



BANKOM

BANKOM d.o.o. BEOGRAD

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GRIEVANCE MECHANISM POLICY

BANKOM

1. Purpose

This policy establishes a transparent, accessible, and confidential **grievance mechanism** for employees, suppliers, and other stakeholders to report concerns or complaints related to the operations, conduct, or impacts of **Bankom**.

The goal is to identify, address, and resolve issues early and fairly — and to continuously improve our operations in line with ethical, legal, and sustainability standards.

2. Scope

This grievance mechanism applies to:

- All employees of Bankom
- Temporary or contracted workers
- Suppliers, subcontractors, and their employees
- Local communities and any affected third parties

3. What Can Be Reported?

Grievances may include (but are not limited to):

- Labor rights violations (e.g. discrimination, harassment, unsafe conditions)
- Environmental or health and safety concerns
- Human rights violations
- Unethical behavior, corruption, or fraud
- Violations of this company's Code of Conduct, policies, or contractual obligations
- Misuse of resources or retaliation against whistleblowers

4. How to File a Grievance

Grievances may be submitted in any of the following ways:

☐ **Email:** office@bankom.rs

☐ **Phone:** +381113190052

☒ **Written submission:** Delivered to the company's HR or Compliance Office at:

Bankom
Bul.Nikole Tesle 30, 11080 Belgrade, Serbia

Matični broj: 06287514

• RegistarSKI broj: BD 11274

Šifra delatnosti: 1041

PIB: 100000686

PDV: 134969218

tekući račun: 340-1101530669 Erste bank AD Srbija 105-000000272830668 AIK BANKA AD 325-950060003210168 OTP banka AD Srbija
Jednočlano društvo sa ograničenom odgovornošću upisano u registar privrednih subjekata pod brojem 11274/2005. Osnovni kapital (upisani i uplaćeni): novčani 667.334,65 EUR, nematerijalni 667.334,65 EUR

☒ **Optional anonymity:** Complainants may choose to remain anonymous. In such cases, all efforts will be made to investigate and address the grievance without compromising confidentiality.

5. Processing and Response Timeline

- Every grievance will be **acknowledged within 5 working days**.
- An initial review will be conducted to determine whether the issue is within the scope of this mechanism.
- Full investigation and response will be provided within **30 calendar days**, unless otherwise justified.
- In cases requiring corrective action, Bankom will work with relevant parties to resolve the issue effectively and ethically.

6. Protection from Retaliation

Bankom prohibits **any form of retaliation** against individuals who submit grievances in good faith. All grievances will be handled with **confidentiality, respect, and impartiality**.

7. Follow-up and Appeals

- Complainants may request a **follow-up meeting** or clarification if they are not satisfied with the outcome.
- Appeals may be submitted in writing to the General Manager of Bankom.

8. Monitoring and Review

This grievance mechanism will be **regularly reviewed** to ensure effectiveness, accessibility, and alignment with international standards.

This document is publicly available and may be distributed to employees, contractors, and external partners.

Issued by:

Bankom

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Slavenka Medan



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