

2016.

Communication on Progress

Basic data:

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# Statement of Continued Support

I have pleasure in presenting you our ninth Communication on Progress, prepared in accordance with the principles of the UN Global Compact Initiative and outlining our activities taken in 2016 in the areas of human rights, labour, environment and anti-corruption.

The principles of social responsibility have been integrated into our business strategy for all 25 years of our corporate history. Each year we are seeking to improve our practice in the area of socially responsible operation, based on employee-development efforts, transparency of operation and availability to our customers, professional relationship with our partners, provision of support to the community and caring for the environment.

We are proud of the prestigious award Certificate Employer Partner awarded to us for the first time in 2016 as a company with high quality human resource management processes. We have demonstrated quality in all five evaluated areas: recruitment and selection, performance, motivation and remuneration, training and development and employee relations. We are aware that everything we do in the field of human resource management has significant influence on the improvement of the quality of our services and our customer satisfaction, and this is what we are seeking – to be the best bank in Croatia, recognizable for quality, competitive and fast services, always available to its customers.



Award “Poslodavac Partner”

In 2016, we consistently implemented the ten principles of the Global Compact Initiative. In the 2016 Communication on Progress we give the summary of our activities and achievements in the areas of human rights, labour, environment and anti-corruption in the light of the objectives we set out to meet, as well as the outline of further plans for 2017.

Lidija Martinović  
Director of Office of Corporate Communications

# Brief description of the fundamental business operation

Hrvatska poštanska banka was founded in October of 1991 as a universal banking organization to provide all banking services at home and abroad. Until 2001, the majority owner of Hrvatska poštanska banka was Croatian Post which through the good business practice of postal banks in Europe, continued to accomplish, through a newly established bank, the mission of the traditional postal savings banks which were founded in Croatia in 1883.

Since the beginning of 2001, the Republic of Croatia is the majority owner of Hrvatska poštanska banka via funds or companies owned by it.

The ownership structure of Hrvatska poštanska banka:

Republic of Croatia	42,4293%
Croatian Post plc	11,9336%
State Agency for Deposit Insurance and Bank Resolution	8,9803%
Croatian Pension Insurance Institute	8,7577%
Hrvatska poštanska banka plc – own treasury shares	0,0393%
Minority shareholders (285)	27,8597%

Hrvatska poštanska banka is the core of the HPB Group which also includes – HPB-Invest Ltd., HPB-Rea dodjela I Estate Ltd. and HPB-Home Savings plc.

One of the major pillars of the business strategy of HPB is its accessibility and availability. The cooperation with the Croatian Post and the use of the post-offices as its distribution channels enabled HPB to be the most accessible bank in Croatia. Along with its accessibility, HPB is especially committed to creating innovative and competitive products and services responsive to the needs of its customers.

Hrvatska poštanska banka is the largest and one of the few Croatia owned banks. HPB is the fourth bank in Croatia based on the number of customers, the seventh based on the assets value, the second based on the number of cash transactions, and according to the researches, the first one based on the recommendations; it is also among the leading banks based on the customers' trust.

As the largest Croatia owned bank, HPB accepts responsibility and takes full account of not only economic but also of social processes in Croatia, and contributes through its actions to their further development.

# Business environment and business challenges

In 2016 Hrvatska poštanska banka was confronted with substantial challenges of announced and current regulatory changes and market competition amid general decline in interest rates. The Bank adjusted to such circumstances by quality sales management, pricing policy and improved processes. Furthermore 2016 was the year when a lot of initiatives and strategic projects were implemented (Super Smart HPB, CRM, NPL sale, SEPA Credit Transfer, etc.) which required engagement of both, human and financial resources.

In 2016 HPB achieved the best results in its corporate history. Together with demanding operating activities, the Bank increased its net profit by 46.2% to HRK 180.2 million, while its operating profit reached the figure of HRK 385.4 million which was HRK 57.7 million or 19.8% more than in 2015 due to higher non-interest income and 4.1% lower expenses amid efficient management.

In 2016, 33 thousand new current accounts of individuals were opened; among 25 thousand new clients 82% have been employed. The majority of new clients are aged between 36 and 50 accounting for faster change in the profile of HPB's customers who are younger and have higher salaries.

Expansion of digital services (mHPB, SuperSmart HPB account, on-line loan application) is a key driver to attracting new customers.

In corporate banking, the Bank introduces new credit lines and expands its cooperation with certain industries and businesses, for example agriculture, craftsmen, lawyers, etc. In cooperation with EBRD the financing for small businesses, women – entrepreneurs and energy efficiency projects has been arranged.

Amid deposits inflow the Bank's assets were up by 9.3% to HRK19.4 billion



HPB and HP



HPB and EBRD



which is the highest growth in the last five years. The Bank achieved the highest market shares in all lending and deposit segments.

Despite lending reduction in the market, HPB continued to record the growth of loan portfolio and the total net loans grew by HRK 1.2 billion or by 11.6%. The loans to individuals grew by 12.3% and every second kuna lent to individuals in 2016 referred to the housing loans which jumped by record 51.2%. Corporate loans grew by 11.5% and reached the figure of HRK 6.8 billion. Total deposits were up by 11.4% to HRK 16.2 billion with change in structure. The highest jump was recorded in corporate deposits by 54%, while retail savings were up by 4.8%.

To keep the quality of its services at the highest level, the Bank increased availability to customers and improved its network, opening new and moving certain branches to better locations. The Bank also continued to develop and improve channels of distribution and to offer more functionalities and products. At the end of 2016 the Bank had 60 business units, and with more than 1000 post offices providing also the services of the Bank, HPB provided its customers with the largest banking network spread throughout Croatia.

Also, one part of the “Bank in Post Office” project has been implemented, introducing so called Financial Corners in 131 post offices where all basic banking services may be arranged, including also non-purpose loans. In cooperation with the Croatian Post, HPB wants to offer their customers the level of service provided in its own branches.



# I HUMAN RIGHTS

A hand is shown placing a blue puzzle piece into a structure of white rectangular blocks. The blocks are arranged in a stepped, ascending pattern from left to right. The hand is positioned on the right side, holding the puzzle piece and about to fit it into the structure. The background is a plain, light color.

**Principle 1** businesses should support and respect the protection of internationally proclaimed human rights within their spheres of influence

**Principle 2** businesses should make sure they are not complicit in human rights abuses

In connection with the principles of responsible business operation referring to the respect for and observance of human rights, Hrvatska poštanska banka continued in 2016 to undertake the activities not only in the sphere of information security in business, but also in the sphere of protection, education and care of all employees of the Bank.

## Information security

During 2016 too, the Bank strongly focused on the protection from fraud attacks against its information system, as well as on a recently growing number of malware-based attacks against financial institutions.

- Anti-Malware and Anti-Fraud tools were implemented and the group for fraud prevention was established within the Corporate Security Office.
- The educational and information activities for the Bank's employees and customers were added.
- The Bank's information system security management was additionally improved and upgraded.
- The cooperation and information exchange amongst the banks in Croatia in the area of information security were both improved.
- The Bank is keeping pace with the global trends in the protection of information and against new security threats to the information system.
- The awareness of the need for more investments in the information security systems has risen.

## Education and care for employees

Hrvatska poštanska banka is continuously taking care of and providing for the expertise and education of its employees in terms of the ever present foundation of the Bank's competitive power on the market. Besides, the Bank's employees are obliged to maintain their professional skills and comply with the professional and applicable regulatory requirements. HPB is supporting and promoting lifelong learning whereby it is directly affecting the creation of the added value of the company and is providing the opportunity to every employee to acquire knowledge necessary for his or her respective area of work. The employees have been actively trained both inside and outside the workplace, through professional counselling, workshops, seminars, conferences, specialized training courses and language and computer courses. The E-Classroom system has been further used and made permanently available to all employees irrespective of the time of use and location of a place of work.

Using the system of instruction provided with the help from internal trainers new and existing employees are continually educated for specific workplaces and provided with all necessary educational contents in order to train and prepare them sufficiently to perform their daily professional activities.

We continued to organize and implement on regular basis all relevant educational programs specifically designed for new employees – interns with the aim of introducing them directly and properly into the Bank's business, both in individual areas and in general, and to prepare them in the best possible manner for their future work. After the completion of such programs all interns



must take internship exam based on which their future employment status is determined and they are steered in the direction of business areas where they can achieve the best possible results.

The educational programs include:

- Internal education
- External education
- Education via E-Learning platform

In case of the internal education, in 2016 the Bank focused mostly on the education of new and existing employees concerning the anti-money laundering and terrorism financing prevention, SEPA and CRM. The internal courses were organized in order to introduce new employees into their work. The internal trainers attended for several days the course to develop the knowledge of advanced selling skills and the comprehensive Train the Trainer course, while those employees who do not conduct trainings but give various lectures were educated in skills of presentation and methods of teaching. A significant number of employees attended internal courses in soft skills, namely team work, communication skills, conflict resolution, provision of feedback, assertiveness, etc.

In case of the education of the existing employees, the sales coaching through mentoring system was implemented in branch offices. Also, in 2016 the Bank continued to provide the courses focused on the sale of insurance products of the insurance company "Croatia osiguranje". These educational programs were implemented by the internal trainers. The same employees

educated also sales network of the Croatian Post about the products of the Bank.

Via the E-Classroom system, the following topics were studied: HPB-Invest agent license test, education and exam in the work with Western Union, list of indicators for recognizing suspicious transactions and persons who are reasonably suspicious of engaging in money laundering or financing of terrorism, conflict of interest and personal transactions of relevant persons and



training in occupational safety and health. Some of these topics were obligatory for a certain number of the Bank's employees (for example for those from the sales network), while on the other hand all the employees had to attend the course in occupational safety and health. Using E-Classroom employees could also gain access to the topics of their choice, for example how to use MS Office tools.

In 2016, in the external education programs the employees were acquiring their professional knowledge participating in different workshops, seminars, conferences and programs of education. In addition to that, for employees occupying the positions requiring them under the law to pass certain state-level exams the Bank organized both, the required courses and the exams. Also, the Bank organized the employee training on compliance with regulatory framework and changes. The most important were the workshops where each organisational unit learned how to set KPIs and the education on "Making Performance Conversations" attended by all managers. Also, the course in English and training for trainers were the most popular.

Finally, it is worth to mention that E-Learning platform provides access to the materials given to those employees attending certain seminars/workshops/conferences so that such materials are available also to other employees of the Bank and that the Bank may encourage knowledge sharing.

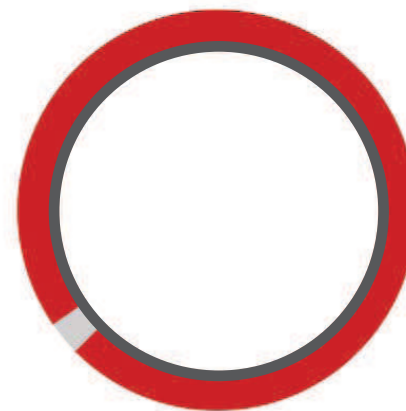
### Employees' data

On 31 December 2016 the Bank had the total of 1067 employees.

#### Structure of employees on 31 December 2016

##### 1) Based on type of employment

Temporary employment	Permanent employment	Total
55	1012	1067



- 1. Temporary employment 55
- 2. Permanent employment 1012
- 3. Total 1067

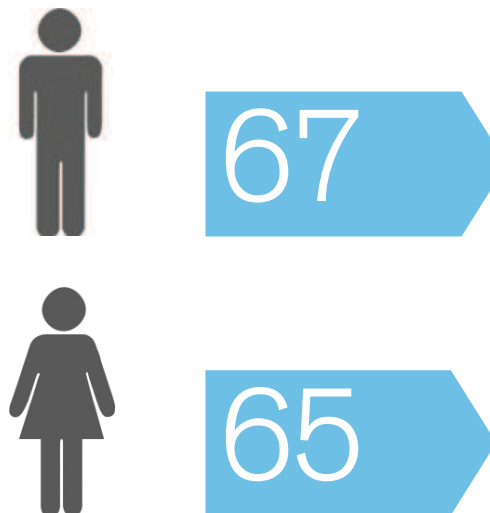
## 2) Based on age and gender structure

Age	Total	Women	Men
19-24	5	3	2
25-29	80	53	27
30-34	226	156	70
35-39	260	172	88
40-44	206	148	58
45-49	122	92	30
50-54	79	57	22
55-59	78	59	19
60-64	11	9	2
65 i više	0	0	0
<b>Total:</b>	<b>1067</b>	<b>749</b>	<b>318</b>

Employees' average age on 31 December 2016 in the Bank was 40.

## 3) Based on gender structure of managers and other senior officers:

men (67), women (65).



### Additional care for employees

1. The employees have been ensured additional and supplementary health insurance in cooperation with a Croatian insurance company
2. Benefits in terms of discounts on theatre tickets and different recreational and wellness programmes
3. Lower rates of interest on loans
4. Discounted electricity rates (discount in case of HEPI tariff)
5. Various extraordinary monetary aids
6. Newsletter
7. Internal web portal

## Contribution towards community

Hrvatska poštanska banka is a socially responsible institution, aware of its environmental impact, and understands that activities and business operation in a society imply also a constant care and respect for it. One of the activities whereby the Bank exercises social responsibility is supporting the community through grants and sponsorships.

We support the projects at the local and national level which encourage the creation of new values, seeking to promote knowledge and excellence and to preserve cultural heritage of our country. Special care is taken also of humanitarian organizations and actions.

### • For humanitarian purposes:

- o Children's Hospital Klaićeva – assistance to purchase new IT equipment
- o Organization "MoSt" – Split – humanitarian action "A DI SI TII?"
- o Organization "Debra" – support to the organisation's operation
- o Organization "Parkinson and We" – humanitarian action "Parkinson and We"
- o Cancer Patients Society "Sv. Juraj" – assistance to organize The Terry Fox Run

### • Education:

- o Organization Melius Croatia – assistance to the Croatian delegation of secondary school students who went to the international conference NHS-MUN held at the United Nations Headquarters in New York
- o Faculty of Electrical Engineering in Osijek – assistance to students who went to the international competition "Elektrijada" in Rimini

### • Sport:

- o Croatian Football Club "Gorica"
- o Mountain Cycling Club "Zemlja – Zrak" – TransDinara Marathon 2016
- o Futsal Club "Marina" – "Hileja Trekk&Trail Marina 2016"

### • Culture and social events:

- o 301st "Tournament of Alka" in Sinj – the Alka Knights Tournament Society
- o 49th "Šokačko sijelo" manifestation in Županja
- o 3rd Youth Salon – Croatian Association of Artists
- o 12th Cash & Carry Day – Academy of Fine Arts – University of Zagreb

### • Conferences and economic events:

- o Croatian Money Market – "Tržište novca d.d."



### Improving financial literacy among population

In the last three years, HPB carried out and presented to the public different surveys on the importance of people's timely and inclusive awareness of finance, their understanding of financial risks and sound personal finance management. HPB sees itself as an institution which can participate in and contribute to the process of enhancing financial literacy, especially in case of pupils and students.

In 2016, the Bank carried out a series of activities within the financial education project, and as a socially responsible institution promoted through different programs the importance of the financial responsibility and literacy for young people. Seeking to enhance the awareness of the importance of the proper ways in which the Bank manages not only its customers' finances, but also those of other people, businessmen, public sector stakeholders and those involved in political life, stronger cooperation with schools, faculties and student associations through joint researches, competitions and promotion of the importance of knowledge has been given priority.

- o Day of Croatian Financial Institutions – Croatian Chamber of Economy
- o Corporate Governance in Croatia – “Lider media d.o.o.”
- o 2nd International Transport and Insurance Law Conference – Intranslaw
- o “Let's Buy Croatian” Campaign in 2016 - Croatian Chamber of Economy Zagreb
- o “Urbanovo 2016” - Wine and Grape Growers Association of Međimurje “Hortus Croatiae”
- o 26th International Meeting of Wine and Grape Growers “Sabatina 2016” – Cooperative Alliance of Dalmatia

Not only through sponsorships and grants, but also through its products and services and their availability through the cooperation with the Croatian Post, the Bank remained close and accessible to individuals and business partners throughout Croatia, as well as to special groups of individuals, such as young people, students and pensioners.





# Future goals

- We plan to introduce in 2017 a comprehensive career management process which will start with talent assessment and identification.
- At the end of 2016 we started to develop the application software to help planning and recording employees' educations; we plan to finish it in 2017 and also to test it and deploy it.
- The Bank will continue to run internal and external education programs for its employees for the purpose of introducing the internal training system and internal trainer database.
- The educational activities will be especially focused on the education of managers in the area of enhanced knowledge of HR processes application, strengthening of leadership skills (Leadership Academy).
- Further enhanced activities through E-Classroom system will include more training courses for HPB Group's employees, and they will be aimed at preventing discrimination, mobbing and violations of dignity in the workplace environment in general.
- The Bank will continue to support the community and society where it operates through sponsorships and grants to those who need them most.
- The Bank will further develop internal communication through existing channels (newsletter and intranet).
- Further activities and projects fostering financial literacy in retail customers and entrepreneurs.





## II WORK CONDITIONS

**Principle 3** businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

**Principle 5** the effective abolition of child labour

**Principle 4** the elimination of all forms of forced and compulsory labour

**Principle 6** the elimination of discrimination in respect of employment and occupation

# Practical activities

- The internal occupational safety and health rules have been updated.
- The Bank's employees have been educated on occupational health and safety measures on an on-going basis.
- Preventive measures and legal obligations related to occupational safety and health and fire protection were implemented and fulfilled.
- All tests prescribed by law, playing a role in the prevention and the control of employees' health, have been made.
- The employees have been ensured additional and supplementary health insurance in cooperation with a Croatian insurance company.
- Continuous improvement of workplace quality through ergonomics and occupational safety and health measures (replacement of old IT equipment and defective chairs in the workplaces).



# Future goals

- Adjustments to the amendments to the Occupational Health and Safety Act.
- On-going education relating to occupational health and safety via E-Classroom.
- Control of the Bank's locations in terms of improved secure work conditions.
- Carrying out emergency evacuation and rescue drills in the Bank's premises.



# III ENVIRONMENT

**Principle 7** business should support a precautionary approach to environmental challenges

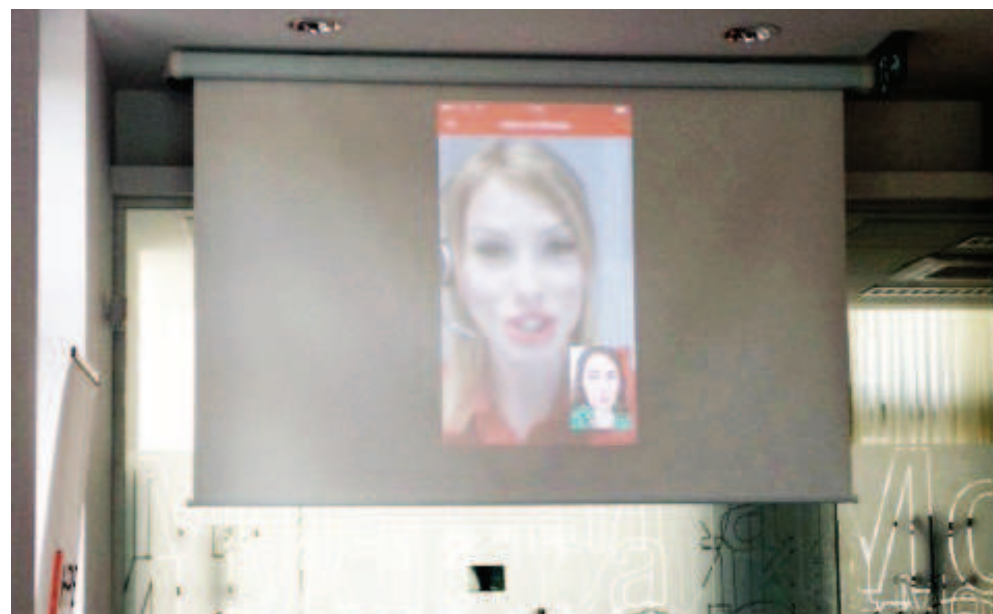
**Principle 9** business should encourage the development and diffusion of environmentally friendly technologies

**Principle 8** business should undertake initiatives to promote greater environmental responsibility



# Practical activities

- HPB has been the first bank in Croatia to introduce fully digital account opening. HPB's SuperSmart account is opened fully on-line, with no paper-based documentation or need to go to a branch. This is only one prominent example of HPB's broader business process digitalization initiative and its focus on electronic channels (Internet Banking, Mobile Banking ...); such initiative is effective in facilitating bank/customer interaction and also in reducing the consumption of paper, energy and waste, thus having a positive influence on environmental sustainability.
- HPB continued rationalization and integration of technology platforms. Preparing the infrastructure to move to new data centres, new disk sub-systems for storage consolidation were purchased and old and energy inefficient systems replaced. Also, new servers were purchased as the base for virtualization platform because by virtual server consolidation older and energy inefficient servers were taken out of service. The ratio of 20 virtual servers operating on one physical host reduces the energy consumption for power and cooling.
- The print management project was completed and the printer fleet consolidated. The control of print quotas is centralized now, and predefined print settings include monochrome mode and duplex printing, as well as the optimized number of printed pages. Following the implementation of this project, print jobs were cut down and toner, paper and electricity consumption reduced.
- Using the integrated unified communication system (Skype for Business) the number of travels to physical locations of meetings is reduced, and also the environmental impact of transport.
- E-waste has been disposed in accordance with the legislation and contracts with suppliers, and the price of disposal has been incorporated into the sale price of electronic equipment.





## Green Office

Since 2012 Hrvatska poštanska banka has been carrying out through the Green Office Initiative the activities which should be also carried out by all employees of HPB Group in their daily tasks in order to minimize in the office operation negative environmental impacts and enhance efficient use of resources. Since the launch of this Initiative, a significant saving of energy has been achieved, and the greatest progress has been marked in the paper consumption.

In 2016 the trend in reducing energy consumption mostly continued at all locations where measurements were made, and special savings in paper consumption were recorded.

### In 2016 the following actions were taken:

- Through the informative and educational Intranet Site – Green Message Board, the Bank continued to educate and advise employees on an ongoing basis on the Green Office measures in terms of reduced paper consumption, optimum heat regulation in the premises, rational water and lighting consumption, gathering old paper and toners in the special boxes, etc.
- In the newsletter “Moja HPBanka”, in its column “HPB thinks green” current environmental issues were discussed in details and the employees were advised on the manners in which they could contribute to the protec-

tion of environment.

- Waste paper was continuously collected in cooperation with the licensed company which was supplying the boxes for waste paper. All waste paper was transported for recycling. The licensed company did not cover the entire area of Croatia and individual branch offices of HPB took the initiative and joined independently the waste paper collection scheme in cooperation with other institutions.
- A record of the quantity of collected waste paper was kept by means of accompanying lists. In 2016, totally 10.6 tons of paper was collected, 9 tons less than in 2015; however, this drop is reasonable as the quotas of printed pages have been constantly decreased.
- All e-waste (obsolete computers, printers, fax machines) was properly disposed of at the companies licensed for e-waste disposal.
- In all its units and Bank’s operational locations, throughout Croatia, the Bank introduced boxes for the purpose of gathering waste toners; they are then transported and disposed of in the correct manner at the company responsible for that.
- The Bank offers its customers the option of receiving bank account and credit card statements and updates via electronic mail.
- Reports on expenditure were regularly sent via emails to the users of corporate mobile phones for the purpose of achieving more rational use of such phones.



# Future goals

- To relocate primary and secondary data centre to specialized premises intended for data centres that are more energy efficient and eco-friendly. To generate energy savings free-cooling systems will be used as they reduce refrigeration energy consumption. Another environmental benefit will be the use of environmentally friendly gases in the automatic fire suppression systems (Novec).
- Further virtualization and rationalization of the IT infrastructure elements which will significantly minimise energy and ecological footprint of the Bank's information system.
- Further digitalization of the internal business processes and communication with customers will minimise paper and printing materials consumption, as well as the amount of waste produced.
- In 2017, the Bank will continue to implement the Green Office activities and will reduce office supplies and energy consumption even more.





# IV ANTI-CORRUPTION

**Principle 10** businesses should work against corruption in all its forms, including extortion and bribery

## Implementation of Anti-Corruption Programme

In furtherance of the Anti-Corruption Strategy of Hrvatska poštanska banka for the Period 2015 – 2020, the Bank performs the activities referring to the promotion of business integrity and transparency, through:

- improvement of corporate management,
- improvement of customer relationship and communication by strengthening customer satisfaction and loyalty and intensifying customer relationship on behalf of the Bank,
- alignment of business operation with laws, regulations and norms,
- improvement of internal control system and operation of control functions,
- promotion of ethical conduct and behaviour.

At the beginning of 2015, a special instruction was issued on how to deal with complaints/objections/reports submitted to the Bank's ethics officer and irregularity officer and a significant progress was made in resolving complaints of irregularities in the Bank's operations and breaches of the Bank's Code of Ethics. In 2016, no complains on irregularities in the Bank's operations was reported. In the last quarter of 2016 Bank issued a Politics for Prevention of Fraud which defines directions and principles for managing prevention of fraud model. That system determines risk protection for all clients and Bank which

resulted in bigger confidence, safer business process and service quality. It also, includes intern and extern frauds that demands special attention and management reporting. Also, the customer relationship and communication has been further improved through the operation of the Service Quality Management Office which is responsible to manage the quality of the services provided to the Bank's customers through on-going customer satisfaction surveys and measurements and giving recommendations to competent persons for the purpose of improving the service quality. This office also manages the process of resolving complaints, objections and other requests of the customers, in cooperation with other organisational units of the Bank.

## Prevention of money laundering and terrorist financing

Being under obligation to undertake measures and actions set in the Anti-Money Laundering and Terrorist Financing Law, the Bank undertook in 2016 in the sphere of money laundering and terrorist financing prevention the following:

- The Bank was undertaking in a consistent manner the measures and actions prescribed by law and regulations passed in accordance with the Law,
- The Bank was systematically developing and improving software in the area of money laundering and terrorist financing detection and preven-

tion,

- The Bank also organized a series of training courses for 555 employees of the Bank and 13 employees of the Croatian Post (internal trainers).

Since while providing payment services in the name and for the account of the Bank, the Croatian Post as “the third party” takes measures and carries out activities prescribed under the Anti-Money Laundering and Terrorist Financing Law, and in order to ensure that the standards used by the Bank for detecting and preventing money laundering are also applied by the Croatian Post, the Bank:

- provides for the education of the internal trainers of the Croatian Post,
- checks whether the bylaws of the Croatian Post governing the detection and prevention of money laundering and terrorist financing are in compliance with the standards used by the Bank,
- supervises efficient implementation of measures, actions and procedures to detect and prevent money laundering and terrorist financing, prescribed under the bylaws of the Bank and the Post.

## Prevention of market abuse and manipulation

In 2016, no conflict of interest was recorded and no use of inside information

by insiders was reported or noted. The Bank continued to control reporting of performed personal transactions of relevant persons and employees of the Bank to the Register of personal transactions of relevant persons and employees of the Bank, kept under the Ordinance on personal transactions of relevant persons and personal transactions of employees of the Bank. In 2016 the Bank also performed the activities under Article 18 of the Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC. Those activities include, among other things, drawing up a list of all persons who have access to inside information, updating the insider list, providing the insider list to competent authority upon its request and ensuring that persons on the insider list acknowledge the legal and regulatory duties under the Market Abuse Regulation, and are aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information.





# Future goals

- Further enhance efficiency, integrity, ethics and transparency in business.
- Further improve anti money laundering and terrorist financing system and internal control system in risk assessment processes related to money laundering and terrorist financing.
- Educate and train employees in the sphere of the application of individual regulations in order to ensure compliance and application of laws, regulations and guidelines of the legislator.
- Further enhance also a culture of money laundering and terrorist financing risk management seeking to raise the awareness and understanding of money laundering and terrorist financing risks.
- Continue to introduce new software for detection and prevention of money laundering and terrorist financing in order to facilitate and accelerate detection of suspicious transactions and persons, simplify analytical work and improve communication of responsible persons in the Bank.
- Continue to actively implement and improve the practices that enhance the transparency of procedures and business operation, including also reassessment and improvement of public disclosure.

