



WHISTLEBLOWING POLICY OF ADRIATIC BANK AD PODGORICA

Podgorica, February of 2025

Klasifikacija/Classification: **Javno/Public**

1. **Purpose:** This Whistleblowing Policy (hereinafter: Policy) is established to encourage and facilitate the reporting of concerns related to misconduct, fraud, or unethical behaviour within Adriatic Bank AD Podgorica (hereinafter: the Bank) while ensuring compliance with Montenegrin anti-corruption legislation and international standards, including those related to anti-money laundering (AML) and counter-terrorism financing (CTF).

This Policy is part of a set of internal acts of the Bank that regulate the prevention of conflicts of interest and the fight against bribery and corruption.

2. **Scope:** This Policy applies to all employees, contractors, suppliers, clients, and other stakeholders of the Bank. It provides a framework for reporting suspected wrongdoing, including but not limited to:

- Fraud, corruption, and financial irregularities;
- Breaches of AML/CTF regulations;
- Violation of the Rules of Business and Ethical Conduct;
- Violation of the Policy for management of Conflict of Interest;
- Regulatory non-compliance;
- Harassment, discrimination, or other workplace misconduct;
- Actions endangering health, safety, or the environment.

3. **Legal Framework:** Although there is no independent law on whistleblowers and their protection, the provisions of the Law on the Prevention of Corruption (*"Official Gazette of Montenegro"* No. 054/24 of 11.06.2024) and accompanying bylaws, regulate the procedure for filing a whistleblower report, the manner of deciding upon it, and the procedure for the protection of whistleblowers. In addition, the protection of whistleblowers is regulated by a series of provisions in various laws, which can serve as the basis for protecting whistleblowers, including: the Labor Law, the Criminal Code, the Law on Free Access to Information, and others.

4. **Reporting Channels:** The Bank provides multiple secure and confidential channels for whistleblowers to report concerns:

- **Internal Reporting:** Reports can be submitted to the authorized officer for receipt and handling of whistleblower reports (Whistleblowing Officer), which is in accordance with the decision of the Management Board, Ms. Vesna Jovanić, the Head of Legal Department, via e-mail wb@adriaticbank.com, or in person.
- **External Reporting:** If internal reporting is not feasible or appropriate, reports may be made to the Agency for Prevention of Corruption or other relevant regulatory authorities.
- **Anonymous Reporting:** The Bank allows the submission of anonymous reports through a secure web portal: <https://adriaticbank.com/whistleblowing-policy>.

5. **Protection for Whistleblowers:** The Bank is committed to protecting whistleblowers from retaliation. Retaliatory actions, including dismissal, discrimination, or any form of adverse treatment, are strictly prohibited. According to Article 173, paragraph 1, point 7 of the Labor Law, addressing competent state authorities due to a justified suspicion of corruption or, in good faith, submitting a report about that suspicion, shall not be

considered a valid reason for the termination of the employment contract. In accordance with the provision of the Law on Prevention of Corruption, the personal data of whistleblowers must be acted upon according to the law governing data secrecy unless the whistleblower explicitly requests that such data be made available to the public.

6. **Investigation Process** All reports will be promptly acknowledged and thoroughly investigated in a fair, independent, and confidential manner. The investigation process includes:

- **Acknowledgment:** Receipt of the report will be confirmed within seven (7) days.
- **Assessment:** An initial review will determine the scope and priority of the investigation.
- **Investigation:** A detailed investigation will be conducted, potentially involving internal or external experts.
- **Outcome:** Whistleblowers will be informed of the investigation's outcome, where legally permissible.

7. **Responsibilities:**

- **Whistleblowing Officer:** Ensures the effective implementation of this Policy and acts as the primary point of contact for whistleblowers. Also, once a year, Whistleblowing Officer reports to the Management Board and the Supervisory Board on whistleblower reports, by January 31 of the current year, for the previous year.
- **Management:** Fosters a culture of openness and supports whistleblowers.
- **Employees:** Adhere to the Policy and report any suspected wrongdoing in good faith.

8. **Confidentiality:** All reports will be treated with the highest level of confidentiality. Information will only be disclosed on a need-to-know basis and as required by law.

9. **Malicious or False Reporting:** Reports made maliciously or knowingly containing false information are considered serious misconduct and may result in disciplinary action.

10. **Training and Awareness:** The Bank will provide regular training and communication to ensure all stakeholders understand their rights and responsibilities under this Policy.

11. **Policy Review:** This policy will be revised as necessary and in accordance with changes in applicable laws, regulations or internal practices.

12. **Contact Information** For further guidance or to report a concern, please contact:

- The Authorized Officer for the receipt and handling of whistleblower reports / Whistleblowing Officer: wb@adriaticbank.com
- Anonymous Reporting Portal: <https://adriaticbank.com/whistleblowing-policy>.

The implementation of this Policy will be defined by the Bank's internal procedure. The policy enters into force on the date of adoption.

The Management Board of Adriatic Bank AD Podgorica