representative.

The Head of Internal Reporting System examines the report received and identifies the most appropriate ways to carry out the necessary investigations. Based on investigations performed the Head of Internal Reporting System determines any necessary corrective measures and informs the Management Board and the Audit Committee of the deficiencies found and the implementation of corrective measures, ensuring the confidentiality of the identity of the whistleblower.

Once the investigation has been completed - and in any case within the maximum term of 3 months from the date of the receipt of the violation report - the Head of Internal Reporting System sends a response to the whistleblower representative.

The whistleblower representative may submit a violation report also anonymously, without disclosing his personal data, with the use of channels as defined in chapter 8.1.

When the whistleblower feels that the Head of the Internal Reporting System (the Director of the Internal Audit Department) could be in conflict of interest with respect to the report may submit a violation report to the Head of Compliance Office.

When the whistleblower considers that the internal violation report could not be effectively investigated internally or that there is a risk of retaliatory measures, he may submit a violation report to the competent Authority for external violation reporting referred to in Article 14 of the ZZPri.

8.10. Nadzor nad procesom in poročanje / Supervision of the process and Reporting

Vodja notranjega sistema za prijavo kršitev zagotavlja pravilno izvedbo procesa v skladu z zakonskimi določili in v skladu s predpisi o varstvu osebnih podatkov. Vodja notranjega sistema za prijavo kršitev zagotavlja poročanje korporativnim in nadzornim organom, kot je opredeljeno v naslednjih odstavkih.

The Head of Internal Reporting System ensures the correct execution of the process in compliance with the regulatory provisions and in accordance with the regulations on the protection of personal data. The Head of Internal Reporting System ensures the reporting to Corporate Bodies and Supervisory Authorities as defined in the following paragraphs.

8.10.1. Poročanje korporativnim organom / Reporting to Corporate Bodies

Vodja notranjega sistema za prijavo kršitev kvartalno poroča o prejetih prijavah kršitev ter preiskavah v teku upravi, revizijski komisiji ter notranji reviziji nadrejenih družb ISP in PBZ.

Kvartalno poročilo vključuje opis prijavljenih kršitev, predlagane in izvedene ukrepe za njihovo odpravo ter oceno tveganja prihodnjih kršitev. V poročilu ne sme biti navedenih podatkov o prijavitelju ali kršitelju.

V primeru pomembnih kršitev vodja notranjega sistema za prijavo kršitev nemudoma obvesti upravo, revizijsko komisijo ter notranji reviziji nadrejenih družb ISP in PBZ.

The Head of Internal Reporting System quarterly reports on the violation reports received and investigations in progress to the Management Board, the Audit Committee and the Internal Audit Functions of the Parent Companies ISP and PBZ.

Quarterly report includes description of reported violations, proposed and implemented measures to eliminate them, and an assessment of the risk of future violations. The report must not contain information about the whistleblower or the violator.

In the event of significant violations, the Head of Internal Reporting System immediately informs the Management Board, the Audit Committee and the Internal Audit Functions of the Parent Companies ISP and PBZ.

8.10.2. Letno poročanje / Annual reporting

Vodja notranjega sistema za prijavo kršitev pripravi letno poročilo o pravilnem delovanju sistema za prijavo kršitev, ki ga potrdi uprava. Poročilo vsebuje zbirne podatke o rezultatih aktivnosti po prejetih prijavah kršitev. Letno poročilo se poroča revizijski komisiji in nadzornemu svetu in je na vpogled vsem zaposlenim v Banki.

Vodja notranjega sistema za prijavo kršitev ali imenovani zaupnik do 1. marca tekočega leta za prejšnje leto Komisiji za preprečevanje korupcije po elektronskem obrazcu, dostopnem na spletnih straneh Komisije za preprečevanje korupcije, poroča v skladu z ZZPri o številu prejetih, anonimnih in utemeljenih prijav ter o številu obravnavanih povračilnih ukrepov, v poročilu pa navede tudi podatek o zaupnikih.

The Head of Internal Reporting System prepares an annual report on the proper functioning of the internal reporting system containing aggregate information on the outcomes of the activities following the violation reports received, which is approved by the Management Board. The annual report is reported to the Audit Committee and the Supervisory Board and is available to the Bank's personnel.

By 1 March of the current year for the previous year, the Head of Internal Reporting System or the appointed Trustee reports to the Commission for the Prevention of Corruption on the number of received, anonymous and justified violation reports, and the number of retaliatory measures investigated, as well as the names of the Trustees, by using an electronic form available on the Commission for the Prevention of Corruption's website, in accordance with the ZZPri.

8.11. Lastnosti in obveznosti oseb, ki sodelujejo v procesu / Characteristics and obligations of the persons involved in the process

Osebe, ki so odgovorne za prejem, preizkus in preiskavo prijave kršitve (zaupniki):

- ne smejo biti hierarhično in funkcionalno podrejene osebi, ki je potencialno v preiskavi;
- ne smejo biti domnevni kršitelj;
- ne smejo imeti nobenega potencialnega interesa v zvezi z zadevno prijavo, ki bi lahko ogrozila nepristranskost procesa odločanja.

Zgoraj navedeni pogoji veljajo tudi za osebe, ki sodelujejo pri identificiranju korekcijskih ukrepov.

Poleg tega osebe, ki so odgovorne za prejem, preizkus in preiskavo prijave kršitve (zaupniki), ne morejo sodelovati pri sprejemanju kakršnih koli disciplinskih ukrepov, za katere je pristojen Sektor kadrovskih zadev in organizacije, in jih zavezujejo obveznosti glede zaupnosti, kot je opredeljeno v poglavju 6.2. (Prepoved povračilnih ukrepov in zaščita).

Persons responsible for receiving, triage and investigating the violation reports (Trustees):

- must not be hierarchically and functionally subordinate to the person potentially under investigation;
- must not be the alleged violator;
- must not have any potential interest connected to the report which could compromise the impartiality of the decision-making process.

The above conditions also apply to persons involved in the identification of corrective measures.

In addition, persons responsible for receiving, triage and investigating the violation reports (Trustees) can't participate in the adoption of any disciplinary measures, which are assigned to the HR & Organization Department and are bound by the confidentiality obligations as defined in chapter 6.2. (Prohibition of retaliation and protection measures).

9. Zunanja prijava kršitev / External reporting of violations

Prijavitelje prednostno spodbujamo k uporabi notranjih kanalov za prijavo kršitve, imajo pa tudi možnost podaje zunanje prijave kršitve neposredno pristojnim organom.

Prijavitelj lahko poda zunanjo prijavo pristojnemu organu za zunanjo prijavo iz 14. člena ZZPri, če meni, da prijave ne bi bilo mogoče učinkovito preiskati v okviru notranjega sistema za prijavo kršitev ali da v primeru notranje prijave obstaja tveganje povračilnih ukrepov.

In priority, the whistleblowers are encouraged to use internal channels to report a violation, but they also have the option of submitting an external violation report directly to the competent authorities.

The whistleblower may submit an external violation report to the competent Authority for external violation reporting referred to in Article 14 of the ZZPri if he considers that the violation report could not be effectively investigated within the internal system for reporting violations or that there is a risk of retaliatory measures.

10. Dostopnost informacij / Availability of information

Informacije o notranjem sistemu za prijavo kršitev in načinu uporabe notranjih poti za prijavo kršitev ter kontaktni podatki vodje notranjega sistema za prijavo kršitev in imenovanih zaupnikov so zagotovljeni na intranetu Banke. Prav tako so na intranetu zagotovljene informacije o zaščitnih ukrepih ter postopkih za zunanjo prijavo.

Za zunanje deležnike so informacije o notranjem sistemu za prijavo kršitev in načinu uporabe notranjih poti za prijavo kršitev objavljene na spletni strani Banke.

Information about the internal system for reporting violations and how to use the internal channels for reporting violations, as well as the contact information of the Head of Internal Reporting System and appointed Trustees, is provided on the Bank's intranet.

For external stakeholders, information about the internal system for reporting violations and how to use internal channels for reporting violations is published on the Bank's website.

11. Priloge / Annexes

- Priloga 1: Obrazec »Notranja prijava kršitve«,
- Priloga 2: Kontrolni seznam za predhodni preizkus notranje prijave kršitve.

- Annex 1: Form "Internal violation report",
- Annex 2: Checklist for internal violation report triage.