

**Disclosure Policy  
of mBank Hipoteczny S.A.**

**Warsaw, 2024**

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## Chapter 1 General Provisions

### § 1

1. The information policy of mBank Hipoteczny S.A. on capital adequacy and other information subject to publication, hereinafter referred to as the "Policy", specifies the scope, frequency, place and form of publication, as well as the manner of approving and verifying information on capital adequacy and information subject to publication, as defined in the CRR, the Banking Law Act and the Recommendations of the Polish Financial Supervision Authority referred to in item 2.
2. The following definitions are used in this procedure:
  - a) **Bank** shall mean mBank Hipoteczny S.A.;
  - b) **Parent Entity** shall mean mBank S.A.
  - c) **Policy** shall mean the Information Policy of mBank Hipoteczny S.A.;
  - d) **Recommendation H** - Recommendation H of the Polish Financial Supervision Authority concerning the system of internal control in banks;
  - e) **Recommendation M** shall mean the Polish Financial Supervision Authority Recommendation M on the management of operational risk in banks;
  - f) **Recommendation P** - Recommendation P of the Polish Financial Supervision Authority on liquidity risk management in banks;
  - g) **Recommendation R** - Recommendation R of the Polish Financial Supervision Authority on the principles of credit exposure classification, estimation and recognition of expected credit losses and credit risk management;
  - h) **Recommendation Z** - Recommendation Z of the Polish Financial Supervision Authority concerning principles of internal governance at banks
  - i) **CRR** shall mean Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms, amending Regulation (EU) No 648/2012, as amended;
  - j) **Banking Law** - the Banking Law of 29 August 1997, as amended;
  - k)
  - l) **Principles of Corporate Governance** shall mean the Principles of Corporate Governance for supervised institutions of the Polish Financial Supervision Authority, adopted for use by mBank Hipoteczny S.A. by resolution No 247/2014 of the Management Board of mBank Hipoteczny S.A. of 16 December 2014.
  - m) **Guidelines EBA/GL/2021/05** - Guidelines on internal governance
  - n) **Guidelines EBA/GL/2018/10** - EBA Guidelines on disclosure of non-performing and forbore exposures.
3. The Bank, acting within the mBank S.A. Group, provides information to the Parent Entity in order to include it in the consolidated figures.
4. The scope of information disclosed at a consolidated level is defined by mBank S.A. as the Parent Entity. Particulars pertaining to the disclosed information are determined by the Information Policy of mBank S.A. concerning the capital adequacy, which is available at: [www.mbank.pl/o-nas/o-mbanku/adekwatnosc-kapitalowa](http://www.mbank.pl/o-nas/o-mbanku/adekwatnosc-kapitalowa).

### § 2

This Policy governs the following areas, described in particular parts of this document:

- 1) the scope of public disclosures,
- 2) principles of disclosure restrictions,
- 3) principles of verification and approval of the disclosed information,
- 4) frequency and deadlines of publishing information,
- 5) place and form of publishing disclosures,
- 6) verification principles of the disclosure policy.

## **Chapter 2 The scope of public disclosures**

### **§ 3**

1. Pursuant to Article 6 of the CRR, the Bank is not required to disclose information under Part Eight of the CRR. Taking into account the scale and nature of the Bank's activities, the Bank publishes information relevant for the assessment of the Bank's activities in the financial statements and Management Board Report on the Bank's activities, in particular information on:
  - 1) own funds,
  - 2) compliance with capital requirements,
  - 3) applied credit risk mitigation techniques,
  - 4) capital buffers,
  - 5) leverage ratio,
  - 6) credit risk adjustments used,
  - 7) operational risk in accordance with Recommendation M, including information on operational risk losses recorded during the year, broken down by class of event including, at least by category of event
  - 8) liquidity Coverage Ratio (LCR), liquidity buffer and net liquidity outflows,
  - 9) net stable funding ratio (NSFR),
  - 10) non-performing and forbome exposures.
  - 11)
2. Information on the applicable remuneration policy for persons having a material impact on the risk profile, containing information in accordance with the Remuneration policy for employees having a material impact on the risk profile of mBank Hipoteczny S.A., is disclosed in a separate document published on the website of mBank Hipoteczny S.A.: [www.mhipoteczny.pl](http://www.mhipoteczny.pl).
3. The Bank shall annually announce the full scope of information to be disclosed, as referred to in paragraphs 1 and 2, as at 31 December each year.

## **Chapter 3 Principles of disclosure restrictions**

### **§ 4**

1. The Bank shall not disclose any information for which the CRR allows restriction of the scope of disclosure, namely:
  - 1) proprietary information the disclosure of which could have an adverse effect on the competitive position of the Bank,
  - 2) confidential information, if the Bank has a duty of confidentiality to the customer or other counterparty,
  - 3) insignificant information (namely information which would not have any influence on the economic-relevant decisions of its recipients).
2. Should the information requested for disclosure be proprietary or confidential according to the provisions of the CRR or the particular provisions of Recommendation M, the Bank shall present reasons for restraining the publication of information and shall communicate more general information, unless this is also proprietary or confidential.

## **Chapter 4 Principles of disclosed information verification and approval**

### **§ 5**

1. Information within the scope of the audit/review of the financial statements shall be verified by a statutory auditor.
2. The annual financial statements and the Management Report on the Bank's activities shall be adopted by the Bank's Management Board, accepted by the of the Supervisory Board and approved by the General Meeting of the Bank.
3. Disclosure within the scope of the applicable policy on remuneration for employees having a material impact on the risk profile, including the maximum ratio of the average total gross remuneration of the members of the management board in the annual period to the average total gross remuneration of other employees of the bank, shall be approved by the Bank's Management Board and then by the Supervisory Board.

## **Chapter 5 Frequency and deadlines of publishing information**

### **§ 6**

Taking into account the scale and specifics of the Bank's activities, the Bank's Management Board has determined that the disclosed information referred to in Chapter 2 of the Policy is published in the Financial Statements and in the Management Report on the Bank's activities on their publication deadlines.

## **Chapter 6 Place and form of publishing disclosures**

### **§ 7**

The disclosed information referred to in Chapter 2 of the Policy shall be disclosed in Polish and English, on the website of mBank Hipoteczny S.A.: [www.mhipoteczny.pl](http://www.mhipoteczny.pl).

## **Chapter 7 Principles for verifying the disclosure policy**

### **§ 8**

1. The Policy and amendments thereto shall be adopted by the Management Board and approved by the Supervisory Board.
2. The Policy shall be subject to review not less frequently than once a year, by 30 November each year.
3. In the case of any changes in the external regulations announced after 30 November which have an effect on the requirement of changing the principles of the Policy, the changes shall be introduced immediately so that they can be published before the end of the year and so that they can be included in the information disclosed as at the end of a given year.