

ОЩАДБАНК

МІЙ БАНК. МОЯ КРАЇНА

Approved by decision of the Supervisory Board  
Nomination and Remuneration Committee  
Minutes No 19 of 22 August 2022

Approved by the Supervisory Board  
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**REPORT ON REMUNERATION**  
**for Members of the Management Board of JSC "OSCHADBANK" for 2021**

Kyiv, 2022

# FOREWORD

This report on remuneration for Members of the Management Board JSC "OSCHADBANK" for 2021 (the "Report") was prepared in accordance with the Law of Ukraine *On Banks and Banking*, the Regulation on Remuneration Policy in Banks, Methodological Recommendations on Organisation of Corporate Governance in Ukrainian Banks, based on the Bank's Charter and the Remuneration Policy for the CEO, Deputies CEO and Management Board Members of the Bank.

Thus, in accordance with Article 52 of the Law of Ukraine *On Joint Stock Companies*: *"The exclusive competence of the Supervisory Board includes: 1<sup>2</sup>) approval of the report on remuneration for members of a joint stock company's executive body, the requirements to which are established by the National Securities and Stock Market Commission, except requirements to the report on remuneration for members of a joint stock company's executive body established by the National Bank of Ukraine"*.

In accordance with item 77 of the Methodological Recommendations on Organisation of Corporate Governance in Ukrainian Banks: *"The Bank Supervisory Board approves the regulation on remuneration of the Members of the Bank Management Board, influential persons and the report on remuneration of the Members of the Bank Management Board, influential persons"*.

Pursuant to item 78 of the Methodological Recommendations on Organisation of Corporate Governance in Ukrainian Banks, items 6, 8 of the Regulation on Remuneration Policy in Banks and item 5.1. of the Remuneration Policy for the CEO, Deputies CEO and Management Board Members of the Bank, the report on remuneration of Management Board Members shall contain information stipulated by the current Ukrainian legislation, in particular:

- 1) amount of remuneration that was and/or will be paid to Management Board Members for the reporting financial year (fixed and variable remuneration parts);
- 2) dates of actual payment of remuneration, their compliance with the Regulation on Remuneration of the Management Board Members;
- 3) a full description of the structure of all remuneration components to be paid to the Management Board Members;
- 4) performance evaluation criteria (indicating how this performance has been achieved), based on which variable remuneration was awarded (if variable remuneration was awarded);
- 5) facts of the bank's exercising the right to reverse the payment of the variable remuneration earlier paid to the Management Board Members;
- 6) participants in the remuneration system implementation (authority and composition of the Supervisory Board Nomination and Remuneration Committee, role of the Highest Governing Body in the remuneration system implementation process);
- 7) incentive programmes. This information includes details of pension schemes (if any) if applied during the reporting year;
- 8) deviations of the actually paid amounts from the amounts payable under the Regulation on Remuneration of the Management Board Members, as well as an explanation of the reasons for such a deviation and the specific elements of the regulation in respect of which the deviation occurred, if such deviations occurred during the reporting year;
- 9) violations of the regulation revealed by the Bank (if any) and measures or decisions taken due to such violations;
- 10) information on actual participation of the Management Board Member in meetings of the Management Board and its committees, where he/she is a member of, or reasons for non-participation;
- 11) confirmed facts of unacceptable behaviour of a Member of the Management Board (including confidentially communicated ones) and measures taken as a result of investigation if such facts / measures have an impact on remuneration of the Bank Management Board Member;

12) presence/absence of reasonable grounds for the payment/deferral/reduction/refund of a Management Board Member's variable remuneration.

13) information on monetary and/or non-monetary (if any) payments made to Management Board Members during the reporting financial year:

- ❖ total amount of funds paid by the bank during the reporting financial year. Such information shall include data on the amount paid as remuneration for the previous financial year and data on the amounts of unpaid deferred remuneration (if any).

If the Bank has made non-monetary payments to Management Board Members, the remuneration report must include information on the estimated value of the remuneration provided in non-monetary form.

The total amount of funds paid out by the bank in the reporting financial year includes information on the remuneration accrued for the previous financial year and paid out in the reporting financial year.

- ❖ amounts paid out by the bank as variable remuneration (broken down by each type of variable remuneration) and the grounds for their payment;

- ❖ amounts paid out by the bank as additional remuneration for performing other functions in addition to the regular ones;

- ❖ termination payments;

14) information on remuneration in the form of participation in a pension scheme (if any) by Management Board Members;

15) the remuneration report shall also contain information on loans, credits or guarantees granted by the bank to Management Board Members during the reporting financial year (specifying the amounts and interest rates);

16) decision-taking refused by a Bank Management Board Member, since a conflict of interests did not allow to perform in full own duties without prejudice to interests of the Bank, its depositors and the shareholder;

17) information on decisions on transactions with parties related to the Bank supported by a Bank Management Board Member;

18) information on untimely or improper performance of obligations to the Bank by parties related to the Bank, the decisions on transactions with which were supported by a Bank Management Board Member;

19) information on cases of a real or potential conflict of interest notified by a Management Board Member;

It should be noted that the Bank additionally took into account explanation of the National Bank of Ukraine No 22-0006/386 of 04.01.2021 regarding reflection of information in reports on remuneration.

Thus, the current legislation provides for a number of requirements for the content of the Report, which were taken into account by the Management Board and duly reflected in the Report.

## 1. Composition of the Management Board in 2021

| Full name                   | Job title   | Period of office during 2021 |
|-----------------------------|---|------------------------------|
| Sergii Naumov               | CEO   | 01.01.2021 – 31.12.2021      |
| Yevhenii Drachko-Yermolenko | Deputy CEO  | 01.01.2021 – 31.12.2021      |
| Volodymyr Lytvyn            | Deputy CEO  | 01.01.2021 – 31.12.2021      |
| Arsen Miliutin              | Management Board Member in charge of NPL management                                 | 01.11.2021 – 31.12.2021      |
| Olexiy Volchkov             | Management Board Member in charge of Corporate Business                             | 15.03.2021 – 19.11.2021      |
| Anton Tyutyun               | Management Board Member in charge of Retail Business<br>(by 15.03.2021, Deputy CEO) | 01.01.2021 – 31.12.2021      |
| Olha Baitsar                | Management Board Member in charge of Micro, Small and Medium Business               | 23.03.2021 – 03.06.2021      |
| Oleh Strynzha               | Management Board Member, CFO  | 01.09.2021 – 31.12.2021      |
| Olena Malynska              | Management Board Member, Chief Transformation Officer                               | 05.04.2021 – 16.06.2021      |
| Iryna Zemtsova              | Deputy CEO  | 01.01.2021 – 12.03.2021      |
| Andriy Stetsevyh            | Deputy CEO  | 01.01.2021 – 05.04.2021      |
| Dmytro Buts                 | Management Board Member – Director of General Risk Management Department            | 01.01.2021 - 19.03.2021      |
| Anatolii Barsukov           | Deputy CEO  | 01.01.2021 - 30.04.2021      |

## 2. Structure of remuneration components to be paid to the Management Board Members

The structure of remuneration for Members of the Bank Management Board is determined by the current legislation of Ukraine, the Bank's Charter, and the employment contract concluded by the Bank with Bank Management Board Members.

The remuneration structure for Bank Management Board Members includes:

(1) Fixed remuneration is a component of remuneration of a Member of the Management Board, which:

- ✓ has a predetermined amount in accordance with the terms and conditions of the contract concluded between the Bank and Management Board Members;
- ✓ corresponds to the level of professional experience, position of a Member of the Management Board in the organisational structure of the Bank and the level of his/her responsibility;
- ✓ does not depend on the Bank's performance;
- ✓ is guaranteed and cannot be changed, withdrawn, withheld, or claimed back by the Bank, except for the cases provided for by the legislation of Ukraine;
- ✓ has transparent and clear conditions for determination, accrual and payment;
- ✓ has a permanent nature of payment during the entire period of performance of functions in the bank by a Member of the Management Board;
- ✓ not encourage accepting risks that are not acceptable under normal circumstances.

Thus, the fixed remuneration for Management Board Members includes a salary in the amount set out in the contract concluded between the Bank and Management Board Members.

(2) Variable remuneration is a component of remuneration of a Member of the Management Board, which is not fixed remuneration according to its signs.

The variable remuneration of Management Board Members includes incentive and compensation payments and bonuses, which may be paid based on a resolution by the Bank Supervisory Board in connection with the achievement of the objectives set for the respective Member of the Management Board and depends on the assessment of performance of such Management Board Member.

The Bank Supervisory Board may decide to pay the variable part of the remuneration partially, postpone its payment, reduce/cancel its payment taking into account performance and the financial position of the Bank. The decision to pay a variable part of the remuneration is made by the Bank Supervisory

Board in a reasonable and well-considered manner taking into account the risks accepted by the Bank and results of such acceptance, the financial performance of the Bank, as well as compliance with the terms and conditions of contracts with Bank Management Board Members.

The bank may provide the following compensation to Management Board Members:

The costs to protect the Bank Management Board Member's interests related to the performance of his/her powers and in connection with the submission of any claims, lawsuits, administrative proceedings or criminal proceedings initiated, or other cases, their scope, and procedure for compensation shall be determined in the employment contract concluded by the Bank with a Member of the Bank Management Board.

Members of the Bank Management Board shall be reimbursed for expenses related to business trips (type of transport, category and cost of tickets to and from the place of destination, hotel accommodation, daily subsistence allowance etc.) during their official duties performance.

Temporary disability leave shall be paid to Members of the Bank Management Board in accordance with the current legislation of Ukraine and shall be included in the accrued salary.

**(3)** Members of the Bank Management Board shall be provided with dismissal payment in accordance with the contract concluded with them and the current legislation of Ukraine.

### **3. Information on participants in the remuneration system implementation (authority and composition of the Supervisory Board Nomination and Remuneration Committee, role of the Highest Governing Body in the remuneration system implementation process)**

As of 31.12.2021, the Bank Supervisory Board Nomination and Remuneration Committee included:

- ✓ Michael Weinstein – Chairman of the Committee, independent Supervisory Board Member;
- ✓ Baiba Apine – Member of the Committee, Chairwoman of the Supervisory Board, independent Supervisory Board Member;
- ✓ Anton Piatygin – Member of the Committee, independent Supervisory Board Member;
- ✓ Roza Tapanova – Member of the Committee, Member of the Supervisory Board, state representative from the Cabinet Ministers of Ukraine;
- ✓ Oleksandr Rodnianskyi – Member of the Committee, Member of the Supervisory Board, state representative from the President of Ukraine.

Juan Pérez Calot was also a Member of the Committee in 2021. During the reporting year 2021, Juan Pérez Calot acted as a Member of the Committee from 01.01.2021 to 29.11.2021.

The competence of the Bank Supervisory Board Nomination and Remuneration Committee in terms of implementation of the remuneration system in the Bank includes:

- 1) submitting proposals to the Supervisory Board concerning forms and terms and conditions of contracts to be concluded with the CEO, his/her deputies and Management Board Members, heads of control unit, AML Officer and other staff whose appointment is decided by the Supervisory Board, as well as determining their remuneration;
- 2) providing general recommendations to the Management Board on the level and structure of remuneration for persons performing management functions;
- 3) supervision of the level and structure of remuneration for persons performing management functions based on reliable information provided by the Management Board;
- 4) giving recommendations to the Supervisory Board on the remuneration system formation and ensuring compliance of remuneration with the risk management culture, the Bank development strategy, approved risk appetite of the Bank, financial results and internal control system, as well as requirements of the legislation of Ukraine for the Supervisory Board, taking into account both the interests of remuneration recipients and long-term interests of the Bank's shareholder, investors and other stakeholders when forming the remuneration system;

5) assessing, at least once a year, the remuneration policy in the Bank, including issues of risk accounting, amount of capital and liquidity when determining the amount of variable part of remuneration for persons whose professional activities have a significant impact on the overall risk profile of the Bank, and ensuring reporting on the results of assessment to the National Bank of Ukraine;

6) communication and coordination with Risk Committee and Audit Committee of the Supervisory Board (in terms of determining the remuneration provided for by the remuneration system, issuing recommendations re the appointment and dismissal of heads of control units, AML Officer, monitoring their compliance with requirements established by law);

7) development and periodic review (at least once a year) of the Bank's remuneration policies (internal regulations);

8) assessment of the practice of paying remuneration for potential receipts (income), terms and probability of receipt of which are uncertain, and coordination of these payments with the financial condition of the Bank and its outlook;

9) making proposals to the Supervisory Board on individual remuneration for Chairperson of the Management Board, his/her Deputies and Management Board Members, as well as heads of control unit, AML Officer to ensure their compliance with the current remuneration policy and their compliance with these persons' performance assessment;

The exclusive competence of the Highest Governing Body of the Bank in terms of implementation of the remuneration system in the Bank includes:

1) approval of terms and conditions of civil contracts concluded with Members of the Bank Supervisory Board, election of a person authorised to sign civil contracts with Members of the Bank Supervisory Board;

2) setting the amount of remuneration for Members of the Bank Supervisory Board, including incentive and compensation payments;

3) approval of the regulation on remuneration for Members of the Bank Supervisory Board, the requirements to which are established by the National Bank of Ukraine;

4) approval of the report on remuneration for Members of the Bank Supervisory Board, the requirements to which are established by the National Bank of Ukraine;

The exclusive competence of the Bank Supervisory Board in terms of implementation of the remuneration system in the Bank includes:

1) approval and control over the implementation of the Bank budget, including financing the risk management unit, compliance unit and internal audit unit;

2) approval of the terms and conditions of employment agreements (contracts) concluded with Bank Management Board Members, head and employees of Internal Audit Department, Chief Risk Officer, Chief Compliance Officer, setting the amount of their remuneration;

3) elaboration of the Bank remuneration policy in accordance with NBU requirements and control over its implementation;

4) approval of the regulation and report on remuneration for Management Board Members, influential persons, and submission of the regulation and report on remuneration for Bank Supervisory Board Members for approval by the Highest Governing Body of the Bank.



## **4. Information on payment of remuneration to the Management Board Members**

### **4.1. Information on the total remuneration to the Management Board Members in 2021**

The total amount of funds paid by the bank during the reporting financial year is UAH 69,291,864.35. There are no payments as remuneration for the previous financial year 2020.

In 2021, the amount of reimbursed expenses related to the performance of duties as Management Board Members was UAH 11,211.49. This amount is included in the total remuneration of Management Board Members for 2021.

In 2021, remuneration (insurance premium) was provided in non-monetary form in the amount of UAH 1,649,635.30 under the Voluntary Liability Insurance Contract for Directors and Top Executives. This amount is included in the total remuneration of Management Board Members for 2021.

### **4.2. Information on deviations of the actually paid amounts from the amounts payable under the Regulation on Remuneration of the Management Board Members, as well as an explanation of the reasons for such a deviation and the specific elements of the regulation in respect of which the deviation occurred, if such deviations occurred during the reporting year**

No information available as the Regulation on Remuneration of the Bank Management Board Members is still being drafted

### **4.3. Information on dates of actual payment of remuneration that were and/or should be paid to the Management Board Members for 2021**

In accordance with the terms and conditions of the collective contract of the Bank, the salary shall be paid to Bank employees on working days at least twice a month, not less frequently than every sixteen calendar days, and no later than seven days after the end of the period for which the payment is made. The salary shall be paid from the 16th to the 21st of the current month inclusive (salary for the first half of the month) and from the 1st to the 6th of each month following the reporting month (final payment for the reporting month).

### **4.4. Data on the amounts of unpaid deferred remuneration (if any) (fixed and variable remuneration parts)**

Remuneration to the Management Board Members for 2021 was paid in full.

#### **4.5. Amounts paid out by the Bank as variable remuneration (broken down by each type of variable remuneration) and the grounds for their payment**

The amount of variable remuneration paid in monetary form as compensation for expenses related to the performance of duties of the Management Board Members is UAH 11,211.49;

No bonuses were accrued or paid to Members of the Management Board in 2021.

#### **4.6. Information on performance evaluation criteria (indicating how this performance has been achieved), based on which variable remuneration was awarded (if variable remuneration was awarded)**

The criteria for performance evaluation of Management Board Members are in the process of being developed.

#### **4.7. Information on facts of the bank's exercising the right to reverse the payment of the variable remuneration earlier paid to the Management Board Members**

In 2021, there were no facts of the Bank's exercising the right to reverse the payment of the variable remuneration earlier paid to the Management Board Members.

#### **4.8. Information on presence/absence of reasonable grounds for the payment/deferral/reduction/refund of Management Board Members' variable remuneration**

In accordance with contracts concluded between the Bank and Management Board Members, bonuses may be paid to Management Board Members by a decision of the Bank Supervisory Board (no bonuses are provided for in the contracts concluded with V. Lytvyn, I. Zemtsova, A. Stetsevykh, A. Barsukov). No decision has been made on accrual and payment of a bonus to Management Board Members based on performance for 2021.

#### **4.9. Amounts paid out by the bank as additional remuneration for performing other functions in addition to the regular ones**

In accordance with the contracts concluded with the Management Board Members, no additional remuneration shall be paid by the Bank for performing other functions in addition to the regular ones.

#### **4.10. Termination payments**

Termination payments were paid to three Management Board Members in 2021 and made UAH 16,140,000.00.

#### **4.11. Information on non-monetary remuneration paid to the Bank Management Board Members**

Pursuant to the decision of the Bank Supervisory Board (Minutes No 42 of 23.12.2020) on liability insurance of directors and top executives, the Bank entered into an agreement of voluntary insurance of liability of Members of the Supervisory Board and Chairperson of the Management Board of the Bank.

The amount of remuneration provided in non-monetary form is UAH 1,649,635.30.

### **5. Information on incentive programmes (including details of pension schemes (if any) if applied during the reporting year and information on remuneration in the form of participation in a pension scheme (if any) by Management Board Members**

Incentive programmes, including pension schemes for the Management Board Members are not provided for in their contracts.

### **6. Information on violations of the Regulation on Remuneration for Members of the Management Board revealed by the Bank (if any) and measures or decisions taken due to such violations**

No information available as the Regulation on Remuneration of the Bank Management Board Members is still being drafted.

## 7. Information on actual participation of the Management Board Member in meetings of the Management Board and its committees, where he/she is a member of, or reasons for non-participation

| Full name of the MB Member | Information on participation of the Management Board Members in meetings of the Management Board and its committees |  |                                |                                  |                               |                                  |                                     |                        |   |  |                  |   |                       |                   |                   |                            |                   |
|----------------------------|---|--|--------------------------------|----------------------------------|-------------------------------|----------------------------------|-------------------------------------|------------------------|---|--|------------------|---|-----------------------|-------------------|-------------------|----------------------------|-------------------|
|                            | Management Board  | Information Security Management System Committee | Financial Monitoring Committee | Project and Technology Committee | Competitive Bidding Committee | Retail Business Credit Committee | Tariff and Product Policy Committee | Main Product Committee | Product Committee Retail Business Sub-Committee | Operational Risks Management Committee | Credit Committee | Assets and Liabilities Management Committee | MSME Credit Committee | Finance Committee | Workout Committee | Regional Network Committee | Technical Council |
| S. Naumov                  | 62 out of 62  | -  | -                              | 20 out of 20                     | -                             | -                                | -                                   | -                      | -   | -                                      | -                | 55 out of 55                                | -                     | -                 | -                 | -                          | -                 |
| Y. Drachko-Yermolenko      | 58 out of 62  | 7 out of 7                                       | -                              | 16 out of 20                     | -                             | -                                | -                                   | -                      | -   | 15 out of 16                           | -                | -   | -                     | -                 | -                 | -                          | 24 out of 24      |
| V. Lytvyn                  | 60 out of 62  | -  | 9 out of 9                     | -                                | 87 out of 87                  | -                                | -                                   | -                      | -   | -                                      | -                | -   | -                     | 12 out of 12      | 48 out of 65      | -                          | -                 |
| A. Miliutin                | 10 out of 11  | -  | -                              | -                                | -                             | -                                | -                                   | -                      | -   | -                                      | -                | -   | -                     | -                 | 13 out of 13      | -                          | -                 |
| O. Volchkov                | 41 out of 43  | -  | 2 out of 2                     | -                                | -                             | -                                | -                                   | -                      | -   | -                                      | 77 out of 79     | 22 out of 23                                | -                     | -                 | 41 out of 46      | -                          | -                 |
| A. Tyutyun                 | 58 out of 62  | -  | -                              | 19 out of 20                     | -                             | 109 out of 117                   | 15 out of 15                        | 30 out of 30           | 9 out of 9                                      | 14 out of 16                           | -                | 51 out of 55                                | -                     | -                 | -                 | 8 out of 8                 | 20 out of 24      |
| O. Baitsar                 | 15 out of 15  | -  | -                              | 3 out of 3                       | -                             | -                                | 6 out of 6                          | 3 out of 3             | -   | -                                      | -                | 11 out of 11                                | 304 out of 354        | -                 | -                 | -                          | -                 |
| O. Strynzha                | 20 out of 20  | -  | -                              | -                                | 41 out of 41                  | -                                | 9 out of 9                          | -                      | -   | -                                      | -                | 19 out of 19                                | -                     | 4 out of 4        | -                 | -                          | -                 |
| O. Malynska.               | 14 out of 15  | -  | -                              | -                                | -                             | -                                | -                                   | -                      | -   | -                                      | -                | -   | -                     | -                 | -                 | -                          | -                 |
| I. Zemtsova                | 11 out of 11  | -  | -                              | -                                | -                             | -                                | -                                   | -                      | -   | -                                      | -                | -   | -                     | -                 | -                 | -                          | -                 |
| A. Stetsevyeh              | 11 out of 13  | -  | -                              | 3 out of 4                       | -                             | -                                | -                                   | -                      | -   | -                                      | 22 out of 23     | 11 out of 11                                | 250 out of 279        | -                 | 11 out of 13      | -                          | -                 |
| D. Buts                    | 11 out of 12  | -  | 3 out of 4                     | 3 out of 4                       | -                             | -                                | -                                   | -                      | -   | -                                      | -                | 11 out of 12                                | -                     | -                 | 12 out of 13      | -                          | -                 |

|             |              |   |   |   |   |   |   |   |   |   |   |              |   |            |   |   |            |
|-------------|--------------|---|---|---|---|---|---|---|---|---|---|--------------|---|------------|---|---|------------|
| A. Barsukov | 18 out of 20 | - | - | - | - | - | - | - | - | - | - | 16 out of 18 | - | 4 out of 4 | - | - | 8 out of 8 |
|-------------|--------------|---|---|---|---|---|---|---|---|---|---|--------------|---|------------|---|---|------------|

\* Tariff and Product Policy Committee was in force until 26.04.21. After 26.04.21, there was the Product Committee.

\*\*Reasons for Management Board Members' absence in meetings of the Management Board or its committees were illness and/or leave and/or other valid reasons when the respective meetings of the Management Board or its committees were held.

## 8. Information on decision-taking refused by a Bank Management Board Member, since a conflict of interests did not allow to perform in full own duties without prejudice to interests of the Bank, its depositors and the shareholder

On 27.09.2021, V. Lytvyn, Deputy CEO, and A. Tyutyun, Management Board Member in charge of Retail Business, refused to take part in voting on the issue "On ensuring legal protection and representation of the Bank's interests in court case No 757/36687/21-ц under the claim of A. Stetsevykh against the Bank for recovery of arrears in salaries and moral damage" in accordance with the Policy of Identification, Prevention and Management of Conflicts of Interest in the Bank.

On 26.10.2021, CEO S. Naumov abstained from voting on the issue "On entering into a loan agreement with the European Bank for Reconstruction and Development (EBRD) on the Bank's participation in the EBRD financing programme "SME Competitiveness Programme in Eastern Partnership" due to the existence of circumstances that may cause a conflict of interest or harm the objectivity or proper performance of obligations towards the Bank, as well as considering the opinion from Compliance Control and Regulatory Compliance Department on interests dd. 24.09.2021.

On 29.12.2021, A. Tyutyun, Management Board Member in charge of Retail Business, refused to take part in voting on opening of non-revolving credit line to Ukrenenergo in the amount of USD 40 m to repay debt to SOE Guaranteed Buyer for 5 years under the state guarantee in accordance with the Policy of Identification, Prevention and Management of Conflicts of Interest in the Bank.

During 2021, there were no decisions of (1) Information Security Management System Committee, (2) Financial Monitoring Committee, (3) Project and Technology Committee, (4) Tender Committee, (5) Retail Business Credit Committee, (6) Main Product Committee, (7) Product Committee Retail Business Sub-Committee, (8) Tariff and Product Policy Committee, (9) Operational Risk Management Committee, (10) Credit Committee, (11) Assets and Liabilities Committee, (12) MSME Credit Committee, (13) Workout Committee, (14) Finance Committee, (15) Regional Network Committee, (16) Technical Council, which Bank Management Board Members refused to take, since a conflict of interests did not allow to perform in full own duties without prejudice to interests of the Bank, its depositors and the shareholder.

## **9. Information on decisions on transactions with parties related to the Bank supported by Bank Management Board Members**

During 2021, there were no decisions on transactions with parties related to the Bank supported by Members of the Bank Management Board.

## **10. Information on untimely or improper performance of obligations to the Bank by parties related to the Bank, the decisions on transactions with which were supported by Bank Management Board Members**

During 2021, there was no untimely or improper performance of obligations to the Bank by parties related to the Bank, the decisions on transactions with which were supported by Bank Management Board Members.

## **11. Information on confirmed facts of unacceptable behaviour of Members of the Bank Management Board (including confidentially communicated ones) and measures taken as a result of investigation if such facts / measures have an impact on remuneration of the Bank Management Board Members**

During 2021, there were no facts of unacceptable behaviour of Members of the Bank Management Board (including confidentially communicated ones) and measures taken as a result of investigation if such facts / measures have an impact on remuneration of the Bank Management Board Members.

## **12. Information on loans, credits or guarantees granted by the Bank to Management Board Members during 2021 (specifying the amounts and interest rates)**

During 2021, the Bank did not grant loans, credits or guarantees to Management Board Members.