

**INFORMATION POLICY
OF BNP PARIBAS BANK POLSKA S.A.
REGARDING CAPITAL ADEQUACY**



BNP PARIBAS



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1. INTRODUCTION

- 1.1. This policy, hereinafter referred to as "Policy", constitutes the fulfillment of the disclosure obligations set out in Regulation of the European Parliament and of the Council (EU) No 575/2013 as of 26 June 2013 on prudential requirements for credit institutions and investment firms, amending Regulation (EU) No 648/2012 (Official Journal EU L. 176, p. 1 as amended), hereinafter referred to as "Regulation (EU) No 575/2013".
- 1.2. In accordance with the Regulation (EU) No 575/2013 BNP Paribas Bank Polska S.A. is obliged to disclose to the public the information referred to in item 3 of Policy, with the exception of irrelevant information, proprietary or confidential information.
- 1.3. The published scope of information is intended to provide market participants with a comprehensive picture of the risk profile of BNP Paribas Bank Polska S.A..
- 1.4. The Policy specifies the scope, frequency, timeline, place and form of disclosure, the rules for verification and approval of disclosed information, as well as the rules for reviewing and approving this Policy.

2. DEFINITIONS

The terms used in the Policy shall have the following meaning:

- 1) **Bank** – BNP Paribas Bank Polska S.A. with its registered office in Warsaw
- 2) **Information** – qualitative and quantitative information on capital adequacy described in point 3 of the Policy
- 3) **Recommendation M** - recommendation of Polish Financial Supervisory Authority, concerning operational risk management within the banks.
- 4) **Regulation (EU) No 2021/637** - Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council and repealing Commission Implementing Regulation (EU) No 1423/2013, Commission Delegated Regulation (EU) 2015/1555, Commission Implementing Regulation (EU) 2016/200 and Commission Delegated Regulation (EU) 2017/2295
- 5) **EBA/GL/2014/14** - Guidelines of the European Banking Authority on materiality, proprietary and confidentiality and disclosure frequency under Articles 432(1), 432(2) and 433 of Regulation (EU) No 575/2013
- 6) **EBA/GL/2020/07** - Guidelines of the European Banking Authority on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis
- 7) **Principles** - the Bank's internal regulation "Principles of preparing data for the purposes of disclosing information on capital adequacy"

3. SCOPE OF INFORMATION DISCLOSED

- 3.1. Pursuant to the provisions of Regulation (EU) No 575/2013, the Bank publishes the quantitative and qualitative information referred to in Part Eight of Regulation (EU) No 575/2013 based on the data available at the highest national level of consolidation for the purposes of prudential consolidation, in accordance with requirements specified in Article 13 of Regulation (EU) No 575/2013.
- 3.2. In order to meet the disclosure requirements provided for in Regulation (EU) No 575/2013, the following scope of information is published:
 - 1) risk management objectives and policies based on Article 435;
 - 2) scope of application based on Article 436;
 - 3) own funds based on Article 437 and information on transitional provisions based on Article 473a;
 - 4) own funds requirements and risk-weighted exposure amounts based on Article 438;



- 5) exposure to counterparty credit risk pursuant to Article 439;
 - 6) capital buffers based on Article 440;
 - 7) exposure to credit risk and dilution risk based on Article 442;
 - 8) encumbered and unencumbered assets pursuant to Article 443;
 - 9) use of the Standardised Approach based on Article 444;
 - 10) exposure to market risk based on Article 445;
 - 11) key metrics based on Article 447;
 - 12) exposures to interest rate risk on positions not held in the trading book based on Article 448;
 - 13) remuneration policy based on Article 450;
 - 14) leverage ratio pursuant to Article 451;
 - 15) liquidity requirements pursuant to Article 451a;
 - 16) use of credit risk mitigation techniques pursuant to Article 453.
- 3.3. The Bank discloses information on the exposures subject to measures applied in response to the COVID-19 crisis according to the of the EBA/GL/2020/07.
- 3.4. According to the Recommendation M, the Bank discloses additional information on operational risk.

4. INFORMATION DISCLOSURE FREQUENCY AND DEADLINE

- 4.1. Information published pursuant to the Regulation (EU) No 575/2013 is published with the frequency specified in Article 433a of the Regulation (EU) No 575/2013, i.e.:
- 1) once a year, the Bank publishes the full scope of the Information, specified in point 3 of the Policy;
 - 2) once every six months, the Bank publishes summary Information on:
 - own funds
 - own funds requirements and risk-weighted exposure amounts
 - exposure to counterparty credit risk
 - capital buffers
 - exposure to credit risk
 - use of the standardized approach
 - exposure to market risk
 - key metrics
 - exposure to interest rate risk for positions not included in the trading book
 - financial leverage
 - liquidity requirements
 - use of credit risk mitigation techniques;
 - 3) once a quarter, the Bank publishes condensed Information on:
 - own funds and risk-weighted exposure amounts
 - key metrics
 - liquidity requirements.
- 4.2. Exposures subject to measures applied in response to the COVID-19 crisis are disclosed semi-annually according to the EBA/GL/2020/07.
- 4.3. Information based on the requirements of Recommendation M is made public once a year.
- 4.4. Information is disclosed as at the end of the accounting period.
- 4.5. Pursuant to Article 433 of the Regulation (EU) No 575/2013 annual disclosures shall be published on the same date as the date on which the Bank publishes its financial statements or as soon as possible thereafter. Semi-annual and quarterly disclosures shall be published on the same date as the date on which the Bank publishes its financial reports for the corresponding period where applicable or as soon as possible thereafter.



5. INFORMATION DISCLOSURE MEANS AND FORM

- 5.1. The Bank publishes Information using the templates specified in Regulation (EU) No 2021/637 and in the guidelines of the European Banking Authority in the remaining scope.
- 5.2. Information is published in electronic format at the Bank's website (www.bnpparibas.pl/) in the section "Investor Relations" in Polish and English.

6. VERIFICATION AND APPROVAL OF DISCLOSED INFORMATION

- 6.1. The relevant substantive divisions / organizational units of the Bank are responsible for the preparation of data and their verification in terms of correctness and completeness, as well as for assessing the adequacy of disclosed information in terms of providing market participants with a comprehensive picture of the Bank's risk profile. The control mechanisms and the responsibilities for control are set out in the Principles.
- 6.2. The Information is not subject to the comprehensive verification by an auditor hired to examine Bank financial statements. The Management Board of the Bank may decide to ask for the verification of any independent entity other than the auditor and to relevant internal organizational units / divisions of the Bank.
- 6.3. Auditor's verification relates to selected elements of information, which overlap with information contained in the Annual Consolidated Financial Statements of the Bank.
- 6.4. The Information, before its disclosure is subject to the approval of the Bank's Management Board and the Bank's Supervisory Board.

7. POLICY UPDATE

- 7.1. The provisions of the Policy are subject to review at least once a year.
- 7.2. The review of the Policy covers the following scope:
 - 1) verification of the required scope of disclosures
 - 2) assessment of the significance of the disclosed information
 - 3) frequency and dates of publishing Information
 - 4) use of reporting templates
 - 5) assigning responsibility for quantitative and qualitative information
 - 6) organization of the internal control process.
- 7.3. The Policy is introduced by a resolution of the Bank's Management Board and is approved by the Bank's Supervisory Board.