



## **Information Policy of Alior Bank S.A.**

**within the scope of Communication with Customers,  
Capital Market Participants and Media**

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**Definitions:**

- Shareholder** – entity holding shares of the Bank.
- Bank** – Alior Bank SA with its registered office in Warsaw, ul. Łopuszańska 38D, entered into the register of entrepreneurs kept by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register, under the following numbers: KRS 0000305178, NIP (Tax Identification Number): 107-001-07-31, REGON (National Business Registry Number): 141387142.
- Best Practices** – Best Practices of WSE Listed Companies 2016 in the wording adopted by Resolution No. 26/1413/2015 of the Supervisory Board of Giełda Papierów Wartościowych w Warszawie S.A. (the Warsaw Stock Exchange) of 13 October 2015, as amended.
- ESPI** – The Electronic Information Transfer System referred to in Regulation of the Minister of Finance of 13 February 2006 on measures and technical conditions for the provision of certain information by entities supervised by the Polish Financial Supervision Authority (Journal of Laws of 2016, item 2288), through which stock exchange messages are made public.
- Investor** – a natural or legal person who is a shareholder of the Bank or an entity interested in investing its funds in the securities of the Bank with the aim of making a profit over a specified period of time.
- Customer** – a natural or legal person or an organisational unit without legal personality purchasing banking products.
- Stock exchange message** – a message containing information published on the basis of the Market Abuse Regulation (MAR), the Act on Offering, the Regulation on Current and Periodic Information or the Exchange Rules.
- Exchange Rules** – The Exchange Rules of Giełda Papierów Wartościowych w Warszawie S.A. (the Warsaw Stock Exchange) in the wording adopted by Resolution No. 66/1721/2019 of the Supervisory Board of Giełda Papierów Wartościowych w Warszawie S.A. of 23 December 2019 on the amendment of the Exchange Rules, as amended.
- Market Abuse Regulation (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. (OJ L No. 173, p. 1, as amended).

- Regulation on Current and Periodic Information** – 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 (Journal of Laws of 2018, item 757), as amended.
- Public company** – a company within the meaning of the provisions of the Act on Offering.
- Bank’s website** – [www.aliorbank.pl](http://www.aliorbank.pl)
- Capital Market Participants** – all types of entities, including:
- 1) commercial banks,
  - 2) other financial institutions, including: insurance companies, investment and pension funds,
  - 3) market-related non-financial institutions in respect of their financial advisory activities,
  - 4) natural persons investing funds in securities.
- Act on Offering** – The Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organized Trading and Public Companies (uniform text: Journal of Laws of 2016, item 1639, as amended).
- Corporate Governance Principles** – The “Corporate Governance Principles for Supervised Institutions” are a set of rules defining the internal and external relationships of supervised institutions, including the relationships with shareholders and customers, their organisation, functioning of the internal supervision and key internal systems and functions, as well as of statutory bodies and the principles of their cooperation adopted by the Polish Financial Supervision Authority.

## **I. Communication with Bank's Customers**

### **§ 1. Friendly Communication**

1. The Bank aims at providing information on the product offer and scope of activity in an accessible, effective and convenient manner for customers, taking into account the impact of communication on reputational risk.
2. Accessible and effective communication with customers is one of the key elements of the Bank's information policy and contributes to eliminating conflict situations between customers and the Bank.
3. Messages shall be formulated in a straightforward and understandable way.
4. The Bank respects the privacy of customers, which is why it does not send information related to the product offer to persons who do not wish to receive them.
5. Communication with customers is conducted in accordance with the highest standards of ethics.
6. The Bank conducts information activities for both current and potential customers.
7. The Bank informs in advance about the planned maintenance work related to Internet banking, which enables customers to plan their orders within a time limit convenient for them.
8. Answers to inquiries, customer complaints and appeals to the customer's ombudsman are provided in a fair and objective manner.
9. If the customer's claims are not recognised, the answer contains comprehensive information justifying the Bank's position, together with an indication of the regulations constituting the basis for rejecting the complaint.
10. On its website – and where the customer's claims are not recognised, also directly in its communication – the Bank provides information on the rules of appealing against the Bank's decision, including information on internal and external entities to which the customer may appeal.
11. The proper implementation of the Bank's information policy rests with units and persons who have both direct contact with the customer and who prepare messages addressed to current and potential customers of the Bank.
12. The Bank carefully analyses customers' remarks, requests, and complaints concerning the products offered and the services provided, and implements solutions to ensure continuous improvement of their quality.

### **§ 2. Time limits for the transmission of information**

1. The Bank shall make every effort to ensure that information on changes in fees and commissions and the scope of the offer is provided sufficiently in advance, enabling customers to become acquainted with the new terms and conditions prior to their term of validity.
2. Information on changes in the products owned by the customer, as well as complaints, shall be provided in compliance with statutory and regulatory time limits.

3. The Bank shall make available information on maximum time limits for responding to instructions and notifications by placing them in documents available to the customer, such as regulations or agreements.
4. Should it be impossible to respond to the customer's request within the time limit, the Bank shall inform about the estimated response time and reasons for the delay.

### **§ 3. Form of customer communication**

1. The Bank shall communicate with Customers through:
  - a) e-mail,
  - b) regular mail,
  - c) text messages (SMS),
  - d) PUSH messages,
  - e) Internet and mobile banking,
  - f) the Bank's websites,
  - g) social media,
  - h) advertising materials,
  - i) direct and telephone contact of the Bank's employees, including employees of the Bank branches and helpline staff.
2. If the complaint is answered, the Bank allows the customer to choose the preferred form of contact from the list of channels available in the product regulations to which the complaint relates.
3. The Bank communicates with the customer using the most optimal contact form, taking into account the time of obtaining information by the customer, its scope, and detail of the provided data.

### **§ 4. Principles of communication security**

1. In providing data, which are covered by banking confidentiality, the Bank always exercises the highest standard of care to provide such information, in maintaining the highest security and confidentiality standards.
2. Due to the need to maintain the security of the provided information, the Bank may limit the electronic contact channels and formats of attached files to those that ensure the security of the transferred data.
3. The Bank allows the customer to set a "password for the reverse verification of the Bank", thanks to which the customer can make sure that the person contacting the customer is actually an employee of the Bank.
4. Employees of the Bank never ask customers to provide passwords, PIN codes, and other confidential data enabling them to log in to Internet banking or use payment instruments. Any such requests should

be treated as phishing attempts by undesirable persons and reported immediately, e.g. by contacting the Bank's helpline.

5. In order to ensure customer security, the Bank uses available communication channels to increase customers' awareness of the principles of security of using banking services and proper use of payment instruments.
6. In the case of detecting operations that may be marked as unauthorised transactions, the Bank shall take actions aimed at protecting the customer's funds and attempt to contact the customer to inform him about the detected event.

#### **§ 5. Sales communication**

1. The Bank pays particular attention to comprehensive and understandable communication for customers concerning the product sales process, enabling customers to properly assess the Bank's offer and the usefulness of the product.
2. Sale is made in accordance with the internal procedures of the Bank, which regulate in detail the form and scope of information necessary to be provided to customers.
3. The Bank's employees clear up the customer's doubts regarding the principles of using the product, the provisions of regulations and agreements, or the Table of Fees and Commissions.
4. The Bank informs customers about the benefits of holding a product or service, as well as obligations resulting from its conclusion, including fees and commissions.
5. The Bank shall take the utmost care to ensure that the proposed products and services are tailored to the individual needs of the customer.

## **II. Communication with Capital Market Participants**

#### **§ 1. General Principles**

1. The Bank cares for regular, timely, and effective communication with capital market participants. As a public company, the Bank has been taking measures to meet stakeholders' information needs, caring for universal and equal access to information, in accordance with the highest market standards and applicable laws.
2. In implementing its information policy, the Bank applies the legal requirements concerning confidentiality and security of information, which are incumbent on the Bank as a public company. In its activities, the Bank shall take into account their impact on reputational risk.

#### **§ 2. Objectives**

Activities within the scope of communication with capital market participants are aimed at:

1. Ensuring the highest information standards for capital market participants, taking into account applicable laws and best practices;
2. Maintaining investor confidence by providing reliable and regular information to facilitate the valuation of the Bank's value;
3. Increasing investor interest and promoting a transparent image of the Bank as a public company.

### **§ 3. Measures**

1. The fulfilment of information obligations shall be carried out in a fair and transparent manner, in accordance with the highest standards of public companies listed on the Warsaw Stock Exchange.  
The Bank shall ensure that stock exchange messages made available to the public are published within the time limits required by generally applicable law, and that their content allows for the assessment of the Bank's operations by rational investors.
2. Convening and holding the General Meetings of Alior Bank SA in accordance with the regulations applicable to public companies and Best Practices and Principles of Corporate Governance to the extent consistent with the expectations of the shareholders of the Bank.
3. The dialogue with capital market participants is carried out in accordance with best market standards by the Management Board of the Bank in cooperation with the Investor Relations Department by:
  - a) providing information through the ESPI,
  - b) publishing information on the Bank's website in the tab "Investor Relations",
  - c) providing information in accordance with the requests made by shareholders during the General Meeting or outside its deliberations in accordance with the rules and within the time limits stipulated by generally applicable laws,
  - d) organising conferences for analysts and investors after the publication of financial results that enable participation in remote meetings and subsequent restoration of records available on the Bank's website, in the tab "Investor Relations",
  - e) regular meetings of representatives of the Bank's Management Board and of the Investor Relations Department  
with institutional investors and market analysts (participation in investor conferences, roadshow meetings, reverse roadshow meetings, and special individual meetings),
  - f) e-mail and telephone communication with representatives of the Investor Relations Department.
4. In order to meet market expectations, the Bank ensures that all information provided is available both in Polish and English.
5. The Bank's website uses tools enabling the use of mobile technology.
6. The contact details of the representatives of the Investor Relations Department responsible for implementing the information policy are available on the Bank's website in the tab "Investor Relations".

### **III. Communication with the Media**

#### **§ 1. General Principles**

1. As a public trust institution, the Bank implements an active and open information policy towards the media. It gives particular consideration to ensuring ongoing and equal access to up-to-date and reliable information for all media representatives and takes into account their impact on reputational risk.
2. The principles of the Bank's information policy are compliant with applicable laws, best practices, and market standards.

#### **§ 2. Objectives**

The purpose of the Bank's media communication activities is to:

1. Ensure ongoing and universal access to reliable and true information about the Bank;
2. Maintain media perception of the Bank as a transparent communication institution;
3. Ensure the highest standards for media information, taking into account the applicable laws and requirements of market regulators;
4. Prevent potential image crises resulting from a lack of information to the media environment;
5. Explain to the public opinion through the media issues having a significant impact on the Bank's current and future operations.

#### **§ 3. Authorised bodies**

1. The Communication Department and the Bank's Public Relations Officer are responsible for implementing the information policy in terms of communication with the media.
2. The following entities make statements on behalf of the Bank: the Management Board of the Bank, representatives of the Supervisory Board, Public Relations Officer, employees of the Communication Department, as well as other persons authorized by the Management Board of the Bank or Public Relations Officer.

#### **§ 4. Measures**

Communication and relations with the media shall be conducted in accordance with the highest market standards:

1. Official Bank messages are published in a separate tab on the Bank's website;
2. The content and form of messages, statements, and responses for the media are approved by the Communication Department;

3. Responses to media enquiries shall be given as soon as possible and as extensively and specifically as possible with the inclusion of limitations arising from the obligation to maintain banking secrecy;
4. The Bank maintains regular communication with media representatives through:
  - a. e-mail,
  - b. phone,
  - c. direct meetings with journalists,
  - d. press conferences,
  - e. social media.
5. Contact for media representatives is available on the Bank's website in the "Contact for the media" tab.