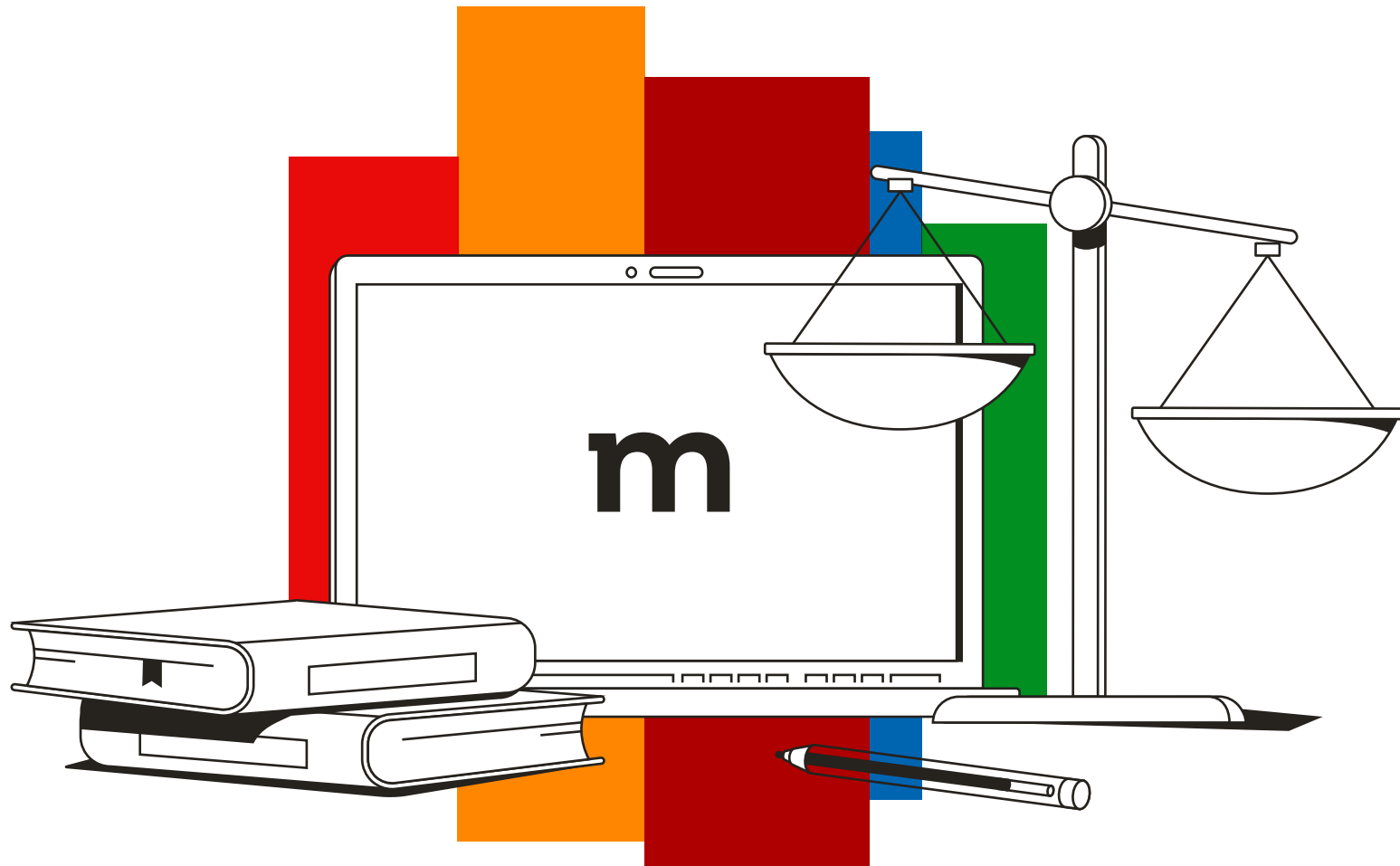


# mBank

## Ethics Programme



## At mBank, we want to build an ethical culture that will also help us meet our obligations and pursue our ESG strategy aspirations.

To ensure the efficiency and effectiveness of our actions, we follow the recommendation of the Banking Ethics Commission of the Polish Bank Association. According to the recommendation, the key elements of building an ethical culture in the bank are:



senior management **supporting** ethical business



**reacting** to violations of ethical standards



**integrity**, i.e. consistency between our promises and actions



appointing an employee responsible for **managing ethical issues** and determining their place in the organisation's hierarchy



**ethical conduct** in the bank's relationship with its clients when implementing new policies, products,



ethics being one of the **criteria for the assessment** of every employee



**a system for reporting** violations of ethical standards



**educating** our employees

## To build an efficient ethical culture involving these elements, it is resolved as follows:

- 1** Ethical standards which must be observed by all employees are defined in **Code of Banking Ethics of the Polish Bank Association**.
- 2** These standards are further supplemented by the bank's **Code of Conduct**.
- 3** **Detailed rules of conduct** in areas that require particular sensitivity to ethical issues are set forth in the **internal regulations** listed in the appendix to this Programme.
- 4** Activities aimed at ensuring **ethical conduct in business operations** are also carried out as part of the bank's ESG strategy.
- 5** **Every bank employee is obliged to know our ethical standards**, to follow them and to react if they are violated.
- 6** The **Chief Ethics Officer** is responsible for managing ethical issues in the organisation.
- 7** The work plan of the Chief Ethics Officer is approved by the **Sustainable Development Committee**.
- 8** Twice a year ethical issues are one of the mandatory discussion points at the **meeting of the Sustainable Development Committee**.
- 9** **A report on the activity of the Chief Ethics Officer** is presented once a year to the Management Board of the Bank.
- 10** **Every employee of the bank is obliged to take the ethics training course** once a year, whereas new employees must complete this training within three months of starting work.

11

All **policies, products, services and procedures must incorporate ethical aspects**. This also applies to the manner of offering products to our clients and our relationship with them.

12

To ensure that our communication with clients is ethical, **we follow the mKanon rules**.

13

**mSygnal**, the bank's system for reporting violations, also offers an option to report violations of ethical standards. All whistleblowers are ensured adequate protection.

14

We carry out **cultural and communication activities aimed at building an ethical culture**. The activities are supervised by the Chief Ethics Officer.

15

The bank's employees are obliged to **act in compliance with mBank's model of values and behaviours** and assessed accordingly. One of the elements of this model is ethical conduct.



## Regulations that must be followed by the bank as a whole and by all its employees to ensure compliance with the ethical standards:

- 1.** Code of Banking Ethics of the Polish Bank Association
- 2.** Code of Conduct
- 3.** Model of Values and Behaviours of mBank
- 4.** Diversity and Inclusion Policy of mBank
- 5.** Anti-Workplace Harassment, Discrimination and Other Unacceptable Behaviour Policy of mBank
- 6.** Order of the President of the Management Board on the Rules for Whistleblowing via mSygnał, an Anonymous Communication Channel, and the Procedure for Analysing Whistleblowers' Reports
- 7.** Policy of Managing Conflicts of Interest
- 8.** Privacy Vision
- 9.** GDPR Package
- 10.** Banking Security Code
- 11.** Rules for Publishing Private Content in Social Media
- 12.** Reputational Risk Management Strategy of mBank S.A. Group
- 13.** Sustainable Development Code for Suppliers and Partners of mBank S.A.
- 14.** Anti-Corruption Policy of mBank S.A.
- 15.** Policy on Providing Services to Reputation-Sensitive Industries – CSR
- 16.** Fraud Prevention Policy of mBank S.A.
- 17.** Employee Misconduct Policy of mBank S.A.
- 18.** Policy of Combating Money Laundering and Terrorism Financing of mBank S.A. Group
- 19.** Data Management Policy of mBank
- 20.** Membership in Organisations Policy of mBank
- 21.** Order of the President of the Management Board on Handling Complaints and Claims at mBank S.A.