

## Information policy on relations with customers and investors

### § 1 DEFINITIONS

For the purposes of this policy, capitalised terms used herein mean:

- 1) **Best Practices** – the document ‘Best Practices for Companies Listed on the Warsaw Stock Exchange 2021’ constituting an appendix to Resolution No. 13/1834/2021 of the Supervisory Board of the Giełda Papierów Wartościowych [Warsaw Stock Exchange] S.A. of 29 March 2021 on the adoption of ‘Best Practices for Companies Listed on the Warsaw Stock Exchange 2021’ and any document that replaces it;
- 2) **Group** – the Company, Caspar Towarzystwo Funduszy Inwestycyjnych S.A. and F-Trust S.A.;
- 3) **Information Policy** – the information policy for the dissemination of information related to capital adequacy;
- 4) **Company** – Caspar Asset Management Spółka Akcyjna with its registered office in Poznań;
- 5) **General Meeting** – the General Meeting of the Company
- 6) **Corporate Governance Principles** – a set of principles defining the internal and external relations of institutions introduced by and subject to the supervision of the Polish Financial Supervision Authority.

### § 2 GENERAL PRINCIPLES

1. This policy sets out the standards for the dissemination of information on the Company's position and the conduct of communications with customers and investors.
2. The purpose of this policy and the activities carried out on the basis thereof is to guarantee efficient, reliable communication with customers and investors as an expression of the Company's respect for the principle of universal and equal access to information.

### § 3 COMMUNICATION WITH INVESTORS

1. The Company's information activities with regard to current and potential investors constitute an important element of the Company's communication with its external environment, which supports the achievement of business objectives as part of the strategy adopted by the Company, the shaping of the Company's desired relations with its investors and the positive image of the Company as a public company listed on the Main Market of the Warsaw Stock Exchange.
2. The main objective of the Company's information activities is to guarantee high standards of communication with capital market participants as an expression of the Company's respect for the principle of universal and equal access to information. As part of its information activities, the Company takes into account the interests of all investors.
3. The purpose of the information policy is also to identify mechanisms for communication with capital market participants that guarantee proper, reliable and complete access to information about the Company for all investors without giving preference to any of them. The purpose of communication with investors is also to build the Company's goodwill and positive image as well as to fulfil the information obligations imposed on the Company as an entity whose shares are listed on the regulated market operated by the Warsaw Stock Exchange in a transparent and reliable manner and to ensure that investors receive reliable and up-to-date information about the Company's position in the manner and with due regard to the applicable laws and regulations of the market on which the Company's shares are listed.

4. The Company's information activities with respect to investors are carried out on the basis of the applicable legal regulations taking into account, to the extent adopted by the Company for application, the Good Practices and the Principles of Corporate Governance.

#### § 4

### **METHODS OF COMMUNICATION WITH INVESTORS**

1. The Company's information activities with respect to investors include both obligatory activities, including publication of current and periodic reports, the scope and timing of which are determined by generally applicable laws and regulations of the market on which the Company's shares are listed, and additional activities.
2. Subject to exceptions provided for by generally applicable laws, the Company publishes current reports immediately after the occurrence of an event giving rise to an obligation to provide information, but no later than within 24 hours of the occurrence of the aforementioned event.
3. The Company publishes periodic reports in accordance with applicable laws and market regulations and on the dates specified in the schedule provided in the form of a current report specifying the dates of publication of periodic information in a given calendar year.
4. The Company's information activity with respect to investors is carried out, in particular, through:
  - a) communication of information using the electronic information transmission system (EBI – Electronic Information Base, ESPI – Electronic Information Transmission System);
  - b) communication of information concerning the Company at the shareholder's request during the General Meeting or outside the General Meeting, within the timeframe and in accordance with the rules set out in generally applicable laws,
  - c) a website with a tab dedicated to investors;
  - d) conferences related to the presentation of the Company to investors;
  - e) answers to questions asked in writing, by telephone or by e-mail.
5. The Investor Relations tab is available on the Company's website at <https://www.caspar.com.pl/relacje-inwestorskie>.
6. The Investor Relations tab on the website publishes information about the Company, in particular the Company's corporate documents, current and periodic reports and financial information. The information posted in the Investor Relations tab is updated promptly and systematically in connection with current events and the Company's information obligations.
7. Investors may request information:
  - a. in writing to the Company's correspondence address: ul. Półwiejska 32, 61-888 Poznań;
  - b. in electronic form:
    - by sending an e-mail to: [am@caspar.com.pl](mailto:am@caspar.com.pl);
    - via the contact form available at: <https://www.caspar.com.pl/relacje-inwestorskie/kontakt-dla-inwestora>.
8. The Company provides answers to questions raised by investors within the scope of its obligations and within the framework of the applicable legal regulations. Subject to the deadlines provided for by generally applicable laws, questions are answered as soon as they are received, but no later than within two weeks.
9. The Company ensures that investors are able to obtain full and reliable information provided in response to questions addressed to the Company, taking into account the limitations imposed by mandatory provisions of law.

## § 5

**COMMUNICATION WITH CUSTOMERS**

1. The information activities carried out with regard to current and potential customers constitute an important element of the Company's communication with its external environment, which supports the achievement of the business objectives set out as part of the strategy adopted by the Company, the shaping of the Company's desired relations with its customers and the Company's image as an honest and reliable financial institution offering products and services adapted to the needs and situations of its customers.
2. The Company's communication with customers is also aimed at ensuring that customers have access to information on the protections to which they are entitled in their dealings with the Company and at minimising the occurrence of conflict situations.
3. The main objective of the Company's information policy towards customers is to enable customers to gain access to full information on the Company's product offering in order to select products and services tailored to their individual needs and to fully comply with information obligations under the law.
4. The Company makes the necessary efforts to ensure that the information provided to customers is transparent, reliable and complete and that it is provided to customers in a timely manner.
5. The Company records telephone conversations held with customers and takes minutes, notes or recordings of conversations held in the direct presence of the customer or potential customer in connection with the provided services.
6. The Company informs customers or potential customers of the recording of telephone conversations or the recording of ongoing e-mail correspondence which would or could result in the provision of a service, prior to the commencement of such a recording.
7. The Company registers, stores and archives documents, recordings of telephone conversations, e-mail correspondence and other information made, transmitted or received in connection with the provision of brokerage services for the period provided for by generally applicable law.
8. In the event that, due to legal restrictions, it is not possible to provide the customer with the information they are interested in, the communication should indicate the reasons why it is not possible to provide such information, unless providing such an explanation is prohibited by law.
9. The purpose of the Company's communication with customers is, in particular, to build the Company's goodwill and positive image, to fulfil the information obligations imposed on the Company by generally applicable laws and arising from the agreements concluded with customers in a reliable manner, to inform customers about the current product offering and to increase customer satisfaction with the services provided by the Company.
10. Communication with customers, carried out as part of the information policy, should:
  - 1) contain reliable, complete and not misleading information,
  - 2) be comprehensible to the average recipient.
11. The Company's information policy with regard to customer complaints is implemented by providing customers with information on the procedure for lodging and considering complaints, in particular on how to lodge a complaint, as well as on the deadline for responding to a complaint lodged by a customer and informing them of the possibility of applying to a common court and indicating the institution supervising the Company's operations.

## § 6

**METHODS OF COMMUNICATION WITH CUSTOMERS**

1. Communication with customers concerns:
  - 1) informing customers of changes to the contractual templates and functionality of the offered products within regulatory deadlines,
  - 2) informing customers about the Company's product offering,
  - 3) providing customers with information on the conditions for safe use of electronic services,
  - 4) providing information on available products and services, as well as implemented instructions,
  - 5) providing answers, explanations and comments to customer enquiries submitted in the form of questions, requests and complaints.
  
2. Communication with the customer takes place using:
  - 1) telephone service,
  - 2) e-mail,
  - 3) postal correspondence,
  - 4) conversations with employees – supervisors of individual customers.
3. Communication with the customer takes place through the channel preferred by the customer, unless applicable laws, provisions of contracts concluded with customers or adopted rules and regulations stipulate the obligation to communicate in a specific form.
4. The Company makes due efforts to ensure that:
  - a) complaints are dealt with due diligence, reliability and thoroughness,
  - b) with objectivity and with respect for generally applicable laws,
  - c) complaints are dealt with promptly, but no later than 30 days from the date of receipt of the complaint by the Company,
  - d) the response to the complaint is formulated in an understandable way and contains a justification.
5. A Customer who has objections to the Company's handling of a complaint, as well as after exhausting the Company's complaint procedure, may bring an action against the Company to the competent material and local court of law, and a Customer who is a consumer within the meaning of the relevant legislation may also turn to the locally competent County (Municipal) Consumer Ombudsman. A Customer who is a natural person may also apply to the Financial Ombudsman for a review of the case.
6. Detailed provisions on the procedure for filing complaints are contained in the regulations for the provision of individual brokerage services.

## § 7

### **FINAL PROVISIONS**

1. This Policy is approved by the Company's Management Board.
2. The Policy is reviewed at least once a year, in particular with regard to its compliance with the Company's current business profile and applicable laws.
3. Information provided in the course of fulfilling the obligations arising from this policy is provided in the Polish language.
4. The scope, place, form, and manner of approval and verification of the information disseminated with respect to capital adequacy are specified in the Information Policy published on the Company's website.