



Sustainability standards

Client relations

July 2024



Our approach

Clients are our key stakeholders. We support them in secure and convenient banking as well as in making conscious financial decisions. We are aware of our responsibility for our impact on their financial well-being. Accordingly, we:

- offer products and services which support the clients' financial standing,
- assess the impact of our products and services on the ESG factors, including those relating to clients,
- simplify our products to help clients understand them and make informed decisions about using them,
- have zero tolerance for misselling,
- inform clients about the costs and risks connected with our products and services in a clear and transparent manner,
- apply mKanon – our proprietary standard for simple and understandable communication with clients and other stakeholders,
- support our clients' financial health so that they can smoothly manage their current financial obligations and have confidence in their financial future,
- ensure privacy of clients' data,
- guarantee an appropriate level of cyber security and help clients avoid cyber threat,
- carefully review the complaints we receive.

Our policies and procedures

Policy for launching new products

Our product launch policy defines the rules for ensuring compatibility of mBank's financial products with customers' needs and rights. Matching products to the needs of their potential users is done by controlling the sales process and analysing complaints and claims. The bank runs a policy of "zero tolerance" for inappropriate product sale rules.

This policy sets out the general rules in line with which we introduce new products and modify the existing ones. It ensures that they are:

- in line with mBank's strategy and values, such as empathy and client-centricity,
- secure for clients and for us, which means, among others, compliance with our security standards,
- compliant with legislation and our internal policies.

We assess each new product in terms of its impact on ESG factors, i.e., on achieving social and environmental goals.

The analysis is conducted at all stages – from planning and implementation, to possible modifications. Products (and changes thereto) are assessed in terms of their impact on five environmental aspects.

The assessment of the impact on ESG factors is done in a special application, which is also used for assessing other aspects of each product added to the bank's offer. Products are reviewed in accordance with defined acceptance procedures. Thanks to this approach, we limit the risk of introducing products that have a negative impact on ESG aspects, do not suit customers' needs or are detrimental to mBank's reputation.

Information policy for communications with investors, the media and customers

We have open and transparent communication taking into account stakeholders' needs. The bank guarantees stakeholders universal and equal access to information in line with the highest market standards and applicable law. The obligation to have an information policy stems from the bank's alignment with Recommendation Z on the principles of internal governance in banks and the Principles of Corporate Governance for Supervised Institutions issued by the Polish Financial Supervision Authority.

mKanon – simple and clear communication

All employees are required to use mKanon in their daily work. It defines the principles of simple and understandable communication with clients and other stakeholders. This communication should be clear, comprehensive, short, grammatically correct, sincere, empathetic and based on the "we" approach. Under mKanon, we focus on listening carefully to clients. Before we offer them any specific products or services, we have to accurately define what they need. Our clients have different experiences and expectations. Our task is to prepare and adjust communication so that it responds to their needs. We use mKanon in all forms of communications, including customer service, promotional activities and internal communication.

Personal data security policy and Policy for personal data management over time (retention)

We regard the protection of personal data and the rights and freedoms of data subjects as a prerequisite for maintaining reliability. All Group companies have implemented and are fulfilling the GDPR requirements and eight of them have the status of an independent data controller and established the position of Data Protection Officer. In doing so, the companies respect all the rights of customers, counterparties, employees and other data subjects and their privacy is protected.

We have regulated the issues of personal data protection in the "Personal data security policy" and the "Policy for personal data management over time (retention)". These documents specify the rights of data subjects and the obligations of mBank as the data controller. They also govern the manner in which the bank complies with its obligations under the GDPR, in particular:

- the principles of data processing, i.e.: lawfulness, data minimisation and adequacy, data integrity, confidentiality and accuracy, specification of the purpose of processing and the duration of data retention,
- the manner of exercising the rights of data subjects,
- compliance with information obligations,
- security of personal data processing, including the principles for dealing with data breaches.

Furthermore, the policy describes obligations of mBank as a personal data controller. In line with the policy, we apply the principles of privacy by design and privacy by default and perform privacy impact assessments.

mBank has a data protection officer who can be contacted at: inspektordanychsobowych@mbank.pl. For more information on data protection and its implementation at mBank, please [visit our website](#).

Policy and due diligence regarding information security and cybersecurity

The Group ensures security of information resources of mBank and other Group companies – both in Poland and in foreign branches. The Group affords protection of confidentiality, integrity, availability and authenticity of information. It is also committed to maintaining the continuity of services provided to customers and responding to any incidents in this regard.

In accordance with the "Information Security Policy", mBank Group:

- views information security management as an important part of bank management,
- recognises cybersecurity as a specific type of information security,
- provides security for customers and employees through the ongoing development of a multi-layered model of defence in cyberspace,
- identifies legal requirements (in particular those relating to information security) and ensures that the activities carried out comply with external regulations,
- keeps internal information security regulations up-to-date and applies security standards,
- manages information security and cybersecurity incidents,
- coordinates activities related to the creation and maintenance of business continuity plans,
- assesses risks in the context of information security and takes measures to reduce the risks,
- continuously improves competences of its employees, especially with regard to the development of banking products and the elimination of new threats,
- provides the resources necessary to execute security processes and the implementation of new safeguards,
- raises awareness of customer and employee safety through educational activities,
- develops and constantly improves the information security management system,

- engages all employees in the implementation of the "Information Security Policy of mBank S.A."

Security and cybersecurity policies:

- Fraud prevention policy
- Anti-money laundering and terrorist financing programme
- Information Security Policy
- Cybersecurity Policy
- Internet payment security policy
- Business continuity management policy
- Clean desk and screen policy
- Social media policy
- Internet payment security policy
- Outsourcing policy

Responsible handling of complaints and claims

We have in place publicly available, clear and transparent rules for handling claims and complaints, guaranteeing fairness, thoroughness, impartiality and compliance with the law and the principles of fair trade and good conduct.

Complaints are for us a natural source of knowledge as to what elements of our offer may cause dissatisfaction among clients. Therefore, we introduced a dedicated programme to identify the causes and reduce the number of complaints. The complaints handling process is overseen by dedicated customer experience officers and the Supervisory Board monitors these processes on an ongoing basis.

We handle all complaints submitted by clients in accordance with the law and our internal regulations and strive to process them within shortest possible period. Although we are not obliged to do so by external regulations, we have introduced the option for corporate clients to appeal a complaint decision. The appeal is always handled by a different person than the one who handled the case in the first place.

Example:

In 2016, the Office of Competition and Consumer Protection (UOKiK) issued its opinion on the alleged improper charges for the use of capital in mortgage loan agreements. Based on this opinion, the District Court in Łódź ordered mBank to reimburse fees.

As a response to those administrative decisions and judgements regarding mBank S.A., the bank proactively informed affected customers of their rights and options for taking further action, formally apologised and made restitution to clients of the benefit obtained under the agreements concluded. Furthermore, in the fourth quarter of 2022, following completion of the pilot phase, mBank launched an attractive settlement programme for customers with CHF loans. The clients can convert the loan from CHF into PLN and reduce the outstanding principal to be repaid. The settlement process is efficient and it does not burden borrowers with many formalities. Terms of annulment are determined individually



and they are subject to negotiations. Settlements enable clients to definitively eliminate exchange rate risk. Detailed description of the settlement programme is available on a special website (in Polish): [mBank ugody frankowe](#)

Other policies concerning clients

For more details on how we build relationships with our clients in a responsible manner, see other documents on our sustainability standards. They apply to, among other things, investment services, credit policies or ethical behaviour. These documents are available at: <https://www.mbank.pl/en/about-us/corporate-social-responsibility/our-standards>.