

# **POLICY FOR A DIVERSE, INCLUSIVE AND NON- DISCRIMINATORY WORK ENVIRONMENT AT MBANK S.A.**

<b>Owner:</b>	Department of Employee Relations and Organisational Culture (DHR)
<b>Issuer:</b>	Management Board of mBank S.A.
<b>Issue date:</b>	28.10.2025 r.
<b>Effective from:</b>	18.11.2025 r.

**Document history**

<b>Version</b>	<b>Effective from</b>	<b>Scope of changes</b>
<b>1</b>	<b>15 lutego 2022 r.</b>	-
<b>2</b>	<b>18.11.2025 r.</b>	This document replaces the previously applicable Policy adopted by Resolution of the Management Board No. 12/2022 dated 15.02.2022 r.

Table of contents

- 1. Why we are implementing the Policy ..... 3**
- 1.1. Objectives of the Policy ..... 3**
- 1.2. Scope of the Policy ..... 3**
- 2. Our focus areas for 2026–2030 ..... 4**
  - 2.1 Eliminating the pay gap ..... 4
  - 2.2 We aim to achieve gender balance in the bank’s management staff as well as in the management and supervisory boards of the largest mBank S.A. Group subsidiaries. .... 4
  - 2.3 We create an inclusive work environment that fosters a sense of belonging – we aim to be one of the most inclusive employers in Poland. .... 5
  - 2.4 We care about the well-being of our employees and create optimal conditions for balancing professional and private life, including caregiving and parenting roles. .... 5
  - 2.5 We manage age diversity effectively ..... 6
  - 2.6. We ensure inclusivity in our relationships with clients ..... 6
- 3. Our goals for 2026–2030 ..... 7**
- 4. Final provisions ..... 7**

## **1. Justification for Implementation**

### **1.1. Objectives and scope of the Policy**

Diversity, equity, and inclusion (DEI) are the foundations of a responsible and modern workplace. As a socially responsible company, we apply the Diversity, Equity and Inclusion Policy ("Policy"). We believe that it is people – their diversity, experiences, and talents – who shape a culture built on trust and belief in good intentions.

As mBank, we support our subsidiaries in shaping principles related to a diverse, inclusive, and discrimination-free work environment across the entire mBank Group. We recommend that our subsidiaries implement the Policy in accordance with the principle of proportionality (i.e. proportionally to the nature and scale of their operations).

Matters not regulated by this Policy are governed by other internal regulations.

### **1.2. Rules for Review and Update**

The Employee Relations and Organisation Culture Department (DHR) is responsible for developing and updating the Policy. The Policy is adopted by the management board. Any amendments to the Policy must follow the same procedure as its initial implementation.

## **2. Glossary of Abbreviations**

DEI – Diversity, Equity, and Inclusion

DHR – Department of Employee Relations and Organizational Culture

## **3. Objectives and Scope of the Policy**

Through this Policy, we aim to:

1. ensure equal treatment and prevent discrimination and mobbing,
2. foster an inclusive culture based on respect for diversity and human rights,
3. increase employee engagement and satisfaction,
4. support positive experiences for our clients,
5. strengthen innovation and business effectiveness,
6. maintain compliance with regulations and stakeholder expectations.

We are committed to ensuring equal treatment, regardless of:

- sex and gender identity,
- age,
- health status, including disability,
- neurodiversity,
- family status,
- lifestyle choices,
- religion, belief and non-belief,
- ideological beliefs or worldview,
- ethnic and national origin,
- sexual and psychosexual orientation,
- financial situation,
- trade union membership,
- or any other factors that may expose individuals to discriminatory behaviour.

The Policy outlines guidelines for fostering a diverse, inclusive, and discrimination-free work environment that apply to:

- all mBank employees – meaning all individuals employed under an employment contract, regardless of working time (including those working in the foreign branches), within the bank’s operational processes,
- all company locations, including remote and hybrid work environments,
- all organisational aspects, such as recruitment and hiring processes, professional development and promotions, remuneration and benefits, organisational culture, internal cooperation and communication, and relationships with clients.

For members of the management board and supervisory board, diversity-related provisions are included in the Policy for the Assessment of Qualifications, Appointment and Dismissal of Members of the Bank’s Bodies at mBank S.A.

The principles described in this Policy represent a set of best practices, which we recommend to mBank’s counterparties and partners as a reflection of shared commitment to building a responsible and inclusive work environment.

#### **4. Our focus areas for 2026–2030**

As part of the Policy, in the coming years we will focus both on actions we are already implementing and on those that reflect our aspirations in the DEI area.

##### **2.1 Eliminating the pay gap**

To achieve this, we:

1. apply a gender-neutral remuneration policy, regularly updated in line with market conditions. Gender neutrality means that pay for the same work or for work of equal value is at a comparable level,
2. communicate minimum base remuneration for each job level,
3. analyse and monitor remuneration data based on job grading and organisational structure,
4. use objective and fair performance evaluation criteria. Pay rises and promotions are a reward for effectiveness and quality of work. We ensure that criteria for promotions, pay rises, and bonuses are transparent,
5. include employees on long-term leaves in salary review processes, provided there are justified grounds based on objective criteria.

##### **2.2 We aim to achieve gender balance in the bank’s management staff as well as in the management and supervisory boards of the largest mBank S.A. Group subsidiaries.**

To achieve this, we:

1. monitor gender balance across all managerial positions, as well as in recruitment and succession processes for these positions. We ensure that the pool of potential candidates for management and supervisory boards, as well as for director and mid-level positions, includes a balanced representation of women and men;
2. provide equal access to development programmes for both women and men, including individuals identified as potential successors to management board members, based on objective competency criteria;
3. develop successors by creating development plans, providing access to training, mentoring, and other development tools, building a diverse pipeline of candidates for top leadership roles, with particular attention to underrepresented genders;

4. base recruitment and succession processes on objective competency criteria;
5. offer diverse development opportunities to all employees;
6. ensure transparency regarding available development activities and internal recruitment processes, so that everyone has equal access to information and growth opportunities;
7. run mentoring programmes, promote balanced leadership, and share success stories and practices of both women and men in various roles;
8. support internal networks and initiatives for underrepresented genders.

### **2.3 We create an inclusive work environment that fosters a sense of belonging – we aim to be one of the most inclusive employers in Poland.**

To achieve this, we:

1. stand against exclusion, discrimination, mobbing and hate speech. We conduct regular preventive and educational activities. We respond to any signs or reports of discrimination, mobbing and intolerance. In confirmed cases, we draw appropriate consequences and/or take corrective actions. We enable anonymous incident reporting and guarantee confidentiality, support, and protection for the whistleblowers. Details on how to report incidents are described in other internal regulations;
2. monitor the needs and experiences of individuals from vulnerable groups;
3. incorporate diversity into our processes and communication activities;
4. carry out educational initiatives, including promoting stories of individuals representing diverse identities and experiences, creating space for dialogue and exchange of perspectives, and offering training on diversity, inclusion, unconscious bias, preventing microaggressions, and inclusive communication;
5. support the strengths of employees through development activities. We ensure that everyone can realise their full potential, regardless of personal traits or field/area of individual talent;
6. create and develop ambassador groups that support the implementation of diversity policies, promote inclusive attitudes, support DEI initiatives, and signal team needs;
7. remove barriers and respond to the needs of people with disabilities and special requirements.

### **2.4 We care about the well-being of our employees and create optimal conditions for balancing professional and private life, including caregiving and parenting roles.**

To achieve this, we:

1. monitor employee well-being through engagement surveys, analyse their needs, and use the insights to improve our actions,
2. educate them on best practices for hybrid work, including team communication, digital hygiene, and time management,
3. offer psychological support and preventive health screenings, and provide education on mental and physical health, taking into account specific needs,
4. conduct development initiatives for managers to help them recognise signs of burnout and mental health crises and respond appropriately,

5. organise integration initiatives and activities that foster relationships,
6. support family life regardless of its model – we implement support programmes for parents and caregivers, initiatives for those caring for elderly, ill, or dependents, and offer family- and partner-related benefits. We also organise campaigns and events focused on family and close relationships.

## **2.5 We manage age diversity effectively**

To achieve this, we:

1. ensure equal opportunities in recruitment, development, and promotion regardless of age,
2. improve recruitment-related communication to eliminate age-based biases and stereotypes,
3. target our recruitment efforts at all age groups, including individuals with longer work experience. We promote development programmes that support this group, while also running internship and trainee programmes that enable students and young graduates to grow within mBank,
4. conduct educational campaigns on the value of age diversity and the benefits of intergenerational collaboration,
5. build platforms for intergenerational dialogue – we organise discussions, workshops, and training sessions focused on the needs and potential of different generations. We initiate knowledge and experience exchange across age groups and promote success stories of individuals from various generations,
6. create mentoring programmes (both traditional and reverse) and intergenerational project tandems,
7. promote opportunities for reskilling and lifelong learning and support the engagement of employees approaching retirement age.

## **2.6. We ensure inclusivity in our relationships with clients**

To achieve this, we:

1. continuously improve our products and services to ensure they are accessible, understandable, and inclusive for all clients,
2. provide multiple ways to contact the bank, including service in the Polish Sign Language, and make branches accessible for people with special needs. Our service standards address the needs of diverse client groups,
3. create communication aligned with mKanon, using gender-neutral language. We design content to be clear, understandable, and inclusive,
4. use stereotype-free language in marketing and advertising materials and represent diverse client groups. We normalise diversity in our messaging and counteract stereotypical or discriminatory narratives,
5. design, implement, and apply AI-based solutions in line with principles of ethics, diversity, equity, and data representativeness, to reduce the risk of reinforcing biases and stereotypes,

6. conduct internal educational activities on accessibility, inclusive design and communication, ethical sales, empathetic customer service, and identifying barriers to service access,
7. run educational campaigns and develop tools that support financial awareness among clients and employees,
8. monitor customer satisfaction surveys, taking into account feedback from diverse groups. We also track the accessibility and inclusivity of our products, service quality, and communication.

## **5. Our goals for 2026–2030**

In our business strategy for 2026–2030, we have defined goals in the area of DEI:

- we will work towards eliminating the pay gap (both in terms of base and total remuneration), with a maximum acceptable limit of 2.5%,
- we will ensure a 40%-60% gender distribution for all managerial positions,
- we will increase the gender balance in our subsidiaries' management bodies – a 40–60% distribution in each body of our main subsidiaries (calculated jointly for the management board and supervisory board of mFactoring, mLeasing, mBH, mFinanse, mTFI),
- we will provide an excellent employee experience (including competitive and transparent remuneration, an inclusive environment that fosters belonging, and a responsible hybrid work model).

Additionally, we update operational goals annually to support the achievement of strategic objectives and respond to current DEI challenges.

We regularly participate in external benchmarks and assessments to identify further areas for improvement. We also report progress consistently, both externally (e.g. in the Sustainability Report) and internally (to the management board and supervisory board).