

## Reputational Risk Management Policy

### Document purpose and scope

The Reputational Risk Management Policy sets out the principles for the prevention, management and control of reputational risk. The reputational risk is the risk of an actual or potential negative impact due to damage to the perception of the Bank and Group among stakeholders. The Policy states that all employees are responsible for reputational risk management, especially senior management.

### Which ESG-related issues does the Policy address?

The Policy defines the preventive and anticipatory approach to reputational risk management and incident management. The key mechanisms in reputational risk management are:

- Monitoring of stakeholder perceptions. These include the Group's employees, customers, suppliers, shareholders, investors, regulatory bodies, media, local communities and wider community.
- Risk identification and assessment. Reputational risk analysis, assessment, management and reporting is performed by the 1st line of defence functions based on the risk management framework.
- Periodic risk assessment. Higher reputational risk transactions and customers & high-impact reputational events are reviewed periodically.
- Testing. Based on a selected sample, the reputational risk unit verifies whether the 1st line of defence functions assess reputational risk in line with the applicable requirements.

The document also addresses preventive management of the reputational impact due to ESG factors. It provides the rules for:

- defining and announcing public sustainability commitments of the Bank and the Group,
- participating in working groups or trade organisations for ESG issues,
- reviewing and challenging operations that may go against the Bank's and the Group's ESG strategy,
- ESG reporting.

One of the aspects addressed by the Policy is greenwashing. The prevention of greenwashing is governed by the Group's separate operating procedures.

### The highest management level responsible for the Policy

The Head of the Compliance Area and the Head of the Communication and Brand Experience Area supervise how this Policy is applied. The compliance unit is responsible for the escalation of high-impact reputational events. The Chief Compliance Officer, who reports directly to the MB member in charge of the Legal and Compliance Division, is engaged in the decision-making and control activities.

### Application across the Bank's subsidiaries

The Policy applies across the Group.