mBank S.A.

Policy

Responsible Investment Policy for Retail Investment Services

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1. Purpose and scope of the Policy

This document is the Responsible Investment Policy for Retail Investment Services of the mBank S.A. Group (hereinafter: the "Policy" or "RI Policy"). It sets out the principles, criteria and procedures that we apply in the Group's investment activities in order to systematically take into account environmental, social and governance (ESG) factors. The way in which the sustainability factors are taken into account varies depending on the type of service and the Group's role.

The Policy sets out the mBank Group's ambitions and standards in the area of responsible investment. It constitutes a clear commitment to clients, investors, and supervisory authorities. It describes how we incorporate ESG factors into our investment processes and on what basis. Last but not least, it places the mBank Group within the broader context of international standards for responsible investment and sustainable development.

The scope of the Policy covers services for retail clients:

- the offer of investment funds available via the fund supermarket, the service for accepting, transmitting and executing orders (retail segment),
- investment advisory services and one-off investment advice in retail banking,
- Wealth Management and Private Banking services provided by mBank's Brokerage Office (portfolio management, model-based advice, personalised advice),
- management of investment funds by mTowarzystwo Funduszy Inwestycyjnych S.A. (mTFI).

This Policy does not cover lending activities; ESG issues relating to financing are governed by separate documents.

2. Legal and regulatory framework

This Policy takes into account the requirements arising from the regulations listed below. We have set out detailed rules for fulfilling these obligations in dedicated documents, procedures, strategies, and regulatory disclosures specific to individual services, products, and entities of the mBank Group.

Regulation	Scope of application
CSRD Directive (EU) 2022/2464 / ESRS	Sustainability reporting in relation to the reporting of information on investment activities and financial products.
MiFID II Directive / Delegated Regulation (EU) 2021/1253	Taking clients' ESG preferences into account when assessing the suitability of investment products
SFDR Regulation (EU) 2019/2088	Disclosures regarding ESG risks (Article 3), PAI (Article 4), products (Articles 8 and 9), and remuneration (Article 5)
EU Taxonomy Regulation (EU) 2020/852	Classification of investments as environmentally sustainable; taxonomy disclosures
Delegated Regulation (EU) 2022/1288 (RTS for the SFDR)	Technical standards on disclosures; PAI indicators
Investment Funds Act (Journal of Laws 2004 No. 146, item 1546, as amended)	Obligations of investment fund management companies (TFIs) regarding risk management and investor disclosures
EBA/ESMA guidelines on ESG risk management	Integration of ESG risks into the risk management processes of financial institutions

This Policy is consistent with the mBank Group's ESG Strategy for 2026–2030, the mBank Group's Transition Plan, and mBank's Global Sanctions Policy. It also refers to the principles of international initiatives to which we are signatories or which we adopt as standards: the UN Global Compact, the Principles for Responsible Investment (UN PRI), and the Principles for Responsible Banking (UN PRB).

3. Definitions

For the purposes of this Policy, the following definitions apply:

Term	Definition
ESG / Sustainability factors	Environmental, social and labour issues, issues relating to respect for human rights, and the prevention of corruption and bribery.
UN Global Compact	UN initiative setting out 10 principles of responsible business in the areas of human rights, labour, the environment, and anti-corruption.
mBank Group	mBank S.A. and its subsidiaries; the use of this term in the Policy does not imply that all entities or all areas of the Group's operations are covered by its provisions. The entities and scope of operations covered by the Policy are set out in Chapter 5.
Sustainable investment	Investment in a business activity that contributes to an environmental or social objective, does not significantly harm (DNSH) any other objectives, and is carried out by an issuer that follows good governance practices (Article 2(17) of the SFDR).
PAI	Principal Adverse Impacts of investment decisions on sustainability factors, as defined in Article 4 of the SFDR.
Commission Delegated Regulation (EU) 2021/1253	Commission Delegated Regulation (EU) 2021/1253 of 21 April 2021 amending Delegated Regulation (EU) 2017/565 as regards the integration of sustainability factors, risks and preferences into certain organisational requirements and operating conditions for investment firms.
RTS for the SFDR	**Regulatory Technical Standards** – Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports.
Sustainability risks	Environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material

(ESG risk)	negative impact on the value of the investment (Article 2(22) of the SFDR).
SFDR	Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector.
EU Taxonomy	Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment.

4. Strategic context

The mBank Group's strategy for 2026–2030, "Full Steam Ahead!", considers sustainability to be an integral part of the business model, rather than merely a regulatory requirement. In the area of investment services, this means the consistent integration of ESG factors into the management of clients' assets.

The mBank Group's Transition Plan further elaborates on these principles at an operational level. In the area of assets under management (AuM), we have set a target relating to the greenhouse gas emissions intensity of the corporate portion of the portfolio. By the end of 2030, we plan to reduce greenhouse gas emissions in the corporate segment of the AuM portfolio by 10% compared with the base year 2024. At the time the Transition Plan was announced, the corporate segment accounted for 41% of the AuM portfolio, the treasury segment for 55%, ETFs for 1%, and the remainder for 3%. We have set this target based on the decarbonisation pathway of a global equity market index in line with the UNEP 2°C scenario. The target covers both portfolios managed by mBank's Brokerage Office and funds managed by mTFI. This target forms part of our monitoring of progress view of climate change and supports the integration of climate factors into the Group's investment activities. In this way, we take into account the impact of the climate transition on the long-term value of investments and the risk profile of managed assets.

In the process of implementing our sustainability strategy and objectives, we also monitor other indicators relating to the integration of ESG factors into our investment activities, including the proportion of investment products promoting environmental or social characteristics in accordance with Article 8 of the SFDR. These indicators support the assessment of progress in developing our range of sustainable products and integrating ESG aspects into our investment processes.

Detailed information on the strategic objectives and monitored indicators is presented in Appendix 1 to this Policy.
We monitor and report on progress towards these objectives in accordance with the principles set out in the Transition Plan and the Group's sustainability reporting.

Our approach to responsible investment is based on four mutually complementary pillars, which are the focus of Chapters 6–9 of this Policy.

I	**ESG integration** The incorporation of ESG analysis into the processes of investment product selection, risk management, and the provision of recommendations to clients. This includes the assessment of ESG risks, selection criteria for instruments and funds, and consideration of principal adverse impacts (PAI). → Chapter 6
II	**ESG in our products and services** Taking ESG factors into account in the investment products and services we offer, both for products created and managed by the mBank Group and for products we distribute. This also includes taking into account clients' interest in investing in financial instruments that incorporate ESG aspects, as well as their preferences

regarding sustainable development to the extent required for a given investment service. → Chapter 7

III

ESG management and monitoring

Ensuring effective oversight of the implementation of the Policy and monitoring how ESG factors are taken into account in the mBank Group's investment activities. This includes the allocation of roles and responsibilities, monitoring risks to sustainable development and PAI indicators, as well as internal control mechanisms and assessments of compliance with the adopted principles. → Chapter 8

IV

Transparency and disclosures

Regular reporting and disclosure of ESG information in accordance with the SFDR, the Taxonomy and the CSRD, both at Group level and for individual investment services. → Chapter 9

5. Scope of application

5.1. Entities covered by the Policy

This Policy applies to entities within the mBank Group providing investment services:

- mBank S.A. in the field of retail banking (fund supermarket[1], model-based and one-off investment advice),
- Brokerage Office (a separate organisational unit of mBank S.A.) which provides the service of accepting and transmitting orders and executing orders, investment advice (model-based and bespoke) and the management of financial instrument portfolios, where investment advice and portfolio management services are available to clients in the Private Banking segment,
- mTowarzystwo Funduszy Inwestycyjnych S.A. in the management of investment funds and client portfolios.

This Policy applies to all employees and decision-making bodies of these entities involved in investment processes, product selection, or relations with investment clients.

5.2. Products and services covered by the Policy

Service / Product	Scope of application of the Policy
Investment Fund Supermarket (retail segment)	ESG criteria for funds; determining whether the client wishes to invest in funds that take ESG factors into account
Model-based and one-off investment advice	Integration of ESG in accordance with accepted standards; identification of the client's preferences regarding sustainability
Model-based and bespoke investment advice (Private Banking)	Integration of ESG in accordance with accepted standards; identification of the client's preferences regarding sustainability
Management of financial instrument portfolios (Private Banking)	ESG integration in accordance with accepted standards; identification of clients' sustainability preferences; incorporation of ESG factors into investment strategies subject to SFDR requirements
Investment funds managed by mTFI	ESG integration in accordance with accepted standards; incorporation of ESG factors into funds subject to SFDR requirements
Accepting and transmitting orders (mBank's BM)	ESG criteria applied when classifying financial instruments; determining whether the client is interested in investing in instruments that take ESG factors into account

[1] In the Fund Supermarket, mBank acts as a distributor of funds managed by the TFI.

6. Pillar I – ESG integration in the investment process

6.1. ESG integration methodology

The mBank Group applies a standardised methodology for integrating ESG factors into the investment process, which comprises the following stages:

- verification of compliance with the adopted ESG criteria, in particular exclusion criteria and the absence of material breaches of international standards,
- a quantitative assessment based on ESG ratings and selected indicators of principal adverse impacts (PAI),
- a qualitative analysis and due diligence, taking into account the specific characteristics of the issuer or financial instrument,
- classification of the financial instrument and incorporation of the analysis results into the investment decision-making process.

We have adapted the scope and method of applying the individual elements of the methodology to the nature of the service, the financial product, and the availability of ESG data.

6.1.1. Understanding sustainability risks (ESG risks)

We treat sustainability risks as a component of investment risk. These encompass environmental, social and governance factors that may have an actual or potential material negative impact on the value of an investment. In our assessment of ESG risks, we take into account environmental factors – including those related to climate change and the energy transition – as well as social and governance factors concerning the issuer. Sustainability risks may take the form of physical risks, transition risks, and risks related to social and governance factors.

We incorporate sustainability risks into our investment processes by applying exclusion criteria, analysing ESG data obtained from specialist providers, and monitoring the ESG risk profile of investment portfolios.

In our investment advisory and financial instrument portfolio management services, we have adopted Strategies on sustainability-related risks, in accordance with the requirements of Article 3 of the SFDR. Detailed information on the specific criteria we take into account when assessing ESG risks in these services is presented in the Strategies and in the appendix to this Policy.

6.1.2. Principal Adverse Impacts (PAI)

Entities of the mBank Group providing investment advisory services and managing portfolios of financial instruments and investment funds take into account the principal adverse impacts (PAI) of investment decisions on sustainability factors. mBank and mTFI publish annual PAI statements in accordance with Article 4 of the SFDR.

The detailed scope of the indicators monitored and the principles governing their consideration are set out in the relevant strategies and procedures.

We incorporate the results of the analysis of PAI indicators into our ongoing investment process, in particular in relation to:

- the selection of financial instruments for trading lists,
- assessing the compliance of investment portfolios with adopted ESG strategies.

6.1.3. ESG ratings

When assessing financial instruments, we use ESG data and ratings sourced from specialist data providers. ESG ratings are one of the elements supporting the assessment of sustainability risks and the process of selecting financial instruments.

We also use ESG ratings in our order acceptance and transmission services. They help us to assess whether the issuer of a financial instrument takes sustainability factors into account in its operations.

6.1.4. Sector exclusions

We apply exclusion criteria as part of our ESG risk management and in the implementation of our responsible investment principles. The scope of the exclusions applied and the method of their verification are set out in implementing documents.

6.2. Use of ESG analysis results

We use the results of ESG monitoring as a key element of the investment process.

We take them into account in particular when:

- we make a decision to buy or sell a financial instrument as part of services where mBank's Brokerage Office or mTFI make investment decisions on behalf of clients,
- we determine the level of exposure to instruments issued by an issuer,
- we classify instruments into investment strategies that take ESG factors into account,
- we assess investment risk and how it changes over time.

This approach ensures consistency between the process of integrating ESG factors, the assessment of investment risk, and the making of investment decisions.

Notwithstanding the principles set out in this Policy, mTFI fulfils its obligations under the regulations governing shareholder engagement. Detailed rules on the exercise of rights attached to financial instruments and the monitoring of portfolio companies are set out in mTFI's Engagement Policy, published on the mTFI website (https://www.mtfi.pl/pdf/Polityka_zaangazowania_w_spolki_notowane_na_rynku_regulowanym_36fd2d7a33.pdf)..

7. Pillar II – ESG in our products and services

In the investment products and services we offer, we take into account environmental, social and governance (ESG) factors – depending on the nature of our business and the role we play in relation to a product or service, in particular as a manufacturer or distributor.
The scope and manner of taking ESG factors into account – including risks to sustainable development, principal adverse impacts on sustainability factors (PAI), and disclosure requirements under the SFDR – depend on the nature of the service provided, the type of financial instrument, and the role played by mBank in relation to the product.

In the case of products created or managed by mBank or mTFI, we define the principles for taking ESG factors into account, sustainability objectives, asset selection criteria, and the scope of required disclosures at the product design stage and when making investment decisions.

In the case of products offered by third parties, mBank acts as a distributor and relies on the information, classifications, and disclosures provided by the issuers of financial instruments, while applying its own criteria for selecting products for inclusion in its offering and for ESG classification of products.

When providing investment services, we determine, to the extent relevant to the service in question, whether the client is interested in investing in financial instruments that take ESG aspects into account. In the case of investment advisory services and financial instrument portfolio management, we also identify the client's preferences regarding sustainable development in accordance with applicable regulations. We take this information into account when presenting our offering, selecting products, and providing investment services. We assess the client's preferences regarding sustainable development independently of the ESG characteristics attributed to a given investment product.

We set out the detailed criteria, methodologies, and principles for taking ESG factors into account, as applied to individual investment products and services, in the relevant internal regulations, product documents, and implementing documents in force at the mBank Group.

7.1. Products distributed by mBank

7.1.1. Funds in the supermarket offering (retail segment)

When selecting funds for our investment offering and presenting them to clients, we apply ESG criteria that take into account, among others, the classification of the fund in accordance with applicable regulations, an assessment of risks related to sustainable development, and additional qualitative criteria set out in internal regulations.

In the case of investment funds offered by third parties, we take into account information on ESG factors provided by fund managers and data from specialist ESG data providers.

7.1.2. Services relating to the acceptance and transmission of orders and the execution of orders

In our services relating to the acceptance and transmission of orders and the execution of orders, we provide clients with information enabling them to identify financial instruments that take ESG factors into account.

When classifying financial instruments, we use information provided by product manufacturers and data obtained from external ESG data providers. We have tailored the scope of ESG consideration to the type of financial instruments and the availability of data.

7.2. Investment advisory services – model-based and one-off (retail segment) and model-based and bespoke (Private Banking segment)

In our investment advisory services, we take into account sustainability risks and, to the extent permitted by the nature of the financial instruments and the availability of data, the principal adverse impacts on sustainability factors (PAI).

The assessment of ESG factors is part of the process of analysing and recommending financial instruments. In this process, we also use available ESG ratings and assessments prepared by specialist data providers, which support the identification of risks and opportunities related to sustainability factors. The extent to which ESG aspects are taken into account is tailored to the nature of the service provided, the type of financial instruments recommended, and the client's preferences regarding sustainability.

7.3. mBank Group's investment products and strategies

7.3.1. Portfolios managed in the financial instrument portfolio management service in the Private Banking segment

In the financial instruments portfolio management service, we take ESG factors into account in the investment decision-making process. This includes, in particular, the identification of sustainability risks, the assessment of principal adverse impacts on sustainability factors (PAI), and the application of ESG-related investment criteria.

For strategies subject to SFDR requirements, ESG factors may form part of the product's investment policy and are subject to the relevant disclosures required by law.

7.3.2. Investment funds managed by mTFI

mTFI takes ESG factors into account in the investment process to an extent appropriate to the nature of individual funds. ESG factors are part of the investment risk assessment, the asset selection process, and the monitoring of investment portfolios.
For funds subject to the SFDR requirements, we determine the scope of the ESG criteria applied and the related disclosures in accordance with the product's characteristics and applicable regulations.

8. Pillar III – ESG management and monitoring

8.1. Governance and accountability

Sustainability factors in the area of investment services are managed within the framework of the mBank Group's sustainability management system, which encompasses mechanisms for oversight, monitoring, controlling, and reporting.

The aim of the system is to ensure the consistent integration of ESG factors into the mBank Group's investment activities, compliance with applicable regulations, and the effective management of sustainability risks.

The system is based on a corporate governance structure which ensures a clear division of roles and responsibilities and effective oversight of the implementation of this Policy. The mBank Group S.A. Sustainability Committee plays a key role in overseeing the implementation of the Policy. The Committee comprises representatives of mBank's senior management, which supports the coordination of activities related to sustainable development and ensures a consistent ESG approach across the mBank Group.

Body / Unit	Scope of responsibility

mBank S.A. Group Sustainability Committee	Overseeing the implementation of the Policy, periodically reviewing its effectiveness, and supporting a consistent approach to the integration of ESG into the mBank Group's investment activities
Chief Sustainability Officer (CSO)	Coordination of ESG activities and ensuring a consistent approach across the Group
Chief Environmental Risk Officer (CERO)	ESG risk management
ESG function at mBank (dedicated ESG roles)	Expert support, monitoring the implementation of ESG standards, and collaboration with business units
mBank Brokerage Office	Integration of ESG into investment services and monitoring of compliance with adopted criteria
Investment Committees (Investment Committees for investment advisory services at mBank/mBank Brokerage Office; Investment Committee for Portfolios at mTFI, with the participation of mBank Brokerage Office; Investment Committee for Funds at mTFI)	Integration of ESG into investment processes and the management of portfolios and funds
Compliance/Internal Control	Oversight of the compliance of investment activities covered by the Policy with applicable regulations and the provisions of the Policy
Internal Control	Implementation of the control mechanisms provided for in the internal control systems of mBank and mTFI

8.2. Integration of ESG into decision-making processes

ESG factors are part of the decision-making processes relating to the offering of investment products, the provision of investment services, and investment decision-making.

Investment committees play a key role in overseeing the integration of ESG factors; they support the implementation of the Policy within the scope of their remit. When making decisions regarding asset allocation, portfolio composition, and the application of adopted investment criteria, they take into account the investment criteria relating to sustainability factors as set out in the procedures and standards.

Within the scope of their remit, the relevant organisational units, investment committees, and persons responsible for providing investment services take into account the results of ESG analyses, available data and ESG ratings, sustainability risks, principal adverse impacts on sustainability factors (PAI), and the adopted investment criteria.

We have tailored the scope and method of incorporating ESG factors to the nature of the product, investment service, investment strategy, and the availability of ESG data.

8.3. ESG monitoring

The mBank Group monitors the integration of ESG factors into its investment activities as part of its ongoing risk management and supervision of investment products.

We carry out this monitoring at a frequency tailored to the type of product, service, and ESG criteria applied, in accordance with the relevant regulations and internal processes.

Monitoring covers, in particular:

- assessing the compliance of products and services with the adopted ESG criteria,
- monitoring of sustainability risks,
- monitoring of principal adverse impacts on sustainability factors (PAI),
- analysis of changes relating to issuers and financial instruments that may affect their ESG profile,
- assessment of the quality and completeness of ESG data used in investment processes.

Monitoring also includes the analysis of selected indicators used to assess the integration of ESG into investment activities, in particular those relating to the coverage of assets by ESG data, the proportion of products incorporating ESG factors, and the achievement of climate targets for assets under management.

In carrying out our monitoring activities, we use data from specialist ESG data providers, information disclosed by issuers and financial product providers, and our own analyses.

The results of ESG monitoring are reported periodically to the relevant investment committees and the ESG function at mBank. Information regarding the implementation of the Policy and climate targets is presented to the mBank S.A. Group Sustainability Committee. We use the monitoring results when reviewing products, investment strategies, and risk management principles, and they are part of the periodic review of the Policy and the development of the ESG approach in our investment activities.

8.4. Non-compliance and corrective actions

Where we identify material breaches of sustainability principles, failure to meet the adopted ESG criteria, breaches of international standards, serious environmental controversies or other circumstances that may affect the issuer's ESG profile, or the compliance of a product or service with the adopted ESG principles, we analyse their materiality.

Non-compliance may be identified in the ongoing ESG monitoring, investment analyses, or other control processes in place at the mBank Group. In the event of material non-compliance or ESG controversies, information is forwarded to the relevant investment committee and the unit responsible for the product or service.

Depending on the nature and scale of the identified issue, appropriate management actions may be taken, including in particular:

- conducting an additional analysis of the investment,
- engaging in dialogue with the issuer to clarify the identified ESG issues,

- reviewing the composition of the portfolio or trading lists,
- changing the classification of the product or financial instrument,
- reducing or liquidating the investment exposure,
- implementing corrective or remedial measures.

This process is carried out in accordance with the principle of due diligence and applicable regulations and internal procedures.

8.5. Remuneration policy

In accordance with Article 5 of the SFDR, the remuneration policies in force at mBank and mTFI take into account risks to sustainable development. The adopted remuneration principles support effective risk management and the mBank Group's long-term objectives relating to sustainable development.

In the case of functions with a significant impact on investment activities or the risk management process, the assessment of the fulfilment of obligations may take into account aspects relating to regulatory compliance, sound risk management, and the application of the ESG standards in force at the mBank Group.

Detailed remuneration policies are set out in separate internal regulations and disclosures published in accordance with applicable legislation.

8.6. Competences of employees serving investment clients

Ensuring an appropriate level of knowledge and competence among employees involved in the provision of investment services is a key element of a responsible approach to investing and the integration of ESG factors into the mBank Group's operations.

Employees involved in offering investment products, providing investment advisory services, and managing portfolios of financial instruments should have the knowledge necessary to properly identify clients' needs, including their interest in investing with regard to ESG factors and their preferences concerning sustainable development, and to accurately present the characteristics, risks, and benefits associated with the products and services offered.

To ensure an appropriate level of knowledge and competences, we apply internal regulations setting out qualification requirements, rules for assessing knowledge, and the development of employees' competences in accordance with MiFID II requirements and applicable regulations on sustainable development.

We support the development of our employees' ESG competences through participation in training courses, development programmes, and professional certifications relating to sustainable development and responsible investment.

Furthermore, we implement organisational arrangements and procedures designed to identify, mitigate, and manage conflicts of interest to ensure that investment services are provided in the best interests of the client. We provide investment advice exclusively in services intended for this purpose and in accordance with applicable regulations and market standards.

9. Pillar IV – Transparency and disclosures

ESG reporting is an integral part of mBank's sustainability management system. Its aim is to ensure transparency regarding the integration of environmental, social and governance factors into our services and to enable the assessment of progress towards the mBank Group's strategic objectives.

We prepare reports for internal and external purposes, in accordance with applicable regulatory requirements and mBank's internal standards.

9.1. Entity-level disclosures

In accordance with Articles 3, 4 and 5 of the SFDR, mBank and mTFI publish on their websites their sustainability risk strategies, annual statements on the principal adverse impacts (PAI) of investment decisions, and information on the alignment of remuneration policies with the consideration of ESG risks. We prepare the mBank Group's ESG reports in accordance with the European Sustainability Reporting Standards (ESRS) as part of the CSRD requirements.

9.2. Disclosures at the level of investment products and services

We provide clients with access to information on how ESG factors are taken into account in the investment products and services we offer, in accordance with applicable regulatory requirements, in particular those arising from the SFDR and MiFID II.

With regard to investment services, we provide clients with information on how we take into account sustainability risks and the principal adverse impacts on sustainability factors in the process of providing investment advice and managing portfolios of financial instruments and investment funds. These disclosures also include information on the identification of clients' sustainability preferences to the extent required by applicable regulations.

We provide clients with information on investment products and services in the relevant pre-contractual documents, information materials, periodic reports, and on the websites of mBank and mTFI. These disclosures include, among others, information on how ESG factors are taken into account, risks to sustainable development, the principal adverse impacts on sustainability factors (PAI), the assessment methods used, and data sources. This enables clients to make informed investment decisions that take sustainability factors into account. We prepare this information with due diligence, based on available and verifiable data, in accordance with the adopted ESG criteria and the relevant regulations and internal policies.

Financial products classified under Article 8 of the SFDR are subject to mandatory pre-contractual disclosures (Article 10 of the SFDR) and annual periodic reports (Article 11 of the SFDR). These documents describe the environmental or social characteristics of the product, the measurement methods used, data sources, methodological limitations, and the results achieved during the reporting period. They are publicly available on the websites of mBank and mTFI and are provided to clients prior to the conclusion of a contract.

10. Review and update of the Policy

The Policy is subject to a formal review at least once a year.

We carry out an immediate review in the event of a significant change in regulations (SFDR, MiFID II, Taxonomy, CSRD), significant changes in the availability of ESG data or the rating methodology

used, recommendations from internal or external audits, and changes to the mBank Group's business model in the area of investment services.

Any amendments to the Policy require the approval of the Sustainability Committee.

11. List of related documents

The documents listed below are related to this Policy or form the basis for its implementation. Documents marked as "public" are available on the mBank or mTFI websites.

Document	Entity / Status
mBank Group ESG Strategy for 2026–2030	mBank Group / public – (https://www.mbank.pl/o-nas/odpowiedzialny-bank/nasze-cele/)
mBank Group Transition Plan	mBank Group / public (https://www.mbank.pl/pdf/plan-transformacji-grupy-mbanku.pdf)
mBank S.A.'s Global Sanctions Policy	mBank S.A. / internal
Strategy on sustainability-related risks in investment advice and one-off investment advice (Article 3 of the SFDR)	mBank S.A. / public – mbank.pl (https://www.mbank.pl/pdf/inwestycje/doradztwo-inwestycyjne/informacje-zwiazane-ze-zrownowazonym-rozwojem-w-usludze-doradztwa-inwestycyjnego-i-jednorazowego-doradztwa-inwestycyjnego-od-28.06.2025.pdf)
PAI strategy for investment advice services (Article 4 of the SFDR)	mBank S.A. / public – mbank.pl (Statement on ESG principal adverse impacts from 28 June 2025)
SFDR information – Bank	mBank S.A. / public – mbank.pl (SFDR information)
Strategy on sustainability-related risks in investment advisory services – Brokerage Office	mBank Brokerage Office / public – mbank.pl/private-banking (Information pursuant to Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR") at mBank Brokerage Office in relation to investment advisory services)
PAI Strategy and Annual PAI Statements – mBank Brokerage Office	mBank Brokerage Office / public – mbank.pl/private-banking (ESG in investments | mBank.pl)
SFDR information – Brokerage Office (investment advice, portfolio management)	mBank Brokerage Office / public – mbank.pl/private-banking/ (ESG in investments | mBank.pl)
Pre-contractual disclosures and periodic reports – model strategies subject to disclosures under Article 8 of the SFDR (Articles 10/11 of the SFDR)	mBank Brokerage Office / public – mbank.pl/private-banking/ (Wealth management services – Rules and documents for private banking clients | mBank.pl)

mTFI S.A.'s ESG risk strategy (Article 3 of the SFDR)	mTFI / public – mtfi.pl/pl/esg (mTFI_Strategia_ryzyka_ESG.pdf)
mTFI S.A. Engagement Policy	mTFI / public – mtfi.pl/pl/esg (informacja_dotyczaca_polityki_zaangazowania.pdf)
mTFI SFDR Information (Article 4 of the SFDR)	mTFI / public – mtfi.pl/pl/esg (01.01.2025_Informacje_SFDR.pdf)
PAI Statement	mTFI / public – mtfi.pl/pl/esg (https://www.mtfi.pl/static-pdf/oswiadczenie_PAI_2025_mTFI_wersja_1.pdf)
mBank Group Sustainability Report (CSRD/ESRS)	mBank Group / public – mbank.pl/o-nas (https://www.mbank.pl/o-nas/odpowiedzialny-bank/)
Principles of sustainability-related communication	mBank S.A. / internal

This Policy is a public document available on mBank's website.

12. Final provisions

This Policy comes into force on the date of its adoption by the Management Board of mBank S.A. In matters not covered herein, the applicable legal provisions shall apply, in particular the SFDR, the RTS to the SFDR, the MiFID II Directive and its implementing regulations, the EU Taxonomy, and the internal regulations of the mBank Group.

Document history

Version 1.0 – [DATE] – First edition of the mBank S.A. Group Responsible Investment Policy for Retail Investment Services

Appendix 1

Principles for incorporating ESG factors into investment products and services

1. Purpose of the Appendix

This Appendix sets out the detailed criteria, methodologies, and limits applied by mBank and the entities of the mBank Group covered by the Policy when taking environmental, social and governance (ESG) factors into account in investment products and services.

2. Sources of ESG data

When assessing ESG factors, mBank makes use, in particular, of:

- ESG data and ratings obtained from external data providers – at the time of the Policy's entry into force, MSCI Inc. is the provider of analytical data, ratings, indicators, and ESG analyses used in investment processes at the mBank Group,
- information disclosed by issuers of financial instruments,
- data on the principal adverse impacts on sustainability factors (PAI),
- information derived from SFDR documentation,
- internal analyses and ESG risk assessment procedures.

3. ESG criteria for distributed products

3.1. Investment funds

We consider funds to be ESG-integrated if they meet both of the following criteria:

- are classified in accordance with Article 8 or Article 9 of the SFDR, and
- have an ESG rating[2] of at least BBB.

3.2. Financial instruments in order acceptance and transmission and order execution services

The criteria for the classification of financial instruments as ESG-integrated vary depending on the type of instrument and the availability of ESG data.

The current criteria are set out in Table 1.

Table 1. Criteria for the classification of financial instruments as ESG-integrated

Type of instrument	**Criteria**
Investment funds / ETFs	• The product is classified as an Article 8 or Article 9 product under the SFDR, and

[2] An assessment of the issuer's management of ESG risks and opportunities on a 7-point scale from AAA to CCC, provided by MSCI ESG Research LLC (where AAA is the highest rating and CCC the lowest)

	• has an ESG rating of ≥ BBB.
Shares, ADRs, GDRs	• The instrument has an ESG rating of ≥ A.
Government and corporate bonds	• The Bloomberg system displays the classification: Green, Social or Sustainability Bond Indicator, or • the instrument has been internally classified as an ESG instrument by the relevant mBank units.[3]
Municipal bonds	• In Bloomberg, the instrument has at least one tag from the category Green/Social/Sustainability Bond Indicator.
Instruments for which ESG classification is not applicable	• Structured deposits • Derivatives

4. ESG criteria in investment advisory services

When preparing investment recommendations, mBank and the mBank Brokerage Office take into account:

- sustainability risks,
- selected PAI indicators,
- ESG ratings,
- the client's preferences regarding sustainable development.

The minimum ESG requirements applied in the advisory models are set out in Table 2.

Table 2. Minimum ESG requirements for investment advisory services

Investment principles	**Indicator**
Exclusions from direct investments Minimising indirect investments (up to 2% of the portfolio's holdings)	manufacture of controversial weapons
	production and distribution of tobacco (revenue > 5%)
	coal production (revenue > 10%)
	violations of the UN Global Compact and the OECD Guidelines
	financial instruments issued by issuers in countries listed in the Global Sanctions Policy
	very serious environmental controversies. These may relate to climate change, land use and biodiversity, spills and releases

[3] The internal ESG classification of financial instruments relating to non-treasury debt issues or the issuer's own debt issues is based on a documented analysis of compliance with environmental, social or governance criteria, in accordance with mBank's internal procedures.

	of toxic substances, water scarcity or operational waste, where the issuer is directly involved
Consideration of principal adverse impact on sustainable development (PAI) – at least 3 PAIs, including at least one each from the environment/climate group and the social, labour, human rights and anti-corruption and anti-bribery group	PAI 4 "Exposure to companies active in the fossil fuel sector"
	PAI 7 "Activities negatively affecting biodiversity-sensitive areas"[4]
	PAI 10 "Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises"
	PAI 11 – "Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises"
	PAI 14 "Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)"
	PAI 15 – "Greenhouse gas emissions intensity" (for investments in government bonds)
	PAI 16 – "Investee countries subject to social violations" (for investments in government bonds)
ESG ratings – investment advisory service	at least 50% of the financial instruments in the recommended portfolios have an ESG Score[5] and an ESG Fund Score[6] of at least BBB. Clients may agree a different limit with us as part of their individual investment strategy
ESG ratings – one-off investment advisory service	In our one-off investment advisory service, we ensure that the recommended funds have: – a high ESG rating (funds with a Fund ESG Rating of BBB or higher), or – a weighted average rating of the portfolio's composition, according to the ESG rating provider's methodology, higher than 5 (on a scale of 0 to 10).

5. ESG criteria in the financial instruments portfolio management service

As part of the financial instruments portfolio management service, we apply:

- minimum exposure levels to instruments meeting ESG criteria,
- exclusion criteria,
- limits on ESG risks,

[4] The PAI 7 indicator (biodiversity) is used exclusively in strategies promoting environmental or social factors.
[5] A numerical value corresponding to the ESG rating assigned by MSCI Inc.
[6] The fund's rating assigned by MSCI Inc.

- requirements arising from the product's SFDR classification.

The current limits and parameters are set out in Table 3.

Table 3. ESG criteria in the financial instrument portfolio management service

Investment principles	**Indicator**
Exclusions from direct investments Minimisation of indirect investments (up to 2% of portfolio holdings)	manufacture of controversial weapons
	production and distribution of tobacco (revenue > 5 &)
	coal production (revenue > 10%)
	violations of the UN Global Compact and the OECD Guidelines
	financial instruments issued by issuers in countries listed in the Global Sanctions Policy
	very serious environmental controversies which may relate to climate change, land use and biodiversity, spills and releases of toxic substances, water scarcity or operational waste, where the issuer is directly involved
Consideration of principal adverse impacts on sustainable development (PAI)	PAI 3 "Greenhouse gas emissions intensity of investee companies"
	PAI 4 "Exposure to companies active in the fossil fuel sector"
	PAI 7 "Activities negatively affecting biodiversity-sensitive areas"[7]
	PAI 10 "Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises"
	PAI 11 "Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises"
	PAI 14 "Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)"
	PAI 15 "Greenhouse gas emissions intensity" (for investments in government bonds)
	PAI 16 "Investee countries subject to social violations" (for investments in government bonds)
ESG ratings – financial instrument portfolio management service	at least 50% of the financial instruments in the portfolios have an ESG Score and an ESG Fund Score of at least BBB.

[7] The PAI 7 indicator (biodiversity) is used exclusively in strategies promoting environmental or social factors.

Additional requirements – strategies under Article 8 of the SFDR	– we do not acquire financial instruments for portfolios where the ESG Score or ESG Fund Score has been set at B or lower, – we aim to achieve an average ESG rating of A.

6. ESG criteria applied by mTFI

mTFI takes ESG factors into account in the investment process by:

- assessing ESG risks,
- identifying assets subject to investment restrictions,
- selecting financial instruments using ESG criteria.

The criteria applied to individual funds are set out in the fund documents and in Table 4.

Table 4. ESG criteria applied to funds managed by mTFI

Investment principles	**Indicator**
Investment exclusions	manufacture of controversial weapons
	production and distribution of tobacco (revenue > 5%)
	coal production (revenue > 10%)
	violations of the UN Global Compact and OECD Guidelines
	exposure to non-cooperative tax jurisdictions
Consideration of principal adverse impacts on sustainable development (PAI)	PAI 4 “Exposure to companies active in the fossil fuel sector”
	PAI 10 “Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises”
	PAI 14 “Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)”
	PAI 22 “Non-cooperative tax jurisdictions”
ESG ratings	minimum ESG rating of BB for the instrument
Additional requirements – strategies under Article 8 of the SFDR	We do not acquire financial instruments for portfolios where the ESG rating has been set at B or lower

7. Products subject to SFDR requirements

The current list of ESG criteria that we take into account for products covered by Article 8 of the SFDR, and products subject to disclosure requirements under Article 8 of the SFDR, is set out in the tables below.

Table 5. ESG criteria for products under Article 8 of the SFDR

ESG criterion	**mBank – strategies with "ESG" in their name**	**mBank – strategies without "ESG" in their name**	**mTFI**
Minimum proportion of investments taking environmental or social factors into account	At least 80% of instruments take environmental/social factors into account	At least 50% of instruments take environmental/social factors into account	At least 80% of investments are aligned with environmental/social factors
Minimum proportion of sustainable investments (Article 2(17) of the SFDR)	At least 10%, including 1% EU Taxonomy-aligned investments	At least 10% sustainable investments	At least 10% sustainable investments (environmental or social)
Proportion of EU Taxonomy-aligned investments	Min. 1% EU Taxonomy-aligned investments	No requirement for EU Taxonomy-aligned investments	No minimum requirement; investments may or may not be included
Minimum ESG rating	At least 80% of instruments rated ≥ BBB	At least 50% of instruments rated ≥ BBB	Exclusion of B-rated and lower-rated instruments; portfolio target ≥ BBB
Prohibition on acquiring instruments with an ESG rating	ESG ratings of B or lower are not accepted	ESG ratings of B or lower are not accepted	Exclusion of instruments with an ESG rating of B or lower
Portfolio rating target	Aiming for an average ESG rating of A	Aiming for an average ESG rating of A	Average ESG rating of the portfolio at BBB or higher

Scope of investment exclusions	Tobacco (> 5%), coal (> 10%), controversial weapons, violations of the UNGC/OECD, tax jurisdictions, environmental controversies	Tobacco (> 5%), coal (> 10%), controversial weapons, violations of the UNGC/OECD, tax jurisdictions, environmental controversies	Tobacco (> 5%), coal (> 10%), controversial weapons, violations of the UNGC/OECD, tax jurisdictions
PAI – scope of indicators used	PAI 4, 7, 10, 14, 22	PAI 4, 10, 14, 22	PAI 4, 10, 14, 22

Table 6 . Products subject to disclosure requirements under Article 8 of the SFDR

Entity	**ESG product / strategy**[8]	**SFDR status**
mBank	Strategia Ochrony Kapitału (Capital Protection Strategy)	Article 8 of the SFDR
mBank	Strategia Dochodowa (Income Strategy)	Article 8 of the SFDR
mBank	Strategia Zrównoważona ESG (ESG Sustainable Strategy)	Article 8 of the SFDR
mBank	Strategia Antyinflacyjna (Anti-Inflation Strategy) (on offer until 31 July 2025)	Article 8 of the SFDR
mBank	Strategia MultiAsset (Multi-Asset Strategy)	Article 8 of the SFDR
mBank	Strategia Dynamicznego Wzrostu ESG (ESG Dynamic Growth Strategy)	Article 8 of the SFDR
mBank	Strategia Akcyjna Megatrendy (Megatrends Equity Strategy)	Article 8 of the SFDR
mTFI	Subfundusz Strategia na min. rok (Strategy Sub-fund for minimum one year)	Article 8 of the SFDR
mTFI	Subfundusz Strategia na min. 3 lata (Strategy Sub-fund for minimum 3 years)	Article 8 of the SFDR
mTFI	Subfundusz Strategia na min. 5 lat (Strategy Sub-fund for minimum 5 years)	Article 8 of the SFDR

[8] As at 25 August 2026, Article 8 SFDR products account for: 100% of mBank's model strategies and 57% of mTFI's entire product range.

mTFI	Subfundusz Strategia na min. 7 lat (Sub-fund Strategy for minimum 7 years)	Article 8 of the SFDR
mTFI	Subfundusz Strategia na min. 10 lat (Strategy Sub-fund for minimum 10 years)	Article 8 of the SFDR
mTFI	Subfundusz Emerytura 2035 (Pension 2035 Sub-fund)	Article 8 of the SFDR
mTFI	Subfundusz Emerytura 2045 (Pension 2045 Sub-fund)	Article 8 of the SFDR
mTFI	Subfundusz Emerytura 2055 (Pension 2055 Sub-fund)	Article 8 of the SFDR

8. Updating of criteria

The criteria set out in this Appendix are subject to periodic review and may be updated, in particular in light of changes to legislation, market standards and guidelines, the methodologies used by ESG data providers, the availability of ESG data, and changes to the mBank Group's approach to sustainability and its product offering.