



INTERNAL WHISTLEBLOWING PROCEDURE

CONTENTS:

1. INTRODUCTION	3
2. REFERENCE DOCUMENTS	3
3. TERMINOLOGY	3
4. DETAILED DESCRIPTION	4
4.1 Delivery of information.....	4
4.2 Receipt of Information	5
4.3 Whistleblowing if information contains data classified as secret.....	5
4.4 Proceedings with received information	6
4.5 Protection of Informant	6
4.6 Compensation of Damages Occurring Due to Whistleblowing	7
4.7 Prohibition of Abuse of Whistleblowing	7

1. INTRODUCTION

This document regulates internal whistleblowing procedure, whistleblower's rights, the Bank's obligations referring to whistleblowing, as well as other issues relevant for whistleblowing and protection of the whistleblower. This document represents general act regulating internal whistleblowing procedure in sense of Law on Protection of Whistleblower.

2. REFERENCE DOCUMENTS

The rules requiring the adoption of general act on procedure relating to internal whistleblowing are:

- Law on Protection of Whistleblower
- The Rulebook on the manner of internal whistleblowing, manner of appointing the Authorized Person (as defined below), with the employer, and other issues relevant for internal whistleblowing with the employer with more than ten employees

3. TERMINOLOGY

Internal whistleblowing – is disclosing of information relating to violation of external regulations and internal rules (policies, rulebooks, procedures) by the employees, violation of human rights, as well as disclosure of information on safety hazards, hazards to public health, environment and causing damage of a larger scale. In particular, but not limited to, internal whistleblowing relates to:

- violations of national regulations, such as: i) administrative, accounting, civil or criminal offenses; ii) illegal behavior or violations of organization and management models;
- violations of national regulations concerning several sectors, such as, 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;
- violations of national rules that harm the financial interests of the country or of the internal market or that frustrate the provisions of the national acts in the above sectors (e.g. behavior attributable to illicit acts);
- all violations of the rules governing banking activities, according to Intesa Sanpaolo Group Rules, thus 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;
- any violation related to Company internal policies and/or procedures, such as the Rulebook "Code of Conduct", the Rulebook "Anti-Corruption Rules", rules related to procurement, transparency in promoting products and service, as well as managing gifts and company expenses;
- 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)..

Informant/Whistleblower – is an individual who discloses information about an illicit activity in connection to his/hers working relationship (employment, temporary employment, volunteering, or any other factual work for the Bank), employment procedure, business cooperation and right of

ownership, i.e. all staff members, including the collaborators in a business relationship, may submit a report regarding such violations. For example, the following shall be regarded as whistleblowers:

- employees and self-employed workers who work or have worked for the Bank;
- holders of a professional collaboration relationship;
- 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;
- volunteers and apprentices (paid and not paid);
- shareholders (natural persons);
- individuals with administrative, control, supervisory or representative functions.

Damaging action – is any action or omission to act with regard to the whistleblowing, which endangers or violates the right of the whistleblower or the person entitled to protection as the whistleblower, or puts such a person into an unfavorable position.

Person Authorized to receive information and conduct a procedure – is the person authorized to receive information and conduct a procedure related to internal whistleblowing (hereinafter: the Authorized Person).

Authorized Public Body – is a body of the Republic of Serbia, territorial autonomy or a local self-government unit or a holder of public authority, competent to act on information by which the whistleblowing is done, in accordance with the law.

4. DETAILED DESCRIPTION

4.1 Delivery of information

The internal whistleblowing process starts with the reporting of information to the Authorized Person

The Authorized Person related to internal whistleblowing is Milica Rapaić, Head of HO Functions Audit Office, as primary contact. Alternatively, only if whistleblower feels that, because of the nature of the report, the Internal Audit could potentially be in conflict of interest, the report shall be addressed to Ana Dominiković, Head of Compliance Office.

Reporting could be made:

1. In writing:

- By electronic mail on the e-mail address uzbunjivanje1@bancaintesa.rs
Solely in case when the whistleblower feels that, because of the nature of the report, the Internal Audit could potentially be in conflict of interest, the report is alternatively sent to e-mail address uzbunjivanje2@bancaintesa.rs
- Direct handing of written document
- Via ordinary or registered mail letter on postal address:
ATTN: Person authorized to receive information and conduct a procedure related to internal whistleblowing
Milentija Popovića 7b
11070 Novi Beograd

2. Orally with written minutes on the information.

Ordinary or registered mail letters bearing a note that indicates that they are addressed to the Authorized Person, or, on the envelope of which it is visible that the letter relates to the internal whistleblowing, may be opened only by the Authorized Person related to the internal whistleblowing.

The information may contain whistleblower's signature and data on whistleblower.

The Authorized Person is, within his/hers authorizations, obliged to act on anonymous reports as well.

4.2 Receipt of Information

The Authorized Person is obliged, when receiving report, to inform the whistleblower that his/her identity may be disclosed to the competent authority if it would not be possible for that authority to act without the disclosure of the whistleblower's identity, as well as to inform him/her about the measures of protection of participants in a criminal proceeding.

After receipt of information, the Authorized Person is obliged to issue acknowledgement of the receipt of information that must include:

- short description of the factual state on the information related to the internal whistleblowing;
- date, time, place, and manner of communication of the information related to the internal whistleblowing;
- number and description of enclosures delivered with the information on the internal whistleblowing;
- data about whether the Whistleblower wants information on his/her identity to be disclosed;
- data on the Bank; signature of the Authorized Person related to the internal whistleblowing.

The acknowledgement of the receipt of information may contain the signature of the whistleblower and data of whistleblower, if he/she wishes so.

Date / time of the receipt of information means:

- date of the immediate delivery of written documents or oral delivery of information;
- date of the delivery of a letter to the post office in case of registered letter;
- date of receipt in case of ordinary mail;
- time indicated in receipt of the electronic mail

The acknowledgement of the receipt of information related to internal whistleblowing should be issued to whistleblower, if possible, while the other copy is filed with the Authorized Person.

4.3 Whistleblowing if information contains data classified as secret

Information may contain data classified as secret.

The classified information referred to in paragraph 1 of this item shall be considered data that, in accordance with the regulation on confidentiality of data, have been previously classified as secret.

If information contains data classified as secret, the whistleblower is obliged to contact the Authorized Person first, and if the information refers to the Authorized Person and to the alternative contact simultaneously, the information is submitted to the Board of Directors.

In the case that the information containing data classified as secret is not processed within 15 days, i.e. no response was given or appropriate measures within its competence were not taken, the whistleblower may contact the authorized public body.

Exceptionally from paragraph 3 of this item, in the case that the information relates to the Board of Directors member, the information shall be submitted to the authorized public body.

If information contains data classified as secret, the whistleblower shall not make public whistleblowing, unless otherwise specified by law.

If information contains data classified as secret, the whistleblower and other persons are obliged to comply with general and specific measures for the protection of data classified as secret prescribed by the law that regulates the secrecy of data.

4.4 Proceedings with received information

The Authorized Person shall act upon information without delay, within 15 days from the date of report submission.

Depending on the character of the received information (type of the event, involved persons), the Authorized Person undertakes actions to verify the information and eliminate consequences of damaging actions occurring in relation to the received information. When undertaking actions, the Authorized Person may conduct proceedings independently or in cooperation with organizational units which are, according to the Organization Code, competent for control of the business activities within the Bank, while complying with the principle of protection of the Whistleblower's identity.

During proceedings, the Bank is obliged, on whistleblower's request, to provide information on course and actions undertaken, enabling him/her to get insight into file documents and to participate in process.

If during proceedings, statements of persons who have knowledge about the information are taken with a purpose of verification of information, minutes shall be made thereof. The person giving the statement shall be entitled to confirm the contents of the minutes.

After the completion of the procedure, report is made on actions taken during the proceedings related to the internal whistleblowing, undertaken and measures are planned in order to eliminate the observed irregularities and consequences of damaging action arising in connection with internal whistleblowing. The report shall be submitted to the whistleblower. The whistleblower may give his/her comments on the report.

The Authorized Person is obliged to inform the whistleblower about the final outcome of the procedure after its completion, within 15 days after the completion.

4.5 Protection of whistleblower

The Authorized Person is obliged to protect whistleblower's personal data, i.e. data based on which the identity of the whistleblower can be disclosed, unless whistleblower agrees with the disclosure of that information, in accordance with the law that governs the protection of personal information.

Any person who becomes aware of information based on which the identity of whistleblower can be revealed is obliged to protect that information. Data based on which identity of whistleblower can be revealed shall not be communicated to the person indicated in the information, unless otherwise prescribed by particular law.

If during the proceedings is necessary to disclose whistleblower's identity, Authorized Person is obliged to inform whistleblower before disclosure of his/her identity.

The Bank shall not, by doing or omitting to do something, put the whistleblower in more unfavorable position with regard to the whistleblowing, in particular if more unfavorable position relates to: employment; acquiring trainee or volunteer status; work outside the employment; education, training or professional development; promotion at work, assessment, acquiring or losing a title; disciplinary measures and penalties; working conditions; employment termination; salary and other remuneration from employment; participation in the profit of the employer; payment of benefits and severance pay; scheduling or moving to another workplace; not taking precautionary measures to protect against harassment by others; referral to mandatory medical examinations or referrals to assess work ability..

The whistleblower shall be entitled to protection in line with the Law on Protection of Whistleblowers, if:

- he/she discloses information in a way prescribed by the law;
- he/she discloses information within a year from the date he/she became aware of the action which is the reason for whistleblowing, and no later than ten years from the date of the performance of that action;
- at the time of whistleblowing, based on available data, a person with average knowledge and experience as the whistleblower would believe in the veracity of the information.

The same right to protection shall be granted to other persons as to the whistleblower, against whom a damaging action has been undertaken based on the disclosed information, in line with the Law.

The whistleblower against whom a damaging action related to the whistleblowing has been taken is entitled to a court protection. The court protection shall be exercised by lodging a lawsuit for protection in relation to the whistleblowing to competent court within six months from the date of awareness that damaging action was made, or three years from the date of the occurrence of the damaging action.

4.6 Compensation of Damages Occurring Due to Whistleblowing

In case of damage incurred due to whistleblowing, the whistleblower shall be entitled to compensation in line with the law governing contracts and torts.

4.7 Prohibition of Abuse of Whistleblowing

Abuse of whistleblowing is prohibited. Abuse of whistleblowing is made by a person who:

- discloses information he/she knows is untrue;
- apart from a request for undertaking actions related to report, he/she requires unlawful gain/interest.