

Commercialisation of Products and Services Policy

Document purpose and scope

The Commercialisation of Products and Services Policy sets out the rules and process that the Group applies to launch new products into the market or modify the existing ones. The document sets out the following standards:

- designing product and service features to ensure that usage rules are simple and easy for customers to understand,
- practicing responsible sales by offering products and services that are tailored to customers' needs,
- providing customers with information about products and services in a clear and transparent manner, including information about the risks associated with their use.

Which ESG-related issues does the Policy address?

According to the Policy, the Group conducts customer relations with honesty, impartiality, and professionalism – placing the needs and interests of clients first. It does not commercialize products or services where the identified risk exceeds acceptable levels or cannot be effectively managed.

The Group develops products and services that are simple and easy to understand, making it possible to clearly explain how they work. Communication about products and services is clear and transparent. All related documents and information must be reliable, impartial, and not misleading. Product and service messaging must include:

- information about costs, usage conditions, features and functions, and customers' rights and obligations,
- warnings about risks associated with using the products and services, as well as other key considerations relevant to the customer's decision-making process.

The Group sells its products and services responsibly. Its employees act in accordance with applicable regulations and best sales practices. To ensure customer protection, employee performance is evaluated in relation to the quality of service and risk management. Sales staff are provided with training to ensure they have the necessary knowledge, skills, and experience. The Policy states that employees are expected to assess whether the products and services purchased by customers are appropriate for their actual needs, taking into account the client's overall level of skills and financial situation.

During customer service interactions, employees should take into account vulnerability criteria and consider special circumstances of financial distress faced by customers which make them more exposed to suffering a damage or loss, financial and/or personal. The Policy also highlights the importance of educating customers to help them make informed decisions about using products and services.

The highest management level responsible for the Policy

The Head of Compliance Department is responsible for developing and updating the Policy. The document presents the roles and responsibilities of the Local Marketing & Monitoring

Committee (LMMC) which decides if new or modified products and services can be launched for sales.

[Application across the Bank's subsidiaries](#)

The Policy is applied across the Group.