

Disclosure of information on supervisory measure of 9 December 2025 imposed on credit institution

Information on perpetrator	
Business name and registered office of legal person	Delavska hranilnica d.d., Ljubljana Miklošičeva cesta 5, 1000 Ljubljana registration number: 5448557000
Information on breach	
Description of circumstances and conduct entailing breach of ZBan-3 or Regulation (EU) No 575/2013	Breaches of the ZBan-3 (cited in detail in the operative part of the order below) were identified on the basis of an inspection, as a result of which Banka Slovenije issued the savings bank with the order on the rectification of breaches referenced PBH-24.60-015/24-005 of 9 December 2025
Nature of identified breaches	Breaches in the area of credit risk management
<p>1. Delavska hranilnica d.d., Ljubljana, of Miklošičeva cesta 5, 1000 Ljubljana, Slovenia, registration number: 5448557000 (hereinafter: the savings bank), as a parent bank in the Republic of Slovenia is in breach of point 2 of the first paragraph of Article 148 in connection with the second and third paragraphs of Article 154 of the ZBan-3 in connection with paragraphs 12, 15 and 96 of the Guidelines on loan origination and monitoring (EBA/GL/2020/06 of 29 May 2020)¹ and Articles 4 and 5 of the Regulation on credit risk management at banks and savings banks² by virtue of the fact that its subsidiary DH Leasing d.o.o. also approves loans to uncreditworthy persons, and thus the credit risk management procedures at the subsidiary DH Leasing d.o.o. differ significantly from the procedures at the savings bank, and consequently the savings bank is failing to meet the requirements regarding internal governance arrangements on a consolidated basis to ensure that its internal governance arrangements are adequately integrated and consistently implemented at its subsidiary DH Leasing d.o.o.</p> <p>To rectify the breach, the savings bank must put in place identical credit risk management procedures at the savings bank and at its subsidiary DH Leasing d.o.o.</p> <p>2. The savings bank is in breach of the third paragraph in connection with the sixth paragraph of Article 9 of the Regulation on the exercise of options and discretions under European Union law³ in connection with Article 400(2)(c) of Regulation 575/2013/EU,⁴ because within the framework of large exposures it exempts exposures to the subsidiary DH Leasing d.o.o., but in so doing is failing to meet all the criteria for exemption in accordance with paragraph (2)(a)(i) of Annex 1 of ECB Regulation 2016/445/EU,⁵ in that the risk evaluation, measurement and control procedures at the subsidiary DH Leasing d.o.o. are not the same as those at the savings bank.</p>	

¹ The Guidelines on loan origination and monitoring (EBA/GL/2020/06 of 29 May 2020) are binding on the DH Group in accordance with the first paragraph of Article 2 of the Regulation on the application of the Guidelines on loan origination and monitoring (Official Gazette of the Republic of Slovenia, No. 104/20).

² Regulation on credit risk management at banks and savings banks (Official Gazette of the Republic of Slovenia, No. 115/21).

³ Regulation on the exercise of options and discretions under European Union law (Official Gazette of the Republic of Slovenia, Nos. 105/21, 67/22, 108/24 and 68/25).

⁴ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (OJ L 176 of 27 June 2013, p. 1), last amended by Regulation (EU) 2025/1215 of the European Parliament and of the Council of 17 June 2025 amending Regulation (EU) No 575/2013 as regards requirements for securities financing transactions under the net stable funding ratio (OJ L, 2025/1215 of 25 June 2025) (hereinafter: Regulation 575/2013/EU).

⁵ Regulation (EU) 2016/445 of the European Central Bank of 14 March 2016 on the exercise of options and discretions available in Union law (ECB/2016/4), last amended by Regulation (EU) 2025/1520 of the European Central Bank of 15 July 2025 amending Regulation (EU)

To rectify the breach, the savings bank may not exercise the exemption vis-à-vis its subsidiary DH Leasing d.o.o. until the conditions for the exemption have been met, that is until all credit risk evaluation, measurement and control procedures at the subsidiary DH Leasing d.o.o. are the same as those at the savings bank.

3. The savings bank's management board must submit a detailed action plan to Banka Slovenije by 15 January 2026 stating the measures taken to rectify the breaches referred to in points 1 and 2 of this order and setting a timetable for the rectification of the identified breaches. The savings bank must rectify the breaches referred to in this order by 31 January 2026, and must deliver a final report to Banka Slovenije by 15 February 2026, enclosing documents and other evidence from which it is evident that the breaches have been rectified.
4. In accordance with Article 310 of the ZBan-3, the following information in connection with this supervisory measure is published on the Banka Slovenije website after this supervisory measure is final:
 1. information about the perpetrator (business name and registered office of legal person);
 2. information about the breach:
 - a description of the circumstances and conduct entailing a breach of the ZBan-3 or Regulation (EU) No 575/2013,
 - the nature of the identified breaches;
 3. the operative part of the decision by which the relevant proceedings are completed;
 4. information as to whether judicial review proceedings have been initiated against the decision in accordance with the ZBan-3.

Information as to whether judicial review proceedings have been initiated against order on rectification of breaches in accordance with ZBan-3

The savings bank has not initiated judicial review proceedings against the order on the rectification of breaches.