



**PBZ RULES ON
INTERNAL
REPORTING
VIOLATIONS
(WHISTLEBLOWING)**

Zagreb, February 2024

Distribution list: to everyone in the Bank

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1. INTRODUCTION

These Rules are aimed at regulating and encouraging reports sent by the individuals indicated by the law, as defined below in details. These reports pertain to violation of European and national regulations, that damage the public interest or the integrity of Intesa Sanpaolo and of the Group Companies (hereinafter: "the Group") and of which the same subjects become aware within the working context, or as a result of their legal-economic relationship existing with the Group.

So, an effective internal reporting system (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 reporting system governed by these Rules ensures the confidentiality of the reporting person (whistleblower) and of persons involved and mentioned into the report, as defined below, protecting them from retaliatory and discriminatory conduct.

These Rules have been adopted by the Management Board of the Privredna banka Zagreb d.d. (hereinafter: the Bank) with consent of Supervisory Board.

The document describes the methods and channels of communication which the reporting person (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. LAW OF REFERENCE

The internal reporting systems are 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) 596/2014 (MAR) on market abuse,
- Article 24 of Regulation (EU) 2015/2365 on transparency of securities financing transactions and of reuse,
- Article 61 of the Directive 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing,
- Regulation (EU) 2016/679 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)

Republic of Croatia regulation:

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- Article 359 of the Credit Institutions Act (Official gazette 159/2013, 19/2015, 102/2015 i 15/2018, 70/2019, 47/2020, 146/2020, 139/2022, 151/2022),
- Act on the protection of reporting person (Official gazette 46/2022) (hereinafter: the Act) transposing Directive 2019/1937 on the protection of persons who report breaches of Union law
- Article 19 of the Croatian National Bank's Decision on Governance System (Official gazette 96/2018, 67/2019, 145/2020.,145/2021, 51/2023).

3. SCOPE OF APPLICATION

These Rules are applying on Privredna banka Zagreb d.d.

The Rules apply to all employees and external collaborators who have an activities in the Bank.

PBZ Group members will comply with local regulation, ISP Group Rules on internal system for reporting violations and with these Rules by implementing the provisions into their internal rules.

According to these Rules, Internal Audit Department shall periodically send information (reports received/investigations in progress) to the Chief Audit Officer of the Parent Company Intesa Sanpaolo. This documentation shall also include the annual report on the proper functioning of the adopted systems, containing the aggregate information on the outcome of the activities performed following the received reports.

4. INDIVIDUALS WHO CAN REPORT AND OTHER SUBJECTS RECIPIENTS OF PROTECTION MEASURES

4.1 Individuals who can report the violations

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

- employees and self-employed workers who work or have worked for the Group;
- workers or external collaborators, who supply goods or services or implement works for third parties and perform or have performed their work for the Group;
- freelancers and consultants, who work or have worked for the Group;
- volunteers and apprentices (paid and not paid);
- shareholders (natural persons);
- individuals with administrative, control, 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 Group.

4.2 Other subjects recipients of protection measures

Especially in relation to protection measures, the Rules apply also to the following individuals who do not make reports on violations directly ("other subjects"), such as:

- facilitators (persons who help the whistleblowers during the reporting process. They are in the same working context and their support must remain in strict confidence);
- persons in the same working context of whistleblower and linked to him by a fixed emotional bond or a family relations up to the fourth degree;
- colleagues who work in the same job context and have an usual and habitual relation with the whistleblower;
- bodies owned by the whistleblower or for which he works, as well as bodies working in the same job context of him.

5. VIOLATIONS SUBJECT TO REPORTING

Violations of both European and national 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 Group Companies are, for example: public contracts; services, products and financial market, prevention of money laundering and terrorist financing, environmental protection, consumer advocacy, 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 rules governing banking activities, any related violation related to the savings, (for example, the sale of products or banking services), credit transactions (for example, granting of loans or credit endorsement), financial activities (for example, provision of investment services) as well as any violation relating to activities connected with or instrumental to the bank (such as shareholdings stake) may be subject to reporting;
- e) any violation related to the Bank's internal policies and/or procedures, such as the Internal Code of Conduct, the Group Anti-Corruption Guidelines, rules related to procurement, transparency in promoting products and service as well as managing gifts and the Banks expenses;
- f) any conduct that leads to a conflict of interest arising from the nonobservance of the rules and control procedures for such situations (for example, an employee's conflict in a credit transaction where a personal interest is at stake).

The following are excluded from the reporting claims:

- disputes, claims or requests related to a personal interest or involving interpersonal issues that must follow the dedicated procedures (e.g. line manager, human resources function);
- violations within the national security, as a matter of exclusive competence of the national legislator.

6. PROTECTION MEASURES

6.1 Confidentiality and processing of personal data

The Bank implements appropriate safeguards to ensure the confidentiality of personal data for the reporting person and the alleged violator.

The information and all other personal data found out and acquired through these Rules are treated in compliance with legislative on personal data protection and privacy, i.e. EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation/GDPR).

The personal data processed for the purposes of these Rules must be:

- adequate, relevant and limited to data strictly necessary to verify the validity of the report and for its management,
- treated lawfully, correctly and transparently, calibrating the protection of confidentiality granted to the reporting person to the one of 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 the report to third parties.

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 (including Group employees) upon getting the acknowledgement of receipt, receive in a traceable way the specific information on the purposes and methods with which their personal data are processed by the Data Controller (so called "WB Indistinct Audience").

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.

Subjects who receive, examine and evaluate the violation reports, the Trustee of the Internal Reporting Violations, facilitator of the reporting person and any other person involved in the process have an obligation to ensure the confidentiality of information, as well as of the reporting person identity who, in any case must be protected from retaliatory, discriminatory repercussions as a result of reporting.

The rights referred to in articles from 15 to 22 of the EU Regulation 2016/679 by data subjects (including the subjects indicated) 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 identity of the reporting person. However, the person being reported, alleged perpetrator of the offense, is not precluded in absolute terms from the possibility of exercising the rights provided for by the aforementioned articles of the EU Regulation 2016/679. Indeed, in relation to the specific limitations to data subjects rights, with reference to the provisions governed by these Rules, the rights concerned may be exercised through the Data Protection Authority who balances the right invoked by the person being reported and the need for confidentiality of the reporting person's identification data. It is understood that in the event of disciplinary proceedings being

activated, the identity of the reporting person 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 reporting person identity is necessary for defending the accused, the reporting will be usable for disciplinary purposes, only whether the reporting person released his/her consent to the disclosure of his/her identity.

The identity of the reporting person may be communicated to the judicial Authority if the latter requires it, in the context of investigations or criminal proceedings started in relation to the facts covered by the report.

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 are cancelled.

6.2 Prohibition of retaliation and protection measures

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". Retaliation is to be understood as any behaviour, act or omission, even if only attempted or threatened, carried out in connection with the reporting, which causes or may cause, directly or indirectly, unjust damage to the whistleblower and to the other subjects, to be understood as unjustified damage.

The whistleblower and the other subjects benefit from protection only where there is a close causal link between the report and the alleged adverse conduct suffered, directly or indirectly.

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 following shall be considered as revenge:

- a) suspension, dismissal, release from duty or equivalent measures
- b) degrading or denying opportunities for advancement
- c) transfer of duties, change of place of work, reduction of salary, change of working hours
- d) denial of training opportunities
- e) negative performance appraisals or employment recommendations
- f) the imposition or imposition of a disciplinary measure, reprimand or other sanction, including a financial sanction
- g) coercion, intimidation, harassment or isolation
- h) discrimination, disadvantage or unfair treatment
- i) deny offers for concluding contracts for an indefinite period of time, for which the legal conditions were met, if the employee had a reasonable expectation that the same would be offered to him
- j) failure to conclude a successive fixed-term employment contract in accordance with the provisions of national labor law, or its early termination
- k) causing damage, including damage to a person's reputation, in particular on social networks, or financial loss, including loss of business and loss of income

- l) negative labeling based on an informal or formal sector agreement or an industry-wide agreement, which may mean that a person will not be able to find a job in that sector or industry in the future
- m) early termination of the contract for the supply of goods or services or its annulment
- n) revocation of a license or permit
- o) references to psychiatric or medical assessments.

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.

6.3 Protection of related persons

Related persons are:

- facilitators of the reporting person
- relatives, colleagues and all other persons who are connected with the reporting persons and who could suffer retaliation in a work-related context
- legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context.

A related person is entitled to protection as an reporting person if she/he makes it probable that she/he has been harmed by relation with the reporting person.

7. PLAYERS INVOLVED – PERSONS AND FUNCTIONS INVOLVED IN REPORTING VIOLATION PROCESS

7.1 Whistleblower - Reporting person

All the subjects indicated in par. 4.1 who become aware of unlawful conduct in the workplace or as a result of the legal-economic relationship existing with the Group, can make reports according to the established procedures.

Reporting person cannot be put in unfavorable position such as: termination of employment contract, harassment, prevention of promotion, depriving of or reduction of salary and other benefits, initiation of disciplinary proceedings, imposing disciplinary measures or penalties, denial of tasks and duties, change of working hours, depriving of education and professional training, depriving of awards and severance pay, assigning to or transfer to another job post, failure to take measures to protect the dignity of the staff due to harassment by other persons, arbitrary referral to health or fitness to work screening tests and other unfavorable treatment.

Reporting person has right on identity protection and confidentiality and emotional support.

Reporting violations shall not be considered a breach of business secret.

The reporting person is obliged to conscientiously and honestly report violations of which she/he is aware and which she/he considers truthful at the time of reporting the violation.

The possibility of adopting special treatment is considered for those reporting persons who may be involved in the violation, consistent with the applicable regulations.

7.2 Trustee of Internal Reporting (Head of Internal reporting system)

Trustee is an employee of the Bank¹ who is nominated for receiving reporting violations and managing the process regarding reporting violation. Trustee of Internal Reporting must ensure the integrity of the process.

The Bank nominates Trustee and Trustee Deputy in accordance with the Bank's Human Resources and Organization procedures and Act on the protection of reporting person².

The Trustee and/or her/his deputy must perform their duties lawfully and conscientiously and must not abuse their authority at the damage of the reporting person.

Trustee and Deputy Trustee shall be nominated with their prior consent.

7.3.1 Trustee and Deputy trustee of Internal Reporting

Trustee and Deputy trustee shall:

- receive and record the reports submitted and confirm receipt of the report within seven days from the date of receipt;
- ensure the confidentiality of the information and the identity of the reporting person in order to protect reporting person from unfair, retaliatory or discriminatory repercussions which may result from the reporting;
- carry out an initial feasibility examination, assessing the conditions to decide whether to proceed with the appropriate investigations or file the report;
- examine the violation report and provide the reporting person with feedback on the report, as a rule within 30 days, but not longer than 90 days from the date of confirmation of receipt of the report or if the confirmation is not sent to the reporting person, after seven days from the date of reporting;
- promptly take actions within her/his authority necessary to protect the reporting person if the reporting person has made it probable that she/he may have been the victim of a harmful act due to reporting violation;
- notify the competent authority for external reporting of violations (Ombudsman) in writing about received reports within 30 days following the decision on the outcome of report on violation;
- forward the report on violation to the authorities having powers to act on the contents of the report, if the violation has not been resolved by the employer;
- depending on the type/scope of the violation, activate the investigations involving the relevant competent function as well as the other competent function of the Bank;
- acquire the results of the investigations conducted by the assigned function;
- promptly inform the reporting person in writing of the outcome of the examination of the reporting person.

Trustee and Deputy trustee is subject to specific and adequate training on reporting.

¹ According to Act on the protection of the reporting person, Article 19, paragraph 2, employer with 50 or more employees is obliged to establish internal reporting violations.

² According to Act on the protection of reporting person, article 20, paragraph 2, point a), Employer shall nominate Trustee on a proposal of works council or trade union's representative who has assumed the rights and obligations of the works council.

7.3.2 Selection and nomination of a Trustee and Deputy Trustee

Selection of a Trustee and Deputy Trustee on a proposal of works council or trade union's representative

Works council or trade union's representative who has assumed the rights and obligations of the works council may propose nomination of a Trustee and Deputy Trustee, subject to her/his prior written consent.

Human Resources and Organization shall assess the appropriateness of proposal for nomination of Trustee and Deputy Trustee. The Management Board of the Bank shall nominate as a Trustee and Deputy Trustee the employees proposed by works council or trade union's representative.

The Management Board shall dismiss the nominated Trustee and Deputy Trustee without delay on the basis of a proposal from the works council or the trade union's representative who has assumed the rights and obligations of the works council.

The Management Board will initiate proceedings for the nomination of a Trustee and Deputy Trustee no later than 30 days after the dismissal of a Trustee and his Deputy. Until nomination of a new Trustee, Deputy Trustee shall conduct Trustee's duties, unless circumstances indicate that a third person should be temporarily nominated as a Trustee.

Nomination of a Trustee and Deputy Trustee if the works council or trade union's representative do not propose a Trustee

If works council or trade union's representative do not propose a Trustee and Deputy Trustee, the Management Board of the Bank shall decide about nomination of Trustee of internal reporting and his Deputy.

7.4 Function Responsible for the Investigation

The Trustee leads the investigation.

Trustee may include in the investigation: the structures of the Human Resources and Organization, Compliance Department, Security and Business Continuity Management Department, Legal Department and the Internal Audit Department (hereinafter: relevant functions).

The persons to whom reporting person reported violation and any other persons involved in proceeding related to violation reporting shall be obliged to protect the information disclosed in report.³

The competent operating functions, engaged by the function responsible for conducting the investigation, evaluates and implements the necessary risk mitigation measures and eliminates irregularities. The competent operating functions reports to function responsible for conducting the investigation and Internal Audit Department about taken measures for eliminating the irregularities.

³ Article 16 of the Act on the protection of reporting person

8. INTERNAL REPORTING VIOLATIONS PROCESS

The process of investigation, management and communication of the reports made by the legitimated subjects, as indicated in paragraph 4.1, and addressed to PBZ, is broken down below. Paragraphs 8.7 and 8.8 specifically regulate the process relating to reports from shareholders and members of the Corporate Bodies.

8.1 Internal reporting

Whenever an reporting person suspects that a violation occurred, or could potentially occur, he/she can report it by sending message by e-mail to:

- zvizdaci@pbz.hr to which Trustee of Internal Reporting Violation and Deputy Trustee have an access. Report could be sent in written form on address: Privredna banka Zagreb d.d., Radnička cesta 50, at attention: Trustee of Internal Reporting or directly, in written form, to Trustee or by the statement to Trustee by means of a written memo.
- oral, through the use of a voice messaging system to the dedicated telephone number.

The report should contain:

- data about reporting person - whistleblower,
- data about persons to whom the report relates and
- a detailed description of the facts and behavior considered in breach of the regulations indicating, if possible, the documents and the rules that are considered violated and other valuable input for conducting the investigation of the alleged offenses.

Trustee will have access to these two media, designed to collect reports.

The whistleblower may also request, via the two channels indicated above, a meeting aimed at making the report. The meeting shall be scheduled within a reasonable time with a Trustee. In this case, with the prior consent of the whistleblower, the report is documented by recording on a device suitable for storage and listening or by means of minutes. The whistleblower can verify, correct and confirm the minutes of the meeting with his signature.

The references for the use of these internal channels are advertised both on the relevant Bank's intranet and on the website of the Bank in the dedicated sections.

Appropriate measures will be taken to effectively protect the reporting person's identity and ensure confidentiality.

The reports are received through specific and encrypted channels, in a separate and independent manner compared to the ordinary channels.

The reporting person is obligated to declare if he/she has any personal interest linked to the reporting.

Anonymous reports are not the matter of these Rules, and are managed by other channels for investigation, except in case when it becomes obviously to Trustee who is behind anonymous report as reporting person and fact that report is relevant for protection measures.

8.2 Receiving, Recording and Investigation of the Report

Upon receiving the report, the Trustee after viewing it, sends, within 7 days from the date of receipt, communication to the whistleblower as an "acknowledgement of receipt" and registers the report.

The Trustee performs a preliminary analysis of the report to verify the pertinence, keeping the conversation with the whistleblower and contacts the whistleblower to request, if necessary, any additional documentation.

The pertinent reports (compliant with the violations indicated in paragraph "5 - Description of the violations to be reported") are diligently followed up by sending to the Function in charge of the investigation, while the reports considered irrelevant are filed, after having advised the whistleblower.

The timing of the entire procedure, from the taking in charge of the report till the conclusion of investigations and the consequent release of feedback to the report, are necessarily commensurate with the complexity of the checks.

In any case, the Trustee, upon receipt of the results of the checks carried out by the Function in charge of the investigation, provides feedback to the reporting person - whistleblower within three months from the date of the "acknowledgment of receipt" or, in the absence of such notice, within three months from the expiry of the seven days deadline from the submission of the report.

The quarterly reporting to the Audit Committee on the reports received and the investigations in progress ensures in any case the monitoring of the terms of the process.

8.3 Investigation

Trustee and the relevant functions, shall carry out the investigation, involving the person under investigation for violations that require in depth examination and clarifications. Relevant functions report to Trustee about findings whereupon Trustee prepares Investigation Memo which formalize the findings as well as the possible need to follow up.

If it is necessary, Trustee of Internal Reporting contacts the reporting person, to request any missing documentation.

For the assessments requiring follow up action, the following actions shall be taken:

- send reports with the results of investigation and possible follow up requirements to the Trustee, when investigation is conducted by relevant function
- identify together with the competent operational functions, any eventual actions of risk mitigation (organizational, IT etc.),
- involve Legal Department for in order to determine the legal aspect of dealing with irregularities,
- engage Human Resources and Organization if there are grounds to implement any necessary measures (termination of employment contract, damage compensation),
- report relevant events to the corporate bodies.

The reports regarding investigations without follow up action, are sent to the Trustee for filing.

8.4 Communication to the Reporting person - whistleblower

The reporting person (whistleblower) receives, from the Trustee, an "acknowledgement of receipt" of the report within 7 days of the receipt, and, subsequently, a feedback from the file (within three months from the date of the acknowledgement of receipt or, in the absence of such notice, within three months from the expiry of the period of seven days from the submission of the report).

The reply provides information on the conclusion of the checks carried out in order to ascertain the existence of the reported facts and, without prejudice to the protection of the subjects involved in various capacities in the investigations and to the confidentiality of the latter, the outcomes and any measures adopted.

The reporting person (whistleblower) will eventually be contacted by the Trustee in charge of receiving the report in the event of the need for any additional elements deemed necessary or by the Function that performs the investigation.

8.5 Communication to the person being investigated

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

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

8.6 Follow-up Actions adopted

The Human Resources and Organization function, engaged by the Trustee or function that performed the investigation, evaluates whether the conditions for any measures (termination of employment contract, damage compensation) and, if necessary, proceeds to formally communicate with the person under investigation, specifying that the report stems from whistleblowing.

The relevant operational functions, engaged by the function responsible for carrying out the investigation, evaluate and implement the necessary risk mitigation measures (e.g. reinforcement of the processes, controls, systems etc.), as defined by the Function responsible for investigation and information about measures taken shares with the Trustee, Function responsible for investigation and Internal Audit Department.

Legal Department undertake activities related to the possible submitting of criminal reports and / or co-operation with the competent authorities during initiated proceedings (Ministry of the Interior of the Republic of Croatia, State Attorney's Office) as well as other activities related to the legal risk assessment for the Bank in concrete case.

8.7 Shareholder violations reporting and related review and feedback process

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 par. 5) depending on the legal-economic relationship that binds him/her to the Bank, using the main channel described in paragraph 8.1 (written and oral), to which the Trustee have access.

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 email or, in the case of an oral report, send it to the address e-mail address above.

The report must contain a detailed description of the facts and behaviors considered to be in conflict with the law, 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 file will be managed in analogy to the ordinary Whistleblowing process, with the involvement, if appropriate and required, of the relevant Functions and the Corporate Bodies, as well as ensuring the necessary information flows.

8.8 Representatives violations reporting and related review and feedback process

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 , who suspect that a violation, as described in paragraph 5, has occurred or may occur, can make a report to the president of the Supervisory Board, in the following form:

- Written, by sending an e-mail to the appropriately identified address belonging to the president of Supervisory Board ;
- Oral, through an eventual dedicated meeting, which will be set within a reasonable time.

The report should contain a detailed description of the facts and behaviors considered in breach with the regulation, 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/she has any personal interest linked to the reporting.

Within 7 days from the date of receipt of the report, the the president of Supervisory Board sends an "acknowledgement of receipt" to the whistleblower representative.

The president of Supervisory Board examines the report received and identifies the most appropriate ways to carry out the necessary investigations, proceeding, if necessary, to convene the Supervisory Board. To this end, the Supervisory Board can appoint the competent Corporate Function based on the matters covered by the report for the preliminary investigation and assessment activities.

Following the completion of the preliminary investigation and analysis process, the Corporate Function in charge provides complete and exhaustive information to the Supervisory Board, which examines the report and, if necessary, adopts any eventual necessary initiatives. In particular, the Supervisory Board informs the Management Board of the deficiencies found, supervising the adoption of suitable corrective measures, and

promptly provides communication to the competent Authorities in the cases envisaged by the current legislation.

Once the examination has been completed - and in any case within the maximum term of three months from the date of the acknowledgment of receipt or, in the absence of such notice, within three months from the expiry of the seven days term from the submission of the report the president of Supervisory Board sends a response to the reporting representative.

8.9 Supervision of the Process and Reporting

The Trustee of the Internal Reporting 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, updates, on a quarterly basis, the executive director of Internal Audit Department on the reports received and investigations in progress, whereupon executive director of Internal Audit Department reports Audit Committee about it. Also, Trustee produces an annual report on the proper functioning of the internal reporting containing aggregate information on the outcomes of the activities following the reports received. Annual report on the proper functioning of the internal reporting Trustee delivers to Internal Audit Department. Executive director of Internal Audit Department submits Annual report to Management Board in order to be approved by the Management Board and made available to the Bank's employees.

In the case of significant events, the Trustee promptly informs executive director of Internal Audit Department who informs the president of Management Board, Supervisory board and Audit Committee.

Internal Audit shall periodically send information (reports received/investigations in progress) to the Chief Audit Officer of the Parent Company. This documentation shall also include the annual report on the proper functioning of the adopted systems, containing the aggregate information on the outcome of the activities performed following the received reports.

8.10 Characteristics and Obligations of the Persons Involved in the Process

The persons responsible for receiving, investigation, examining and assessing the violation reports:

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

The persons responsible for receiving, investigation, examining and assessing the violation reports can't participate in the adoption of any disciplinary measures, which are assigned to the competent Functions or Corporate Bodies and are bound by the confidentiality obligations included in in the "protection measures".

9. EXTERNAL REPORTING VIOLATIONS PROCESS

In priority, the reporting persons (whistleblowers) are encouraged to use the internal channels and, when certain conditions occur, they can make an external report directly to the competent Authorities (Public Ombudsman).