

APPENDIX TO

*SUPERVISORY BOARD RESOLUTION 165/21 DATED 3 DECEMBER 2021*

# **Information Policy of mBank**

## **for communication with investors, the media and clients**

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**Warsaw**

**January**

**2022**

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**Annex:** Scope of information to be disclosed

## 1. General provisions

### § 1.

1. mBank S.A. ("bank"), as a public trust institution, pursues an information policy ("policy"), based on the principles of open and transparent communication. It takes into account the needs of all stakeholders. The policy provides them with universal and equal access to information in accordance with the highest market standards and applicable laws.
2. The policy is directed to:
  - 1/ institutional and individual investors, financial intermediaries and stock market analysts,
  - 2/ shareholders of the bank,
  - 3/ supervisory institutions and securities market organisers (including the Polish Financial Supervision Authority ("KNF"), the Warsaw Stock Exchange ("GPW"), the Central Securities Depository of Poland ("KDPW")),
  - 4/ credit rating agencies,
  - 5/ media representatives and bank customers.

### § 2

1. The bank's information activity is an important element of the external communication which:
  - supports the achievement of business objectives set out in the bank's strategy,
  - shapes the appropriate relations with investors<sup>1</sup>, media and customers
  - creates a positive image of the bank as a renowned public company and an honest, reliable institution offering high quality products and services aligned with the needs of customers.
2. We make every effort to ensure that disclosures are timely, reliable, useful, consistent over time and comparable between banks. We present them in an understandable and transparent manner. We want shareholders, customers and other interested parties to be able to read them easily and carry out the necessary analysis.
3. We follow the provisions of the Policy in compliance with the legal provisions concerning confidentiality and security of information which are incumbent upon the bank as a public company and a supervised institution.

### § 3

1. The policy is implemented by the bank's management board with the support of the relevant organisational units of the bank. The owners of the policy are:
  - the Retail Banking Marketing Department,
  - the Communication and Marketing Strategy Department, and
  - Investor Relations Specialists

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<sup>1</sup> **An investor** is understood as a shareholder of the Bank (institutional or individual investor) or a securities market analyst

who, together with the bank's organisational units responsible for the implementation of the policy, participate in its development and updating.

2. The rules for disclosing information on capital adequacy are defined in a separate "Information Policy of mBank S.A. on capital adequacy".

## 2. Scope of disclosure

### § 4.

1. We fulfil the information obligations of a public company. We provide current and periodic information to the public within the time limits and scope required by law.<sup>2</sup> including confidential information within the meaning of MAR.<sup>3</sup>
2. Notwithstanding the mentioned provisions, we publish the information required by other applicable provisions of common law, in particular the provisions of:
  - the Commercial Companies Code,<sup>4</sup>
  - the Banking Law,<sup>5</sup> t
  - he Act on Trading in Financial Instruments<sup>6</sup> and
  - other regulations and provisions relating to financial institutions and public companies listed on GPW.
3. We also apply the principles of information policy and communication with investors contained in the Principles of Corporate Governance, the "Best Practice for GPW Listed Companies 2021"<sup>7</sup> ("Best Practice"), and the Code of Ethics in Banking.<sup>8</sup>

### § 5.

In addition, we disclose information on the adopted "Conflict of Interest Management Policy", including:

- the bank's management methods of material conflicts of interest and conflicts that could arise due to the bank's membership of the group<sup>9</sup> or
- transactions concluded by the bank with other entities in the group - in accordance with Recommendation 13.6 of Recommendation Z.

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<sup>2</sup> **Act on Public Offering** - Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies

<sup>3</sup> **MAR** - Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC

<sup>4</sup> **Commercial Companies Code** - Act of 15 September 2000 - Commercial Companies Code

<sup>5</sup> **Banking Law** - Act of 29 August 1997 - Banking Law

<sup>6</sup> **Act on Trading in Financial Instruments** - Act of 29 July 2005 on Trading in Financial Instruments

<sup>7</sup> **Best Practice for GPW Listed Companies 2021** - [the text is available on the website of the Warsaw Stock Exchange](#)

<sup>8</sup> **Code of Ethics in Banking** – [the text is available on the website of the Polish Bank Association](#)

<sup>9</sup> **The Group** means the bank and the Bank's subsidiaries subject to consolidation in accordance with the accounting principles binding at the Bank

For the purposes of the policy, we recognize that material conflicts of interest are conflicts with respect to members of the supervisory board and the management board of the bank. We described these issues in Chapter C. 4 of the “Conflicts of Interest Policy”.

#### § 6.

1. In the appendix to this policy, we have included the scope of information disclosed by the bank covered by the policy. It is in the form of a list of information and documents published by the bank, it includes the place of publication and frequency.
2. The bank's organisational units monitor the legal provisions regarding the bank's disclosures. They notify the policy owners of the necessity to make changes to the annex to the policy.

### **3. Implementation of information policy**

#### **3.1 Communication with investors and other capital market participants**

#### § 7.

Relations with investors and other capital market participants are coordinated by investor relations specialists. On the bank's website, in the Investor Relations tab, we provide information on how investors can contact the bank.

#### § 8.

1. Communication with investors and other capital market participants is aimed at:
  - 1/ ensuring the highest standards of information for investors and other capital market participants, according to applicable laws and good practices,
  - 2/ building investor confidence by providing reliable and regular information to facilitate the valuation of the bank,
  - 3/ increasing investor interest and promoting a positive image of the bank as a public company.
2. We fulfil our information obligations in a reliable and transparent manner, in line with the highest standards for public companies listed on GPW. We ensure that current and periodic reports are published within the deadlines required by the applicable laws, and that their content enables investors to assess the bank's operations.

#### § 9.

1. To carry out information activities in relation to investors:
  - 1/ we provide information via the electronic information transfer system (EIB / ESPI),
  - 2/ we run the bank's website. We post on it, in accordance with legal regulations and good practices, information on investor relations (investor relations website),
  - 3/ we organise meetings, teleconferences and videoconferences with stakeholders – face-to-face, individual or group,
  - 4/ we organise investor conferences, press conferences and thematic seminars.
2. We also communicate with the bank's shareholders during the General Meetings of Shareholders ("GM") via electronic communication (e-General Meetings), inter alia:

- 1/ we provide shareholders with information and explanations and provide answers during the General Meeting,
  - 2/ we provide publicly available real-time broadcast of GM sessions,
  - 3/ we enable the media to participate in the General Meeting.
3. The investor relations specialists, according to their duties and within the limits of the applicable legal regulations and the resulting limitations, provide answers to investors' questions. They do it no later than within 14 days. In justified cases, they can reply after 14 days (they inform the investor in advance about the extended response time).

### **3.2 Communication with media representatives**

#### § 10.

1. The press office is responsible for media relations. On the bank's website, in the Press Office tab, we provide information on how representatives of the media can contact the bank.
2. The spokesperson and the press office reporting to the spokesperson are responsible for the implementation of the policy regarding communication with the media.
3. On behalf of the bank, statements for the media are made exclusively by:
  - members of the bank's management board
  - members of the supervisory board,
  - the spokesperson, members of the press office, and
  - other persons authorised by the bank's management board or the spokesperson.

#### § 11.

1. The Bank maintains regular communication with media representatives through, among others :
  - 1/ press conferences,
  - 2/ press releases,
  - 3/ face-to-face meetings with journalists,
  - 4/ social networks,
  - 5/ e-mail.
2. Answers to media enquiries are provided in accordance with best market practice in the shortest possible time. We take into account the limitations that result from the obligation of:
  - banking secrecy,
  - business secrecy,
  - confidential information or other information which might in any way impair the bank's competitive position.
3. We publish the bank's official announcements on the website: [www.mbank.pl](http://www.mbank.pl) in the tab: Press Office.
4. In providing financial information, the press office is supported by investor relations specialists to ensure consistency of the information provided to :
  - the media
  - investors and
  - other capital market participants.

### 3.3 Communication with customers

#### § 12.

The bank's organizational units are responsible for the implementation of the policy towards customers, which:

- participate in direct customer service and contacts, and
- prepare communication addressed to the bank's current and potential customers.

#### § 13.

1. The Bank provides information to existing and potential customers of the bank.
2. Customer communication activities:
  - 1/ build the bank's image as a relationship bank and an institution of public trust,
  - 2/ increase customer interest in the bank's offer and solutions
  - 3/ increase customer satisfaction with the bank's services and solutions,
  - 4/ use customer feedback to build a relationship bank
  - 5/ improve the bank's operations to match the product offer to customer needs,
  - 6/ ensure that customers have access to information on available protection measures in their relations with the bank and eliminating conflicts,
  - 7/ comply with the law and regulations for the banking and insurance market.
3. We send information to customers as quickly as possible. At the same time, we maintain high quality standards. Our communication is transparent, reliable and comprehensive. We write simply so that our messages are understandable to everyone (we follow the rules of mKanon).
4. If we can't provide the client with the information he needs, we indicate the reasons why it is not possible, unless such explanation is prohibited by law.
5. We provide information to persons with special needs in forms such as:
  - an audio recording,
  - a visual recording of the content in Polish sign language,
  - a printout in Braille
  - a printout with a font size that is comfortable to read,We do it within 7 days of request (Act of July 19, 2019 on providing accessibility to people with special needs).

#### § 14.

1. The bank's information activities with regard to customer relations primarily concern:
  - 1/ the bank's product offering
  - 2/ amending model contracts within the time limits laid down by legislation and provisions resulting from contracts,
  - 3/ the client's products and services and client's executed instructions,
  - 4/ conditions for the safe use of banking services,
  - 5/ the rules for the processing of personal data
  - 6/ answers and explanations to customer enquiries including questions, applications, complaints and appeals,

- 7/ other circumstances required by law.
2. To communicate with customers, we use:
  - 1/ direct and telephone contact by the bank's employees, including employees of the bank's branches, the Contact Centre, as well as external companies acting on behalf of the bank,
  - 2/ online and mobile banking,
  - 3/ SMS messages,
  - 4/ e-mail,
  - 5/ traditional mail,
  - 6/ the bank's website,
  - 7/ social media,
  - 8/ advertising material.
3. Communication with the client takes place in the manner chosen by the client. The exceptions are situations in which applicable law, provisions of contracts concluded with a client or product regulations stipulate the obligation to communicate in a specific form, e.g. through registered channels.
4. The main source of information about the bank is the website [www.mbank.pl](http://www.mbank.pl). We provide it with documents and information required by law and other materials.

#### § 15.

1. In compliance with the requirements of the Act on Provision of Electronic Services. We respect the privacy of our customers and do not send any information which constitutes product offerings to persons who do not wish to receive it.
2. We provide customers with information about planned maintenance works related to internet banking in advance. We do it to enable the customer to plan the order at a convenient time for the customer.
3. We make every effort to ensure that information on changes to fees and commissions and the scope of the offer is communicated well in advance. We do it to enable customers to familiarise themselves with the new terms and conditions before they take effect.
4. We pay particular attention to exhaustive and friendly communication regarding the product sales process. We do it to enable the customer to properly assess the our offer and usefulness of products.
5. The bank's employees, on the basis of information obtained from the client, exercise the utmost care to offer customers only products and services tailored to their needs.

#### § 16.

1. We replay to customer complaints in reliable and objective manner. We adhere to the regulatory and statutory deadlines
2. If the customer's claims are not accepted, we reply justifying our position together with an indication of the regulations constituting the grounds for rejecting the claim.

#### § 17.

When we provide a client with data covered by banking secrecy, we exercise diligence and follow the highest standards of security and confidentiality. To maintain the security of the

information transmitted, we may limit the electronic contact channels and formats of attached files to those that ensure the security of the transmitted data.

#### **4. Final provisions**

##### § 17

1. The policy is adopted by the bank's management board and approved by the supervisory board.
2. Changes to the policy require the same procedure as its implementation. The supervisory board authorises the bank's management board to update the appendix to the policy. It sets out the scope of information to be disclosed. If, during a calendar year, there are significant changes in legal regulations which affect the scope of information disclosed, the bank's management board may decide to amend the appendix. The changes implemented by the bank's management board are approved by the supervisory board at the end of the calendar year, as part of the annual review of the policy.

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