

# 2024



Report of the Internal Ombudsmen for 2024

Dear shareholders, business partners, colleagues,

I am pleased to present the fourth annual report of the MONETA Group's internal ombudsmen. This document provides an overview of our work to promote and protect employee rights across the Group. We focus in particular on issues relating to the working environment, ethics, equality and trust within the internal culture.

The report is further expanded to include information on the process of reporting potentially illegal conduct, breaches of internal regulations or ethical principles - an area known as whistleblowing. Over the past year, we have focused on effectively setting up this process so that it is transparent and credible and allows for safe reporting without fear of negative consequences. By taking this approach, MONETA confirms its commitment to openness, responsible management and high ethical standards, while also providing support and protection to those who choose to blow the whistle on potential misconduct.

Our goal remains to build an open working environment based on respect, trust and a willingness to listen. This report is not only a reflection of our work to date, but also a commitment to the future - to protect the values on which MONETA is built.

## WHAT IS THE ROLE OF THE INTERNAL OMBUDSMAN?

MONETA Group considers whistleblowing as a key tool in protecting ethical principles, promoting transparency and preventing illegal and unethical practices, including corruption and fraud. Through this system of internal ombudsmen, we create a safe and confidential environment where individuals have the opportunity to report any suspected misconduct that could put not only MONETA Group members at risk, but also the wider public.

The role of the Internal Ombudsman includes the following activities:

- **Receiving Whistleblowing** - We provide a secure, discreet and confidential way for whistleblowers to raise suspected unethical or illegal behaviour or violations of the rules.
- **Investigation and analysis** - we carry out a thorough analysis of all notifications received to check whether there are genuine grounds for further action.
- **Whistleblower Protection** - We are committed to protecting the rights and interests of whistleblowers, ensuring that those who blow the whistle on unethical conduct are not subject to retaliation.
- **Compliance** - we monitor MONETA Group's compliance with all relevant laws, regulations and whistleblowing rules and help implement the necessary procedures and measures.
- **Education and support** - we actively raise awareness of the importance of whistleblowing and encourage employees to speak up when integrity, equal opportunity or fair pay principles are violated.
- **Cooperation with management** - We work closely with management and other relevant stakeholders in the company to ensure that we respond adequately to notifications and take appropriate corrective action.

## WHO IS THE OMBUDSMAN?

The function of the Internal Ombudsman is performed by MONETA Group employees who are appointed to this position by the Director of Compliance. This department, which is also the owner and guarantor of the whole process, is responsible for ensuring the independence and confidentiality of the channels for reporting unethical or illegal behaviour. Supporting the ombudsman and protecting whistleblowers are key responsibilities of the Compliance Department, which thus contributes to maintaining ethical standards and transparency in the organisation.

In 2024, the following internal ombudsmen dealt with complaints and notifications:

- **Lucie Sehnalová** – Manager of the Client Ombudsman team, which focuses on resolving serious complaints from MONETA Group clients, and also Chief Operating Officer of the MONETA Clementia Foundation;
- **Peter Balogh** – Senior Manager HR Business Partnering, providing support to employees in Sales divisions, especially in the area of labour relations;
- **Jakub Beránek** – Shared Services Manager, responsible for documentation and process management in the mortgage lending area.

These ombudsmen have worked together to ensure integrity, trust and transparency within the MONETA Group.

## WHAT COMPLAINTS DOES THE INTERNAL OMBUDSMAN DEAL WITH?

The Internal Ombudsman is responsible for receiving and handling reports of violations of internal rules or unethical behaviour in the organisation. In addition, he or she ensures that the rights and legitimate interests of whistleblowers are protected, promoting a safe and open environment for anyone who chooses to raise irregularities. The Ombudsman also provides advice and consultation on compliance with the rules of the Internal Code of Conduct.

In addition to these notifications, internal ombudsmen also receive suggestions on improving working conditions, work culture and workplace relations. The aim is to identify areas where the environment and efficiency could be improved, while addressing issues that may affect employee satisfaction and productivity. Where the situation warrants, the Ombudsman proposes appropriate corrective measures that not only to eliminate the current problems but also to prevent them from recurring.

## WHAT PRINCIPLES DOES THE OMBUDSMAN FOLLOW?

In carrying out our ombudsman function and investigating allegations 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 Group regulations;
- **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?

The MONETA Group provides all employees, clients, business partners, suppliers and others with several ways to report suspected violations of regulations or ethical values. Reports can be made through the following channels:

- **Confidential telephone line:** +420 224 448 077 (available on working days from 9:00 to 15:00);
- **E-mail address:** ombudsmanCZ@moneta.cz;
- **Online form:** available on the website <https://www.moneta.cz/kontakt/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.

For whistleblowers who are concerned about the potential consequences, we offer the option of filing a complaint in confidence. Whistleblowers can also request protection of their identity during an investigation. Under this scheme, complaints can be made anonymously via an online form, ensuring the highest level of confidentiality and security.

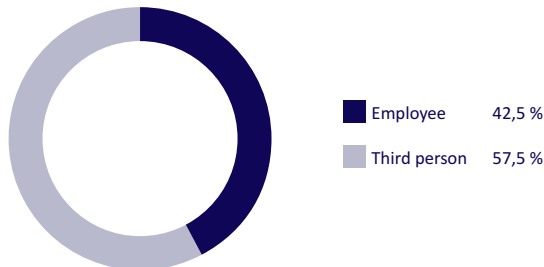
Internal ombudsmen guarantee that any whistleblower will be protected against any retaliation, whether they choose to remain anonymous or come forward under their own identity.

MONETA Group employees may contact any of the internal ombudsmen, the choice of which depends on their personal preference and trust in the individual.

## WHAT COMPLAINTS DID OMBUDSMEN ADDRESS IN 2024?

A total of 33 whistleblowers contacted the internal ombudsmen in 2024, a significant increase from the previous year when only 7 complaints were filed. We attribute this increase to the visibility and transparency of the whistleblowing process, which MONETA Group has strongly promoted over the past year. Of these 33 complaints, 14 were made by MONETA Group employees. The remaining whistleblowers came from clients and others.

### ORIGINATOR OF THE REPORT



This increase in submissions demonstrates the growing confidence in the whistleblowing process and confirms that improved transparency and communication about the opportunities to report unethical or illegal behaviour has led to increased whistleblower activity. MONETA Group will continue to promote this culture of openness and ethics.

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

- Fraudulent third party behaviour (phishing/vishing/smishing attacks);
- Suspicion of fraudulent conduct by a former MONETA Group employee in the provision of consumer loans;
- Approving days off for staff in excess of statutory leave;
- Flex place;
- Inappropriate and unprofessional behaviour of a colleague or supervisor in the workplace;
- The circumstances of the negotiation of the termination agreement;
- Abuse of managerial authority;
- Suspicion of unethical conduct by a branch employee;
- The conduct and outcome of the selection procedure;
- Violations of the rules of the headquarters building by employees;
- OSH violations, entitlement to lunch breaks;
- Suspicion of economic crime by a client of the MONETA Group and others.

As part of the complaint resolution process, the internal ombudsmen did not identify any violations of external or internal regulations in the High Severity category, discussed all areas of concern with the whistleblowers in detail and ensured that corrective action was taken promptly for legitimate complaints.

## OUTLOOK TO 2025

In the course of 2024, as MONETA Group's internal ombudsmen, we continued to strengthen the culture of transparency, integrity and ethical behaviour that is the foundation of our business. We are pleased to have gained greater trust from our employees, clients and business partners through increased visibility and a more transparent reporting process, which has led to an increase in the number of complaints. This positive trend confirms the importance and effectiveness of the Internal Ombudsman function and our processes to ensure ethical and responsible business conduct.

Every suggestion received represents an opportunity to further improve and strengthen our commitment to protecting the rights of individuals and the overall integrity of the organisation. We recognize that the journey to achieve higher ethical standards is a long one and we will continue to strive to make our processes as transparent, efficient and trustworthy as possible.

I would like to conclude by thanking all those who contributed to the development of this process, and especially those who were not afraid to point out any irregularities and thus supported the assurance of ethical standards in the MONETA Group.



**Lucie Sehnalová**  
Chief Internal Ombudsman  
MONETA Group



[www.moneta.cz](http://www.moneta.cz)