

# INTERNAL WHISTLEBLOWING





## Report any suspicion of misconduct and support responsible business practices at AIK Banka

We build the trust of all our stakeholders on the basis of acting with integrity and adhering to the highest ethical standards. You can express concerns about undesirable behaviour through various channels, thus contributing to safeguarding legality and maintaining compliance with established standards of responsible business practices.

### What is whistleblowing?

*Whistleblowing* is the disclosure of information regarding violations of regulations, breaches of human rights, misuse of public authority contrary to its intended purpose, threats to life, public health, safety, and the environment, as well as a means to prevent significant harm;

### Who is considered a Whistleblower? A

Whistleblower is an individual who reports harmful activities related to their employment with the Bank, the hiring process, use of the Bank's services, business relationship with the Bank, or ownership rights with the Bank, and who has had their rights endangered or violated, or who has been placed in a disadvantageous position.

### Examples of Whistleblowing reports:

Violation of regulations, internal acts, rules of good business practice, corruption, or occurrences and processes within the Bank that are not in accordance with regulations, the Bank's acts, or rules of good business practice.

### Who can submit a whistleblowing report?

Clients, business partners, employees of the Bank, and anyone who suspects that an action has been taken by an employee or individual acting on behalf of AIK Banka, which could have legal, criminal, or reputational consequences for the Bank.

### How are whistleblowing reports submitted?

If you become aware that any of our employees or individuals acting on behalf of AIK Banka is involved in a breach of regulations, ethical principles and values, or any form of illegal or unacceptable behaviour, you can assist us by reporting your suspicions or concerns via email to: [uzbunjivac@aikbanka.rs](mailto:uzbunjivac@aikbanka.rs);

A whistleblowing report may also be submitted as follows:

- By directly sending a report to the address of the Bank's registered seat addressed: RE: Whistleblowing Officer at the Bank;
- By regular or registered mail to the following address: Bulevar Arsenija Čarnojevića 59A, 11070 Novi Beograd, Belgrade, addressed: RE: Whistleblowing Officer at the Bank;
- Verbally, with the preparation of a Record of Receipt of Whistleblowing Information at the specified address
- By calling the telephone number of the Whistleblowing Officer at the Bank at +381 11 202 8846

### Is submitting a whistleblowing report anonymous or are you required to provide your identity?

You are not required to provide your identity. The person submitting the report decides whether or not he/she wishes to remain anonymous or not.

### Who in the Bank handles whistleblowing reports?

The **Authorised Person (Whistleblowing Officer)** at the Bank, who has extensive experience in ensuring regulatory compliance, including mechanisms for preventing fraud and misuse, as well as confidentially investigating and establishing relevant circumstances, handles the receipt of whistleblowing information.

### Which issues are not suitable for whistleblowing reports?

Whistleblowing is not intended for general questions about the Bank's operations, inquiries, complaints, or other forms of expressing dissatisfaction from clients and business partners, including reports of workplace harassment (mobbing).

### Can anyone prevent a Whistleblower from filing a report?

Preventing whistleblowing is prohibited.

### What is the deadline for submitting a report?

A report can be submitted within one year from the date of becoming aware of the action being reported, or within 10 years from the date the action in question occurred.

### Whistleblowing procedure

The authorised person must act on the information received within 15 days of its receipt.

During the procedure, the authorised person is obliged to: provide updates on the progress and actions taken in the process upon the Whistleblower's request; grant the Whistleblower access to the case files; allow the Whistleblower to attend proceedings related to the case. The Authorised Person must inform the Whistleblower of the final outcome of the procedure within 15 days of the completion of the process.

### Whistleblowing which includes confidential<sup>1</sup> information

If the information contains confidential data, the Whistleblower must first address the matter to the designated officer. If the information concerns the designated officer, the Whistleblower should submit the report to the **Chairperson of the Executive Board** of the Bank. If the designated officer or the **Chairperson** of the Executive Board does not act within 15 days of receiving the information containing confidential information, or if they do not respond or take appropriate action, the Whistleblower may escalate the matter to the **Authorised body**<sup>2</sup>.

### Is the Whistleblower protected?

Any person who whistleblows within the stipulated timeframe is guaranteed protection under the Law on the Protection of Whistleblowers. However, this protection does not extend to those who abuse the system by providing false information

or seeking unlawful benefits in addition to requesting action regarding the whistleblowing information.

The designated officer (Whistleblowing Officer) receiving the information, as well as any other individual who becomes aware of these details, is required to protect the Whistleblower's personal data and any information that could reveal their identity, unless the Whistleblower consents to the disclosure of such data.

Upon receiving the information, the designated officer must inform the Whistleblower that their identity may be disclosed to the relevant authority if such disclosure is necessary for the authority to act on the information. Additionally, the Whistleblowing Officer must inform the Whistleblower of the protective measures available for participants in criminal proceedings.

If it becomes necessary during the process to reveal the Whistleblower's identity, the designated officer must notify the Whistleblower of this requirement before disclosing their identity.

<sup>1</sup> **Confidential information** is considered information that has previously been identified as confidential in accordance with confidentiality regulations

<sup>2</sup> **Authorised body** is a body or authority of the Republic of Serbia, territorial autonomy or unit of local government or public entity authorised to act on information regarding whistleblowing, in accordance with the law

(such as the Ministry of Internal Affairs, the Public Prosecutor's Office, the Anti-Corruption Agency, the Ombudsman, etc.)