



KBC GROUP: Corporate Public Affairs Policy

27 June 2023

Purpose

KBC actively contributes to debates in society, public decision-making, and regulations, as part of a constructive dialogue with public authorities on issues that are relevant for KBC and its stakeholders. KBC uses all contacts with stakeholders on public policy issues as opportunities to seek relevant feedback on our activities and operations, with the aim to better serve and support our customers and communities.

This policy is written in support of our code of conduct that reflects KBC's fundamental values and expectations regarding the manner in which we, as professionals, should conduct ourselves. This code can be found on www.kbc.com.

KBC is a corporate member of Bepact¹, which stands for the 'Belgian Public Affairs Community' and groups Public Affairs professionals in Belgium. The association has drawn up a Charter of Ethical Conduct. KBC commits groupwide to the principles of Bepact.

Scope

The KBC policy is applicable to all staff of the KBC Group, including all companies, associations and entities that are members of our group in the broadest sense. Employees whom advocate on behalf of KBC have to be aware of all applicable regulations and should be guided by the principles of responsible lobbying as laid out in this policy.

All employees whom advocate on behalf of KBC work with our Senior General Managers and Executive Committee members to periodically review and evaluate KBC's key public policy issues in order to assess if the public policy issues advocated by KBC employees or professional associations in which KBC participates are in line with KBC policy. KBC representatives defend these positions in the professional associations in which it is represented, where they are held by the internal governance applicable to the organization concerned. The KBC Group Executive Committee (GEXCO) has the highest level of direct responsibility for key public policy issues. The ultimate decision-making power to assess potential compliance with KBC's key public policy issues lies therefore with KBC's GEXCO.

Integrity

In their relations with public authorities, in addition to the values and expectations that are reflected in the KBC Code of Conduct, KBC Group employees shall:

- always comply with all applicable laws, regulations, charters or code of conducts with respect to lobbying activities (e.g. Code of conduct of Transparency Register, Bepact's Charter of Ethical Conduct);
- ensure that information provided is up-to-date, complete and not misleading
- not obtain or try to obtain information or decisions dishonestly or by use of undue pressure or inappropriate behaviour;

¹ **Bepact's Charter of Ethical Conduct** provides Public Affairs professionals with a clear ethical framework within which they must operate. **Bepact members sign the Bepact Charter of Ethical conduct** and commit to observe it. The Charter can be found here: <http://www.bepact.be/en/charter-of-ethical-conduct>

- not induce officials or other staff from public authorities to contravene the rules and standards of behaviour applicable to them;
- not sell to third parties copies of documents obtained from public authorities;

Transparency

In their relations with public authorities:

- employees shall always identify themselves and make clear whom they are representing
- KBC will always be transparent about the cost of lobbying activities (EU Transparency register, Register of Lobbying Ireland, Sustainability report, ...)
- KBC exerts its influence by joining professional associations that help it develop its positions by talking with its peers. KBC adheres to the following main associations at global level and in its six core markets:
 - o At Global and EU level: European Banking Federation, Insurance Europe, ISDA, ICMA, IFF, ...
 - o At Belgian level: Febelfin, Assuralia, BEAMA, VBO, Voka,
 - o At Czech level: Česká bankovní asociace, Česká asociace pojišťoven, Asociaci stavební spořitelén,
 - o At Slovakian level: Slovak Insurance Association, Slovak Banking Association, ...
 - o At Irish level: Banking & Payments Federation Ireland, Irish Funds, Irish Business and Employers Confederation, ...
 - o At Hungarian level: Hungarian Banking Association (Bank), Association of Hungarian Insurances (MABISZ), ...
 - o At Bulgarian level: The association of the banks in Bulgaria, Association of Bulgarian Insurers, NBBAZ (National Bureau of Bulgarian Motor Insurers), UAB (Union of the Bulgarian Automobilists), ...

Training

KBC undertakes to set up regular trainings for employees active in lobby activities and/or participates in training activities organised by Bepact, the Belgian Public Affairs Community.

Donations to political parties/organisations

KBC Group Anti-corruption and Bribery Policy states that *“KBC does not condone nor tolerate any form of donations whatsoever to persons or parties in a political or public capacity that is in contravention of the applicable law and regulations. The Executive Committee has decided on a policy concerning the acceptance of presents, gifts and commissions by KBC Group Employees.”*

The KBC Policy on Gifts, Entertainment, Donations & Sponsoring specifies the KBC Group Anti-corruption and Bribery Policy. One of the principles mentioned is that *“KBC Group does not make any contributions to political parties, organizations or events, nor governmental organizations. No exceptions are allowed.”* All policies have been approved by Decision of the KBC Group Executive Committee.