



Information policy of Bank Millennium S.A.
in the field of communication with clients, investors
and the media

Principles of the general information policy

Bank Millennium S.A. ("the Bank") as an institution of public trust pursues a transparent information policy towards customers, shareholders, investors, rating agencies, media and other stakeholders.

The scope of information disclosed by the Bank meets the requirements of the Banking Law¹, the Commercial Companies Code², the Act on Public Offering³ and Trading in Financial Instruments⁴, the MAR Regulation⁵, the Act on the National Cybersecurity System⁶, as well as other detailed regulations concerning financial institutions and public companies listed on GPW⁷. In implementing its information policy, the Bank, as a public company and a supervised institution, also complies with the provisions of law on confidentiality and protection of information, as well as the protection of personal data.

The Bank's information policy provides all stakeholders with proper access to information and is consistent with the corporate governance principles contained in the "Best Practice for WSE Listed Companies 2021"⁸ and the recommendations of the Polish Financial Supervision Authority⁹

The rules for disclosing information on capital adequacy are set out in a separate "Policy for disclosure of information on risk, own funds, capital requirements, information on remuneration and other information required by law or recommendations of the PFSA" available on the Bank's website in the Investor Relations section <https://www.Bankmillennium.pl/o-Banku/relacje-inwestorskie/polityka-informacyjna>

The information policy and guidelines for communication in the event of a crisis situation are contained in separate internal documents in force at the Bank.

2. Supervision and coordination of the implementation of the information policy addressed to customers, investors and the media

The Bank's information policy has been approved and is being implemented by the Bank's Management Board and relevant organisational units responsible for communication with customers, investors and the media.

The Bank's organisational units, which participate in direct service and contacts with customers and which prepare communication addressed to customers, are responsible for communication with customers. Contact details for customers are available on the Bank's website, in the Contact - <https://www.Bankmillennium.pl/o-Banku/kontakt> section.

The Investor Relations Department is responsible for relations with shareholders, investors, rating agencies and other capital market participants. Contact details are provided on the Bank's website, in the Investor Relations section [Investor Relations - About the Bank - Bank Millennium.](#)

The head of the Public Relations Department and the employees of the Public Relations Department are responsible for cooperation and contacts with the media and opinion-forming circles. Contact details are provided on the Bank's website, in the Press Centre section <https://www.Bankmillennium.pl/o->

¹ **Banking Law** - Act of 29 August 1997 - Banking Law

² **Commercial Companies Code** - Act of 15 September 2000 - Commercial Companies Code

³ **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

⁴ **Act on Trading in Financial Instruments** - Act of 29 July 2005 on Trading in Financial Instruments

⁵ **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

⁶ **Act on the National Cybersecurity System** - Act of 5 July 2018 on the National Cybersecurity System

⁷ **Regulation of the Minister of Finance of 29 March 2018 on current and periodic information** published by issuers of securities and conditions for recognising as equivalent information required by the laws of a non-member state

⁸ **Best Practice of Companies Listed on GPW 2021** (<https://www.gpw.pl/dobre-praktyki2021>)

⁹ **Principles of Corporate Governance for Supervised Institutions** of 22 July 2014

3. The Bank's information policy towards customers and potential customers

When directing communication to its customers and potential customers, the Bank complies with the requirements resulting from the law, in particular those concerning confidentiality and security of information, personal data protection, and is guided by the Principles of Corporate Governance for Supervised Institutions, among others by providing customers with proper access to information on the products and services offered.

The Bank uses the following to communicate with customers:

- website and mobile application
- web pages
- correspondence by letter
- electronic mail
- text messaging
- PUSH messages
- direct contact of the Bank's employees, including: in branches, via telephone lines, videoconferences
- direct contact of employees of companies cooperating with the Bank on the basis of appropriate agreements
- advertising materials produced for the purposes of sales support in branches and outside them
- advertising materials broadcast in the on-line and off-line media
- advertising materials broadcast on social media
- social media

Questions and notifications regarding the Bank's offer may be directed by customers via the contact channels indicated in the Contact section of the Bank's website appropriate for a given customer line.

The Bank provides customers with information on the rules and deadlines for responding to requests, notifications and complaints by placing them in documents available to the customer, such as regulations and agreements for a given product, and on the Bank's website.

The Bank responds to customer complaints and requests within the deadlines in accordance with the applicable law, in particular in accordance with the Act of 15 August 2015 on the handling of complaints by financial market entities, on the Financial Ombudsman and on the Financial Education Fund, the Act of 11 August 2011 on payment services and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of data on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) - GDPR.

In the event of refusal of the customer's claims or request, the Bank, in response to the complaint or request, provides the customer with comprehensive information (reasons) justifying its position, along with an indication of the regulations and legal grounds constituting the basis for the refusal of the complaint or request, in particular information on the possibilities of appealing against the Bank's decision

On its website the Bank also provides information on the rules for appealing against the Bank's position, including internal and external entities to which the customer may appeal, in particular the Banking Arbitrator, the Municipal/District Consumer Ombudsman, the Financial Ombudsman, the ODR platform, the Polish Financial Supervision Authority and the Office of Competition and Consumer Protection and common courts.

If it is not possible to respond to the client's complaint or request within the deadline, before the expiry of the deadline the Bank shall inform the client about the extension of the deadline, the expected response time and the reasons for the delay, taking into account the deadlines and requirements resulting from the provisions of generally applicable law, and indicates the circumstances that must be established for the consideration of the case.

Communication with the customer takes place via the channel preferred by the customer, unless the applicable law, provisions of agreements concluded with the customer or product regulations provide for the obligation to communicate in a specific form.

The main source of information about the Bank is the www.bankmillennium.pl website, where the Bank publishes, among others in product sections, all documents required by law and other materials.

4. The Bank's information policy addressed to shareholders, investors, rating agencies and other capital market participants and stakeholders ("capital market participants").

The Bank fulfils the disclosure obligations of a public company, in particular by publishing confidential information specified in the regulations governing trading in financial instruments, including the disclosure of current and periodic information to the public within the time and to the extent required by law ("regulations on public companies"). The legal sources of this information are cited in the footnotes on page 1 of this policy, and the statutory terms are in the List of documents published by the Bank below. Notwithstanding the above provisions, the Bank publishes information required by other generally applicable laws, in particular the provisions of the Commercial Companies Code, the Act on Trading in Financial Instruments and the Banking Law.

The Bank also conducts open communication with shareholders during General Meetings, by:

- providing answers and explanations to shareholders during the General Meeting by members of the Bank's governing bodies;
- the Management Board may provide information in writing no later than within two weeks from the date of submission of the request during the General Meeting, if there are important reasons for doing so and the response is made publicly available on the Bank's website in the Investor Relations section,
- broadcasting the General Meeting via the Internet,
- enabling shareholders to participate remotely in the General Meeting using electronic means of communication (e-General Meeting), in cases where the person convening the General Meeting has decided on such a possibility,
- enabling the participation of media representatives in the General Meeting.

In addition, in its communication with capital market participants, it uses the following channels:

- current reports provided by the EBI/ESPI system
- direct, individual or group meetings with investors, analysts and rating agencies,
- investor conferences organised in a hybrid manner (on-line + the Bank's headquarters) or in an on-line format with two-way communication,
- press releases,
- information in the media,
- participation in conferences and thematic seminars organised by external entities,
- publications on the Bank's website,
- social media (among others LinkedIn, platform X).

The Bank provides information required by law within the deadlines resulting from the regulations concerning public companies in accordance with the List of documents published by the Bank below.

Employees of the Investor Relations Department respond promptly to inquiries from capital market participants addressed to the Investor Relations Department, but no later than within 7 days, unless the nature of the case requires an extension of this deadline, of which the Bank will inform the interested party. When answering, the following restrictions are taken into account, resulting from the obligation to maintain, among others:

- banking secrecy,
- the principles of personal data protection resulting from the provisions of law,
- trade secrets, confidential information or other information that could in any way contribute to the weakening of the Bank's competitive position.

List of documents published by the Bank addressed to the above-mentioned stakeholders, specifying the frequency and place of publication

No.	Type of document	Frequency of publication	Place
1.	Quarterly presentation of the results and recording of the conference broadcast	Quarterly, usually before the end of the first month following the closed quarter, no later than 60 calendar days after the end of the quarter	Website: www.bankmillennium.pl (Investor Relations Section)
2.	Quarterly financial report	For the 1st and 3rd quarters, usually before the end of the first month after the closed quarter, no later than 60 calendar days after the end of the quarter	Website: www.bankmillennium.pl (Investor Relations Section)
3.	Semi-annual financial report	Once a year, usually at the end of July, no later than 3 months after the end of June	Website: www.bankmillennium.pl (Investor Relations Section)
4.	Annual financial report consisting of a descriptive report on the Bank's activities and a financial report (consolidated and Bank solo)	Once a year, usually at the end of February, no later than 4 months after the end of the financial year	Website: www.bankmillennium.pl (Investor Relations Section)
5.	Sustainability information (non-financial information of the Bank)	Once a year, together with the Descriptive Report on the Bank's activities	Website: www.bankmillennium.pl (Investor Relations Section and Responsible Business/ESG Section)
6.	Report on capital adequacy, risk and remuneration policy of the Bank Millennium's Group (CRR requirements*)	Report once a year (**), selected information every quarter	Website: www.bankmillennium.pl (Investor Relations Section/ Capital Adequacy and Financial Reports)
7.	Remuneration Policy	Once a year, it is part of the Descriptive Report on the Bank's activities	Website: www.bankmillennium.pl (Governing Bodies and Corporate Governance)
8.	Report on remuneration of Members of the Management Board and the Supervisory Board Of Bank Millennium	Once a year (***)	Website: www.bankmillennium.pl (Governing Bodies and Corporate Governance)
9.	Corporate Governance Report	Once a year, it is part of the Descriptive Report on the Bank's activities	Website: www.bankmillennium.pl (Investor Relations and Governing Bodies and Corporate Governance Section)
10.	Report on activities of the Supervisory Board of Bank Millennium	Once a year, at least 26 days before the General Meeting of the Bank (as one of the documents for the General Meeting)	Website: www.bankmillennium.pl (Governing Bodies and Corporate Governance Section)
11.	Current reports (ESPI)/ Corporate Governance Reports (EBI)	After an event that is to be disclosed in accordance with the MAR Regulation and internal rules	Website: www.bankmillennium.pl (Investor Relations Section)
12.	Press releases	According to needs/requirements	Website: www.bankmillennium.pl (Press Centre Section) and the Bank's official social media profiles

13.	Annual Financial Report of the Parent Company (BCP)	Once a year (English only)	Website: www.bankmillennium.pl (Investor Relations/financial reports/annual reports section)
14.	Report in accordance with the CRR ("Market discipline") regulation of the parent company (BCP)	Once a year (English only)	Website: www.bankmillennium.pl (Investor Relations Section/ Capital Adequacy)
15.	Information on realised tax strategy of Bank Millennium S.A.	Once a year	Website: www.bankmillennium.pl (Governing Bodies and Corporate Governance section)

(*) This information is a mandatory disclosure under the EU Capital Requirement Regulation (CRR). Detailed rules for these disclosures can be found in the document entitled "Policy for disclosure of information on risk, own funds, capital requirements, information on remuneration and other information required by law or recommendations of the PFSA" referred to as the Information Policy according to CRR. In particular, it contains the rules for the publication of selected data disclosed on a quarterly and semi-annual basis.

(**) Update of variable remuneration of the Management Board after the decision of the Personnel Committee of the Supervisory Board (convened after the General Meeting of the Bank).

(***) The document is one of the documents accepted by the General Meeting of Shareholders

3. The Bank's information policy towards the media

The Head of the Public Relations Department and the Public Relations Department subordinated to him are responsible for the implementation of the policy in the field of communication with the media.

On the Bank's website, in the Press Centre section, there is information on how media representatives can contact the Bank.

On behalf of the Bank, statements for the media are given only by:

- members of the Bank's Management Board,
- members of the Supervisory Board,
- Director of the Public Relations Department and members of the Public Relations team
- other persons authorised by the Bank's Management Board or the Director of the Public Relations Department.

The Bank maintains regular communication with media representatives via among others:

- press conferences,
- press releases,
- direct meetings with journalists,
- social media.
- electronic mail.

The Bank provides answers to media questions in accordance with the best market practices, in the shortest possible time. Restrictions apply resulting from, among others, the obligation to maintain:

- banking secrecy,
- the principles of personal data protection resulting from the provisions of the law on trade secrets, confidential information or other information that could in any way contribute to the weakening of the Bank's competitive position.

The Bank's press releases are published on the website in the <https://www.Bankmillennium.pl/o-Banku/centrum-prasowe#informacje-prasowe> Press Centre section and on the Bank's official social media profiles.

6. Procedure for adopting the information policy and making changes

This information policy is introduced and amended by a resolution of the Bank's Management Board.