

mBank Declaration on Human Rights



April 2026

Our approach

Human rights are one of the fundamental pillars across all areas of our operations and in the value chain. We are committed to respecting human rights as an employer, a provider of financial products and services, and in our cooperation with suppliers and business partners. We conduct our business in a fair and transparent manner, and open dialogue, both internally and externally, is a guiding principle for building a responsible organisation. We are guided by values that shape the direction of our business and decision-making. We oppose all forms of violations, including mobbing and discrimination. As a listed financial institution, we ensure high standards of protection of banking secrecy, business secrecy, personal data and confidential information.

Our approach is based on applicable law and international standards, including the International Bill of Human Rights, comprising:

- the Universal Declaration of Human Rights,
- the International Covenant on Civil and Political Rights,
- the International Covenant on Economic, Social and Cultural Rights,

as well as the fundamental conventions of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023 edition).

We are also a signatory to the Ten Principles of the UN Global Compact and the Code of Banking Ethics.

Human Rights Due Diligence Process

We implement a human rights due diligence process (HRDD) in line with international standards of responsible business conduct. We regularly assess human rights impacts. The last analysis carried out with an external partner, took place in 2024, and the implementation of its recommendations was completed in 2025. One of the outcomes was the further development of the due diligence process, which supports us in identifying and assessing risks as well as actual and potential adverse impacts on human rights, taking appropriate actions, and monitoring their effectiveness. We pay particular attention to activities that may be associated with severe human rights violations, including forced labour or child labour.

The implementation of these commitments is supported by policies, procedures, and processes that are continuously developed and rolled out across the organisation. Their purpose is to ensure a consistent approach to human rights, including the definition of standards applicable to all stakeholders with whom we cooperate.

Employees

In our relations with employees, we respect human dignity, mutual respect, equal treatment and safe working conditions. We do not accept forced labour or child labour.

Our standards are set out in internal regulations, including the [Code of Ethics](#), documents addressing the prevention of mobbing and discrimination, harassment, and other unacceptable behaviours, as well as the Policy on a diverse, inclusive, and non-discriminatory work environment. We place a strong emphasis on equal pay, occupational health and safety.



Customers

In our relationships with customers, we act in accordance with ethical principles and ensure that our products and services are not associated with human rights violations. We expect the same standards from our business partners. If such risks are identified, we conduct an assessment and take appropriate actions, up to and including the limitation or termination of cooperation.

We do not provide services to entities that violate the Ten Principles of the UN Global Compact or the OECD Guidelines.

Our standards are set out, among others, in the Code of Ethics and the Policy on providing services to reputation-sensitive industries at mBank. We protect customers' right to privacy in accordance with applicable laws and internal regulations.

We ensure equal and non-discriminatory treatment for all customers and strive to make our products and services widely accessible, taking into account diverse customer needs, including those related to health status, age, life circumstances or communication barriers.

Suppliers and Business Partners

We expect our suppliers and business partners to adhere to principles of ethics, environmental protection, and respect for human rights, including labour rights, as defined in our [Code of Conduct for Suppliers and Business Partners](#).

Education

We ensure that our employees understand the concept of human rights and are sensitive to potential violations. Therefore, all mBank employees regularly participate in mandatory training on: ethics, sustainability, diversity and inclusion, information protection. In addition, relevant elements are included in other training programmes, for example ethics as part of AI-related training.

Reporting Violations

mBank provides a publicly available channel for reporting violations through the mSygnał application. Reports may be submitted either on a named or anonymous basis within defined categories, including "Violation of ethical rules, including human rights". Each report is registered and thoroughly analysed, and the information provided is treated as confidential. We ensure protection for reporting persons against any retaliatory actions. Violations may also be reported in writing by correspondence to the following address: mBank S.A., ul. Prosta 18, 00-850 Warsaw, Compliance Department WZN, with the note "mBank violation report – confidential".

Oversight and Responsibilities

Responsibility for human rights lies with the Chief Sustainability Officer appointed by the Management Board of mBank.

If you have any questions regarding this declaration, please contact us at: esg@mbank.pl



This declaration is available to employees on the intranet and is published on the mBank website. We also communicate our approach to human rights in our sustainability-related disclosures.

Date of last update of the declaration: 29 April 2026