

Whistleblowing Process

By its internal acts, UniCredti Bank a.d. Banja Luka sets up minimum requirements to ensure an environment in which third parties feel free to report detrimental or illegal acts.

The irregularities refer to any action and/or omission in a work-related context or impacting the work, that is or could be harmful to the Bank and employees of the Bank, i.e. irregularities which are in relation to the contract and execution of the contract with you, as a third party. The action and/or omission mean:

- Illegal, unfair or unethical conduct,
- conduct that presents a breach of laws and the other regulations,
- conduct that presents a breach of rules and procedures of the Bank.

Conditions under which the illegal and detrimental conduct is reported

The Bank fosters the principles of the ethical conduct and protects all employees and the third persons that report the irregularity. In order to report the unlawful and detrimental conduct, you can submit the written report (by the mail or electronic mail) or the verbal report (over the telephone, or through the direct contact).

All reports, either written or verbal, will be considered seriously.

However, it is recommended that reports are written and named (reports in which the Whistleblower's identity is stated) for the following reasons:

- it is more difficult to investigate an issue if the additional questions cannot be raised,
- it is more difficult to act upon the verbal report,
- it is more difficult to ensure the protection to the Whistleblower,

The Report needs to include:

1. Personal data of the Whistleblower, except in the case when the Whistleblower would like to remain anonymous:
 - name and surname,
 - contact telephone and the business email address,
2. Description of the case that is reported:
 - The way in which the information has been obtained,
 - organizational unit, in which the irregularity has occurred,
 - the way in which the irregularity has occurred,
 - short description of the case being reported,
 - evidence proving the report, if the Whistleblower possesses it.

Contacts to report the unlawful and detrimental conduct to

When submitting the report either verbal or written (by letter, email, etc.), they should be submitted as follows:

- *via email to the following address: Pracenje.Uskladjenostiubb@unicreditgroup.ba*
- *written report to the Manager of Compliance and Anti-money Laundering or the appointed contact person from the Whistleblowing Procedure, to the address: UniCredit Bank a.d. Banja Luka, Marije Bursać 7, 78000 Banja Luka.*

Considering the report

On the report, the following can be decided:

1. If it has been determined that there is the sufficient evidence of the unlawful and detrimental conduct, the Decision will be made on Commencing of the Internal Investigation, and Appointment of the Person that will manage the Internal Investigation (hereinafter referred to as: Investigation Manager).
2. If it has been determined that report does not include the sufficient evidence of the unlawful and detrimental conduct in order to commence the Internal Investigation, the third person that has submitted the report will be notified about the report rejection.

If you consider that your report has not been considered seriously, you can submit the complaint to Compliance within the term of five (5) business days after the day of reception of the information on the report rejection.

Results of the Internal Investigation into the unlawful and detrimental conduct

Every Whistleblower is informed about the results of the implemented investigation at latest three (3) months after notification of the report reception, except for the situation when the Manager of Compliance and Anti-money Laundering estimates that it would be opposite the further course of the procedure.