

BANKA

SLOVENIJE

EVROSISTEM

CODE OF ETHICS
OF THE BANK
OF SLOVENIA

AUGUST 2019

BANKA SLOVENIJE

EVROSISTEM

1.	GENERAL	3
2.	CONFLICT OF INTEREST	6
	2.1. General provisions on conflict of interest.....	6
	2.2. <i>Private activities</i>	9
	2.3. <i>Acceptance of gifts</i>	11
	2.4. <i>Financial independence</i>	13
	2.5. <i>Conflict of interest after termination of employment at Bank of Slovenia</i>	15
3.	PROFESSIONAL STANDARDS	19
	2.6. <i>Internal relations</i>	19
	2.7. <i>Relations with external stakeholders</i>	20
	2.8. <i>Safeguarding of confidentiality</i>	23
4.	POWERS IN THE AREA OF COMPLIANCE	24
5.	FINAL PROVISIONS	27

BANKA SLOVENIJE

EVROSISTEM

Pursuant to Article 42 of the Bank of Slovenia Act (Official Gazette of the Republic of Slovenia, Nos. 72/06 [official consolidated version], 59/11 and 55/17), the Governing Board of the Bank of Slovenia hereby adopts the following

CODE OF ETHICS OF THE BANK OF SLOVENIA

1. GENERAL

Article 1

(purpose and objective of code of ethics)

In exercising its powers and tasks in the implementation of its objectives pursuant to the Bank of Slovenia Act and the Statute of the European System of Central Banks and of the European Central Bank (hereinafter: the Statute of the ESCB and of the ECB), the Bank of Slovenia upholds the highest standards of integrity and professional ethics, which represent the basis for ensuring the credibility of the Bank of Slovenia and the trust of the public.

To this end, the Bank of Slovenia has put in place a framework of integrity and professional ethics that is based on independence, transparency and accountability of individuals working under the authorisation of the Bank of Slovenia.

This code of ethics transposes Guideline (EU) 2015/855 of the European Central Bank of 12 March 2015 laying down the principles of a Eurosystem Ethics Framework and repealing Guideline ECB/2002/6 on minimum standards for the European Central Bank and national central banks when conducting monetary policy operations, foreign exchange operations with the ECB's foreign reserves and managing the ECB's foreign reserve assets (ECB/2015/11), and Guideline (EU) 2015/856 of 12 March 2015 laying down the principles of an Ethics Framework for the Single Supervisory Mechanism (ECB/2015/12).

The Code of Conduct for High-Level ECB Officials applies to the Governor as a member of the Governing Council of the ECB, to a member of the Governing Board of the Bank of Slovenia who is appointed to the Supervisory Board of the ECB as the Bank of Slovenia's representative, and to any staff member appointed as a deputy-member of the Governing Council or as a deputy-member of the Supervisory Board, with regard to their actions in the role of member or deputy-member.

Article 2

(application of code of ethics)

This code of ethics regulates the framework of integrity and professional ethics in connection with the conduct of members of the Governing Board of the Bank of Slovenia and other staff members who work or used to work in exercising the powers of the Bank of Slovenia (hereinafter: staff members) on the basis of an employment contract or another similar contract (hereinafter: contract).

The Bank of Slovenia upholds the framework of professional ethics and integrity set out by this code of ethics, including in relation to third parties when they are working with the powers of the Bank of

BANKA SLOVENIJE

EVROSISTEM

Slovenia in the implementation of its objectives and tasks, or are concluding a contract for the supply of goods or services with the Bank of Slovenia, to prevent unlawful or unethical actions by the Bank of Slovenia as a result of the conduct of the third party.

Article 3 (principles of integrity and professional ethics)

In performing their tasks for the Bank of Slovenia, staff members shall uphold the framework of integrity and professional ethics, which is based on the principles of independence and transparency.

In exercising the principles referred to in the previous paragraph, staff members shall act fairly, professionally, impartially, transparently and responsibly, and shall give precedence to the objectives that the Bank of Slovenia pursues in the public interest over personal interests.

When concluding a contract with the Bank of Slovenia, an individual shall make a declaration that he/she has been acquainted with the principles of this code of ethics, and that he/she will consistently uphold and implement them with regard to the importance of his/her tasks and responsibilities and the nature of his/her work or functions in the implementation of the tasks and objectives of the Bank of Slovenia pursuant to the Bank of Slovenia Act and the Statute of the ESCB and of the ECB.

The Bank of Slovenia shall monitor the compliance of individuals' conduct with the principles of this code of ethics while the contract is in force, and after the expiry of the contract.

Article 4 (principle of independence)

In their actions in connection with the implementation of the tasks and objectives of the Bank of Slovenia, staff members shall act independently, and in so doing shall not be bound by the resolutions, views or instructions of state bodies, agencies, offices or other organisations, and may not seek instructions or guidance from them, except when explicitly required to do so by law or EU regulations binding upon the Bank of Slovenia.

In performing tasks for the Bank of Slovenia, staff members shall:

- make their own prudent, objective and impartial decisions and judgments, having regard for the internal organisation and decision-making powers at the Bank of Slovenia, without any undue influence from stakeholders outside the Bank of Slovenia, and
- prevent and avoid conflicts between the interests of the Bank of Slovenia and personal interests.

Staff members shall inform their immediate superior and the compliance officer of any attempt at undue influence by organisations or persons outside the Bank of Slovenia over a staff member in connection with the performance of his/her professional tasks at the Bank of Slovenia.

Article 5 (principle of transparency)

The Bank of Slovenia endeavours to communicate, in a clear, comprehensive and timely fashion, information in connection with its actions that in the relationship with the public allow it to exercise the

BANKA SLOVENIJE

EVROSISTEM

responsibilities of the Bank of Slovenia as an independent institution, having regard for the safeguarding of the confidentiality of information in accordance with applicable regulations.

The Bank of Slovenia endeavours to cooperate openly, accessibly and well with other public authorities, public agencies, holders of public authorisations, and other institutions working in the public interest, having regard for their lawful powers and responsibilities and any regulations governing the procedures and basis for such cooperation.

In communicating with external stakeholders with regard to the actions and decisions of the Bank of Slovenia, staff members shall uphold the principles of this code of ethics, and the rules and methods of communication set out by the Bank of Slovenia.

Staff members shall ensure the proper reporting of circumstances for the timely identification of risks to integrity or the occurrence of corruption, and shall ensure traceability (provability) with regard to the activities that they carry out in performing tasks for the Bank of Slovenia.

Article 6 (role of senior management)

Members of the Governing Board of the Bank of Slovenia, directors and other staff members with senior managerial powers shall by their example actively contribute to staff members' awareness of the principles of integrity and professional ethics set out by this code of ethics.

Article 7 (definition of terms)

The terms used in this code of ethics shall have the following meanings:

- **“tasks in the area of supervision”** mean the Bank of Slovenia's activities and tasks in exercising public authorisations in supervisory procedures in connection with a supervised entity, including decision-making on supervisory measures and sanctions for misdemeanours exercised by the Bank of Slovenia in connection with:
 - the supervision of banks and savings banks, including tasks within the framework of the Single Supervisory Mechanism in accordance with Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions,
 - the supervision of payment systems and payment service providers, and other entities pursuant to regulations,
 - the resolution and compulsory wind-up of banks, and
 - macroprudential supervision;
- **“ECB tasks”** mean the powers and activities of the European Central Bank (hereinafter: ECB) in connection with monetary policy and exchange rate policy pursued by the ECB and the Bank of Slovenia as part of the European System of Central Banks (hereinafter: ESCB) in accordance with the Treaty on the Functioning of the European Union, and the Statute of the ESCB and of the ECB;

BANKA SLOVENIJE

EVROSISTEM

- a “**supervised entity**” means a legal or natural person in connection with which the Bank of Slovenia exercises supervisory powers pursuant to Slovenian regulations or within the framework of the Single Supervisory Mechanism;
- a “**counterparty**” means a counterparty of the ECB in connection with tasks in the area of monetary policy (within the framework of monetary policy operations);
- a “**business partner**” means a legal or natural person with whom the Bank of Slovenia has concluded a contract for the supply of goods or services (and the contract is still being performed), or with whom it is in the phase of negotiating such a contract;
- a “**person involved in a public procurement procedure**” is a person who is a member of an expert commission at the Bank of Slovenia for awarding a public contract, and a person who within the framework of his/her work powers and tasks decides on, confirms and proposes the content of tender documentation, assesses tenders or proposes the selection of a tenderer in connection with public procurement procedures (i.e. without taking account of procedures to award low-value contracts) and for public contracts for which it is not necessary to carry out a public procurement procedure, if the contract value is equal to or higher than the value for conducting the procedure to call for tenders with prior publication. Persons involved in a public procurement procedure who are not employed by the Bank of Slovenia shall also be deemed persons responsible for public contracts;
- “**external stakeholders**” are public-sector or private-sector entities (including state bodies, public agencies, institutes and funds, companies and interest groups, and representatives of civil society, including the media and the general public) other than the ECB, and other national central banks that are part of the ESCB, and national authorities of Eurosystem Member States that are responsible for the supervision of credit institutions;
- an “**immediate family member**” is a person whose relationship to a staff member is that of spouse or a person living in an extra-marital partnership or in another civil partnership that has the same rights under property law as marriage (hereinafter: partner), or who is the child, parent, brother or sister of a staff member, or who lives with a staff member as part of the same household.

2. CONFLICT OF INTEREST

2.1 General provisions on conflict of interest

Article 8 (conflict of interest)

A conflict of interest is a set of circumstances where staff members have personal interests that may influence, or appear to influence, the impartial and objective performance of their professional duties at the Bank of Slovenia.

A staff member’s personal interests may entail any kind of actual or potential, financial or non-financial, direct or indirect advantage for the staff member. The personal interests of a staff member taken into account in the assessment of a conflict of interest are primarily:

BANKA SLOVENIJE

EVROSISTEM

- material interests including the staff member's private transactions (e.g. ownership of equity and debt instruments, holding of management rights, financial liabilities and claims deriving from loans);
- interests in connection with acting as the agent or representative of entities of private or public law, including elected or appointed membership of the management or supervisory bodies of entities of private or public law, including membership of the bodies of political parties, bodies of local government and other organisations that pursue activities in areas falling under the competence of the Bank of Slovenia or that are business partners of the Bank of Slovenia;
- professional interests, including professional and other gainful activities encompassing permanent or occasional business relationships, and other activities that are a source of taxable income, including employment or consultancy, and are being provided, or have been provided in the last three years, or are intended to be provided by the staff member (future employment) for a legal or natural person who:
 - pursues activities in areas falling under the competence of the Bank of Slovenia,
 - is a business partner of the Bank of Slovenia, or
 - acts as a lobbyist, advisor, significant business partner or statutory representative of the interests of a supervised entity, a counterparty or a business partner of the Bank of Slovenia;
- the interests of an opposing party in a significant legal dispute with the Bank of Slovenia, a supervised entity, a counterparty or a business partner.

A staff member's personal interests also encompass the interests of other legal and natural persons who are closely linked to the staff member on the basis of family, friendly, political or business relationships when the person in question is the holder of an advantage referred to in the previous paragraph. Closely linked persons are in particular persons who have one of the following relationships with a staff member:

- an immediate family member,
- a person with whom the staff member maintains frequent and close private contacts (friends, relatives) that could have or appear to have an influence on the impartial performance of the staff member's duties at the Bank of Slovenia,
- a partner in a significant business relationship (e.g. a business partner in a joint venture),
- a former employer or close colleague (e.g. in the same organisational unit or in the same division) in the three years before employment at the Bank of Slovenia.

Article 9

(prevention of conflict of interest)

Within the framework of its organisational and commercial capacities, the Bank of Slovenia shall provide for measures to prevent conflicts of interests in connection with the work tasks of staff members.

Staff members shall avoid conflicts of interest in connection with the performance of their professional duties at the Bank of Slovenia, and shall notify their superior without delay if they identify the existence of circumstances that could entail a conflict of interest. In the notification the staff member shall also disclose essential information with regard to the personal interests of the closely linked person in an extent that allows for an assessment of the conflict of interest and the implementation of appropriate

BANKA SLOVENIJE

EVROSISTEM

measures to safeguard the interests of the Bank of Slovenia, provided that this does not encroach disproportionately on the third party's right to privacy.

Staff members who, in connection with the performance of their professional tasks for the Bank of Slovenia, identify the existence of circumstances that could entail a conflict of interest shall cease working on the matter in question, unless to do so would result in significant damage to the Bank of Slovenia.

Having received a notification, the superior shall decide within five business days whether a conflict of interest exists, and shall take appropriate measures to eliminate the conflict of interest. If the superior decides that the staff member should continue to work on the matter in question despite the conflict of interest, he/she shall provide guidance for the staff member's conduct in the performance of tasks.

The staff member or the superior may consult the compliance office on the existence of a conflict of interest in connection with specific circumstances or with regard to measures to prevent a conflict of interest. The superior shall keep a record of notifications received and decisions with regard to measures to address conflicts of interest.

Article 10 (declaration of personal interests)

For the purpose of monitoring conflicts of interest, the following staff members shall submit a declaration of circumstances that could entail a conflict of interest for the Bank of Slovenia (the declaration of personal interests) to the compliance officer by the end of January for the previous calendar year:

- members of the Governing Board of the Bank of Slovenia,
- directors and deputy-directors who are responsible for performing tasks in the area of supervision or for performing ECB tasks in the area of monetary policy and exchange rates,
- assistant directors, heads of section and other staff members who are responsible for heading permanent expert groups in the area of supervision or the performance of ECB tasks in the area of monetary policy and exchange rate policy,
- persons who were directly involved in public procurement procedures for the Bank of Slovenia in the previous calendar year.

The declaration of personal interests shall include:

- information about the staff member and the work that he/she performs at the Bank of Slovenia;
- information about the staff member's material interests, including information about:
 - real estate owned by the staff member (identification of the real estate, value, type of use),
 - individual items of movable property owned by the staff member valued at more than EUR 10,000 (description, value, type of use),
 - the staff member's balances at credit institutions, if their total value exceeds EUR 10,000 (credit institution, amount),
 - the staff member's currency holdings, if their total value exceeds EUR 10,000 (currency, amount),
 - the staff member's debts, liabilities and guarantee commitments with a value of more than EUR 10,000 (amount, type, creditor),
 - the staff member's loans whose total value exceeds EUR 10,000 (value, debtor),
 - the staff member's direct ownership of shares, participating interests and other management rights in companies or legal persons of private law where the holding in

BANKA SLOVENIJE

EVROSISTEM

- the management rights or equity of the subject is more than 5% (name of legal person, ticker symbol of instrument and number of instruments, value),
- the staff member's indirect ownership of shares, participating interests and other management rights in companies or legal persons of private law where the holding in the management rights or equity of the subject is more than 5% (name of direct owner, form of indirect ownership, name of issuer, ticker symbol of instrument and number of instruments, value),
- other securities if their value exceeds EUR 10,000 (name of issuer, type/class, ticker symbol of instrument and number of instruments, value),
- financial instruments resulting from prohibited financial transactions referred to in the third paragraph of Article 23 of this code of ethics (name of issuer, type/class, ticker symbol of instrument and number of instruments, value);
- information about the gainful activities of a family member (name of employer, description of work).

The compliance officer shall set out the detailed content of the declaration referred to in the previous paragraph and the manner of its submission. Staff members who are required to report a breakdown of their personal assets on the basis of the law governing integrity and the prevention of corruption may submit the report on personal assets that they submitted to the Commission for the Prevention of Corruption (CPC) instead of the declaration referred to in the previous paragraph. In this event the compliance officer may require the staff member to submit a declaration of individual circumstances not covered by the report for the CPC.

The compliance officer shall brief the superior on the basis of the declarations received and any additional clarifications from the staff member on circumstances that entail a suspected conflict of interest, and shall propose appropriate measures.

Article 11

(prevention of conflict of interest with regard to candidates for employment)

Within the framework of the selection procedure the Bank of Slovenia shall review the circumstances that could entail a conflict of interest in the event of the employment of a candidate for a vacancy. A candidate may be selected to fill a vacancy if no conflict of interest is identified in the selection procedure, or if appropriate measures are taken upon employment to manage an identified conflict of interest.

The persons responsible for selection shall warn candidates in the selection procedure that they are required to disclose and submit to the Bank of Slovenia all information and data that could entail a conflict of interest in the event of their employment at the Bank of Slovenia.

The persons responsible for selection may consult the compliance officer on the existence of a conflict of interest or with regard to measures to prevent a conflict of interest.

2.2 Private activities

Article 12

(restrictions on private activities)

BANKA SLOVENIJE

EVROSISTEM

In pursuing private activities, irrespective of whether they are remunerated, staff members shall avoid activities that conflict with the Bank of Slovenia's interests or could damage the Bank of Slovenia's reputation.

Staff members may pursue private gainful and non-gainful activities, provided that such activities do not impede them in or prevent them from performing their work tasks at the Bank of Slovenia regularly and with the requisite quality.

During official working hours, staff members may not perform private gainful activities for themselves or for third parties, and may not require other staff members to do so.

Article 13 (public activism)

Staff members who are privately active within the framework of civil society or politics (e.g. as an elected representative on local government bodies, in public action within the framework of civil associations and organisations or political parties) may not refer to their position at the Bank of Slovenia in such activities.

Article 14 (prohibition of pursuit of private activities)

Within the framework of private activities staff members may not provide services or work directly or indirectly for a supervised entity or a counterparty.

Within the framework of private activities staff members may not provide services or work directly or indirectly for business partners of the Bank of Slovenia when the staff member is involved in the process of drafting or performing the contract of commercial cooperation.

Within the framework of private activities staff members may not provide services or work directly or indirectly for a financial corporation established in the Republic of Slovenia when the private activities are related to the Bank of Slovenia's tasks.

Article 15 (prior authorisation)

Staff members shall obtain the prior authorisation of the compliance officer for any private activities related to the powers and tasks of the Bank of Slovenia, whether remunerated or not.

When making the assessment of prior authorisation for a staff member's private activities, the compliance officer shall take account of the following in particular (after consulting the staff member's superior):

- any influence that the private activity in question might have on the effective performance of the staff member's work tasks at the Bank of Slovenia,
- whether any private activity could influence or appear to influence the impartial, fair and professional performance of the staff member's work tasks at the Bank of Slovenia,
- the risk of abuse of the confidentiality of Bank of Slovenia documents, information and data,
- the impact on the reputation and integrity of the Bank of Slovenia.

BANKA SLOVENIJE

EVROSISTEM

The compliance officer may issue prior authorisation for an individual private activity for a period of no more than 12 months.

The compliance officer may at any time request that a staff member submit clarifications in connection with the performance of private activities, and may require a staff member to cease the pursuit of such activities (irrespective of any prior authorisation), if he/she assesses that the conditions set out by this code of ethics have not been met.

2.3 Acceptance of gifts

Article 16 (restrictions on acceptance of gifts)

Staff members may not accept, for themselves or on behalf of others, gifts or other advantages (hereinafter: gifts) from third parties that are in any way connected to the performance of professional duties at the Bank of Slovenia, except in cases set out by this code of ethics.

A gift shall be deemed to be connected with the performance of professional duties if it is offered on the basis of a function or position performed by the staff member. Customary hospitality of negligible value that is offered within the framework of working meetings shall not be deemed a gift pursuant to this code of ethics.

Staff members may accept gifts during work events in connection with the performance of powers and tasks of the Bank of Slovenia as a representative of the Bank of Slovenia (protocol gifts), and occasional gifts of low value that are customarily delivered during cultural, ceremonial, educational and similar events (occasional gifts). Occasional gifts are gifts whose value is no more than EUR 60, whereby the total value of the gifts from the same source may not exceed EUR 150 in a single calendar year.

The previous paragraph notwithstanding, a staff member may not accept a gift (including an invitation to a corporate entertainment event), if the gift is in any way connected to the performance of his/her professional duties in the following areas:

- tasks in the area of supervision, when the source of the gift is in any way related to a supervised entity,
- tasks in the area of public procurement procedures and in other procedures for contracting for good or services, when the source of the gift is in any way related to a supplier with whom the Bank of Slovenia is cooperating commercially or intends to cooperate commercially.

Article 17 (refusal of gift)

When a gift is offered that may not be accepted under Article 16, the staff member shall refuse the gift and shall warn the source of the gift of the rules on the acceptance of gifts pursuant to this code of ethics.

When the gift cannot be refused in cases referred to in the previous paragraph, because given the particular circumstances to do so might insult the source of the gift or endanger the commercial

BANKA SLOVENIJE

EVROSISTEM

cooperation, the staff member may exceptionally accept the gift. A gift of this type shall remain the property of the Bank of Slovenia.

Irrespective of value, the staff member shall refuse any gift:

- in the form of money, securities, gift vouchers or precious metals,
- when the acceptance of the gift would influence or appear to influence the impartial and independent performance of the staff member's tasks at the Bank of Slovenia, or the independent functioning of the Bank of Slovenia,
- when the acceptance of the gift would constitute a criminal offence.

When the prevailing intention of a gift of money, securities or a product made of a precious metal is its commemorative, historical or similar symbolic value (e.g. commemorative and collector coins), the gift shall not be deemed a gift in the form of money, securities or precious metals.

Article 18 (declaration of accepted gift)

Staff members shall declare the following to the compliance officer within ten business days:

- the acceptance of any gift whose value exceeds EUR 25,
- any offer of a gift whose acceptance was refused in accordance with the previous article, or whose acceptance could not be refused.

The value of the gift shall be determined by the staff member on the basis of available information about the usual market value, information from the producer, and information about the usual market prices of comparable products.

Article 19 (delivery of gifts to ownership of Bank of Slovenia)

Protocol gifts shall become the property of the Bank of Slovenia (except for a gift in the form of corporate entertainment events and similar non-material advantages that may be accepted and are entirely exploited within the framework of a business meeting).

Occasional gifts whose value is no more than EUR 25 shall become the property of the staff member. Staff members shall hand over protocol gifts and occasional gifts whose value exceeds EUR 25 to the ownership of the Bank of Slovenia.

At the proposal of the staff member, the compliance officer may decide that the staff member may keep a protocol gift or occasional gift whose value exceeds EUR 25 if, given the circumstances, this does not influence or appear to influence the impartial and independent performance of the staff member's tasks at the Bank of Slovenia. When the value of the gift exceeds EUR 60, the staff member shall pay the Bank of Slovenia the value of the gift in excess of this amount at the request of the compliance officer.

Article 20 (application of rules for acceptance of gifts)

The prohibitions and restrictions with regard to the acceptance of gifts set out in this code of ethics shall also apply to staff members' immediate family members.

BANKA SLOVENIJE

EVROSISTEM

2.4 Financial independence

Article 21 (financial independence)

When entering into private transactions, staff members shall act prudently and diligently and may not take up any disproportionate risks or enter into speculative transactions (e.g. transactions in instruments typified by high volatility and non-transparent price formation, transactions with high risk of loss, leveraged trading, options) that could prejudice or appear to prejudice their impartiality or adversely affect the reputation and integrity of the Bank of Slovenia (financial independence).

Staff member's private financial transactions shall be commensurate with their income and assets. Speculative transactions may not constitute a significant proportion of the financial transactions entered into by a staff member.

Article 22 (private financial transactions)

Private financial transactions are transactions in the following financial instruments:

- shares, bonds and other debt instruments (except deposits),
- derivatives tied to instruments referred to in the previous indent,
- combined instruments that have the attributes of instruments referred to in the first and second indents,
- units/shares in investment funds or similar schemes that invest primarily in instruments referred to in the previous indents.

A financial corporation is a corporation as defined in Regulation (EU) No 549/2013 of the European Parliament and of the Council of 21 May 2013 on the European system of national and regional accounts in the European Union (institutional sector S.12), and includes:

- credit institutions (banks, savings banks and other deposit-taking institutions other than the central bank),
- pension and investment funds, including money-market funds, and funds that invest in non-current financial and non-financial assets,
- investment firms (brokerage houses) and other financial intermediaries (leasing, factoring, securitisation, clearing, etc.),
- financial auxiliaries engaged in fund management, payment institutions, credit intermediaries, etc.,
- insurance corporations,
- financial holding companies, mixed financial holding companies and mixed-activity holding companies,
- other providers of financial services classified under institutional sector S.12 according to the standard classification of economic activities.

Article 23 (prohibited private financial transactions)

BANKA SLOVENIJE

EVROSISTEM

Staff members who perform work at the Bank of Slovenia in the area of supervision or in the area of implementation of ECB monetary policy and exchange rate policy may not enter into private financial transactions in:

- shares, bonds or other debt instruments issued by a financial corporation established in the Republic of Slovenia or in another EU Member State, or a branch therein, or a supervised entity (including entities belonging to the same group as a supervised entity),
- derivatives tied to shares, bonds or debt instruments referred to in the previous indent,
- combined instruments including one or more of the attributes referred to in the first or second indents,
- units in collective investment schemes (investment funds) whose main purpose is to invest in financial instruments referred to in the first, second or third indents.

Staff members who in the performance of their work at the Bank of Slovenia are involved in public procurement procedures may not enter into private financial transactions in financial instruments issued by a business partner of the Bank of Slovenia or by a person participating in the procedure as a tenderer.

The first and second paragraphs notwithstanding, private financial transactions entered into as follows and instruments obtained as follows by a staff member shall not be deemed prohibited private financial transactions:

- before this code of ethics began to apply to him/her,
- before the circumstances that give rise to the prohibition on the staff member from entering into private financial transactions arose,
- not through his/her own actions (e.g. by inheritance, by gift or as a result of a status change on the part of the issuer).

Staff members shall notify the compliance officer of the ownership of financial instruments resulting from prohibited private financial transactions and of the circumstances referred to in the previous paragraph within ten business days of the circumstances arising.

Staff members shall obtain prior authorisation from the compliance officer to dispose of the assets resulting from prohibited financial transactions and to exercise the rights associated with the assets.

The compliance officer may propose appropriate measures to avoid a conflict of interest in connection with staff members' assets resulting from prohibited financial transactions, including the transfer of the management of the assets to an independent third party or the sale of the assets.

Article 24

(ex post reporting of other private transactions)

Staff members who perform work at the Bank of Slovenia in the area of supervision or in the area of implementation of ECB monetary policy and exchange rate policy shall report the following private transactions to the compliance officer within 30 business days of entering into the transaction if the total value of such transactions exceeds EUR 5,000 in a single calendar month:

- foreign exchange transactions, other than the purchase or sale of foreign currency in connection with occasional non-financial transactions and the staff member's personal activities (e.g. private travel);
- transactions in gold;
- transactions in securities issued by EU Member States;
- transactions in derivatives tied to instruments referred to in indents (i) to (iii);

BANKA SLOVENIJE

EVROSISTEM

- transactions in shares in collective investment schemes (investment funds) whose main purpose is to invest in financial instruments referred to in indents (i) to (iv);
- the raising of a loan by the staff member (without sureties and collateral provided by the staff member in connection with a loan to a third party);
- short-term trading transactions (e.g. the purchase and sale of an instrument completed within one month), unless the sale is executed as a stop-loss;
- the purchase or sale of virtual currencies.

On the basis of the report the compliance officer shall assess the influence of the private financial transaction on the staff member's financial independence and on the reputation and integrity of the Bank of Slovenia, and in so doing shall in particular assess:

- the staff member's professional tasks and his/her access to relevant confidential documents, information and data in connection with individual financial instruments and issuers of instruments (risk of abuse of confidentiality),
- the risks and the speculative nature, if any, of the private financial transaction,
- the source of the funds invested in the financial transaction and the impact of any loss resulting from the financial transaction on the staff member's financial independence.

If in the assessment of the compliance officer there is a conflict of interest for the Bank of Slovenia, the compliance officer shall propose measures to address the conflict of interest, including the transfer of management of the assets in accordance with Article 25 of this code of ethics or the disposal of the instruments or assets resulting from the financial transaction.

Article 25 (exemptions)

The prohibitions on entering into private financial transactions (Article 23) and the requirements for the *ex post* reporting of private financial transactions (Article 24) shall not apply if the staff member entrusts the control of his/her private financial transactions and the assets resulting from these transactions to an independent asset manager by virtue of a written agreement that provides for the management of the assets without the staff member's instructions.

In order to exercise the exemption referred to in this article, staff members shall obtain the compliance officer's prior authorisation before concluding a written agreement on asset management. In his/her assessment, the compliance officer shall take particular account of whether the staff member has direct or indirect influence over decisions made with regard to control. The staff member shall notify the compliance officer of any amendment to the contractual provisions, including to any general terms and conditions.

2.5 Conflict of interest after termination of employment at Bank of Slovenia

Article 26 (action in connection with termination of employment at Bank of Slovenia)

When negotiating in connection with new employment at another employer or in connection with the intention to independently pursue professional activities for the purpose of obtaining income or material advantage (hereinafter: new employment), staff members shall endeavour to ensure that their new

BANKA SLOVENIJE

EVROSISTEM

employment after the termination of employment at the Bank of Slovenia does not create the appearance that:

- by virtue of the promise of employment or work, the new employer or client has influenced the impartial and objective decision-making of the staff member in performing tasks at the Bank of Slovenia, or
- by hiring the staff member the new employer or client obtained the ability to use the Bank of Slovenia's confidential information, thereby influencing its decisions and procedures.

Staff members shall notify the compliance officer of the circumstances in connection with potential new employment, when such circumstances could give rise to a conflict of interest for the Bank of Slovenia. If circumstances that entail a conflict of interest for the Bank of Slovenia exist in connection with the potential new employment or with the work after the termination of employment at the Bank of Slovenia, the compliance officer shall notify the competent superior of measures to prevent a conflict of interest, taking account of the staff member's interests with regard to the confidentiality of information in connection with the potential new employment.

Article 27

(notification of intent to change employment)

Staff members shall notify the compliance officer of new employment, and of the new employer/client in particular, by no later than their submission of notice to terminate their employment at the Bank of Slovenia, and shall explain the principal tasks and duties or activities that they will perform at their new employer or within the framework of their new business activities.

Even after the termination of their employment at the Bank of Slovenia, former staff members shall notify the compliance officer of any new employment that they intend to accept after their employment at the Bank of Slovenia, as follows:

a) within 24 months of the cessation of the performance of one of the following functions, if they performed the function for at least six months uninterrupted:

- a member of the Governing Board of the Bank of Slovenia,
- the director or deputy-director responsible for the area of supervision;

b) within 12 months of the cessation of the performance of the function or work at the Bank of Slovenia in one of the following positions, if they performed the function or work for at least six months uninterrupted:

- secretary-general, or a director or deputy-director (other than the director or deputy-director responsible for the area of supervision);

b) within six months of the cessation of the performance of work at the Bank of Slovenia, if in the 12 months prior to the termination of employment:

- they conducted proceedings to impose a supervisory measure, including inspections and granting of authorisations,
- they conducted misdemeanours proceedings or issued a decision therein,
- they were involved in a procedure for awarding a high-value public contract.

Article 28

(measures to address conflict of interest in connection with new employment)

BANKA SLOVENIJE

EVROSISTEM

The following measures to prevent a conflict of interest may be adopted during the notice period in connection with a staff member in respect of whose new employment the risk of a conflict of interest has been identified:

- assignment to other work,
- limits on authorisations,
- restriction of access to information and resources.

With the aim of avoiding a conflict of interest as a result of new employment, staff members whose employment relationship at the Bank of Slovenia has terminated shall not accept new employment with an employer during a cooling-off period as follows:

- a) if they performed the function of a member of the Governing Board of the Bank of Slovenia for at least six months uninterrupted:
- at a supervised entity established in the Republic of Slovenia (including entities belonging to the same group as a supervised entity): a period of 12 months from the cessation of their membership of the Governing Board of the Bank of Slovenia,
 - at a credit institution established in a member-state of the euro area: a period of six months from the cessation of their membership of the Governing Board of the Bank of Slovenia and 12 months from the cessation of their membership of the Supervisory Board of the ECB,
 - at a counterparty to the ECB in monetary policy operations: a period of six months from the cessation of their membership of the Governing Board of the Bank of Slovenia and 12 months from the cessation of their membership of the Governing Council of the ECB,
 - at a financial institution established in the Republic of Slovenia: a period of six months from the cessation of their membership of the Governing Board of the Bank of Slovenia,
 - at another financial institution (established outside the Republic of Slovenia): a period of six months from the cessation of their membership of the Governing Council of the ECB or their membership of the Supervisory Board of the ECB,
 - at a payment or settlement system operator, a central counterparty or a provider of payment instruments subject to ECB oversight: a period of six months from the cessation of their membership of the Governing Council of the ECB,
 - at an entity that in the preceding six months (before the cessation of the function) advised supervised entities or represented the interests of supervised entities in the Bank of Slovenia's supervisory procedures, or lobbied for the interests of supervised entities in matters falling under the competence of the Bank of Slovenia or the ECB: a period of six months from the cessation of their membership of the Governing Board of the Bank of Slovenia;
- b) if they performed the function of a director or deputy-director at the Bank of Slovenia that in accordance with the internal organisation is responsible for the management and performance of tasks in the area of supervision (including deputisation for a member of the Supervisory Board of the ECB) for at least six months uninterrupted:
- at a supervised entity established in the Republic of Slovenia (including entities belonging to the same group as a supervised entity): a period of six months from the cessation of their function,
 - at credit institution established in a member-state of the euro area: a period of three months from the cessation of the function or a period of six months from the cessation of their deputisation for a member of the Supervisory Board of the ECB,
 - at a financial institution: a period of three months from the cessation of their function,
 - at another financial institution (established outside the Republic of Slovenia): a period of three months from the cessation of their deputisation for a member of the Supervisory Board of the ECB,

BANKA SLOVENIJE

EVROSISTEM

- at an entity that in the preceding six months before the cessation of the function advised supervised entities or represented the interests of supervised entities in the Bank of Slovenia's supervisory procedures, or lobbied for the interests of supervised entities in matters falling under the competence of the Bank of Slovenia: a period of three months from the cessation of their function;
- c) if they performed the function of a director or deputy-director at the Bank of Slovenia that in accordance with the internal organisation is responsible for the management and performance of ECB tasks in the area of monetary policy and exchange rate policy (including deputisation for the Governor as a member of the Governing Council of the ECB) for at least six months uninterrupted:
- at a bank or another counterparty in ECB monetary policy operations: a period of six months from the cessation of their function,
 - at a payment or settlement system operator, a central counterparty or a provider of payment instruments subject to Bank of Slovenia or ECB oversight: a period of three months from the cessation of their function,
 - at an entity that in the preceding six months (before the cessation of the function) advised or represented the interests of entities referred to in the previous indents in the oversight procedures of the Bank of Slovenia or the ECB, or lobbied for the interests of such entities in matters falling under the competence of the Bank of Slovenia or the ECB: a period of three months from the cessation of their function;
- d) if for a total duration of at least six months they performed tasks at the Bank of Slovenia in the area of supervision encompassing the management and coordination of permanent expert groups (e.g. joint supervisory teams):
- at a supervised entity established in the Republic of Slovenia (including entities belonging to the same group as a supervised entity) that pursues business activities of the same type as those supervised by the permanent expert group: a period of six months from the cessation of their performance of the management or coordination tasks;
- e) if they conducted individual supervisory proceedings to impose a supervisory measure or to grant an authorisation (including inspections), or conducted misdemeanours proceedings or issued a decision therein:
- at an entity in connection with which a supervisory procedure was conducted or specific supervisory activities were carried out, with the staff member's direct involvement: a period of six months from the cessation of the activities;
- f) if they performed tasks at the Bank of Slovenia encompassing the management and coordination of permanent expert groups in connection with the Bank of Slovenia's activities in performing ECB tasks in the area of monetary policy or exchange rate policy for at least six months uninterrupted:
- at a counterparty of the ECB in connection with the implementation of monetary policy: a period of three months from the cessation of the activities;
- g) if, in a procedure to award a public contract of the Bank of Slovenia conducted as a high-value contract, as the representative of the organisational unit that submitted the request for procurement (the contracting authority) they were directly involved in preparing the proposal, deciding on or confirming the content of the tender documentation, evaluating the tenders received, or selecting the tenderer:
- at an entity that is a potential tenderer or submitted a tender (in connection with a procedure that has not yet been completed): a period of six months from the cessation of their performance of the tasks,

BANKA SLOVENIJE

EVROSISTEM

- at an entity selected as the tenderer in a public procurement procedure: a period of six months from the conclusion of the contract.

After the termination of employment, during the period in which the restrictions referred to in this article apply, the former staff member may request the Bank of Slovenia for an opinion with regard to a conflict of interest in connection with intended employment. With regard to the circumstances of the specific case, the Bank of Slovenia may conclude that the restrictions referred to in this article do not apply in connection with the intended employment, or may agree to shorten the duration of the restrictions (the cooling-off period) if, given the circumstances of the individual case, there is no conflict of interest or the conflict of interest has been adequately addressed by other appropriate measures. The former staff member shall address the request referred to in this article to the compliance officer.

For former members of the Governing Board of the Bank of Slovenia and a former director or deputy-director who was responsible for the management and performance of tasks in the area of supervision, with regard to the specific circumstances in connection with the new employment the cooling-off period may exceptionally be extended, but by no more than half of the cooling-off period set out by this article. Should a former staff member accept new employment in contravention of the restrictions referred to in this article, and fail to rectify the non-compliance by the appropriate deadline when called on to do so by the compliance officer, the Bank of Slovenia may decide to publish an opinion with regard to the non-compliance of the former staff member's conduct, if such publication is appropriate and proportionate with regard to the circumstances of the case (with regard to the function and tasks that the former staff member performed during the period of employment at the Bank of Slovenia).

Article 29 (agreement on cooling-off)

In connection with upholding the restrictions referred to in the previous article, staff members may propose to the Bank of Slovenia that they conclude an agreement on cooling-off in which the contracting parties agree suitable compensation for the staff member to receive during the agreed cooling-off period.

The procedure and detailed rules with regard to exercising the right to compensation for cooling-off shall be set out via a bylaw.

3. PROFESSIONAL STANDARDS

3.1 Internal relations

Article 30 (compliance with internal organisation)

In performing their tasks, staff members shall comply with the organisation and division of labour at the Bank of Slovenia as laid down by the Bank of Slovenia's bylaws.

Staff members shall treat their colleagues with respect, and shall endeavour to work together honestly. In so doing staff members shall not conceal or withhold information that colleagues need to perform their work, and shall not spread inaccurate or incomplete information in order to gain a personal advantage.

BANKA SLOVENIJE

EVROSISTEM

Article 31 (respect in the workplace)

Staff members shall be respectful in their relations with colleagues, and shall refrain from any inappropriate conduct or action that directly or indirectly humiliates, harasses or unfairly discriminates against another.

Staff members shall contribute to a culture of respect, and shall deter and draw attention to any occurrences of inappropriate or disrespectful conduct. Staff members may denounce inappropriate conduct in accordance with the Bank of Slovenia's bylaws.

Article 32 (use of resources)

Staff members shall respect property, and shall safeguard the resources provided to them by the Bank of Slovenia in connection with the performance of work.

The Bank of Slovenia's resources shall be used exclusively for work purposes, unless use for private purposes is explicitly permitted in accordance with the Bank of Slovenia's bylaws or with the consent of the superior.

Article 33 (dispute resolution)

In the event of a dispute or disagreement, staff members shall endeavour to reach an amicable solution in a respectful and professional manner. In connection with dispute resolution, staff members may request the assistance of the compliance officer or another staff member who enjoys their confidence in connection with dispute resolution (confidant).

The compliance officer or the staff member who as confidant is advising a staff member in the resolution of a dispute shall uphold confidentiality in connection with the staff member's statements with regard to the dispute, and may only disclose them to others with the staff member's explicit prior consent.

3.2 Relations with external stakeholders

Article 34 (accessibility and open communication)

In communications with external stakeholders the Bank of Slovenia shall focus on its tasks and objectives, and shall ensure that all interested stakeholders and public audiences are informed to the same degree with regard to relevant content and views pertinent to the functioning of the Bank of Slovenia.

Staff members shall be open and accessible for questions from the public with regard to general information in connection with the functioning of the Bank of Slovenia, and shall politely communicate

BANKA SLOVENIJE

EVROSISTEM

correct and complete information (including information by telephone or email), upholding the principle of transparency.

In their communications with external stakeholders staff members shall use official communications channels and the Bank of Slovenia's resources in accordance with the rules set out by the Bank of Slovenia for communications with the public. Communications with external stakeholders shall as a rule be undertaken in writing (traceability).

In their communications with external stakeholders staff members shall consistently uphold their obligation to safeguard the confidentiality of the Bank of Slovenia's documents, information and data that are classified as confidential in accordance with regulations or contractual commitments.

Article 35 (prohibition against accepting payments)

Staff members may neither solicit nor accept any payment from a third party for themselves or for others in connection with activities related to the performance of their professional tasks and duties or to the powers of the Bank of Slovenia.

Article 36 (expression of views)

Staff members shall avoid expressing personal opinions or views on matters that are of relevance to the Bank of Slovenia's decision-making in connection with its powers and that have not been published, particularly when such views could influence or appear to influence the actions of stakeholders that have direct material interests.

When within the framework of their professional activities staff members express their views on issues regarding which the Bank of Slovenia has not taken an official position, they shall explicitly emphasise that their views do not necessarily reflect those of the Bank of Slovenia.

Article 37 (attendance at public events and appearance in external publications)

Accepting an invitation to an event (e.g. a conference, seminar, reception or publication) where a staff member will express views on matters that are of relevance to the Bank of Slovenia's decision-making in connection with its powers may not generate or appear to generate a prestige advantage for the organiser over competitors as a result of special links with the staff member or the Bank of Slovenia. When a staff member expresses views that could influence the actions of market participants, an adequate (simultaneous) level of information for all interested stakeholders shall be ensured.

Staff members who within the framework of their professional duties intend to attend a public meeting or event or publish a piece in external media (an interview, an expert article) as a representative of the Bank of Slovenia, where they will express views in connection with the functioning of the Bank of Slovenia, shall notify the Bank of Slovenia's public relations officer in advance.

Article 38

BANKA SLOVENIJE

EVROSISTEM

(attendance at non-public meetings and gatherings)

Planned meetings and non-public gatherings of staff members with external stakeholders (representatives of the public sector or the private sector, interest groups and representatives of civil society, supervised entities, tenderers and business partners, etc.) at which there are discussions that given the nature of the content or the participants could directly influence decisions in matters falling under the competence of the Bank of Slovenia or that concern the operations of the Bank of Slovenia shall be held in the presence of at least two staff members. This requirement shall apply to non-public meetings and gatherings at the Bank of Slovenia or outside the Bank of Slovenia, and teleconference meetings.

When owing to objective circumstances it is not possible to ensure the attendance of at least two staff members at a meeting or gathering, it is necessary to cancel the meeting or gathering as a rule, unless cancellation would cause disproportionate damage or would significantly impede the performance of the Bank of Slovenia's tasks. In this event the staff member shall notify his/her superior in advance of the intended meeting, and shall request appropriate instructions with regard to holding the meeting.

The requirements referred to in this article shall not apply to unannounced (opportunistic) meetings and contacts (e.g. telephone or electronic communication). In such cases staff members shall avoid providing assurances or formal views in connection with the functioning of the Bank of Slovenia. When information about an opportunistic meeting or contact is important to the functioning or decision-making of the Bank of Slovenia, the staff member shall compile minutes of the meeting or contact, and shall inform his/her superior of the contact.

Article 39

(announcement of attendance of members of Governing Board of Bank of Slovenia at public and non-public meetings)

The Bank of Slovenia shall publish information on its website about public events and non-public official meetings and gatherings (including teleconferences) with external stakeholders that are to be attended by members of the Governing Board of the Bank of Slovenia in connection with the performance of their functions at the Bank of Slovenia, including functions on the official bodies and working bodies of the ECB, the European Banking Authority and the Single Resolution Board, and other official mandates at the EU and in international institutions, unless the publication of all or some of the information would contravene regulations binding upon the Bank of Slovenia.

In addition to the date and venue of the meeting, the announcement referred to in the previous paragraph shall also include the name of the external stakeholder or institution and the subject or purpose of the meeting. When the external stakeholders are representatives of public bodies, the announcement shall also cite the name and function of the representative. The announcement shall not include information about written or telephone communications with external stakeholders, or information about internal meetings or events.

For non-public meetings of members of the Governing Board of the Bank of Slovenia with representatives of supervised entities that are part of a particular supervisory procedure and activities in connection with the supervised entity, only the information "*Meeting with supervised entity*" shall be published alongside the date and venue of the meeting, with no indication of the name of the supervised entity, the name of the representative or the subject of the meeting. For non-public meetings of members of the Governing Board of the Bank of Slovenia with representatives of the media, only the information "*Meeting with media representatives*" shall be published alongside the date and venue of the meeting,

BANKA SLOVENIJE

EVROSISTEM

with no indication of the name of the media outlet, the name of the representative or the subject of the meeting.

3.3 Safeguarding of confidentiality

Article 40 (duty to safeguard confidentiality)

Staff members shall uphold the confidentiality of documents, information and data that have been produced by or are at the disposal of the Bank of Slovenia (including documents, information and data regarding the functioning of the ECB, other national central banks and other competent authorities of EU Member States, and other EU institutions), that are classified as confidential in accordance with regulations or contractual commitments, and that the staff member has obtained or has learned of in the performance of work and tasks for the Bank of Slovenia.

In the handling of documents, information and data that are classified as confidential, staff members shall act in accordance with the bylaws and requirements of the Bank of Slovenia with regard to the safeguarding of confidential documents, information and data, and may not disclose them to unauthorised persons or use them for private purposes.

Staff members may not disclose confidential information to other staff members at the bank who do not require the information to perform their tasks. In case of doubt, staff members shall request appropriate written instructions and guidance from their superior or from the competent body of the Bank of Slovenia.

This duty to safeguard confidentiality shall not cease upon the termination of employment at the Bank of Slovenia.

Article 41 (prohibition on abuse of confidentiality)

Staff members may not use documents, information and data classified as confidential outside of the exercise of their professional tasks and powers for the Bank of Slovenia for private advantage whose purpose is gaining direct financial or non-financial advantages for the staff member or for another person, particularly within the framework of:

- private transactions for the account of the staff member, including the use of information in the performance of the staff member's private (outside) activities,
- transactions for the account of a third party where the staff member is an intermediary or agent,
- other disclosure of confidential information to an (unauthorised) third party to indirectly allow the use of the information for the third party's private purposes (in connection with the third party's professional or private activities or transactions, including advice regarding the conclusion of private transactions).

A staff member shall be presumed to have abused confidentiality for the purpose of gaining direct financial advantages in connection with a private financial transaction if, before entering into the transaction, during work at the Bank of Slovenia the staff member had disposal of or learned of confidential documents, information or data that:

BANKA SLOVENIJE

EVROSISTEM

- contain precise information in connection with the financial assets or the issuer of the financial instruments that are the subject of the transaction, and the information in question has not been published or is not otherwise available to the public, and denote circumstances that have arisen or could reasonably be expected to arise, on whose basis conclusions could be drawn about the movement of the prices of the financial assets (and would be used by a reasonable investor as the basis for an investment or business decision), and
- contain information that were it to become public or available to other entities in the market would probably have a material impact on prices on financial markets.

The use of information that has already been officially published or is otherwise lawfully available to the public shall not constitute an abuse of confidentiality pursuant to this article.

Article 42

(disclosure of confidential documents, information and data)

Documents, information and data classified as confidential may only be disclosed to a designated recipient or to the public on the basis of a decision by the competent body of the Bank of Slovenia or an authorised person, provided that the legal and other conditions for disclosure are met.

The previous paragraph notwithstanding, disclosure by a staff member shall also be permitted if the disclosure by the staff member is necessary in order to report a criminal offence to the competent authorities or if the disclosure is required of the staff member by a court or another competent authority within the framework of proceedings conducted pursuant to regulations, and appropriate measures to safeguard confidentiality have been taken in the proceedings.

The duty to safeguard confidentiality shall not apply to documents, information and data that on the basis of a decision by the Bank of Slovenia have been published or otherwise made available to the public.

4. POWERS IN THE AREA OF COMPLIANCE

Article 43

(interpretation of code of ethics and monitoring of compliance)

The compliance officer is authorised to interpret the provisions of this code of ethics, and to monitor that staff members' conduct and personal interests comply with the requirements of this code of ethics within the framework of regular and *ad hoc* reviews in accordance with the internal rules governing the actions of the compliance officer.

The regular reviews of compliance shall in particular encompass the review of the conduct of individual staff members and their personal interests for the purpose of assessing the risk of a conflict of interest for the Bank of Slovenia on the basis of:

- staff members' periodic reports of their personal interests (Article 10),
- requests for prior authorisation of private activities (Article 15),
- declarations of gifts and advantages received (Article 18), and
- *ex post* reporting of private financial transactions (Article 24).

BANKA SLOVENIJE

EVROSISTEM

The compliance officer shall set out the method and detailed content of the reports and requests referred to in the previous paragraph, and any evidence to be submitted by staff members for the purposes of reviewing compliance.

The *ad hoc* reviews of compliance shall encompass the review of the conduct and personal interests of staff members:

- when there is increased compliance risk in conduct or risk of a conflict of interest for the Bank of Slovenia in connection with staff members in a specific area or in specific processes carried out by the Bank of Slovenia, or
- when there is doubt as to whether a staff member is acting in accordance with this code of ethics, or when the staff member's personal interests conflict with the interests of the Bank of Slovenia.

Within the framework of an *ad hoc* review, the compliance officer may require the staff member to provide clarifications and evidence with regard to his/her conduct or personal interests in the extent necessary to verifying that his/her conduct complies with this code of ethics.

Article 44

(monitoring of compliance in connection with private financial transactions)

For the purposes of monitoring compliance with the requirements with regard to private financial transactions, the compliance officer may require information and evidence with regard to the following from staff members:

- their holdings of bank accounts, including joint bank accounts, custodial accounts, accounts at brokerage houses and credit card accounts, including information on transactions in the aforementioned accounts,
- authorisations to manage private financial transactions for the account of a third party, including authorisations to dispose of assets in the accounts of the third party,
- communications with persons to whom they have transferred responsibility for the management of their assets from private financial transactions,
- sales and purchases of assets or rights for their own account or for the account of a third party.

The information and evidence referred to in the previous paragraph shall be treated as strictly confidential.

When the staff member does not have the evidence regarding the circumstances referred to in the first paragraph at his/her disposal, the compliance officer may require the staff member to submit a written declaration in connection with the circumstances or conduct in question that confirms compliance with this code of ethics.

When on justifiable grounds staff members do not wish to submit evidence regarding the circumstances referred to in the first paragraph of this article, or if so proposed by the compliance officer, the monitoring of compliance may be conducted by an independent contractor on the basis of a resolution by the Governor. The same requirements regarding the safeguarding of confidentiality shall apply to the contractor.

Article 45

BANKA SLOVENIJE

EVROSISTEM

(supervision of compliance with code of ethics, and interpretation of content)

Staff members' superiors are responsible for monitoring the compliance of staff members' conduct within the framework of work processes, and for the implementation of measures to ensure that staff members' conduct and the Bank of Slovenia's operations comply with this code of ethics in these processes.

In case of doubt with regard to the interpretation of an individual rule in practice and with regard to measures to prevent a conflict of interest in connection with a staff member, the staff member's superior shall consult the compliance officer.

For members of the Governing Board of the Bank of Slovenia and for persons appointed by the Governing Board of the Bank of Slovenia, the role of the superior pursuant to this code of ethics is performed by the Governing Board of the Bank of Slovenia.

Article 46

(confidentiality and retention of data)

Information and evidence in connection with the conduct and personal interests of staff members shall be treated as confidential, unless explicitly stipulated otherwise for individual cases, or unless it is public or classified with a lower level of confidentiality on another basis. The information and evidence may be used exclusively for the purposes of assessing the compliance of the staff member's conduct with this code of ethics, and for procedures conducted in connection with the staff member on this basis.

Information and evidence in connection with the conduct and personal interests of staff members shall be retained until the completion of the review process or until the completion of procedures conducted in connection with the findings.

Article 47

(staff member's liability in case of non-compliance with code of ethics)

In the event of the identification of a staff member's non-compliance with this code of ethics as a result of the staff member's conduct or direct personal interests, the compliance officer shall:

- propose to the staff member's superior that appropriate organisational measures be taken in the work process,
- call on the staff member to cease specific conduct or to take measures to rectify the identified non-compliance, or
- issue a report of a breach against the staff member in accordance with bylaws (procedure for reporting and internally investigating breaches by staff members at the Bank of Slovenia).

When the staff member fails to act in accordance with the call referred to in the previous paragraph, the compliance officer may issue a report of a breach against the staff member in accordance with bylaws (procedure for reporting and internally investigating breaches by staff members at the Bank of Slovenia), and may propose that appropriate labour law proceedings be conducted against the staff member, including a disciplinary sanction.

BANKA
SLOVENIJE
EVROSISTEM

5. FINAL PROVISIONS

Article 48
(entry into force)

This code of ethics shall enter into force on 1 September 2019.

On the day that this code of ethics enters into force, the Code of Ethics of the Bank of Slovenia of 1 January 2017 shall cease to be in force.

Boštjan Vasle
President of the Governing Board of the Bank of
Slovenia