



Sustainability standards

# Responsible investment services

November 2022



## Our approach

We offer the following services to individual clients:

- services enabling them to independently conclude transactions in financial instruments (both instruments listed on stock exchanges and those traded over-the-counter),
- services thanks to which clients can use off-the-shelf investment products (such as investment funds and deposits),
- management of financial instrument portfolios and investment advisory.

Our investment clients are served by competent employees. We apply procedures which help us prevent the risk of a conflict between the interests of a client and of our employee or ourselves. We provide investment advisory only as part of dedicated services.

In order to ensure that our services meet legal requirements, we observe the following rules:

- we determine the clients' investment profile based on information obtained from them,
- we offer clients services, investment products and financial instruments that suit their individual characteristics, objectives and needs, including those pertaining to sustainable development,
- we warn clients who intend to buy an investment product or a financial instrument that does not correspond to their investment profile,
- based on information from independent sources, such as reliable ESG ratings, we check if the investment products offered by external providers and the financial instruments we make available to our clients support the ESG goals,
- we successively introduce investment services and solutions that support sustainable development.

## Our policies and procedures

### **Policy on competences of employees who serve investment clients**

We follow the Policy on Meeting the Requirements to Possess Adequate Knowledge and Competence by Employees Serving Investment Clients. It is designed to ensure that the investment services we offer are tailored to the individual client profile. This way, we comply with the requirements of MiFID II. All mBank employees serving investment clients are subject to knowledge and competence verification. The policy stipulates:

- the job positions which are subject to the said verification,
- the scope of knowledge and professional experience required of staff,
- the way of verifying and improving staff competence.



This enables our staff to understand both the characteristics of the investment products offered and the needs of our clients.

### **Strategy on ESG risks in investment services**

In 2021, we implemented the [Strategy Concerning Sustainability Risks Related to the Investment Advisory and Financial Instrument Portfolio Management Services Offered by the Brokerage Bureau of mBank](#), as well as a [document containing the information required by SFDR regulation](#), which accompanies the strategy. These documents describe how, in providing portfolio management and investment advisory services, we take into account the impact of investment decisions on sustainable development. Evaluating investments from this perspective is intended to help us meet these objectives and achieve the best possible investment outcomes for our clients.

At the Brokerage Bureau of mBank, we have established committees which select financial instruments for investment portfolios. They take into account the impact of investments on sustainable development goals, which allows us to:

- exclude the assets which are the most harmful from the ESG perspective,
- apply positive asset selection (“best-in-class” approach).

We believe that ESG factors significantly influence our clients’ investment performance. To the greatest extent possible, we aim to incorporate them into the financial analysis and asset allocation of our investment decisions and recommendations.