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



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1. INTRODUCTION

- 1.1. Preparation and announcement of the said "Principles of Information Policy of BNP Paribas Bank Polska S.A. regarding Capital Adequacy" equal the fulfillment of the obligation 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 (Acts. Office. EU. L. 176, p. 1 with later. D.) ("Regulation (EU) No 575/2013").
- 1.2. In accordance with the 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 (Acts. Office. EU. L. 176, p. 1 with later. D.), BNP Paribas Bank Polska S.A. with its registered office in Warsaw ("Bank"), is obliged to make public information referred to in item 3 excluding irrelevant information, proprietary or confidential.
- 1.3. This "Principles of information policy of BNP Paribas Bank Polska S.A. regarding capital adequacy" sets out the scope, frequency, deadline, place and the form of disclosure and approval and verification of information disclosed regarding capital adequacy information of the Bank.

2. DEFINITIONS

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

Bank - BNP Paribas Bank Polska S.A.;

Regulation (EU) No 575/2013 – 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 (Acts. Office. EU. L. 176, p. 1 with later. D.);

Information – qualitative and quantitative information on capital adequacy described in item 3 of the said document, which is publicly disclosed by the Bank pursuant to the Part 8 of Regulation (EU) No 575/2013;

EBA/GL/2016/11 Guidelines – European Banking Authority Guidelines on disclosure requirements under Part Eight of Regulation (EU) No 575/2013;

EBA/GL/2018/01 Guidelines – European Banking Authority Guidelines on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 as regards transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds;

Recommendation – Recommendation M of Polish Financial Supervisory Authority, concerning operational risk management within the banks;

RTS – Supplementing Regulations of the European Parliament and of the Council with regard to regulatory technical standards for the disclosure of information in relation to Part 8 of Regulation (EU) No 575/2013;

Principles – the said document "Principles of information policy of BNP Paribas Bank Polska S.A. regarding capital adequacy".

3. SCOPE OF INFORMATION DISCLOSED

- 3.1. In accordance with the requirements of Regulation (EU) No 575/2013, the Bank publishes Information referred in Part 8 of Regulation (EU) No 575/2013.
- 3.2. Information takes into account EBA/GL/2016/11, EBA/GL/2018/01 Guidelines and reflects the rules of presentation provided in RTS.
- 3.3. Pursuant to article 13 of the Regulation (EU) No 575/2013, Bank publicly discloses the Information as defined in art. 437, 438, 440, 442, 450, 451, 453 and additionally information as defined in 443 based on data available at the highest, national level of consolidation for prudential purposes.
- 3.4. Information encompasses the qualitative and quantitative disclosures and concerns in particular:
 - 3.4.1. Own funds based on the art. 437 of the Regulation (EU) No 575/2013.
 - 3.4.2. Capital requirements based on the art. 438 of the Regulation (EU) No 575/2013.



- 3.4.3. Capital buffers based on the art. 440 of the Regulation (EU) No 575/2013.
- 3.4.4. Credit risk adjustments based on the art. 442 of the Regulation (EU) No 575/2013.
- 3.4.5. Unencumbered assets based on the art. 443 of the Regulation (EU) No 575/2013.
- 3.4.6. Remuneration policy based on the art. 450 of the Regulation (EU) No 575/2013.
- 3.4.7. Leverage based on the art. 451 of the Regulation (EU) No 575/2013.
- 3.4.8. Use of credit risk mitigation techniques based on the art. 453 of the Regulation (EU) No 575/2013.
- 3.5. The obligations arising from art. 450 of the Regulation (EU) No 575/2013 are fulfilled through the publishing on the Bank's website of the "Information on Remuneration Policy for persons having material impact on the risk profile of BNP Paribas Bank Polska S.A.".
- 3.6. Based on Recommendation M, Bank discloses additional information regarding operational risk.

4. INFORMATION DISCLOSURE FREQUENCY AND DEADLINE

4.1. In the light of the scale and relevant characteristics of Bank's business, such as scale of operations, range of activities, presence in different countries, involvement in different financial sectors, and participation in international financial markets and payment systems, Bank annually discloses the Information, as well as additional information required on the basis of Recommendation M as at the end of the last fiscal year. Additionally, taking into account EBA/GL/2016/11 Guidelines in the part regarding the need to assess the disclosure of information more frequently than annually, the Bank discloses quarterly information on own funds, capital requirements, financial leverage as at the end of the quarter and other information specified in the indications included in the EBA/GL/2016/11 Guidelines with the appropriate frequency. The date of disclosure of information is combined with publication of Consolidated Financial Statements.

5. INFORMATION DISCLOSURE PLACE AND FORM

5.1. Information, together with additional information required on the basis of Recommendation M is published in electronic format at the Bank's website (www.bnpparibas.pl/) in the section "Investor Relations" in Polish and English.

6. APPROVAL AND VERIFICATION OF DISCLOSED INFORMATION

- 6.1. The Information is not subject to comprehensive verification by an auditor hired to examine Bank financial statements. The Board of Executives may decide to assign the verification to any independent entity other than the auditor and to the Bank's internal units.
- 6.2. Auditor's verification relates to selected elements of information, which overlap with information contained in the Annual Consolidated Financial Statements of the Bank.
- 6.3. The Information, before disclosure is subject to the approval of the Bank's Board of Executives.

7. VERYFICATION OF INFORMATION POLICY PRINCIPLES

- 7.1. The Principles are established by the Bank's Board of Executives.
- 7.2. The Principles are annually verified by the Bank's Board of Executives.

