



# Disclosure Policy of ING Bank Śląski S.A.

**Investor Relations Bureau, Press Spokesman, October 2021**

# 1 General Rules of Disclosure Policy

Being a public trust organisation, ING Bank Śląski pursues disclosure policy which consists in keeping an open and transparent line of communication with shareholders, investors, rating agencies, the media and all stakeholders.

When giving information, the Bank as a public company and a regulated institution follows the corporate governance rules, and abides by the applicable laws, including but not limited to the requirements of the Banking Law, the Commercial Companies and Partnerships Code, the Public Offering and Trading in Financial Instruments Act, MAR, as well as Act on the National Cybersecurity System. In particular, the Bank complies with the rules on bank secrecy and the rules on preventing the use and disclosure of confidential information.

Carrying out the disclosure policy, ING Bank Śląski ensures proper access to information about the Bank to shareholders, investors, rating agencies, the media and all stakeholders.

This Disclosure Policy does not provide for the rules of communication between the Bank and its clients which are regulated separately.

# 2 Competences under Disclosure Policy

The Bank's disclosure policy is carried out by the Management Board and relevant organisational units.

The Investor Relations Bureau coordinates relations with shareholders, investors, rating agencies and other equity market participants. The contact details for investors are published at the Bank's website in the Investor Relations section (<https://en.ing.pl/company-profile/investor-relations/contact-us>).

The Press Officer and the employees of the Media Relations Team are responsible for the cooperation with and for representation of the Bank in the media and with opinion leaders. The contact details for the media are published on the Bank's website in the Press Office section (<https://media.ing.pl/kontakt>).

The Bank discloses the information as required by binding laws in line with deadlines arising under relevant provisions of law. The Bank's representatives respond to the inquiries received by the Investor Relations Bureau and the Press Officer together with the Media Relations Team immediately; however, no later than within 7 days. If the nature of the issue entails extension of the said period, the Bank will inform the party concerned thereof.

# 3 Pursuit of Disclosure Policy

The Bank fulfils the disclosure duties of a public company in particular by publishing confidential information specified in the provisions of law that govern trading in financial instruments, including publishing current and periodic information in line with deadlines and scope required by the applicable laws.

Regardless of the above-mentioned provisions, the Bank publishes the information required by other universally binding laws, in particular the provisions set out in the Commercial Companies and Partnerships Code and the

Banking Law.

The Bank also uses General Meetings to keep an open line of communication with shareholders by:

- providing answers and explanations to shareholders' questions during the General Meeting by the members of the Bank's governing bodies,
- enabling shareholders to take part in the General Meeting on a remote basis via electronic communication means (e-general meeting),
- broadcasting the General Meeting session via the Internet,
- enabling media representatives to participate in the General Meeting's sessions.

Moreover, the Bank uses the following channels to communicate with the stakeholders:

- direct, individual or group meetings with investors, analysts and rating agencies,
- investor conferences,
- press releases,
- press conferences,
- information in the media, and
- thematic conferences and seminars.

The Bank monitors on a regular basis the development of modern tools that support the management of communication with shareholders, investors, rating agencies, the media and other stakeholders; where possible, the Bank adapts those tools to its operations to improve the communication process.

## 4 Disclosure Policy Implementation and Amendment Procedure

This Disclosure Policy is implemented by the Bank Management Board resolution.

The amendments hereto can be made only as provided for hereinabove.