

2023

HELPING OUR CLIENTS GROW



REPORT OF THE INTERNAL
OMBUDSMEN
2023

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OMBUDSMEN
FOR 2023

Dear shareholders, business partners, colleagues,

Please allow me to present the third report of the internal ombudsmen, which contains information on the protection of the rights of MONETA Group employees, including ensuring their integrity, and now also information on our Whistleblowing process - the process of receiving and dealing with reports suspecting possible illegal conduct, breaches of regulations or ethical values.

In response to the enactment of Laws No. 171/2023 and No. 172/2023, which address the area of whistleblower protection, MONETA Group has launched a brand new whistleblower area on its website <https://www.moneta.cz/web/en/whistleblowing>, which provides a safe and discreet environment for clients, employees and others who wish to report illegal or unethical conduct. Whistleblowers will find information on their rights, the procedure for submitting a report and contact details of the persons responsible for investigating such reports. In this way, MONETA Group underlines its commitment to transparency and integrity, while ensuring protection for those who have the courage to raise concerns about possible irregularities.

WHAT IS THE ROLE OF THE EMPLOYEE OMBUDSMAN?

The MONETA Group sees whistleblowing as an important means to protect social values, ethics and the detection of corruption, fraud or other unfair practices. Therefore, through the system of internal ombudsmen, MONETA creates a safe and confidential environment where you can share information about unethical or illegal conduct that affects and may affect MONETA Group members and the public.

Internal Ombudsmen:

- receive reports and provide a safe and discreet way for whistleblowers to report suspicious behaviour or violations of the rules;
- as part of the follow-up investigation, they then analyse and review the reports received to determine whether there is a basis for further action;
- ensure that the rights and legitimate interests of whistleblowers are protected against retaliation for persons who report illegal or unethical conduct;
- monitor MONETA Group's compliance with relevant whistleblowing laws, regulations and rules and help implement relevant procedures;
- help spread the word about the importance of whistleblowing and encourage employees to report situations where they are not treated in accordance with the principles of integrity, equal opportunities or fair pay;
- work with company management and other relevant stakeholders to ensure appropriate response to reports and implementation of corrective actions.

WHO IS THE OMBUDSMAN?

The individual ombudsmen come from MONETA Group employees and are appointed by the Director of Compliance, who is also the owner and guarantor of the entire process. Supporting the internal ombudsman function, together with operating an independent and confidential information channel to ensure the protection of whistleblowers who report potentially illegal or unethical behaviour, is thus one of the key responsibilities of the Compliance Department.

In 2023, three internal ombudsmen dealt with complaints, namely:

- **Lucie Sehnalová** – Manager of the Client's Ombudsman team, which handles serious complaints from MONETA Group clients, and Director of the MONETA Clementia Foundation;
- **Peter Balogh** – HR Business Partnering Manager, who provides support to employees in Sales divisions in the area of labour relations;
- **Jakub Beránek** – Back Office Manager, responsible for mortgage loan administration.

WHAT COMPLAINTS DOES THE INTERNAL OMBUDSMAN DEAL WITH?

The Internal Ombudsman receives and handles reports of violations of the rules or unethical behaviour, ensures the protection of the rights and legitimate interests of whistleblowers and is also a source of advice and consultation on the rules of the internal code of ethics. In addition to the above-mentioned notifications, the internal ombudsmen also receive suggestions for improving working conditions, the working environment and relations in the workplace. Where the situation so requires, appropriate corrective action is proposed by the internal ombudsmen, with the aim, among other things, of eliminating the very cause of the problematic situation.

WHAT PRINCIPLES DOES THE OMBUDSMAN FOLLOW?

In carrying out our ombudsman function and investigating notifications of misconduct or unethical behaviour, we adhere to the following principles:

- **confidentiality** – we handle employee complaints with the utmost respect, confidentially and, if requested by the whistleblower, anonymously for all parties involved;
- **objectivity** – we are impartial and unbiased when investigating and evaluating the complaint;
- **responsibility** – we consider all notifications to be serious and we take into account our responsibility towards the notifier and MONETA Group companies when dealing with them;
- **equality** – we treat all interested parties or persons affected by the notification equally and do not disadvantage any party;
- **sharing** – we share information on notifications, investigation findings and corrective actions with stakeholders in accordance with applicable law and MONETA Group's internal and concern policies;
- **prohibition of retaliation** – MONETA Group and the members of the statutory bodies are obliged to protect the whistleblower from all types of unfair treatment, retaliation and penalties for false reports made in good faith.

MONETA does not have a trade union and is not governed by a collective agreement.

HOW CAN THE INTERNAL OMBUDSMAN BE CONTACTED?

We allow our employees, clients, business partners, suppliers and any other persons to report suspicions of possible wrongdoing, violations of regulations or ethical values by:

- confidential telephone line 224 448 077, on weekdays from 9 am to 3 pm;
- by email to ombudsmanCZ@moneta.cz;
- using the form located on the website <https://www.moneta.cz/web/en/whistleblowing>;
- in writing at MONETA Money Bank, a.s. / MONETA Auto, s.r.o. / MONETA Leasing, s.r.o. / MONETA Stavební Spořitelna, a.s., Vyskočilova 1442/1b, 140 28 Prague 4.

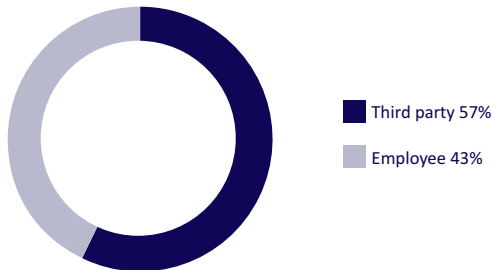
If the whistleblower is concerned about the consequences, he or she can file a complaint in confidence or ask for his or her identity to be protected during the investigation. To this end, the MONETA Group provides a confidential complaint-handling mode for whistleblowers wishing to report a breach, whereby the complaint can be submitted fully anonymously via an online web form. Internal ombudsmen also guarantee the protection of the whistleblower against subsequent sanctions.

Employees of the MONETA Group can, of course, turn to any of the ombudsmen and it depends only on their preferences as to which one they trust the most.

WHAT COMPLAINTS DID OMBUDSMEN ADDRESS IN 2023?

In 2023, a total of 7 whistleblowers contacted the internal ombudsmen, 3 of whom were MONETA Group employees from two individual divisions - Retail Banking and IT.

ORIGINATOR OF THE REPORT



The internal ombudsmen dealt with complaints and provided advice on the following areas:

- inappropriate and unprofessional behaviour by a colleague in the workplace;
- approving days off for staff in excess of statutory leave;
- repeated inappropriate behaviour of a visitor to the branch;
- suspicion of fraudulent behaviour by a third party related to the use of a current account at MONETA Money Bank, a. s.

In dealing with complaints, the internal ombudsmen did not identify any serious breaches of external or internal policies, discussed all areas of dispute with the whistleblowers in detail and ensured that corrective action was taken promptly for legitimate complaints.

OUTLOOK TO 2024

The year 2024 presents an opportunity for internal ombudsmen to continue to grow and improve in the whistleblowing field. Internal Ombudsmen want to focus on improving whistleblower communication channels to ensure easy and confidential access for anyone interested in sharing their concerns. We plan to implement additional measures to increase transparency throughout the whistleblowing process and promote client, employee and other whistleblower confidence in our organization, as well as ensure that whistleblowers are not subjected to any form of retaliation or discrimination. We aim to ensure that MONETA Group is a place where whistleblowers of unethical or illegal behaviour feel safe.

Finally, I would like to thank all employees, managers and colleagues who contributed to improving the whistleblowing process at MONETA Group in the past year. I believe that together we can create a safer and more ethical working environment.

Lucie Sehnalová
Chief Employee Ombudsman
MONETA Group



www.moneta.cz