



Disclosure Policy

November, 2024

1. Scope of Application

- 1.1. This Policy applies to all Directors, officers and team members of ATB Financial and its subsidiary corporations (collectively, **ATB Financial**), or anyone who is authorized to communicate publicly on behalf of the ATB Financial.
- 1.2. This Policy applies only to the public disclosure types listed in Article 2.1 of this Policy.

2. Policy Purpose & Objectives

2.1. Purpose of the Policy

This Policy demonstrates the commitment of ATB Financial to transparency in meeting its reporting obligations and commitments to its stakeholders and outlines ATB Financial's philosophy, policies and practices regarding the public disclosure of information about ATB Financial that is intended to maintain and enhance the trust of ATB's stakeholders.

This Policy applies only to the following public disclosures by ATB:

- ATB's Annual Report which highlights its financial results, performance against targets, management disclosure and analysis and compensation disclosure and analysis;
- Annual Sustainability report, which highlights ATB Financial's progress against its Environmental, Social and Governance goals;
- Media Releases, which include discrete outputs of information to the public about ATB Financial through news channels such as [insert], but does not include [insert]

This Policy supplements ATB Financial's ESG Governance Policy. This Policy also supplements ATB Financial's Privacy Code, which sets out ATB Financial's commitment to protecting privacy and confidentiality of personal information.

2.2. Objectives

The main objectives of this Policy are to:

- (a) Explain and document ATB Financial's disclosure philosophy and principles, policies and key practices for disclosing information about ATB Financial to the public and to set standards to which they must be designed, implemented and operated;

- (b) Outline roles and responsibilities of various individuals and groups at ATB Financial, regarding the release of information;
- (c) Ensure that ATB Financial operates in an open and transparent manner and complies with all laws, regulations and best practices relating to disclosure of information; and
- (d) Provide a reference guide and promote awareness among all Directors, officers and team members of ATB Financial's disclosure philosophy, policies and practices.

3. Policy Essentials

3.1. Policy Requirements

ATB Financial will follow the following principles and practices when releasing disclosures covered by this Policy:

- (a) Disclosure in the form of public reports (i.e. Annual Report and Sustainability Report) shall meet all legal and regulatory requirements, and achieve a reasonable balance of:
 - (i) comparability with competitors using established frameworks as a starting point;
 - (ii) disclosing relevant, value-added information;
 - (iii) authenticity and taking into account ATB's unique ownership and market position; and
 - (iv) not imposing undue cost to ATB Financial, nor exposing ATB Financial to risks of litigation.
- (b) Information will be communicated to the public using forms of communication appropriate in the circumstances. Information will be contemporaneously posted on atb.com to enhance dissemination;
- (c) Disclosure will be balanced. Unfavourable information will be disclosed as promptly and prominently as favourable information;
- (d) If ATB Financial subsequently learns that a disclosure contained a material error, or misrepresentation at the time it was disclosed to the public ATB Financial will correct it promptly upon discovery;
- (e) ATB Financial will not comment on rumours or speculation; and
- (f) ATB Financial will ensure its directors, officers and team members are aware of its disclosure policies and practices.

3.2. Disclosure Guides

- (a) Each disclosure type referenced in Article 2.1 shall have an associated

guide that will identify the purpose of the disclosure, as well as roles and responsibilities for the collection of related data, consolidation and publication of the disclosure.

3.3. Spokespersons

- (a) In order to minimize the risk of selective disclosure and to ensure a clear message is communicated to the public, ATB Financial designates a limited number of spokespersons responsible for disclosure. These spokespersons are the following:
 - (i) Chair of the Board; and
 - (ii) President and CEO
- (b) Any other spokesperson identified in the relevant disclosure guide. Individuals holding the above offices may from time to time designate others to speak on behalf of ATB Financial or respond to specific inquiries from the community or media provided they ensure such spokespersons are knowledgeable about this Policy.
- (c) Directors, officers and team members of ATB Financial should refer inquiries from the media to the Associate Vice President, Strategic Communications or their designate.

4. Roles and Responsibilities

- 4.1. The roles and responsibilities of specific bodies and individuals at ATB Financial regarding this policy are outlined in this section.
 - (a) Governance and Conduct Review Committee – The Governance and Conduct Review Committee of the Board has ultimate responsibility for the Disclosure Policy.
 - (b) Senior Management – Senior Management is responsible for ensuring that each business unit integrates applicable measures into its business operations to ensure compliance with this Policy.
 - (c) Internal Assurance – The Internal Assurance department shall be accountable to periodically examine, evaluate and report to the Governance and Conduct Review Committee on the adequacy and effectiveness of processes implemented by management to ensure compliance with this policy.

5. Contact Person

- 5.1. If there is a concern about a possible breach of this Disclosure Policy in respect of material information about the ATB Financial, please contact the Associate Vice President, Strategic Communications.

6. Implementation Mandate

6.1. The Board hereby mandates this Policy be implemented in accordance with all of its provisions.

7. Implementation Time Frame and Review Cycle

7.1. The Policy shall be implemented promptly upon approval by the Committee. The Policy shall be subject to a review by the Committee at least once every three years.

8. Appendices

None.

9. Policy Governance

Description of Action	Date	Policy Owners
Recommended jointly by Legal Services and People & Culture, Brand and Communications	November, 2024	Stuart McKellar, Chief Legal and Sustainability Officer & Corporate Secretary
Approved by Governance and Conduct Review Committee	November, 2024	Michael Ulrich, Associate VP, Strategic Communications

 Rob Logan
 Chair of the Governance and
 Conduct Review Committee