

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

Warsaw, 2020

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Chapter 1 General Provisions

§ 1

1. The following definitions are used in this procedure:

Bank shall mean mBank Hipoteczny S.A.;

Parent Entity shall mean mBank S.A.

Policy shall mean the Information Policy of mBank Hipoteczny S.A.;

Recommendation M shall mean the Polish Financial Supervision Authority Recommendation M on the management of operational risk in banks;

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;

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.

2. The Bank, acting within the mBank S.A. Group, provides information to the Parent Entity in order to include it in the consolidated figures.

3. 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.

§ 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. In the financial statements and in the Management Report on the Bank's activities, the Bank shall disclose, on an individual basis, information relating to:

- 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) applicable remuneration policy for persons having a significant impact on the risk profile,

- 8) operational risk in accordance with Recommendation M,
 - 9) the application of the IRB approach with regard to credit risk,
 - 10) Liquidity Coverage Ratio (LCR), liquidity buffer and net liquidity outflows.
2. The full scope of the information referred to in § 3(1) shall be announced by the Bank as at 31 December each year on an annual basis.

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, subject to an opinion of the Supervisory Board and approved by the General Meeting of the Bank.

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.

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.