

Code of business ethics in Gorenjska banka d.d., Kranj

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1 Introduction

1.1 Content and purpose

In relation to colleagues, partners and customers, the Code of Business Ethics of the employees of Gorenjska banka d.d., Kranj (hereinafter: the Code) is a set of values and principles that represent the guidelines of our conduct for the realization of standards of integrity and professional ethics. As such, they help us in making decisions and in performing our daily work duties, which are based on the independence, transparency and responsibility of the bank's employees.

1.2 Regulatory frameworks

ZBAN, With the Act on Integrity and Prevention of Corruption

1.3 Related internal documents

Fraud risk management strategy,
Activity protocol in the event of a report of suspected fraud.

2 Field of use

Consistent compliance with the provisions of the Code strengthens the reputation of both bank employees and the bank itself. It contributes to the responsible conduct of individuals and the collective as a whole, and consequently to higher business standards. The Code does not interfere with valid internal acts, which our employees are obliged to strictly respect, but it is linked to and supplements them. All Gorenjska banka employees are obliged to comply with its provisions and act according to them.

3 Core values

The fundamental values, which are common to all employees and which we consistently respect and implement at Gorenjska banka, contribute to the consolidation of such an organizational culture, which puts impeccable operations first and the awareness that the bank can only be successful in the long term if it respects high professional and ethical business standards .

Employees of the bank are committed to the following core values:

- **Responsibility**
We are always ready to take **responsibility for our decisions, actions and results** . We work in the desire for the best solutions for the individual, society and nature.
- **Excellence**
We come from a passion for mission, so we inspire others with our dedication. Achieving and exceeding expectations leads us to **excellence** .
- **Innovation**
User experience is at the core of our interest. Because we are aware that only in this way can we include **innovation in the search for advanced solutions and further development** .
- **Devotion**
devotion to anyone who finds a reliable partner in us . To this end, we maintain a space where respect, trust, encouragement and open communication prevail.
- **Trust**

We prioritize **trust** . Because we are ready to listen to both customers and employees, because we believe that the key to success lies in mutual cooperation.

4 Basic principles

Protection of the bank's reputation and integrity

In doing business, we comply with applicable regulations and contracts concluded with customers. We act in accordance with accepted principles and values as well as strategy, business goals and commitments to the bank. We do not harm the bank's reputation with our work and behavior.

Protection of the client's rights and interests

We protect the rights and interests of the client. We refrain from behavior that could harm customers.

Constructive internal relations

Internal relationships are based on mutual trust, respect and help. We are respectful, friendly and fair to our colleagues. We resolve differences of opinion and possible disagreements tolerantly and constructively. We reject all forms of physical or psychological harassment or abuse.

Managing conflicts of interest*

We avoid situations where our interests could be in conflict with the interests of the bank. If we detect them, we alert our superiors and enable appropriate follow-up action.

Insofar as there is a possibility that we would run into a conflict of interests when preparing or making concrete business decisions *, we exclude ourselves from such a procedure. We do not even participate in the preparation of materials for the bank's authorities, where the reason for the occurrence and the method of managing the conflict of interests must be defined.

*** Opposite interests** it exists when private interest employees threatens could you _ threatened unbiased and objective implementation order respectively decision-making in relation to interests banks . Private interest means property or non-property benefit employee , his narrower family member and others physical or legal persons with whom has did he have personal , business or political contacts . At judge opposites interests are taken into account everything circumstances , especially economic , political and others _ circumstances that are immediate _ related to employees and others legal and physical persons who _ they have common interests with employees .

Undoubtedly arises opposite interests , when bank does business with employees , theirs narrow it down family ones members and with him connected persons . Connected persons are everything legal persons who are employees of the bank respectively theirs narrower family members representatives in supervisory organs , organs management respectively have in them at least 5% owned share . In all of them the others cases it is necessary to judge Existence opposites interests considering in the preceding paragraph stated definition .

Membership in supervisory boards of companies

In the event that a bank employee is proposed to be a member of the supervisory board of a company, but the bank itself did not propose him for this position, he must obtain the consent of the bank's management before the appointment.

Prevention of money laundering and terrorist financing

We respect and consistently implement all regulations and internal acts in the field of preventing money laundering and terrorist financing to which the bank is committed.

Protection of business secrets, information and personal data

We protect business confidentiality, information and personal data of customers and employees in accordance with applicable legislation and the bank's internal acts. The obligation to protect refers to all information and data that are accessible to us or that we learn about while performing our work at the bank.

No one who is aware of or has access to inside information may use it to acquire or dispose of the financial instruments to which this information relates. When communicating with the external environment, we strictly observe the rules of silence, and after the end of working hours or when absent from the workplace, we follow the clean desk rule, according to which all materials containing confidential information are kept in such a way that they are not accessible to unauthorized persons.

Harmonious business

We realize the bank's business goals in compliance with applicable laws and bylaws, recommendations from external institutions, good business practices, internal bank policies, and ethical and moral principles.

Unacceptable behavior

Such conduct includes, in particular, conduct in connection with incorrect financial reporting and violations, economic and financial crime (including fraud, money laundering, cartel collusion, violation of financial sanctions through bribery and corruption, market manipulation, misleading sales and other violations of consumer protection laws).

High standards of work

We perform work professionally and on time, in accordance with applicable regulations, internal acts, professional standards, good practice and instructions from superiors. We treat the bank's assets with care, like a good steward. We care about the reputation and good name of the bank, colleagues and customers. We are organized, and so is our working environment.

Bribery, limited acceptance and giving of gifts are prohibited

We prohibit and reject any form of obtaining material benefit for ourselves or others that is detrimental to the bank or contrary to legal and moral norms. Therefore, we do not accept or give gifts, favors or other benefits, insofar as they are given or received as consideration for concluding a transaction.

Under no circumstances will we accept money, securities or precious metals as a gift (except, for example, commemorative or occasional coins). The following are considered acceptable and therefore outside the stated limits:

- occasional gifts, the value of which, in accordance with the Tax Procedure Act, does not exceed 42 euros in a lump sum and does not exceed 100 euros on an annual basis.
- ordinary hospitality, which does not exceed 84 euros in a one-off amount and does not exceed 150 euros on an annual basis.

For gifts and hospitality, the value of which exceeds the mentioned amounts, the prior consent of the superior and notification to the Department of Business Compliance and PPDFT is required.

Fraud prevention

Fraud means any intentional act committed by fraud, abuse or fraud, i.e. dishonest actions, with the aim of obtaining personal or third party benefits to the detriment of the bank. Frauds are inadmissible and the bank will consistently sanction them (zero tolerance). Any employee who discovers or suspects internal fraud should immediately report such an event in one of the ways defined in point 4 of the Code.

Social and environmental responsibility

The bank is aware of its responsibility towards the wider social community. This is proven by supporting various humanitarian, educational, sports and other projects that contribute to a higher quality of life in the environment.

5 The attitude of employees towards customers

Respecting the needs and wishes of customers

Within its possibilities, the bank must take into account the wishes and needs of the client and strive to fulfill their expectations. The refusal must be carefully considered, justified and always expressed within the bounds of courtesy.

Building trust

Our employees strive to maintain and strengthen the trust of our customers. We do not allow trust to be undermined due to a possible abandonment of the necessary care and attention in relation to the client.

Consideration of customer comments and suggestions

We consider customer comments and suggestions related to the bank's operations and, if justified, take them into account. We respond to written comments in writing.

Responsive resolution of customer complaints

We treat customer complaints carefully and resolve them quickly and considerately. Here, we are focused on the benefits of the client and protecting the reputation and trust in the bank. We strive to resolve potential disputes with customers amicably or through out-of-court settlement of consumer disputes before the competent authorities.

Transparent general business terms and correct information to customers

The general terms and conditions of business, which define in more detail the rules and procedures of banking business and working with customers, must be transparent and accessible. Therefore, we make sure that these are available to customers in a visible place in the bank's official premises and on the bank's website, and are also available for inspection upon request.

We inform the customer about a change in the way of working, practices, tariffs or general terms and conditions and about the date from which the changes will apply within the prescribed or within an acceptable period.

Protection of confidential information

We protect all information, facts and circumstances about each customer as confidential. Only authorized employees of the bank can dispose of this data. Except in cases specified by law, we may not communicate customer information to third parties, use it ourselves, or allow third parties to use it.

Professional communication with customers

Communication channels between employees and customers are different, and we strictly follow the rules of business etiquette and communication with all of them. We are respectful and professional, unambiguous and understandable. The information provided is accurate and consistent with the bank's business policy.

6 Information and implementation of the code

All bank employees must be familiar with the Code. Employees must use the provisions of the code in their work, develop and enrich them, and encourage their colleagues to respect the provisions of the code by their personal example.

Heads of organizational units must ensure compliance of employees' activities with the values and principles of the Code and, in case of detected deviations from the provisions of the Code, take appropriate action. Newly employed workers are familiarized with the Code upon starting their employment, and at least every two years, all workers must again regularly familiarize themselves with the latest developments and test their knowledge via the e-learning system. The code is also published on the bank's website.

Violations of the Code

Violations of the code can be of a general, operational or financial nature and include, among others, e.g. dishonesty, fraud, scams, theft, extortion, illegality, neglect of business activities, inappropriate behavior towards another person, indecency, impropriety, unethicity, etc.

Violations of the Code can be reported anonymously or publicly by employees or external parties:

- to the fraud risk management officer or the business compliance consultant at Gorenjska banka d.d., Kranj, Compliance and PPDFT Department, Bleiweisova cesta 1, 4000 Kranj by regular mail,
- Through the online solution for reporting irregularities: <https://gbkr.vco.ey.com/>, which also enables the management and resolution of the application.

Violations of the Code can also be reported by employees or external parties to the Bank of Slovenia, at the address Slovenska cesta 35, Ljubljana, by regular mail with the note "Report violation - do not open" or via the online link: https://vsebina.bsi.si/prod/brm/Form.aspx?tip_application=NS. Employees are the first to detect irregularities in the bank's operations or in the behavior of colleagues. Anyone (even a third party) who believes that there is a suspicion of a violation of any provision of the Code has the right to report (anonymously or publicly). The application must contain at least information on who the potential violator is and a statement of the circumstances from which it follows that a violation of the Code is suspected.

More precisely, the application, processing and reporting procedures are defined in the Fraud Risk Management Strategy or Activity protocol in the event of a report of suspected fraud.

The Bank must ensure that anyone who in good faith reports a violation of the Code or non-compliance will be protected from any form of retaliation, discrimination or other punishment (direct or indirect humiliation, harassment). The bank must ensure the highest level of confidentiality for both the applicant, the offender and the victim, except in cases where the law stipulates otherwise. More precisely, the whistleblower protection procedures are defined in the Whistleblowing Regulations of Gorenjska banka d.d., Kranj.

In Kranj, 22.12.2023

Member of the board
Mojca Osolnik Videmšek

Member of the Board
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Mario Henjak