

POLICY FOR ENSURING DIVERSITY IN THE COMPOSITION OF THE BANK'S MANAGEMENT BOARD AND SUPERVISORY BOARD

THE IMPLEMENTED DIVERSITY POLICY

The diversity policy for the members of the Bank's Management and Supervisory Boards is an important part of the Bank's suitability assessment policies, i.e:

- The suitability policy concerning the Management Board members and key officers of the Bank and suitability assessment at the Bank's Group companies,
- The policy on assessing the suitability of candidates for members and members of the Bank's Supervisory Board.

The provisions implemented by the Bank set the directions for selecting, appointing and planning succession, including staff resources and suitability assessment of the Management Board members and key officers of the Bank. These persons are assessed in terms of their competences, knowledge and skills, experience adequate to the position and reputation understood as sufficiently unblemished opinion, honesty and ethical behaviour. Based on the regulations implemented, the General Shareholders' Meeting makes decisions on the selection and suitability assessment of the candidates and members of the Bank's Supervisory Board, the Supervisory Board makes decisions on the selection and suitability assessment of the Management Board members, and the Management Board members make decisions on the selection and suitability assessment of the MRT (Material Risk Takers). The Bank's Supervisory Board monitors the effectiveness of the policy applied and, if appropriate, makes changes taking into account the recommendations of the Nominations and Remuneration Committee.

As a result of the annual review of the Suitability Policy for Candidates for Members and Members of the Supervisory Board, in June 2024 the General Meeting adopted amendments to the provisions of the Diversity Policy regarding:

- specifying the deadline and method of achieving the gender diversity objectives on the Supervisory Board by assuming that the target achievement of at least a minimum level of gender diversity (i.e. 30%) in the composition of each Bank's Supervisory Board should take place starting from the appointment of the Bank's Supervisory Board for a new joint term after 31 December 2025, and that the achievement of this target will be achieved by applying the principle of equal opportunities in the selection of Supervisory Board members and fostering a culture of diversity in the organisation,
- further specifying that the General Meeting, when making changes to the composition of the Bank's Supervisory Board, including the election of members for a new term, considers the possibility of incorporating diversity objectives in terms of gender.

Following the annual review of the Management Board Suitability Policy, in December 2024 the Bank's Supervisory Board adopted amendments to the provisions of the Diversity Policy regarding:

clarification of its provisions with regard to the selection of Management Board members, i.e. the application of objective selection criteria and the need to ensure gender diversity in the composition of the body in order to underline their consistency with the general principles contained in Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures, with regard to achieving gender diversity in the Management Board of the Bank.

Equivalent changes to the diversity policy for members of the Bank's Supervisory Board are planned for 2025.

DIVERSITY POLICY ASSUMPTIONS

- The policies for assessing the suitability of candidates and members of the Bank's Management Board and candidates and members of the Bank's Supervisory Board include the Supervisory Board's/General Shareholders' Meeting's commitment to take into account the principles of diversity in selecting candidates for members of the aforementioned bodies.
- The principle of diversity in selecting the Bank's Supervisory Board and Management Board members is based on objective substantive criteria in terms of education, skills and professional experience. The additional criteria which support diversity in the composition of these bodies are age and gender.

- When making changes to the composition of the Bank's Management Board/Supervisory Board, including the election of members of the bodies for a new term of office, the Bank's Supervisory Board/General Meeting shall each time analyse the possibility of taking gender diversity objectives into account.
- The policies contain the commitment to monitor the effectiveness of their application, including in terms of diversity objectives.
- The suitability assessment policy contains an obligation for the Bank's subsidiaries to introduce regulations regarding the principles of suitability – respective regulations are in place in the Group entities.

STRUCTURE OF THE MANAGEMENT AND SUPERVISORY BODIES AND MRT (MATERIAL RISK TAKERS)

Table. Diversity by gender, age and experience – statistics as at 31 December 2024

Gender	Women	Men
Supervisory Board	2	6
Management Board	1	6
MRT (Material Risk Takers)	18	66

Age	Up to 30 years	30-50 years	above 50 years
Supervisory Board	-	1	7
Management Board	-	4	3
MRT (Material Risk Takers)	-	52	32

Years of service at the Bank	up to 1 year	2-5 years	6-10 years	11-20 years	above 20 years
Supervisory Board	8	-	-	-	-
Management Board	4	1	1	1	-
MRT (Material Risk Takers)	14	10	20	24	16

Years of service at the Bank: for members of the Management Board and Supervisory Board there are years at the position in the Management Board and Supervisory Board.

Total length of service	up to 1 year	2-5 years	6-10 years	11-20 years	above 20 years
Supervisory Board	-	-	-	-	8
Management Board	-	-	-	-	7
MRT (Material Risk Takers)	-	-	3	14	67

OBJECTIVES OF DIVERSITY OF THE COMPOSITION OF THE MANAGEMENT BOARD AND SUPERVISORY BOARD

- The application of the diversity policy is aimed at ensuring appropriate selection of the Management Board and Supervisory Board members in order to obtain a wide range of competences, knowledge and skills adequate to a particular position and ensure that the Management Board and Supervisory Board members (both individually and collectively) issue top quality, independent opinions and decisions in all areas of the Bank's operations.
- In their selection of members of the Bank's bodies, the General Shareholders' Meeting and the Supervisory Board of the Bank try to achieve gender balance in the composition of the Bank's Supervisory Board and Management Board, respectively, or at least to achieve a minimum representation of the less numerous gender at 30%, taking into account the results of the suitability assessments.
- The target achievement of at least a minimum level of gender diversity in the composition of each Management Board of the Bank and the Supervisory Board of the Bank should take place (at the latest) starting from the appointment of the Bank's Management Board for a new joint term after 31 December 2025.

- The diversity targets relating to the composition of the Supervisory Board and the Management Board of the Bank are considered in the selection of members of these bodies only to the extent that it does not have an adverse effect on their functioning and suitability.