

INFORMATION POLICY AT XTB S.A.

General provisions

XTB S.A. (hereinafter "XTB"), pursuant to the Regulation of the Minister of Finance on November 26th, 2009, in the matter of disclosing information concerning capital adequacy, reveals the information concerning capital adequacy in a manner defined in this Information Policy at XTB S.A. (hereinafter the "Policy").

Scope of the revealed Information

The information of qualitative and quantitative nature concerning capital adequacy describes the capital condition of XTB, describes the risk connected with the business activity, manners of managing and minimising it and contains other information having significant impact on assessment of the capital condition and risks connected with the business carried out. For the purpose of assessing capital adequacy XTB provides the information about methods of assessing internal capital and details of capital requirements for each type of risk, approach used to calculation of their value as well as other relevant information.

XTB provides the following financial information: annual financial report; introduction to the financial report, which is a part of the additional information; balance sheet; profit and loss account; statement of changes in equity; cash flow for the financial year; opinion of the chartered auditor. As for the own funds the constituents of these funds and their reductions are shown.

XTB reveals also the information concerning the policy related to variable pay components for employees holding managing positions, established on the basis of decision issued by a minister competent in matters related to financial institutions and in the scope defined in the regulations of the minister of finance competent in matters related to financial institutions.

Frequency, form and place of revealing the information

The complete set of information on capital adequacy will be published by XTB once a year, not later than within 30 days of approval of the annual financial report by the authorised body of XTB. XTB may reveal the information, which are relevant due to the scale and the profile of the business activity carried out by XTB, scope of activity outside of the Republic of Poland, commitment into various financial sectors, commitment into international financial markets and payment, accounting and settlement systems, including in particular the information, which have significant influence on risk profile of XTB, amount and structure of the supervised capitals and compliance with capital requirements related to each type of risk, as well as other information being exposed to frequent changes more often than once a year.

The set of information related to capital adequacy will be provided through publishing it:

- 1. on the XTB's website (www.xtb.com)
- 2. at the registered office of XTB

Terms of approval and verification of the information being revealed

The information published within the financial report is analysed by a chartered auditor. XTB reserves the right to provide the information not verified by a chartered auditor, however each time this fact will be marked out. The published information must be approved by the Management Board of XTB.

Terms of verification of the information policy

Provisions of the information policy at XTB S.A. are set forth by the Management Board and approved by the Supervisory Board. They are periodically verified, in particular in terms of scope and frequency of publishing the information, within the internal control systems operating in XTB. The verification is made once a year and in case of changes having significant impact on the information contained in the document.