



Dear colleagues,

Nova KBM is firmly on its way to fulfil our vision – to be the best bank in Slovenia. Our bank integration efforts in the past have allowed us to grow into a major, strong bank. Our vision is based on principles and values, but we're also aware that it is our employees who can contribute the most in bringing our successful story to life by shaping a positive corporate culture.

We build successful brands, grow the circle of satisfied clients, and improve services and financial products that bring us closer to our clients than ever; we're available to them practically anytime, anywhere. Yet in the background of everything we do, which is what our clients notice the most as well, lie our actions, our relationships, and our corporate culture.

Any integration of banks is always a sensitive process and we're immensely proud today that employees of all banks that have been gradually integrated in the past worked together to shape, step by step, our shared new values and guidance. This was done at all times

through dialogue, surveys, and plenty of teamwork. Our values are therefore truly ours and will accompany us on our journey as the leading principles of our actions. Values are an essential part of everything we do, our decisions, and our way of thought. But that's not all; our values are based on our awareness that we need to act responsibly – toward our clients, owners, the social and natural environment, and toward our colleagues.

The Code of Conduct is the most important internal act in Nova KBM d.d. and Nova KBM Group and the fundamental document of our corporate culture and values. It provides guidance to employees on how to act in different situations and circumstances of business practice. It is connected to the vision and mission of Nova KBM d.d. and Nova KBM Group and is an important part of governance and development processes and risk management.

John Denhof,

President of the Management Board



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This Code of Conduct of Nova KBM and Nova KBM Group ("the Code") outlines the principal ethical standards, values and rules of conduct that we as employees of Nova KBM and the Nova KBM Group (Nova KBM and the Nova KBM Group collectively as "NKBM") follow daily in our line of work and which we pursue in creating our corporate culture.

1.1. The Code applies to all of us

Provisions of the Code are morally and legally binding for all NKBM employees. The Code defines what is regarded as acceptable and unacceptable behaviour of employees of NKBM across all of its governance, hierarchical and organisational levels.

Code was approved by the Management Board of Nova KBM.

Every member of Nova KBM Group is obligated to appropriately implement or transpose the Code, taking into consideration its own corporate size as well as its organisational and business structure.

Any deviations from this rule regarding the implementation of the Code must be notified to the Ethical Compliance Officer at Nova KBM's Compliance Office.

1.2. Zero-tolerance for conduct counter to the Code

As described herein, NKBM enforces a zero-tolerance policy towards actions of employees and other individuals that may either have a negative impact on NKBM's reputation or are unacceptable from a legal, moral or ethical perspective.

1.3. External stakeholders respect the Code as well

The Code is also an important guidance for our external stakeholders, business partners, vendors/suppliers, associates, and others who cooperate with the Bank in any other way.

1.4. Our actions impact our reputation

Although the Code covers a number of important ethical issues, it cannot anticipate all possible circumstances or determine the appropriate conduct for all situations. In situations not covered by the Code, we should act with the best intentions to protect the reputation and integrity of NKBM and its stakeholders

Compliance with the Code is easiest to ensure by using good judgement and seeking guidance when questions arise.







Our mission

Nova KBM's mission is to successfully implement all strategic pillars:

- 1. GROWTH AND PROFITABILITY,
- 2. CLIENT EXCELLENCE,
- 3. STRONG RISK MANAGEMENT AND COMPLIANCE,
- 4. OPERATIONAL EFFICIENCY,
- 5. ORGANISATIONAL CULTURE AND TALENT DEVELOPMENT.

Principles

- We follow the needs of our clients.
- We take responsibility for our actions.
- We are precise, diligent, sincere, and truthful.
- We act honestly and in line with our values, ethical and moral standards, and the law.
- We are a trustworthy partner.
- We provide clients with professional and useful solutions.
- We alert clients of possible risks.
- We protect the integrity and assets of NKBM.

- We protect personal and confidential data of all stakeholders.
- The bank creates an environment conducive to employee development.
- Employees regularly take part in training.
- We strive for dialogue.
- We are respectful, professional, readily available, and neat in appearance.
- We avoid conflicts of interest.
- We strive for NKBM to be successful,
- We identify and remedy violations and irregularities.

Core values

We build and strengthen our corporate culture by pursuing positive values that determine our actions, decisions, and good practices.

We create an environment that welcomes open communication and everyday challenges, and have the responsibility to act, especially when detecting conduct that is counter to the Code.



TRANSPARENCY AND HONESTY



BRINGING TOGETHER THE BEST TALENT



CLIENT EXCELLENCE



EFFICIENCY AND INNOVATION



GOAL ORIENTED



TRANSPARENCY AND HONESTY

We always comply with regulations in everything we do. People and the organization as a whole do not hide or conceal important information, and we encourage everyone to speak up about any non-compliance. Honesty and integrity are an essential part of all our relationships and activities, and we expect the same from our partners.



BRINGING TOGETHER THE BEST TALENT

We wish to be the employer of choice in the financial industry and therefore offer our employees tangible career and professional development opportunities.

We recognize and reward good performance in more ways than just financially.

We promote cooperation between staff and departments across different hierarchical levels and business lines, and we take decisions by listening to and considering different opinions.



CLIENT EXCELLENCE

Client excellence is our primary mission.

We endeavour to provide our clients with the best possible experience and always look for solutions that allow our clients to satisfy all financial needs as easily as possible. We actively strive to understand their needs and provide them with the best services anytime, anywhere. The interests of our clients are important to us, but they also need to be to the benefit of all and aligned with the interests of the bank.









We have the duty to act in accordance with applicable legislation and internal regulations. Compliance of employees' actions with the provisions of the Code forms an integral part of the contractual obligations of each employee.

5.1. Duty to comply

We have the duty to act in accordance with applicable legislation and internal regulations. Compliance of employees' actions with the provisions of the Code forms an integral part of the contractual obligations of each employee.

Given that each employee is responsible for his/her ethical conduct, we consider the values and principles set out in the Code to be of upmost importance. We consistently comply with all relevant legislation and internal regulations, always striving to act according to the highest applicable standards.

We need to confirm our awareness of provisions of this Code and take part in annual training to test our knowledge of the Code. All NKBM employees have the right to consult directly with the Ethical Compliance Officer at the NKBM Compliance Office, who can provide advice and act in line with the rules and values outlined in the Code.

All internal regulations of NKBM need to be aligned with provisions of this Code.

5.2. Ethical conduct

We are committed to ethical conduct across all areas of our operations and in relationships with all our stakeholders. Client relationships are at the core of our business. Good and mutual relationships that we strive to have with our clients, owners, business partners and external service providers are based on respect, trust, and consideration of the ethical values of NKBM.

Taking ethical decisions also means seeking advice when necessary.

Ethical conduct starts with us.

5.3. Conscientious objection

When we believe that an action required of us is unlawful, incorrect, or unethical or that we are being led or induced to violate the provisions of this Code, we have the right to make a written conscientious objection.

The objection is accepted, processed, and decided on by the Ethical Compliance Officer at the Nova KBM Compliance Office in cooperation with other relevant support departments.



We take knowledge of confidential data in our line of work. Regardless of format, data is regarded as confidential when it is designated as such by internal regulations, but also if it is not designated as confidential by any internal regulation yet is not publicly available and would cause significant harm if it were disclosed to an unauthorized person.

5.4. Managerial responsibility

The bank expects of its senior managers to lead their colleagues by example and in line with the bank's values.

5.5. Data protection duty

We take knowledge of confidential data in our line of work. Regardless of format, data is regarded as confidential when it is designated as such by internal regulations, but also if it is not designated as confidential by any internal regulation yet is not publicly available and would cause significant harm if it were disclosed to an unauthorized person. This includes first and foremost any data about our clients, employees, and business secrets that we encounter in our line of work. We are aware that data are both an asset and a competitive advantage of the bank. We have the duty to protect all data that we take knowledge of in our line of work in accordance with applicable laws. Our duty to protect data extends even beyond our term of employment at the bank, as we need to protect and safeguard any data we have taken knowledge of during our time in the bank even after we leave it.

Q: At work I took knowledge of documents about a loan my neighbour applied for to build another structure on his lot. Can I tell another neighbour of mine that the first neighbour's loan application is being processed? Can I forward the loan documentation to a friend of mine who also plans to build a similar structure and could use the documents for planning?

A: No. Data we take knowledge of in our line of work must not be disclosed without proper authorization.

Q: In my line of work I have access to incoming payments to clients' transaction accounts. Can I check my ex-partner's account that I was previously authorized to use to see how much they earn at their new job?

A: No. Having access to confidential data of clients and bank employees does not automatically give you the right to access data. Any data access needs to be supported by a relevant purpose and cause.



We protect our clients' interests also by complying with antitrust rules and by acting in accordance with applicable laws.



We shall not use our positions or work at Nova KBM to advance our personal interests or the personal interests of other persons.

5.6. Anti-trust

We protect our clients' interests also by complying with anti-trust rules and by acting in accordance with applicable laws. Anti-trust rules protect competition by regulating actions that denote, in particular, undue restriction of competition or are counter to market conventions.

5.7. Conflicts of interest

A conflict of interest is a situation where private interests of an employee influence or appear to influence the impartial and objective performance of his/her duties.

It is the responsibility of each and every one of us when performing our duties to pay attention to any actual or potential conflict of interest and to do whatever is necessary to avoid it.

All situations or circumstances that denote conflict of interest must be reported to the Compliance Office at **eticnavprasanja@nkbm.si**.

We shall not use our positions or work at Nova KBM to advance our personal interests or the personal interests of other persons.

Members of Nova KBM Group are required to incorporate the rules governing conflicts of interest into their internal documents to a reasonable extent.

5.7.1. PRIVATE INTERESTS OF EMPLOYEES

It is forbidden to perform duties in a situation where the private interests of an employee influence or appear to influence the impartial and objective performance of his/her duties.

When engaging in private external activities, NKBM employees should never create the impression that we are acting on behalf or for the account of NKBM.

5.7.2. PRIVATE FINANCIAL TRANSACTIONS

We must refrain from carrying out private financial transactions that could threaten our impartiality and independence, or transactions which constitute or could constitute conflict of interest.

In any private financial transactions NKBM employees must act as good and diligent managers and avoid excessive borrowing.



Personal relationships in the workplace may give rise to conflict of interest. We must therefore be careful to avoid any such situation.

Q: Can an aunt and her niece work in the same organizational unit?

A: Related persons are not allowed to work in the same organizational unit.

5.7.3. PERSONAL RELATIONSHIPS AND RELATED PERSONS IN THE WORKPLACE

Personal relationships in the workplace may give rise to conflict of interest. We must therefore be careful to avoid any such situation.

Personal relationships between Nova KBM employees are not forbidden, nor is it forbidden to hire a person related to an employee, but we must ensure that employees personally related to one another do not perform their work within the same organisational unit and, if possible, not even within the same organisational line of Nova KBM.

In order to effectively manage conflicts of interest within Nova KBM, we must notify the Compliance Office whether any person related to us is employed at Nova KBM and, if so, in which position. The definition of related persons for the purpose of this Code is provided in the note below.¹

The Compliance Office will process these data only for the purpose of effectively managing conflicts of interest and will protect them as confidential and in accordance with the applicable legislation.

As part of the recruitment process and prior to selecting any candidate, the HR Development Sector is required to obtain information from each job applicant about any person related to him/her who is already employed at Nova KBM.

Considering their respective organisational structures, members of Nova KBM Group other than Nova KBM are required to incorporate into their internal documents the rules governing the work of related persons within the same organisational unit, as well as the rules applicable to the collection and processing of data concerning related persons employed by them.

¹ Related natural persons are close family members of an employee. A close family member means a person in one of the following relationships with another person:

[•] a spouse or a person with whom they live in a relationship that has the same rights in property as those arising out of a matrimonial relationship, or a person with whom they live in a same-sex civil partnership according to the law governing the registration of same-sex civil partnerships

[·] a child or adopted child of such a person or person from the previous point

[•] other persons under such a person's guardianship or the parents/grandparents of such a person or the person referred to in the first point

a direct blood relative to any degree (grandparents, parents, children, grandchildren, and great-grandchildren)

[·] an indirect relative up to and including the third degree (brothers, sisters, nephews, nieces, uncles, and aunts)

an in-law relative up to and including the second degree (fathers-in-law, mothers-in-law, sons-in-law, daughters-in-law, brother-in-law, sister-in-law, stepfathers, stepmothers and stepchildren)

[•] any other person with whom the employee is privately related in a way that may lead to conflicts of interest.



In pursuing private activities, we must never give the appearance of acting on behalf or for the account of NKBM.

5.7.4. EXTERNAL ACTIVITIES OF EMPLOYEES

During our employment relationship with NKBM we must not, without written consent of the Management Board, engage in any for-profit or non-profit activity, conclude any transactions for our own account or for the account of a third party, or be involved in any legal entity if the respective activity falls within the category of activities carried out by Nova KBM and is or could be competitive to Nova KBM, nor should we engage in any for-profit or non-profit activity, or conclude any transactions for our own account or for the account of a third party, if the respective activity is identical or similar to the ones we perform at Nova KBM, or if the performance of this activity is or could be competitive to Nova KBM.

Q: A corporate relationship manager wishes to engage in business advisory services as a sole trader in his private time. Does he need consent of the employer?

A: Yes. Consent is needed for any activity that is or could be competitive to Nova KBM.

Q: Can I use the name 'Nova KBM' or data that I took knowledge of in my line of work in my closing thesis?

A: Consent of the Management Board is required to use the name of the bank or data you took knowledge of in your line of work.

Q: In my private time I create knitted accessories. Do I need the consent of my employer?

A: No. This activity is not competitive to Nova KBM or your position within the bank. You do, however, need to report your engagement to the Compliance Office at eticnavprasanja@nkbm.si.

We are also required to obtain written consent from the Management Board for taking up a position in a supervisory or governance body and for publishing any written contributions, articles or books, or for engaging in publishing activities, as well as for carrying out educational or training activities or lectures if, in carrying out any of these activities, we use the name 'Nova KBM' or non-public information obtained in performing our duties at Nova KBM.

You are obligated to notify the NKBM Compliance Office also if engaging in a business activity or holding a for-profit or non-profit function in a local body or environment that does not require the consent of the Management Board.

In pursuing private activities, we must never give the appearance of acting on behalf or for the account of NKBM.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of Nova KBM Group and be complied with by employees of every Group member.



5.8. Anti-bribery and anti-corruption

Nova KBM is committed to complying with all applicable anti-bribery and corruption laws and regulations. Our bank expects transparency and the highest level of integrity in all of its business dealings to avoid any improper advantage, either in fact or appearance, as a result harmful practice. Nova KBM expects of its employees and third parties who cooperate with the bank to act with the same level of integrity as the bank itself.

You are responsible for preventing, detecting, and reporting any attempted bribery and other forms of corruption in connection with our bank's business.

Bribery or corruption in any form is not tolerated by our bank – you and third parties associated with your business are prohibited from offering, promising, giving or authorising, any form of solicitation, agreement to receive, or accepting anything that constitutes, or could be perceived as constituting, bribery or corruption.

5.8.1. GIFTS AND ENTERTAINMENT

We should not accept gifts or entertainment from our customers, external service providers, business partners or any other persons, either for ourselves or for our colleagues. However, we are aware that there are social circumstances in which it would be impolite or awkward to refuse a gift or entertainment, or other occasions on which the acceptance of gifts or entertainment is justified.

We are familiar with internal rules on when to seek approval for gifts received or given and when a gift becomes property of NKBM.

Q: Can I accept a gift or entertainment from a customer?

A: Yes, but you need to act in accordance with internal regulations that specify when a gift needs to be approved by the Director of Compliance. If the gift/entertainment market value exceeds a certain amount, you need to seek approval.

In any such circumstances or events, it is necessary to clearly justify the business reason for accepting a gift or entertainment, taking into consideration the restrictions and rules of Nova KBM that are applicable to this issue.

The acceptance of any gift or entertainment does not affect, and should not affect, our business decisions.

Q: A customer gave me a gift worth 250 €. Can I keep it?

A: No. When gift value exceeds 200 €, it becomes property of Nova KBM.

Q: A vendor sent me a ticket for a football match of my favourite team in exchange for my future engagement in helping their company to sign a contract with the bank. Can I accept this gift?

A: We advise you not to, as this gift, irrespective of value, influences or could influence objective and impartial performance of your work duties in relation to the contract negotiated by the company and the bank. The correct way to act would be to return the gift to the vendor and politely clarify the reasons why you are not able to accept it.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of Nova KBM Group and be complied with by employees of every Group member.



Protecting the integrity of financial markets is a key factor in promoting fair and efficient markets and investor trust.

5.9. Prohibition of market abuse

Protecting the integrity of financial markets is a key factor in promoting fair and efficient markets and investor trust. Improper market conduct undermines market fairness, efficiency, and trust. Market manipulation/abuse may have a negative impact on our clients, financial markets, and our bank as a whole.

In our line work we may take knowledge of information that is not public but could be of importance for investors. Disclosure of this information is prohibited.

An employee who, in performing his/her duties, has obtained inside information in respect of a certain financial instrument or an issuer must not use any such inside information for any direct or indirect acquisition or disposal of the respective financial instrument for his/her account or the account of persons related to him/her or disclose the information to third parties.

We are required to follow relevant internal regulations in any private transactions in securities.

5.10. Anti-money laundering and counter-terrorist financing and sanctions

Money laundering is an abuse of the financial system for the purpose of concealing the origin of funds, while terrorist financing refers to the direct or indirect financing of individuals and organisations involved in terrorism. Both are prohibited under the applicable legislation and internal regulations of NKBM.

Within the line of our duties and responsibilities, we consistently perform the tasks set out in the applicable internal regulations and notify the relevant department of any deviation or suspicion of potential abuse in this field.

SANCTIONS

In its business operations NKBM complies with sanctions adopted by the EU/FBE and the OFAC. Sanctions may be enforced either as a full business ban, financial sanctions (ban on cooperation or freezing of funds), or as other measures that restrict business operations of persons (natural or legal) subject to sanctions (a ban on financing certain raw materials or products, securities, etc).



Every Nova KBM employee has the duty and right to anonymously report any suspicion of harmful practice and any harmful practice undertaken by any of his/her colleagues.

5.11. Political engagements

NKBM is a politically neutral organisation and does not engage in political party campaigning or make any donations to any political parties or candidates running for office.

If you are involved in a political activity in private capacity, you are required to make sure that this is kept entirely separate from your duties as an employee and that our bank's funds or resources (including time) are not used for political purposes. NKBM employees are prohibited from recruiting or convincing others to contribute to activities of political parties or other political organizations.

Prior to accepting a public office, employees need to notify their B-1 supervisor and the Compliance Office, and check for any incompatibilities or restrictions of holding this type of public office.

5.12. Duty and right to report wrongdoing (whistleblowing)

Every Nova KBM employee has the duty and right to anonymously report any suspicion of harmful practice and any harmful practice undertaken by any of his/her colleagues who, in their line of work, are or have been involved in an act of corruption or an act harmful to the bank's assets, or any other violations of the Code or other regulations. The report needs to be detailed enough to allow the bank to investigate the allegations. All reports are fully confidential. If an employee chooses to sign the report with his/her name, their employment will not be jeopardized, provided the report was made in good faith. Reports can also be made anonymously. Prohibited behaviour reports can be filed in different ways, as described at www.nkbm.si/sum-in-prijava-nedovoljenega-ravnanja.

The bank investigates all reports in a thorough, fair, discrete, and timely manner.

The bank puts great emphasis on preventing recurring harmful practice. For this purpose, the bank investigates not only the circumstances of a particular case, but also the status of existing processes and internal controls.

The obligations and procedures outlined above shall be reasonably incorporated into the internal documents of all members of the Nova KBM Group and be complied with by employees of every Group member.





We communicate with each other in a respectful, professional, and efficient manner, thereby contributing to a positive corporate culture and the attainment of common goals.

6.1. Internal communication

We communicate with each other in a respectful, professional, and efficient manner, thereby contributing to a positive corporate culture and the attainment of common goals. We encourage dialogue and the exchange of opinions, initiatives, and ideas. We continuously nurture, develop, and upgrade our knowledge and skills of internal communication.

These rules above shall be reasonably incorporated into the internal documents of all members of the Nova KBM Group and be complied with by employees of every Group member.

6.2. Employee availability and responsiveness

We communicate with our colleagues through different channels (telephone, Skype, Microsoft Teams or other appropriate software, email, meeting). We provide feedback in a quick and appropriate manner. In case of absence, we make sure that our colleagues are aware of it, and we provide feedback in the shortest possible time after returning.

6.3. Prohibition of discrimination

NKBM provides equal employment opportunities to all persons with the required qualifications and does not discriminate based on nationality, citizenship, political orientation, religion, age, marital status, sex, sexual orientation, sexual identity, disability, or any other status. Bullying, mobbing, and any other forms of workplace discrimination are prohibited.

6.4. Work-life balance

Nova KBM strives to create a work environment where all employees can be productive at work and satisfied with their performance despite their family obligations.

Efficiently balancing private and professional life requires mutual cooperation and trust. With this in mind, Nova KBM launched the process of obtaining the 'Family Friendly Enterprise' certificate and was awarded the full certificate.



Nova KBM creates conditions that encourage and promote the development of its employees and balance between work and their private lives.

6.5. ESG Strategy

The Bank is aware of the rising importance and relevance of a comprehensive ESG programme for its business and the environment in which it operates, in particular with regard to climate change. We recognise the importance of the role of financial institutions in financing the green transition.

The Bank is actively working on its comprehensive ESG transformation and have incorporate ESG objectives in the overall business strategy of the bank and are incorporating ESG aspects in overall business operations.

We are seeking to improve our response to global environmental challenges and opportunities, all while taking into account the expectations of strategic stakeholders.

ocial responsibility and sustainability have been important elements of the Bank's identity ever since it was established. Over the years, its approach to managing these areas has become increasingly comprehensive and strategic. We collaborate with various organisations and individuals in the field of sports, culture, science, and business, as well as with other entities that are active in the local communities in which the Bank operates.

In the implementation of its ESG Strategy, the Bank dedicates particular attention to fostering the development of a positive workplace culture and employee conduct that reflects the Bank's values, a high-quality working environment, equal opportunities and non-discrimination.

Nova KBM creates conditions that encourage and promote the development of its employees and balance between work and their private lives. We handle work-related and other assets and resources in a way that is the least harmful to the environment. We comply with all environmental protection regulations.

In order to raise awareness, the Bank organizes training that is mandatory for all employees.





Reputation is an important part of NKBM's assets, and we are the guardians of the bank's reputation.

7.1. Protection of reputation

Reputation is an important part of NKBM's assets, and we are the quardians of the bank's reputation. We always act in such a way as to avoid damaging the reputation of NKBM, but rather to preserve, protect and strengthen it. We consider the applicable professional and ethical standards, act in accordance with our common values, and comply with the rules of proper conduct and communication. We have a responsibility to recognise, and as far as possible, to control any threats that could adversely affect the reputation of NKBM. As its employees, we are also obligated to protect the reputation of NKBM during our free time by refraining from activities or functions that may have a negative impact on NKBM's performance or reputation or give the impression of abuse of power.

When performing activities, being part of transactions, or exercising a position or office outside the bank, we must never give the appearance of acting as a bank employee.

7.2. Using the Nova KBM brand name

When performing activities, being part of transactions, or exercising a position or office outside the bank, we must never give the appearance of acting as a bank employee or use the bank's brand name in any of these engagements.

7.3. Responsible use of social media

We use social networks, online chatrooms and public forums responsibly and we clearly separate private messages from business ones, always being aware that stakeholders associate our messages and actions, including those that we express and take in our free time, with the values and corporate culture of Nova KBM. We therefore always communicate in such a way as to avoid causing harm to the reputation of Nova KBM, but rather to protect and strengthen it.

Q: Can I post an indecent photo or comment on social media?

A: No. Employees are required to take care of NKBM's reputation in our free time as well.



We communicate with clients, owners, business partners, external service providers, and other stakeholders in an open, responsive, accurate, respectful, and professional manner.

7.4. Appearance of employees

The bank expects of its employees to take care of their appearance and wear business-appropriate attire particularly when dealing with clients and representing the bank.

7.5. External communication

We communicate with clients, owners. business partners, external service providers, and other stakeholders in an open, responsive, accurate, respectful, and professional manner. We respect confidentiality and do not disclose confidential and private data or information that is regarded as proprietary information of Nova KBM. Communication with the media and any public presentations of Nova KBM is done exclusively by the Management Board and relevant departments authorised to do so. We do not communicate about matters for which we lack authorisation without the approval of competent authorities.

To ensure that inquiries from the media and other interested members of the public are dealt with properly, Nova KBM has created the email address pr@nkbm.si. We use social networks, online chatrooms and public forums responsibly and we clearly separate private messages from business ones, always being aware that the stakeholders associate our messages and actions, including those that we express and take in our free time, with the values and corporate culture of Nova KBM. We therefore always communicate in such a way as to avoid causing harm to the reputation of Nova KBM, but rather to protect and strengthen it.

The rules outlined above shall be reasonably incorporated into the internal documents of all members of the Nova KBM Group and be complied with by the employees of every Group member.

7.6. Relations with external stakeholders

We expect of our business partners, service providers, vendors, advisors, and anyone cooperating with the bank in any way to act in accordance with provisions of this Code and relevant laws. We also expect of them to do business in an ethical manner, protect human rights, and consider regulations governing sustainable development. In dealing with external stakeholders, we need to avoid situations that cause or may cause conflict of interest. If such a situation does occur, it needs to be reported to the Compliance Office immediately.





We aim to provide our clients with the best service possible. We want to establish and nurture a long-term relationship with each client.

8.1. Client focus

We aim to provide our clients with the best service possible. We want to establish and nurture a long-term relationship with each client. That is why our services are developed based on an individual and professional approach and are always focused on ensuring client satisfaction.

Client excellence is one of our most important strategic priorities and a programme based on core values. We strive to create a unique user experience and increase client satisfaction by seeking the most appropriate solutions and by streamlining our processes. We provide services to our clients with enthusiasm, proper communication, and teamwork.

8.2. Resolving client complaints

Client excellence is one of Nova KBM's strategic business pillars and satisfied clients are one of our topmost priorities. An important aspect in this regard is efficient, quick, and successful resolution of complaints. Relevant departments of Nova KBM process each complaint with due care and attempt to resolve it in cooperation with the client. It is therefore very important that we engage in any complaint resolution in a systematic manner and with the aim of resolving the matter as soon as possible. By carefully analysing all complaints it receives Nova KBM ensures that any errors and issues in relationships with our clients are fully eliminated.

8.3. Client protection

The protection of our clients' assets, personal data and confidential information is a principle on which we build client trust. NKBM is obligated to treat client data as confidential and in accordance with the applicable legislation. In our relations with clients, we are committed to the highest standards of due care and therefore do not disclose any confidential information we have obtained or come across in performing our work to anyone.

We carefully protect personal data and disclose it to third parties only in accordance with the applicable legislation. We are obligated to protect personal data obtained during our employment even after the end of term of our employment.



Client excellence is one of our most important strategic priorities and a programme based on core values.





We handle these assets in a prudent and responsible manner and protect them against damage, demolition, alienation, misuse, or loss.

9.1. Management and protection of assets

The assets of Nova KBM consist of physical assets, comprising movable and immovable property, financial assets, and intellectual property rights. We handle these assets in a prudent and responsible manner and protect them against damage, demolition, alienation, misuse, or loss. We use the assets exclusively to attain the business goals of Nova KBM. The assets shall not be used and for private purposes, for which we bear personal responsibility.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of the Nova KBM Group and be complied with by employees of every Group member.

9.2. Handling of information assets and resources

Information resources of Nova KBM shall be used for business purposes only.

Information resources and assets of Nova KBM shall be used in a respectful and professional manner; responsibly and in accordance with Nova KBM's policies and applicable internal regulations. Uploading contents that were not authorized by the responsible person is not permitted.

Q: Can my children use my company laptop for video games and chatrooms?

A: Any laptop computer should be used in a respectful and professional manner, with proper responsibility and in accordance with NKBM policies and internal regulations. It is not appropriate to use your company computer for video games and chatrooms. Any use of Nova KBM's information resources and assets, including for private purposes, brings the risk that Nova KBM will take knowledge of the contents of a message or electronic data. We can eliminate this risk by using Nova KBM's information resources and assets solely for business purposes.

Q: Can I use my company email address for private purposes?

A: Any use of NKBM's information resources and assets, including private use, exposes you to the risk of NKBM taking knowledge of the contents of the message and electronic data.

The obligations outlined above shall be reasonably incorporated into the internal documents of all members of the Nova KBM Group and be complied with by employees of every Group member.



A healthy and safe work environment is important for the wellbeing of our employees. During our work we follow and honour internal regulations that govern work health and safety.

9.3. Healthy and safe work environment

A healthy and safe work environment is important for the wellbeing of our employees. During our work we follow and honour internal regulations that govern work health and safety. We treat our colleagues with respect, and we respect diversity.

We are aware that consumption of alcohol and illicit substances, both at the workplace and during working hours, is prohibited. An occasional toast during working hours is allowed only if there is a justified business reason for this and the toast is considered to be part of the business protocol and good manners.

Q: Can I have a toast with my colleagues during working hours and in the premises of NKBM to commemorate a private occasion (birthday)?

A: No. An occasional toast during working hours is allowed only if there is a justified business reason for this and the toast is considered to be part of the business protocol and good manners.

9.4. Clean Desk and Clear Screen

Employees have the duty to safeguard the Bank's confidential information and electronic devices, handle their private information, and lock their electronic devices when they are left unattended.

The Bank can conduct control checks to ensure data safety. Employees will be made aware of control checks and consequences for unauthorized conduct. The clear desk and clear screen rule reduces the risks of unauthorized access, loss, and damage to information during and outside normal working hours.

The clear desk rules mandates that all documents designated as Business Secret – Confidential and all documents labelled Business Secret – Top Secret are removed from the desk and locked away when the items are not in use, or when an employee leaves their workstation.

The clear screen rules requires of all employees to lock their computers and other media when leaving their desk and to log off when leaving for an extended period of time (more than 10 minutes). This ensured that the contents stored on the media are protected from unauthorized use, modification, input, or deletion.



Any wilful or negligent breach or neglect of one's duties and responsibilities set out in the provisions of the Code will be treated as a breach of work obligations.

10.1. Questions regarding the Code

Any questions may be addressed to the Ethical Compliance Officer at the Compliance Office of Nova KBM, either via email at eticnavprasanja@nkbm.si

10.2. Breach of the Code

Employees of Nova KBM or any Nova KBM Group member are required to report any suspected breach of provisions of the Code to the Ethical Compliance Officer at the Compliance Office of Nova KBM, either via email at eticnavprasanja@nkbm.si

Any wilful or negligent breach or neglect of one's duties and responsibilities set out in the provisions of the Code will be treated as a breach of work obligations in accordance with the relevant legislation, the collective bargaining agreement, and the applicable internal regulations.

10.3. Entry into force

This Code enters into force on 1 August 2023.

As of the date of enactment of this Code, the Code of 1 September 2020 shall cease to apply.



