

Code of Conduct Of Gorenjska Bank



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1. Introduction

1.1 Purpose and content summary

Code of Conduct of Gorenjska Bank has been written in line with Gorenjska banka values and lists the principles which all Employees must comply with in order to ensure high standards of professional conduct and integrity. The Code of Conduct is applicable to Third parties related to their activities in or on behalf of the Gorenjska Bank.

Setting an appropriate culture is a core principle of robust governance arrangements in the Gorenjska Bank. Thus, the Bank developed, adopted and now promote high ethical and professional standards that are set forth in the Code of Conduct of Gorenjska Bank.

The Code of Conduct was developed taking into consideration needs and characteristics of the Gorenjska Bank, as well as types and nature of the business operations performed in subsidiaries.

The main goal of the Code is to reduce the risks which the Gorenjska Bank is exposed to, in particular operational and reputational risks, which can have a considerable adverse impact on a Banks's profitability and sustainability through fines, litigation costs, restrictions imposed by competent authorities, other financial and criminal penalties, and the loss of brand value and consumer confidence.





The Code aims to:

- > clearly prescribe that everything we do shall always be conducted in compliance with the applicable laws, regulatory requirements, internal policies and corporate values;
- > promote strong risk culture as a fundamental principle and one of the top priorities of the Gorenjska Bank; thus, all Employees shall perform their activities in line with the defined risk appetite and limits, and their respective roles and responsibilities in the organization;
- > set out principles on and provide examples of acceptable and unacceptable behaviors, in particular related to financial misreporting and misconduct, economic and financial crime. This includes fraud, money laundering and anti-trust practices, financial sanctions, bribery and corruption, market manipulation, mis-selling, greenwashing and other violations of consumer protection laws;
- > clearly communicate the expectation for all Employees to conduct themselves with honesty and integrity and perform their duties with due skill, care and diligence; and
- > ensure that Employees are aware of the potential internal and external disciplinary actions, legal actions and sanctions that may follow misconduct and unacceptable behaviors in line with HR internal acts.

1.2 External Regulation Framework

This Code of Conduct is drafted taking into consideration relevant EU legislation, especially EBA Guidelines on Internal Governance.

1.3 Scope of application

Gorenjska Bank adopted this Code to ensure a consistent approach to dealing with ethics and integrity. The Code outlines the risk culture and corporate values of the Gorenjska Bank and explains desirable behaviors, while punishes misconduct and non-compliance.

The Code is addressed to all Gorenjska banka Members and applies to all members of strategic, control and executive bodies, employees, tied agents (e.g., financial advisors) and temporary employees and across all Gorenjska Bank business activities, and shall be applied in compliance with legal requirements and regulations locally in force. The Code is to be applied in conjunction with other relevant bank's policies and corresponding local internal regulations.

This Code is not intended to be a comprehensive guide to all legal and regulatory obligations in force, but it aims at helping to promote a Gorenjska bank's culture by providing all Employees an outline of the compliance rules and the ethical professional standards of the Gorenjska banka.

Compliance with the provisions of this Code within the above-mentioned framework is an integral part of the contractual obligations of each Employee. Parts of this Code of Conduct can be inserted in the contractual agreements with Third parties and made available to all recipients and to the public, always through the Gorenjska bank's approved and official channels of communication (without publishing the document in full).

The minimum standard of compliance for any local policies or operational regulations is in any case set by the current Code of conduct and corresponding rules. Subsidiaries are required to align their local rules with this Code of conduct, without failing to comply with regulatory requirements.





2. Principle values of the Gorenjska Bank

The mission of the Gorenjska Bank is to build partnership by supporting people in creating their future. Gorenjska Bank strives to make a difference and become the first choice for all stakeholders.

In that respect, the principal values of the Gorenjska Bank are as follows:

Trust

Supporting each other. Our strength.

- > We nurture a culture of open communication and work together to achieve our goals, with mutual respect.
- > We have built a culture of open communication, one in which we work together to achieve our goals, create new value and generate new ideas.
- > We listen to and understand our clients, thus we are able to build lasting relationships and achieve common goals.
- > We openly communicate key information so that we can work together toward the achievement of our goals and to create new value.
- > We have built our reputation on active participation and by caring about what our community has to say.





Excellence

A step ahead. Our standard.

- > We strive to always be the best version of ourselves, performing our daily activities with expertise and professionalism.
- > We have built and nurture an environment conducive to employee development and create conditions in which excellence is achievable.
- > We have an active impact on our internal environment (processes) and external environment (client business models, economic parameters, in considering the business environment) and work together with our clients to achieve the very best outcomes.
- > With a proactive approach, we expertly and professionally carry out daily activities within specified deadlines, toward the fulfilment of our goals.
- > We listen, understand and actively participate in projects of significance to the community.

Innovation

Ideas capable of changing reality. Our inspiration.

- > Visionary thinkers, we create an environment that fosters exchange through the potential for development of us all.
- > We have created an atmosphere through which we encourage and utilize potential for further improvement and the exchange of ideas.
- > We think creatively and continue to generate solutions (on the go) ensuring our clients have the best user experience.
- > We create innovative solutions to deliver added value.
- > We improve daily routines by developing new solutions that help refine quality of life.





Responsibility

The result of today's decisions. Our tomorrow.

- > Through personal example, we inspire collegiality and solidarity, promote quality, generate loyalty and clients that can succeed.
- > We inspire collegiality and solidarity through personal example, we monitor the performance of activities with mutual respect.
- > We make the right decisions and thereby create successful and loyal clients.
- > We accept challenges and find the right solutions through which we ensure the sustainability of our operations.
- > By our own example, we support the local community and care for all included.

Dedication

An advisor and a pillar of support. Our way.

- > We build long-term collaboration by providing efficient and simple solutions founded on understanding the needs of our employees, clients and our community.
- > We have built long-term relationships with our clients by providing efficient and straightforward client specific solutions and by creating a quality user experience.
- > Our clients trust us because we are available to them, we know and understand them and provide the support they need.
- > We meet our clients' needs with accessibility and understanding, build trusting relationships that last, and have become a recognizable partner capable of leading toward ever-stronger collaboration.
- > By working together, we build lasting relationships with our clients, who are the most important members of our community.





3. Principles of professional conduct

3.1 Safeguarding the reputation and integrity of the Bank

In business, reputation and integrity are crucial in gaining and sustaining trust and fruitful relationships with all stakeholders. By preserving its own reputation and integrity, Employee is safeguarding the reputation and integrity of the Gorenjska Bank.

The Employees are expected to observe high standards of professional conduct and encourage others to do so. The Employees shall act in integrity with bank's values, the applicable laws and regulations, the industry professional standards and internal rules. They have to be able to demonstrate competence, diligence, respect and ethical manner in their relationship with all stakeholders.

They shall avoid any impropriety, or any appearance of impropriety conduct and shall protect Gorenjska bank's reputation and business sustainability. Employees are expected to refrain from any conduct—whether in the workplace or in private affairs (especially in situations where Employees' actions or public presence may be associated with the Gorenjska Bank)—that could adversely affect the Gorenjska bank's reputation. Employees must avoid expressing opinions, even on social media, in a manner that could compromise or damage the Gorenjska bank's reputation or its business activities.

Only designated employees are authorized to publicly represent Gorenjska Bank or speak on behalf of Gorenjska Bank. Therefore, any opinions expressed by other employees are strictly personal and must not be interpreted as reflecting the Bank's official position. Employees must clearly indicate that any views they share—particularly in public forums or on social media—are their own and not related to their role within the Gorenjska Bank.

Gorenjska bank's name and brand images should be used in good faith, and in line with the relevant internal policies and guidelines.





3.2 Whistleblowing

Employees should timely raise concerns and suspicions on unacceptable conduct occurred or likely to occur, in line with Rules on the reporting of breaches and the protection of reporting persons.. Managers should create an environment where Employees are encouraged to report any questionable conduct or suspicious activity, while the Gorenjska Bank guarantees the protection of whistleblowers and confidentiality of any information reported. Open-speaking culture is one of the pillars of the Gorenjska bank's corporate culture and, therefore, is of utmost importance to ensure that whistleblowing process is properly established, well-known and accessible to the Employees, as well as regularly promoted by the Gorenjska bank's top management.

3.3 Confidentiality and Data Protection

Employees and Third parties shall treat confidential information carefully, refrain from sharing it with others, discussing in public, or inside the Gorenjska Bank but outside the strictly business purpose, always respecting the "need to know" principle. All employees of the Gorenjska bank are responsible for protecting bank's clients' information, as well as Gorenjska bank's proprietary data. Confidential information disclosure has to be performed only in compliance with the adopted internal regulations.

Processing of personal data is permitted only under the conditions laid down in the General Data Protection Regulation (GDPR), the applicable Personal Data Protection Act as in force from time to time, other applicable data protection regulations, the Privacy Policy and related internal acts.

Recipients shall use, access, store, transfer, delete and disclose information belonging to the Gorenjska bank's members with care and based on principle of confidentiality. They shall protect appropriately the information belonging to the Gorenjska Bank, including clients' data from loss, destruction and unauthorized access or use.

Recipients are required to maintain the confidentiality of any non-public information which comes to their knowledge within performance of their work, or in the working environment, and to use such information exclusively for the execution of their work. They must handle such information in accordance with applicable laws and the Gorenjska bank's data protection standards. The obligation to maintain confidentiality remains in force even after the termination of the employment relationship.

3.4 Working environment

Employees must act in integrity, and contribute to creating and maintaining an inclusive, safe and non-discriminatory working environment. They must treat others with dignity and respect and under no circumstances shall demonstrate or tolerate discrimination or harassment on the basis of age, race, color, national origin, citizen status, political opinions, religion, marital status, gender, sexual orientation, gender identity, disability and any other status not otherwise mentioned.

Employees shall not tolerate or exercise mobbing and bullying, but shall support an environment of equal opportunities for professional development. In case an Employee believes that he/she or someone else has been subjected to harassment or discrimination, it should be reported. Apart the fact that employees can report this to superior, HR and other relevant functions, there are also established whistleblowing channels available for reporting of such conducts.





3.5 Environmental and social responsibility

Environmental, Social and Governance (ESG) related risks and opportunities are integral part of the Gorenjska bank's operations. Gorenjska Bank is aware of its responsibility to the wider community, and role in enabling the transition to a more sustainable economy. Gorenjska Bank is dedicated to the goals defined in Environmental Social Governance strategy. In that sense, ESG is fully embedded across all levels – from strategy and governance, to processes, data, and technology – ensuring long-term value creation for all stakeholders. As integrated in community in markets where operates, Gorenjska Bank is fully sensitive to social environment and committed to provide support where needed, especially regarding “green” agenda, well-being, health, education, entrepreneurship and innovation.

3.6 Gorenjska Bank's assets and intellectual property

Employees may only use Gorenjska Bank's assets (e.g. facilities, equipment, technology, business plans, client lists, etc.) for legitimate business purposes, in line with Gorenjska Bank's internal rules. Gorenjska Bank assets should not be used for personal purposes unless allowed, and should be treated in the same manner regardless of the mode of work, whether performed remotely, or from office. Employees should always treat Gorenjska Bank's assets (physical assets, as well as confidential information and intellectual property) with respect and in line with Gorenjska Bank's internal rules even if, or when, employment relationship is terminated. In particular, it is of utmost importance to act in line with IT and Security related internal rules in order to prevent misuse of Gorenjska Bank's assets that could result in leakage of confidential information or other security incidents.

Recipients must respect the intellectual property obligations according to the applicable law. Among the rest, they shall respect Gorenjska Bank's intellectual property, IT systems, equipment, manuals and videos, knowledge, processes, technology, know-how and in general, all other work developed or created within Gorenjska Bank.

Employees should act to prevent any deliberate or non-deliberate misuse of Gorenjska Bank's assets. In case of suspicion or knowledge of misuse of Gorenjska Bank's assets, it should be reported to the competent functions (e.g. Security department).





3.7 Relationships with the Competent authorities

Gorenjska Bank is committed to maintaining transparent and responsible communication with all competent authorities in accordance with applicable laws and internal rules.

Communication and other relationships with Competent authorities must be based on principles of transparency, integrity, professionalism and cooperation, and must be performed in strict compliance with the applicable legislation and Gorenjska bank's/respective Subsidiary's internal rules.

When dealing with Competent authorities, Employees are forbidden to state untrue or misleading information, conceal or omit important facts/information or provide false or altered data. Employees must respond to inquiries from competent authorities in a timely, accurate, and responsible manner. Upon official request, Employees should cooperate with competent authorities in all initiated proceedings, providing necessary documentation and support as required.

3.8 Conflict of interest

Employees must avoid circumstances where their interests may conflict with those of the Gorenjska Bank/respective Subsidiary. If detected, they must be brought to the attention of the superiors and Compliance function in line with Gorenjska bank's on Conflict of Interest.

Employees are required to act in a fair and unbiased manner and to avoid finding themselves in situations of Conflict of Interest, whether actual or potential, that: (i) could impair their independence of judgment and choice; (ii) is incompatible with their duties; (iii) can harm Gorenjska Bank/Subsidiary interest or reputation. This refers also to relationships with all business partners and customers, including suppliers and public authorities.

Employees take decisions related to their activity independently and solely based on solid professional judgment and ethical factors and must not be influenced by family ties, friendships with Third Parties or other personal interests.

Employees must report on personal interest (e.g., corporate roles or shareholdings in companies outside Gorenjska Bank or external jobs) to permit their employing company to identify and manage conflicts that could arise between Employees' and Gorenjska Bank or its stakeholders' interest.

Employees who hold a position that might affect their working activities must inform their employing company and agree the most appropriate way to manage such a position, so that the position does not interfere or conflict with their work for Gorenjska Bank in terms of time, effort and use of company assets and information.

Employees' close family member interests should also be reported whenever the Employee has the power to influence the outcome of a business transaction, and those family members could directly or indirectly benefit from it.





3.9 Client interest protection

Responsible relationship with our clients is the Gorenjska bank's highest priority. Accordingly, transparency in relationships with clients, colleagues, shareholders, and the broader community is of strategic importance.

Employees and Third parties (when acting on behalf of the Gorenjska Bank) must act with reasonable care and exercise prudent judgment towards Gorenjska bank's customers. They must act for the benefit of customers and put their interests first, respecting the applicable law, regulations and internal rules.

Marketing materials, sales information, and advisory activities to the customers should always be based on the principles of fairness, objectivity, transparency, and sound financial judgment. Gorenjska Bank provides all clients with comprehensive, clear, and valid information about its products and services, in full compliance with applicable legislation. By upholding the principles of transparency, Gorenjska Bank enables its clients to better understand the services the Bank's offers, fostering reliable and efficient cooperation based on mutual trust.

Employees must not perform deliberate or negligent sales of products or services in circumstances where the contract is either misrepresented, or the product or service is unsuitable for the customer's needs and risk inclination. The ultimate goal shall always be to ensure that clients receive accurate information and benefit from a level of protection, as well as products and services tailored to their individual needs and profiles.

Gorenjska Bank prohibits practices contrary to the requirements of professional diligence which materially distort or are likely to materially distort the economic behaviour of the average consumer with regard to a product or service, in particular regarding transactional decisions (e.g. false statements, aggressive practices, greenwashing and similar).

Employees shall treat customer complaints seriously, in a fair and timely manner, always respecting local law requirements in terms of both complaint management and customer protection.

3.10 Market transparency and Integrity

In line with regulatory requirements, Gorenjska Bank strictly prohibits any conduct that would constitute market abuse and any unlawful behavior in the financial markets, including engaging or attempting to engage, or recommending/inducing that another person engage in insider dealing or unlawful disclosure of inside information, as well as engaging or attempting to engage in market manipulation.

Employees who possess information not generic and not yet public, relating, directly or indirectly, to one or more listed financial instruments (or relevant issuers), and which, if made public, would be likely to have a significant effect on their market prices (inside information), must not act (disclose or use them to execute transactions for personal or other interest) or cause others to act on the information.

Employees cannot use client or Third-party information acquired in the course of their working activity with Gorenjska Bank, for executing personal dealings or obtaining any personal benefit.





3.11 Antitrust

Violations of competition protection regulations may result in significant penalties and reputational damage to Gorenjska Bank. Furthermore, such breaches may lead to misdemeanor, criminal, and administrative sanctions for individuals responsible for non-compliance. Following previous, Employees are required to be aware of, and to comply with, competition law and antitrust rules. They must not share sensitive commercial information with competitors or be part in meetings with competitors of Gorenjska Bank where information which could reveal future conduct or strategies is exchanged, or in any case illegally or improperly acquire information about the market or the competitors. Employees must not conclude restrictive agreements (agreements which prevent, restrict, or distort competition), or perform activities which could lead to abuse of dominant position, if such was acquired by any Gorenjska Bank member in relevant market.

In cases where employees are uncertain whether a particular action may constitute a violation of free competition principles, they are required to seek guidance before proceeding. In the event of operations or transactions involving the acquisition of substantial ownership interests or governance rights in third-party entities, Gorenjska Bank shall carefully evaluate whether prior notification of a concentration to the relevant Antitrust Authority is required.

3.12 Anti-bribery and Anti-corruption

Gorenjska Bank adheres to the fundamental values of integrity, transparency, and accountability in all jurisdictions where business is conducted, and fosters the culture of compliance in which bribery and corruption is never acceptable. Gorenjska Bank has a “zero tolerance” towards acts of bribery and corruption and prohibits them in any form, both direct and indirect.

Bribery and corruption risks may emerge across various aspects of Gorenjska bank’s daily operations. These include but are not limited to: the offering or acceptance of gifts and business hospitality, interactions with public officials, charity, donations and sponsorships, engagement of third-party service providers, recruitment practices, and corporate acquisitions.

Employees are prohibited from any action of bribery and corruption irrespective of whether the receiver is public official or private individual, and irrespective of their nationality and the place where the bribery and corruption are committed. Attempting, inciting, aiding and abetting bribery and corruption is also illegal and prohibited. Employees cannot request, receive, offer or be in any way involved in facilitation payments, gifts in cash or cash equivalent, while certain gifts and business hospitalities are allowed under rules set forth in the Gorenjska bank’s Anti-bribery and Corruption Policy and and related internal acts governing gifts and business hospitality.





3.13 Anti-fraud

Gorenjska Bank is exposed and faces risks or threats related to fraud from both internal and external sources. Fraud can have a devastating effect on Gorenjska Bank because it could result in significant financial loss and other long-term business repercussions, such as reputational damage. Fraud means any intentional act committed through deceit, abuse or scam – that is, an act of dishonesty for the purpose of obtaining personal or third-party benefits to the detriment of Gorenjska Bank. Frauds are unacceptable and will be sanctioned consistently by Gorenjska bank's (zero tolerance). Any Employee who discovers or suspects an internal or external fraud should immediately report the event in one of the ways specified in Rules on Fraud Risk Management.

3.14 Ethical use of Artificial Intelligence (AI)

AI offers significant opportunities for the financial industry and banking sector such as faster and automated processes, the development of more accurate and granular risk assessments, better customer experience or combating customer fraud more efficiently. However, AI can also bring new risks or increase existing ones, in particular due to the limited transparency and explainability of some AI systems, which among other things can increase the risk of bias and discriminatory outputs.

Gorenjska Bank supports and encourages technological innovation throughout its organization, anyhow the use of AI tools must be conducted in strict compliance with Gorenjska bank's internal policies and applicable laws and ensure responsible, transparent, and fair usage in line with ethical and regulatory standards. Through this approach, Gorenjska Bank fosters innovation while simultaneously safeguarding the interests of its clients, employees, and the broader community. It ensures that the application of artificial intelligence remains ethical, transparent, and socially responsible.

When dealing with AI systems, Employees must follow the General principles and Rules of use prescribed within the Gorenjska bank's Rules on Ethical use of AI. In any case, Employees must not conduct the practices which are defined as prohibited within adopted internal rules and applicable external regulation. Unauthorized usage of external web-based AI tools is restricted, as it exposes Gorenjska Bank to regulatory, reputational and leakage risks.





3.15 Anti-money laundering and counter-terrorist financing

The Employees are prohibited from supporting or facilitating money laundering or terrorist financing activities. They must take reasonable care to not (deliberately or not) tip off persons suspected of money laundering, terrorist financing.

Employees must:

- > Be aware and follow Gorenjska bank's Customer Due Diligence and Know Your Customer rules and other Gorenjska bank's guidance on anti-money laundering in the form implemented locally;
- > Be always vigilant and critically analyse customers and transactions; and
- > Timely raise concerns and report suspicions relating to money laundering, terrorist financing in line with the reporting process implemented in the relevant Gorenjska bank's Member.

Gorenjska Bank provides effective systems and controls for detecting and preventing money laundering, terrorist financing and proliferation financing, including regular staff training, transaction monitoring and cooperation with the competent authorities. Any breach of these rules may have serious legal consequences and result in reputational damage; therefore, Gorenjska Bank promotes diligence, responsibility and immediate action in identifying and reporting any suspected irregularities.

3.16 Financial sanctions

Employees are strictly prohibited from engaging, supporting or facilitating business relationships and business activities with persons and entities that are subject to United Nations, European Union, United States or United Kingdom sanctions as well as with countries that are subject to comprehensive sanctions (Prohibited Countries), in line with relevant Gorenjska bank's rules.

Employees must:

- > Be knowledgeable of the requirements set out in the Policy on Restrictive Measures and the related operational provisions on financial sanctions;
- > Pay particular attention to changes to sanctions requirements and the immediate impacts these have on business activities;
- > Be alerted to spot financial sanctions related issues, involvement of sanctioned parties or countries when reviewing or analysing business dealings; and
- > Escalate concerns immediately as per the applied internal regulation.

3.17 Relationship with Shareholders and Business Partners

Gorenjska Bank is committed to responsible, transparent and ethical governance that ensures sustainable growth and long-term value for its shareholders. At the same time, it recognises the importance of reliable and fair business relationships with its business partners, based on mutual trust, integrity and respect for common interests.





3.17.1 Relationship with Shareholders

Gorenjska Bank strives for effective corporate governance that ensures the protection of shareholders' rights and their timely and transparent information about material business and financial decisions. In doing so, it undertakes to:

- > manage assets carefully and responsibly and ensure long-term stability and growth in value for shareholders,
- > communicate with its shareholders on a regular, clear and transparent basis and provide them with access to relevant and accurate information,
- > consistently observe the principles of corporate governance that ensure the impartial and professional functioning of the management and supervisory bodies.

3.17.2 Relationship with Business Partners

Gorenjska Bank cooperates with business partners who share its values and respect high ethical standards and legal compliance. In establishing and maintaining business relationships, it ensures:

- > fair and transparent procedures for selection and cooperation, avoiding any form of favouritism or unfair practices;
- > respect for contractual obligations and agreements, including reliability, accountability and the professional performance of business activities;
- > socially and environmentally responsible business conduct, giving preference to partners who support sustainable development, environmental protection and ethical business practices.





4. Reporting of information on Breaches

Information on breaches of the Code may be of a general, operational or financial nature and may include, inter alia, dishonesty, fraud, deceit, theft, extortion, conflicts of interest, money laundering, terrorist financing, proliferation financing, breaches of financial sanctions, breaches of competition law, harassment, neglect of business activities, inappropriate behaviour towards another person, indecency, impropriety, misconduct, unethical conduct and similar.

Employees or third parties may report information on breaches in various ways. They may do so anonymously or by disclosing their identity, including, inter alia, via:

- > Via the email address **prijava-krsitev@gbkr.si** or telephone number **+386 4 208 4473**.
- > To the address: **Gorenjska banka d.d., Kranj, Sektor skladnosti in PPDFT, Bleiweisova cesta 1, 4000 Kranj** by ordinary post.

Breaches of the Code may also be reported by employees or third parties to the Bank of Slovenia (Banka Slovenije):

- > by ordinary post to the address **Slovenska cesta 35, Ljubljana, with the indication “Prijava kršitve – ne odpiraj” (“Report of breach – do not open”)**, or
- > via the online link: **https://vsebina.bsi.si/prod/brm/Obrazec.aspx?tip_prijave=NS**.

Employees are the first to be able to detect information on breaches in the Bank’s operations or in the conduct of their colleagues. Any person (including an external person) who believes that there is a suspicion of a breach of any provision of the Code has the right to submit a report (anonymously or by disclosing their identity). The report must contain at least information on who the potential perpetrator is and an indication of the circumstances giving rise to the suspicion of a breach of the Code.

The procedures for reporting information on breaches, the protection of reporting persons, the handling of reports and reporting are defined in more detail in the Rules on the Reporting of Breaches and the Protection of Reporting Persons.



 **GorenjskaBanka**

Because we understand you.