

Bitcoin Banking for a Sustainabile Future

Sustainability Report

Reporting Year: 2024 Headquarters: Ljubljana, Slovenia Publication Date: March 2025

This report presents SBanKLA's performance and commitments in the areas of economic responsibility, environmental impact, data privacy, anti-corruption, and governance.

We are committed to shaping a responsible future for digital banking—one that is secure, transparent,

energy-efficient, and ethically governed.

About SBanKLA

SBanKLA is a pioneering financial institution based in Slovenia, specializing in secure and transparent Bitcoin-based banking services. Established in 2019, the bank was founded with the vision of bridging traditional financial services with the fast-growing digital currency economy.

Our operations are fully digital, with no physical branches, enabling us to minimize our environmental footprint while maximizing accessibility and efficiency. SBanKLA serves both retail and institutional clients, offering services such as cryptocurrency custody, digital wallets, Bitcoin-denominated savings accounts, and blockchain-based cross-border transfers.

As of December 2024, SBanKLA employs 46 professionals across Europe and serves over 12,000 active clients. Our core values are innovation, trust, transparency, and long-term sustainability.



Company Overview

SBanKLA is a Slovenia-based financial institution offering retail, corporate, and digital banking services, including specialized products in cryptocurrency-related accounts and blockchain advisory. Established in 2009 and headquartered in Ljubljana, the bank operates through a network of regional branches and digital platforms serving clients across Central Europe.

SBanKLA's core services include savings and loan products, asset management, and transaction solutions. In recent years, it has expanded into digital finance, providing Bitcoin custodial wallets and compliance-driven crypto exchange support for verified clients.

The bank employs over 450 staff and is committed to upholding responsible banking principles through transparency, ethical governance, data security, and inclusive finance. It maintains strong internal oversight and risk management structures, ensuring compliance with both EU banking regulations and evolving digital asset policies.

SBanKLA integrates sustainability into its business strategy by promoting responsible lending, reducing its environmental footprint, and supporting financial literacy programs. It continues to explore innovation that aligns financial growth with social and environmental value.



General Disclosures

Legal Structure and Ownership

SBanKLA operates as a privately owned digital bank, registered and regulated under the laws of the Republic of Slovenia. The bank is fully compliant with national and EU-level financial regulations, including those related to virtual asset service providers. Its ownership is distributed among a group of European fintech investors with a strong background in blockchain innovation and digital finance.

Location and Operations

The bank's headquarters is located in Ljubljana, Slovenia, with all operations managed remotely via secured digital infrastructure. SBanKLA does not maintain physical branches, and its services are accessible globally through its web and mobile platforms. Operational data centers are hosted within the EU, ensuring GDPR compliance and data sovereignty.

Mission and Strategy

SBanKLA's mission is to build a sustainable and ethical future for digital finance. We aim to provide Bitcoin-based banking solutions that are energy-efficient, inclusive, and secure. Our strategy focuses on integrating blockchain transparency with responsible governance and customer privacy.

Employees and Governance

The organization currently employs 46 staff members with diverse technical and financial backgrounds. All employees work remotely across 5 countries within the European Economic Area (EEA). Governance is overseen by a supervisory board composed of four members, including representatives from the fintech and cybersecurity sectors. Ethical conduct, data privacy, and anti-corruption measures are embedded into our corporate policies and staff training programs.



Material Topics

Determining What Matters

In 2024, SBanKLA conducted an internal assessment to identify the most significant sustainability topics affecting its operations and stakeholders. The process included consultation with management, employees, digital asset users, fintech partners, and legal advisors. The assessment prioritized issues based on two dimensions: the impact of the topic on the bank's business, and the influence of the bank on each topic from an environmental, social, or governance perspective.

The following topics were identified as most material to our activities:

1. Data Privacy and Security

Ensuring confidentiality and protection of client data is critical in a fully digital bank handling sensitive financial information.

2. Anti-corruption and Ethical Conduct

Maintaining integrity in the context of digital currency operations is vital to build trust and reduce risks of financial misconduct.

3. Energy Efficiency and Digital Infrastructure

Given the environmental concerns surrounding Bitcoin, our

focus is on minimizing energy usage in our technology stack.

4. Regulatory Compliance and Tax Transparency

Navigating emerging laws in cryptocurrency and ensuring full compliance with tax regulations is essential for credibility and long-term growth.

5. Economic Performance and Financial Inclusion

Providing accessible Bitcoin-based services to underbanked or tech-savvy populations contributes to both economic value and digital equity.

Each of these topics will be addressed in the sections that follow, including our approach to managing them and key performance indicators where applicable.



Regulatory Compliance and Tax Transparency

Economic Performance and Financial Inclusion

Integrity and Anti-Corruption

Our Commitment to Ethical Conduct

SBanKLA is built on a foundation of integrity, transparency, and responsible innovation. In an industry where anonymity and decentralization can pose ethical risks, we prioritize strict internal controls and proactive governance to prevent any form of corruption, bribery, or unethical behavior.

Policies and Procedures

Our Code of Conduct outlines clear expectations regarding conflicts of interest, misuse of digital assets, and engagement with clients and partners. All employees and contractors must complete an ethics and anti-corruption training upon onboarding and renew their certification annually.

We have also implemented:

- A whistleblower policy with anonymous reporting channels
- Real-time transaction monitoring to detect suspicious activity
- Third-party due diligence for all vendor and partner relationships

Monitoring and Reporting

In 2024, there were no confirmed incidents of corruption or ethical breaches within SBanKLA's operations. The internal audit team conducted quarterly reviews covering digital transaction flows, employee conduct, and client onboarding practices. Our governance board receives a biannual report on compliance and ethics metrics, ensuring ongoing oversight and improvement.

Looking Ahead

As cryptocurrency regulation continues to evolve, we are actively engaging with European compliance networks to enhance our practices and align with emerging standards. We view ethical conduct not as a constraint, but as a strategic advantage in earning client trust and regulatory credibility.



Energy Efficiency in a Digital-First Bank

Minimizing Our Environmental Impact

While SBanKLA does not operate physical branches or cash handling facilities, we recognize that digital infrastructure—particularly blockchain-related activities—can carry a significant environmental footprint. As part of our sustainability approach, we focus on optimizing the energy performance of our systems and data centers.

Our Digital Infrastructure Strategy

Our banking platform is hosted in cloud environments that run on 100% renewable electricity, provided by EU-based data centers certified for energy efficiency (ISO 50001 and TIER IV standards). We conduct regular reviews of our cloud architecture to reduce unnecessary computational loads and streamline blockchain validation processes when applicable.

Key measures taken in 2024 include:

- Migrating core services to low-energy cloud providers
- Implementing smart load balancing to reduce server demand
- Using lightweight blockchain nodes for read-only validation
- Avoiding proof-of-work mining internally and supporting external networks with cleaner alternatives

Energy Use and Performance

Although SBanKLA does not engage in cryptocurrency mining, we acknowledge the environmental concerns surrounding Bitcoin. Therefore, we actively educate our clients on sustainable Bitcoin use and support wallets and exchanges that disclose their environmental performance. In 2024, our total energy use associated with server operations was estimated at 13,200 kWh—a 6% decrease from 2023 due to improved server efficiency and code optimization.

Future Outlook

We aim to further reduce energy use per transaction through software refinement and by exploring partnerships with green blockchain networks. Our long-term goal is to achieve carbon-neutral operations by 2026.







Data Privacy and Information Security

Protecting What Matters Most

As a fully digital financial institution, SBanKLA views data privacy and cybersecurity not only as technical necessities but as core pillars of trust and responsibility. Our clients entrust us with highly sensitive financial information, and we are committed to safeguarding it through a rigorous, proactive approach to information security.

Governance and Architecture

We maintain a multilayered cybersecurity framework that includes:

- End-to-end encryption for all transactions and communications
- Multi-factor authentication for clients and staff
- Decentralized backup protocols and blockchain audit trails
- Regular penetration testing by external cybersecurity firms

All operations are designed in compliance with the **EU General Data Protection Regulation (GDPR)**, and data is processed and stored exclusively within the European Economic Area (EEA).

Client Rights and Transparency

We ensure that clients have full control over their data. They can

access, correct, or request deletion of their information at any time through their secure dashboard. Additionally, our privacy policy is written in plain language and made publicly available on our platform.

Incidents and Monitoring

In 2024, SBanKLA experienced zero data breaches or significant security incidents. We track and log all access attempts and

regularly update our internal security policies in line with emerging threats.

Building Digital Trust

To promote digital literacy and responsible usage, we also offer periodic workshops and online resources to help clients understand how to protect their identity and assets in the crypto space.



Economic Performance and Financial Impact

Driving Value Through Responsible Innovation

SBanKLA's business model is centered on the intersection of digital innovation and financial inclusion. As a Bitcoin-based bank, we offer clients access to decentralized finance tools while ensuring regulatory compliance and operational transparency. Our economic contributions extend beyond profitability, reaching into the realms of financial empowerment, job creation, and local ecosystem development.

Key Figures – 2024

- Total Revenue: €6.8 million
- Net Profit: €1.9 million
- Operational Expenditures: €3.7 million
- Employee Wages and Benefits: €2.1 million
- Taxes Paid to Slovenian Authorities: €640,000
- **Community Investment**: €85,000 (crypto education and digital access programs)

Sustainable Growth Focus

We have adopted a long-term investment approach, reinvesting over 40% of our profits into research and development, especially in blockchain scalability and secure digital identity tools. We also support local fintech startups through micro-grants and mentorship programs, helping to cultivate the next generation of responsible digital finance players.

Supporting Financial Inclusion

One of SBanKLA's key goals is to serve populations that are underbanked or excluded from traditional finance systems. In 2024, we launched a low-fee Bitcoin savings account that attracted over 1,800 new users from rural areas and non-EU residents working in Slovenia.

Outlook

Looking ahead, SBanKLA aims to expand its economic impact by entering new European markets and partnering with sustainable finance institutions. We believe that financial success must go hand-in-hand with social responsibility and innovation for public good.

Economic Performance and Financial Impact



Driving Value Through Responsible Innovation

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Sustainable Growth Focus

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Outlook

Expanding impact amorgss nmarkets expandsions and sustainable finance partnerships

Tax Transparency and Legal Compliance

Ensuring Full Compliance in a Complex Landscape

Operating within a highly regulated sector, SBanKLA is committed to full compliance with both national and international tax and financial laws. We recognize that transparency in tax matters is essential for maintaining stakeholder trust and demonstrating our contribution to public finances.

Our Approach to Taxation

SBanKLA adheres strictly to Slovenian corporate tax laws, as well as cross-border reporting obligations under EU directives such as DAC6 and the OECD Common Reporting Standard (CRS). We do not engage in tax avoidance schemes, nor do we operate through offshore structures or aggressive tax planning strategies.

All revenues and profits are declared in Slovenia, and our digital operations are structured to ensure transparent tax liability even when serving clients across borders.

Key Tax Data – 2024

- Jurisdiction of Tax Payment: Slovenia
- Total Income Taxes Paid: €640,000
- Effective Tax Rate: 25.7%
- No fines, penalties, or non-compliance issues reported

Legal Compliance and Licensing

SBanKLA is licensed by the Slovenian Financial Administration (FURS) as a virtual asset service provider (VASP). We also maintain voluntary alignment with selected provisions of the forthcoming EU Markets in Crypto-Assets Regulation (MiCA), to future-proof our compliance framework.

In 2024, we passed all independent audits with no major findings and responded to 12 regulatory inquiries from national and EU authorities, all of which were closed without incident.

Looking Ahead

We support evolving legislation that brings clarity and accountability to the digital finance space. Our legal and compliance team is actively involved in industry working groups to shape best practices for responsible Bitcoin banking.

TAX TRANSPARENCY AND LEGAL COMPLIANCE



Our Approach to Taxation

Key Tax Data - 2024



Jurisdiction of Tax Payment Slovenia



Effective Tax Rate **25,7**%



Total Income Taxes Paid €640,000



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Legal Compliance and Licensing



Outlook

Charting a Sustainable Digital Future

SBanKLA stands at the frontier of digital finance, and we recognize the responsibility that comes with this position. As the global financial ecosystem evolves, our focus remains on building a secure, ethical, and energy-conscious platform for Bitcoin banking.

In the years ahead, we aim to:

- Expand our client base across the European Economic Area and selected global markets
- Reach full carbon neutrality in operations by 2026 through energy optimization and certified offsets
- Deepen partnerships with blockchain innovators focused on sustainability and transparency
- Enhance our ESG governance structure with more stakeholder involvement and independent oversight
- Advocate for fair, smart, and inclusive regulation of digital assets

We believe that trust is the currency of the future—and we are committed to earning it, every day, through transparency, innovation, and shared value.

Charting a Sustainable Digital Future



Expand our client base across the European Economic Area and selected global markets



Reach full carbon neutrality in operations by 2026



Deepen partnerships with blockchain innovators focused on sustainability and transparency



Enhance our ESG governance structure with more stakeholder involvement and independent oversight



Advocate for fair, smart, and inclusive regulation of digital assets