

Procedure for handling whistleblowing

Whistleblowing and whistleblower protection

Unicredit Banka Slovenija d.d.
Ljubljana, November 2025

Podpiramo skupnosti
pri napredku.



Agenda

1

Whistleblowing channels

2

Procedure for handling whistleblowing reports

3

External whistleblowing



Kanali za prijavo suma nepravilnosti

Whistleblowing may be submitted through one of the following channels*:

SpeakUp system® web link

[LINK](#)

Telephone 0800 83 115

Access code 129562

E-mail

To the following address:

whistleblowing@unicreditgroup.si

Sending a written report to:

UniCredit Banka Slovenija d.d.

DON'T OPEN – FOR: COMP, Whistleblowing Champion

Ameriška ulica 2, 1000 Ljubljana, Slovenija

Request a physical meeting or call:

With a request to UniCredit Banka Slovenija d.d., DON'T OPEN – FOR: COMP, Whistleblowing Champion, Ameriška ulica 2, 1000 Ljubljana, Slovenija, or e-mail: whistleblowing@unicreditgroup.si

Breaches and/or irregularities related to issues governed by the Bank's whistleblowing policy and external regulations may be reported, in particular as regards the following conduct:

1. Bribery and corruption
2. Money laundering/terrorist financing
3. Breaches of financial sanctions rules
4. Violation of antitrust laws
5. Insider dealing and/or market manipulation
6. Harassment
7. Bullying
8. Fraud and scams
9. Misuse of confidential customer and business information
10. Breach of a code of ethics and/or code of conduct
11. Violations of other laws and regulations applicable to Unicredit Banka Slovenija d.d.



Procedure for handling whistleblowing reports

How the process works

- Secure whistleblowing channels are provided to ensure the anonymity and protection of the reporting person.
- Personal data shall be treated confidentially.
- The whistleblower shall receive feedback on receipt and feedback on the investigation, absence of retaliation or discrimination against the reporting person.
- If the whistleblower is anonymous, he or she will not be able to receive feedback on the results of the investigation if he or she has used channels that do not allow for the exchange of messages.

Who are the stakeholders involved

- Compliance is the owner of the process: all reports, anonymous or signed, including those received from branch managers or other functions outside whistleblowing channels, must be transmitted confidentially to the Chief Compliance Officer of UniCredit Banka Slovenija d.d.
- The assessment of each case at UniCredit Banka Slovenija d.d. is carried out by a working group for handling whistleblowing reports. It examines the report, informs about the status of the whistleblower's proceedings, conducts an investigation, prepares a report to the investigation and proposes appropriate measures.



External whistleblowing

Reports of irregularities may be submitted through competent external institutions in the Republic of Slovenia and the European Union. The procedure for handling reports is managed by external institutions according to their established rules and procedures. In Slovenia, the procedure is regulated by the Protection of Whistleblowers Act.

Unicredit encourages employees to use internal whistleblowing reports.

The whistleblower may submit the whistleblowing report to external institutions, in particular if one of the following conditions is met at the time of submission:

- in whistleblower's work environment there is no provision on mandatory activation of internal reporting channel, or such channel is not active or even if it is active, is not in line with the law;
- has already submitted an internal report and has not received any feedback of follow-up;
- have reasonable grounds to believe that internal reporting would not be followed up effectively or that the same reporting could create a risk of retaliation;
- has reasonable grounds to believe that the infringement could constitute an imminent or manifest threat to the public interest.

In addition, the reporting person may contact external institutions and inform them of retaliation received for his or her report. The whistleblower may also use public disclosure of irregularities if conditions are given.

