# me direct

ESG Strategy 2022-2024/25

On the path to sustainability

May 2024



### MeDirect ESG approach



MeDirect ESG strategy is based on four strategic pillars with sustainability objectives translated into commitments that support our business goals



MeDirect will continue building a responsible and sustainable organisation based on sound values and ESG principles



MeDirect's ambition is to create an attractive and inclusive organisation promoting diversity and equality that support professional development



MeDirect will endeavour to build a low-carbon business supporting own and clients' green transition and climate resilience to reach climate commitments



MeDirect will further engage in social community initiatives that promote inclusion and development and support future prosperity

On the path to sustainability

## MeDirect ESG strategy pillars



#### Governance

- Sound corporate values
- Responsible and sustainable business
- Institutional approach to ESG

#### Employees

- Attractive workplace
- Diversity, equality and inclusion
- Professional development

#### Four strategy pillars







- Green products
- Climate risk resilience





#### Society

- Community engagement
- Social inclusion
- Society development and support

We will continue to integrate ESG principles into our daily business while increasing ESG awareness across the Group

















## ESG strategy implementation and monitoring



ESG Committee and the Board responsibility

#### Governance

Qualitative/quantitative targets and commitments to be measured and disclosed in the annual non-financial report

#### Implementation

Ownership assigned

#### ESG strategy setting

Clear strategic direction and priorities defined with a specific time horizon

Regular ESG strategy review and update

MeDirect defined the main steps to implement the strategy





Governance
Strategic pillar #1

- Solid values will shape our corporate culture and inspire our employees thus shaping the Group's approach to business
- MeDirect will continue to develop a responsible and sustainable business to build a trusted and distinctive brand
- MeDirect will continue integrating ESG in the corporate governance framework striving to further enhance its position in the sustainability ratings

# MeDirect core values underpin our corporate principles and business philosophy



#### Our core values

#### Autonomy

We encourage our employees to **take ownership** of their work and grow their skills.

We **empower** our customers to navigate the financial world and give them the choice to manage their money.

#### Innovation

We do not rest on our laurels. We are results driven and constantly review how we go about delivering on our vision and improve our value proposition.

#### Transparency

The financial world isn't simple, but the MeDirect app is. We get straight to the point when we communicate with our clients and among us.

#### Responsibility

We advocate for equality, diversity and inclusion and we care for our environment in all that we do.

#### Mission

"Be a one-stop shop for people's investments and savings: a place where they can manage their money, their way. This means providing our customers with an app they can understand, navigate and trust. This also means making our customers feel included. Listening to them, speaking their language and guiding them forward — so they can make the choices that suit their values and needs."

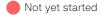
MeDirect core values as a foundation of the Group mission

# MeDirect focus is on creating a responsible organisation with a sustainable business



Achieved/Ongoing





# Responsible business approach

- Clients' onboarding duediligence (CDD/KYC)
- Anti-fraud and scams prevention procedures
- Human rights clauses/statements in the new contracts (if applicable)<sup>2</sup>

# Professional customer service

- High service standards
- Transparent & responsible sales
- Client-oriented and trained employees

## High customer satisfaction

- Best in class user experience
- User friendly communication
- High NPS and customer retention

Comply with laws, regulations and codes of conduct while maintaining high corporate governance standards



#### 2024/25 Commitments

- Maintain the policy of not onboarding clients from controversial industries and geographical locations (in line with customer acceptance policy)
- Incorporate human rights clauses screening during new contracts signing with the institutional partners and corporate lending clients<sup>2</sup>



#### 2024/25 Priorities

 Maintain high NPS (customer recommenddation factor)



min. 30

(vs. 37; YE 2023)<sup>1</sup>

Responsible business approach and professional customer service should reinforce customer satisfaction and create long term business opportunities

## ESG embedded in the corporate structure









Not yet started

#### Organisational approach



#### 3 lines of defence (3LoD)

- Identifying, assessing and managing CER/ESG risks
- Planning, reviewing, controlling & monitoring activities and audits
- Front-line business
- Risk & Compliance
- Internal Audit



#### 2024/25 Commitments



- Embedded ESG/CER considerations in internal audit reviews Consideration of sustainability regulations by Compliance in the Compliance Monitoring Plan
- Min. 3 independent members in the Board



#### 2024/25 Priorities

Increased ESG awareness inside the organisation & ESG agenda implementation



- To Board
- 2. To all employees

Governance

Employees

Environment

Society

Appendix

# MeDirect will accelerate incorporation of ESG in the main business processes



Achieved/Ongoing





# Credit process

- Clients onboarding & due diligence including ESG/CER (e.g. questionnaires, heatmaps, EPC)
- Portfolio screening
- CER/ESG in the credit policies and procedures

## Wealth process

- ESG filters in Wealth platform
- Sustainability
  preferences in the
  advisory & portfolio
  management (suitability
  test)
- ESG criteria in funds selection

#### **Procurement**

- Key suppliers' due diligence including ESG/CER (questionnaires)
- e ESG/CER clauses in the new contracts (if applicable)



#### 2024/25 Commitments

- Min. 50% of key suppliers¹
  with ESG verification by
  2024/25 (e.g. questionnaire,
  vendors' statements)
- Ca. 100% corporate lending clients with ESG/CER verification by 2024/25 (e.g. questionnaire distribution, review of annual reports, corporate websites, media news flow where available)<sup>2</sup>



#### 2024/25 Priorities

Reinforcing ESG/CER awareness among the clients/partners & closing data gaps



ESG/CER in the product/service launch process (PNU)

#### Responsible bank incorporating sustainability into its daily business

NOTE: Climate and environmental-related risks (CER); Energy Performance Certificate (EPC), Third Party (TP) funds; Priori notice unit (PNU) responsible for assessing new products and services, as part of the new product and services approval process

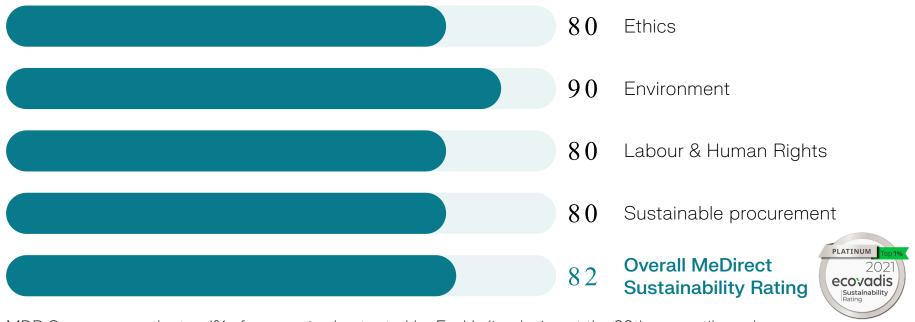
<sup>1.</sup> Suppliers that exceeds certain pre-defined threshold

# MeDirect will continue to implement its ESG agenda to further strengthen its sustainability positioning



Achieved/Ongoing In progress Not yet started

Solid starting position with potential to develop into one of the top rated companies in sustainability





#### 2024/25 Priorities

 Enhancement of MeDirect sustainability rating and non-financial disclosure



MDB Group among the top 1% of companies best-rated by EcoVadis, placing at the 99th percentile and awarded a Platinum Medal

ESG external rating confirms our sustainability efforts and market recognition

## New commitments by MeDirect to continue developing a responsible and sustainable business





**Audit** 

#### New 2024/25 Commitments

#### NED - ESG skillset

At least one member of NED responsible for ESG with appropriate skillset

Consideration of an audit

review on sustainability

practices

#### **GHG** emissions

IT Tool to collect GHG emissions data

#### **Supply Chains**

IT portal to automate data collection from vendors

#### Sustainability rating

Consider other accredited sustainability rating providers, such as CDP's Climate Change questionnaire

#### Involvement of Sustainability in appropriate Committees

#### Risk assessment

Sustainability/ESG risks to be incorporated in wider risk assessments carried out for all new products, services, and outsourcing arrangements





Employees
Strategic pillar #2

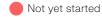
- MeDirect ambition is to create a unique corporate culture and an attractive workplace with high employee satisfaction
- MeDirect's multi-cultural organisation will continue to promote diversity, equality and inclusion as core principles
- Professional development of our employees will closely follow the changing business environment and remain an important element of our Group success story

# MeDirect's priority is to be an attractive employer with supportive working conditions and dialogue-oriented culture



Achieved/Ongoing







### Maintain ESG/CER objectives in remuneration scheme

- Included in the remuneration policy (variable component)
- Individual objectives established pursuant to the ESG initiatives

- Multi-cultural and collaborative environment
- Attractive remuneration
- Performance-linked variable remuneration
- Employee benefits (e.g. staff home loans scheme)
- Medical care
- Flexible forms of employment
- Remote / hybrid working
- Promotion of well-being (External Foundation)
- Dialogue (Townhall meetings)



#### 2024/25 Commitments

 Top management with specific and relevant ESG/CER objectives



#### 2024/25 Priorities

Further improvement in employee job satisfaction

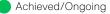


min. 80%

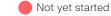
(vs. 77% in 2023)1

## MeDirect nurtures an international team with respect for human diversity, equality and inclusivity









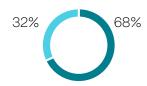


#### Diversity



#### Equality

#### Women/Men in leadership



#### Women/Men in succession<sup>1</sup>





#### 2024/25 Commitments

- Maintain Board gender diversity at 20% min. representation
- Ensure Leadership gender diversity at 40% min. representation (vs. 32% in 2023)
- Maintain gender neutral recruitment process
- Ensure gender diversity in the succession programme for managerial positions at min. 40% representation (vs. 64% in 2023)



#### 2024/25 Priorities

Maintain a balanced gender representation in leadership & succession



Policies on diversity, discrimination and harassment are rooted in Group's principles

Governance

Employees

Environment

Society

Appendix

# MeDirect will facilitate career opportunities and professional growth to remain an attractive employer



Achieved/Ongoing





#### Attract talent

- Interns, graduate programmes
- Participating in career events at universities
- Promoting MDB as an attractive employer

#### **Develop employees**

- Trainings and professional development<sup>2</sup>
- Mentoring and coaching
- Code of conduct and ethics policy

#### Retain employees

- Inspire loyalty and satisfaction
- Engage people (e.g. Townhalls, volunteering, conferences)
- Succession scheme



#### 2024/25 Priorities

 Increase number of training/development hours per employee



+55%

(14 hours in 2023 vs. 9 hours in 2022)<sup>1</sup>

Employees are the most important assets at MeDirect. We will continue building an empowered team

# New commitments by MeDirect to continue creating a unique corporate culture and an attractive workplace





#### New 2024/25 Commitments

#### **ESG Champions**

- ESG hackathon with selected interested employees
- Selection of ESG champions (min. 1 employee)

#### Employee engagement

 Two-way communication system to facilitate employee voice regarding working conditions

#### Employee representative

 Selection/nomination of one employee as representative

#### Career plan

 Career management / plan for all employees across all organisation / personal development plans

#### Diversity, equality and inclusion

- Employment of min. 1 disabled person
- Consider collaboration with local foundations
- Implement gender neutral policies / facilities

#### Wage equality in the workplace

Promote wage equality in the workplace





## Environment

Strategic pillar #3

- MeDirect defined the roadmap to reach climate neutrality and outlined main targets and milestones leading to development of a low carbon business
- MeDirect will continue offering green products supporting its own and its clients' green transition in alignment with the business profile
- MeDirect will further integrate climate risks into the risk management framework and business processes developing a more resilient business model

# MeDirect will transition its low carbon business model towards climate neutrality



Achieved/Ongoing





#### Commitments

1-3 Years

3-5 Years

5-10 Years

#### • Short term

- Primarily digital business model
- Decarbonisation & green transformation targets
- Measure own emissions (Scope 1 and 2)
- Measure financed portfolio emissions (Scope 3)
- Waste segregation, reuse well-functioning equipment

#### Medium term

- Reduce own carbon emissions by 5%
- Certified offices in main locations
- Gradual replacement towards low-carbon vehicles
- Eco-improvements (e.g., offices/client communication)
- Monitoring of materials consumption

#### Long term

- Become carbon neutral operation (Scope 1 and 2)
- Reduce own carbon footprint and introduce offsetting initiatives
- Reduce chain emissions¹

#### 2050 Priorities

Climate neutral Group in line with the Paris Agreement goal<sup>1</sup>

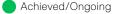


The Group defined its milestones to reach climate neutrality

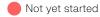
1. Including own and financed corporate portfolio emissions

# MeDirect's prudent approach towards environmentally sensitive sectors will support transition to low carbon











#### 2024/25 Commitments

- MeDirect will continue not finance corporate clients directly involved in the following sectors (exclusion list)1:
  - Thermal coal power generation (excluding equipment and services)
  - Arctic offshore oil and gas exploration and production (excluding equipment and services)
  - Construction and management of new nuclear power plants
  - High-level nuclear power plants waste processing, transportation or storage activities
  - Mining, exploration, upgrading or trading of oil tar sands

- Mining, trading or processing of asbestos, uranium or thermal coal
- Directly and knowingly contributing to non-sustainable deforestation
- Operations that knowingly generate a negative impact on areas such as the UNESCO World Heritage Sites and wetlands registered by the Ramsar Convention
- Manufacturing of components specifically for the production of chemical and biological weapons; and
- Beaching of ships



#### 2024/25 Priorities

Contributing to the achievement of regulatory decarbonisation objectives



Exclusion list activities might be associated with the potentially negative impacts on the environment including greenhouse gas emissions, biodiversity loss and water scarcity

# MeDirect will limit its financing to sectors highly contributing to climate change to support decarbonisation





#### 2024/25 Commitments

Exposure to the sectors highly contributing to climate change<sup>1</sup> (% share of Group assets; YE 2023)

Industry	NACE	% of Group assets
Agriculture, forestry, and fishing	A1-A2	0.00%
Mining and Quarrying	B5-B9	0.00%
Manufacturing	C10-C33	2.20%
Electricity, gas, steam, and air conditioning supply	D35	0.00%
Water supply; sewerage, waste management and remediation activities	E36-E39	0.00%
Construction	F40-F43	1.04%
Wholesale and retail trade; repair or motor vehicles and motorcycles	G45-G47	1.02%
Transportation and storage	H49-H53	0.18%
Accommodation and food service activities	155-156	0.70%
Real estate activities	L68	2.77%
		7.9%



#### 2024/25 Priorities

Exposure to the sectors highly contributing to climate change<sup>1</sup>



Max. 12%

of Group assets

Re-aligning our portfolio by limiting exposure to sectors highly contributing to climate change fits into Group business strategy

# MeDirect will participate in green transformation by offering and investing in green products









#### Green home loans

#### Green loans

 Product available for residential real-estates with green EPC certificate (market specific energy requirements) for Maltese and Belgium clients



• Offer includes preferential terms (e.g. lower credit margin)

#### Home loans

# Preferential terms

Borrower can take for instance a higher mortgage amount then standard, provided the additional amount is used to take energy savings measures or high energy labels



## Green

Green funds distributed by MeDirect with sustainability characteristics



## Green bonds



Bonds certified according to the European Green Bond Standard



#### 2024/25 Priorities

 Share of green home loans in sales<sup>1</sup>



Min. 5%

 Share of green mutual fund & ETFs offered by MeDirect



Min. 45%

(vs. 80% in 2023)

 Share of fixed income Treasury book invested in green bonds



**Min. 10%** (vs. 11.8% in 2023)

#### Light green funds (Art. 8 SFDR)

Funds that promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices. These funds may invest in sustainable investments but do not have sustainable investing as a core objective.

#### Dark green funds (Art. 9 SFDR)

Financial products that have sustainable investment as their core objective and an index has been designated as a reference benchmark.

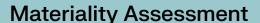
# CER to be an integral element of MeDirect risk framework strengthening the resilience of our business model



Achieved/Ongoing







- Indicate material C&E risks/ opportunities impacting business environment<sup>1</sup>
- Define necessary mitigating actions

#### **Stress Tests & Models**

- Conduct internal climate stress tests
- Financial planning

#### **Lending process**

- Clients onboarding and due diligence including ESG/CER (e.g. questionnaires, heatmaps, EPC)
- Pricing, products
- ESG/CER clauses/statements<sup>2</sup>
- Portfolio screening
- Limits/targets

## Business continuity & reputation

- Monitor/Mitigate impact of CER on Bank's reputation
- Monitor/Mitigate impact of physical CER on Bank's operations (e.g. premises/data centres, liquidity)



#### 2024/25 Commitments

- Maintain monitoring of CER
   KPIs and undertake
   necessary mitigating actions
- Start screening of MeDirect corporate credit portfolios to identify EU taxonomy aligned/eligible assets
- Risk appetite limits related to CER



#### 2024/25 Priorities

Build a climate resilient model



Dedicated policies and procedures to properly manage and oversee climate risks

# New commitments by MeDirect to continue its efforts towards achieving its climate objectives





#### New 2024/25 Commitments

#### Materiality assessment

 To evaluate different elements of environmental risks in materiality assessment

#### Post loan origination conditions

 Implement post loan origination conditions for borrowers

#### ESG criteria in funds selection

• MT Financial Advisory: 50% of funds on the Whitelist with sustainability objectives (SFDR Article 8 and 9)

#### Contaminated sites / indigenous rights

No financing of new credits on contaminated sites / indigenous rights

#### **EPC labels**

- Explore ways of how to improve stock and flow of ECP labels
- Encourage borrowers to provide EPCs to reduce unknown % of EPC labels

#### **CER risk category**

## Promotion of green commuting and green products

- Promotion of green commuting to all employees
- Bike storage facilities and incentives

#### **Treasury Portfolio**

 Continue to invest in Treasury instruments in least susceptible sovereign jurisdictions, with the exception of selective and limited investments in Maltese sovereign instruments, where required for regulatory purposes, due to its home market status





Society
Strategic pillar #4

- MeDirect continues to be actively engaged in the local communities by participating in voluntary and charitable initiatives
- MeDirect will support social inclusion through education, accessible banking and cooperation, raising public awareness and building a sustainable society
- MeDirect wants to play an important role in developing and supporting society by offering innovative financial solutions, safe banking and social support schemes

# MeDirect will promote social inclusion, drive equal opportunities and remove barriers



Achieved/Ongoing





## Social Education

- Free online sessions
   (e.g. wealth talks), online
   market updates and
   speakers at conferences
- Campaigns linked to ESG (e.g. MeGreen BE, Green Home Loans)

# Accessible banking

- Transparent digital solutions and communication (e.g. website, social media)
- Facilities to people with disabilities in MDB locations

# Cooperation with community

- Hackathon Software Development students (e.g. MCAST)
- Cooperation with local universities



#### 2024/25 Commitments

- Min. 5 CSR initiatives conducted each year
- Quarterly events/training on financial literacy provided to the public, including seniors
- Regular training/events to students
- Internship Programme revamp
- Implementation of a Graduate Programme



#### 2024/25 Priorities

Building inclusive and sustainable society



# MeDirect will continue providing solutions that support social and business development



Achieved/Ongoing





## Innovative solutions

- Deliver user-friendly wealth-tech digital solutions to make lives easier
- Cooperation with innovative partners

# Safe banking

- Cybersecurity and data protection
- Promoting best practices in digital banking

## **Support** schemes

Participation in social support schemes with authorities' guarantees (e.g. MDB assistance, Housing Authority, NHG)



#### 2024/25 Commitments

 Maintain high exposure to social support schemes min. 50% of Group lending
 (vs. 67% in 2023)



#### 2024/25 Priorities

Enhance social prosperity



# Contributing to social well-being is part of MeDirect's corporate social responsibility



Achieved/Ongoing





#### Volunteering

 Dedicate to volunteering activities (e.g. financial education, clean-ups)

# Charity & Sponsorship

- Support local talents in sports/culture and charitable institutions
- Funds donations and collections

## **Equipment** Donation

- IT/office equipment
- Donations to NGOs



#### 2024/25 Commitments

- Increase number of volunteering hours to 2 person days (vs. 26 person days in 2023)
- Increase attendance of Group sponsored volunteering events to min. 75 employees (vs. 67 employees in 2023)
- Min. 5 volunteering initiatives per year tackling various pillars such as community, environment etc. (vs. 15 initiatives in 2023)
- Maintain regular participation in charitable donations and sponsorships



#### 2024/25 Priorities

Increase engagement in local community activities & support



## New commitments by MeDirect to continue operating an inclusive and responsible bank









Not vet started



#### New 2024/25 Commitments

#### Inclusive and responsible bank

Incorporation of the European Accessibility Act (EAA) principles from Directive (EU) 2019/882 (Transposition date: 28/06/2022 and Applicability date: 28/06/2025)

1/ Accessibility in Digital Services by ensure all digital platforms (websites, mobile apps) are accessible to persons with disabilities. Tangible actions to consider:

- Implement features like screen reader compatibility, keyboard navigation, and alt text for images
- Train developers on accessible design practices

2/ Inclusive Financial Products by designing financial products that cater to diverse needs, including those of persons with disabilities. Tangible actions to consider:

- Develop accessible credit cards, account services, and investment products.
- Provide easy-to-understand documentation in multiple formats (plain text, large print, braille).
- Offer financial literacy programs

3/ Physical Branch Accessibility. Tangible actions to consider:

- Install ramps, elevators, and wide doorways for wheelchair access
- Train staff to assist customers with disabilities
- Display clear signage and provide accessible seating areas

4/ Employee Training and Awareness to foster a culture of inclusion and awareness among bank employees. Tangible actions to consider:

- Conduct mandatory training on disability awareness, etiquette, and reasonable accommodations
- Promote diversity and inclusion through internal communications
- Celebrate International Day of Persons with Disabilities within the organisation

5/ Reporting and Metrics to ensure transparent reporting on EAA-related efforts. Progress on EAA compliance shall be disclosed in the Non-financial report.

## Strategic pillars are translated into ESG targets



#### Governance Improve MeDirect sustainability rating by 2024/25 >62 pt Maintain high NPS (customer recommendation factor) Min. 30 by 2024/25 Independent members on the Board Min. 3 Min. 1 ESG training per year Ca. 100% Corporate clients with ESG/CER verification by 2024/25 Key suppliers with ESG verification by 2024/25 Min. 50% No onboarding of clients from controversial industries Ongoing and geographical locations Human rights clauses in the new contracts as defined By 2024/25 Embedded ESG/CER considerations in IA reviews By 2024/25 Consideration of sustainability regulations in CMP By 2024/25

#### NED responsible for ESG with appropriate skillset Min. 1 Employees Improvement of employees' satisfaction by 2024/25 Min. 80% Key managers with ESG/CER objectives Ongoing Maintain Board gender diversity Min. 20% Leadership gender diversity by 2024/25 Min. 40% Balanced gender rep. in succession schemes Min. 40% (managerial positions) by 2024/25 Number of training/development hours per employee +25% Selection of ESG champions Min. 1 Selection/nomination of one employee as representative Min. 1 Employment of disabled person Min. 1

Environment	
<ul> <li>Defined exclusion list of environmentally sensitive sectors</li> </ul>	Ongoing Max. 12% of Group assets
<ul> <li>Exposure to the sectors highly contributing to climate change by 2024/25</li> </ul>	Min. 5%
<ul> <li>Share of green home loans in sales by 2024/251</li> </ul>	
<ul> <li>Share of green funds offered by MeDirect by 2024/25</li> </ul>	Min. 45%
<ul> <li>Share of fixed income invested in green bonds in MeDirect Treasury book</li> </ul>	Min. 10%
<ul> <li>Carbon neutral operation (5-10Y)</li> </ul>	By 2032
Climate neutral Group (own & financed emissions)	By 2050
<ul> <li>Reduce own carbon emissions by 2026 (3-5Y)</li> </ul>	-5% vs. 2022
<ul> <li>MT FA Whitelist with sustainability objectives</li> </ul>	50% of funds

**Appendix** 

3	ociety	
•	Increase number of volunteering hours by 2024/25	Min. 2 person days
•	Increase number of volunteers by 2024/25	Min. 75 FTE
•	Volunteering initiatives per year	Min. 5
•	CSR initiatives per year	Min. 5
•	Quarterly training for general public, inc. seniors	Min. 4 per year
•	Students Internships and Graduate Programme	Ongoing
•	Regular training/events to students	Ongoing
•	Maintain regular participation in contributions to charity / sponsorship by 2024/25	vs 60 ths in 2021
•	Maintain high exposure to social support schemes <sup>2</sup>	Min. 50% of Group lending



# Annex



# MeDirect will continue strengthening its green offer in Wealth App



Green mutual funds & ETFs, pcs.	YE 2023
Number of mutual funds offered by the Organisation under art. 8 SFDR (light green funds)	) 1,550
Number of mutual funds offered by the Organisation under art. 9 SFDR (dark green funds)	) 364
Number of ETFs offered by the Organisation under art. 8 SFDR (light green funds)	116
Number of ETFs offered by the Organisation under art. 9 SFDR (dark green funds)	8
Green mutual funds & ETFs, € million	
Market value of mutual funds under custody/management by the Organisation under art. 8 SFDR (light green funds)	578.5
Market value of mutual funds under custody/management by the Organisation under art. 9 SFDR (dark green funds)	42.2
Market value of ETFs under custody/management by the Organisation under art. 8 SFDR (light green funds)	29.5
Market value of ETFs under custody/management by the Organisation under art. 9 SFDR (dark green funds)	0.3



#### 2024/25 Priorities

Share of green mutual fund & ETFs offered by MeDirect



Min. 45%

(vs. 80% in 2023)

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