



KDPW_CCP
Annual Report
for 2019

www.kdpwccp.eu

KEY INFORMATION ABOUT KDPW_CCP

The company KDPW_CCP S.A. (KDPW_CCP, clearing house KDPW_CCP) has its registered address in Warsaw at ul. Książęca 4. KDPW_CCP is a 100 percent subsidiary of Krajowy Depozyt Papierów Wartościowych S.A. (KDPW, The Central Securities Depository of Poland). KDPW and KDPW_CCP are members of the Krajowy Depozyt Papierów Wartościowych S.A. Group (KDPW Group), of which Krajowy Depozyt Papierów Wartościowych is the parent entity.

1.1 Core business

According to the applicable legislation and the KDPW_CCP Statute, the core business of the company in 2019 included:

- to clear transactions concluded in financial instruments;
- to operate a transaction clearing liquidity guarantee system;
- to promote information and perform educational activities concerning the capital market.

Furthermore, under the Statute, the Company may conduct activities involving:

- performance of functions of an exchange clearing house for transactions concluded on commodity markets;
- other forms of lending – cash loans outside of the banking system;
- other financial services not classified elsewhere, excluding insurance and pension funds – other financial intermediation related mainly to distribution of cash other than by lending, concluding hedging transactions.

CORE BUSINESS

1.2 Corporate bodies

The Company's corporate bodies are the **General Meeting**, the **Supervisory Board**, and the **Management Board**.

General Meeting

In 2019, Krajowy Depozyt Papierów Wartościowych was the sole shareholder of the Company.

Supervisory Board

In 2019, the Supervisory Board of KDPW_CCP of the fourth term of office was comprised of:

- **Dr Marek Dietl** – Chairperson
- **Norbert Jeziolowicz** – Deputy Chairperson, Independent Member
- **Michał Rumiński** – Independent Member, member of the Supervisory Board until 26 November 2019
- **Paweł Sobolewski**
- **Dr Renata Wojciechowska** – Independent Member
- **Paweł Kołkiewicz** – Independent Member
- **Adam Młodkowski** – Independent Member, was appointed to the Supervisory Board on 14 January 2020.

1.2 Corporate bodies

Management Board



Maciej Trybuchowski

President of the
Management Board

appointed on 6 March 2019



Sławomir Panasiuk

Vice-President of the
Management Board



Michał Stępniewski

Vice-President of the
Management Board



Piotr Jaworski

Member of the
Management Board

appointed on 6 March 2019

CORE BUSINESS

1.3 Legal basis of activity

KDPW_CCP operates in accordance with the authorisation to provide clearing services as a CCP issued under the **decision of the Polish Financial Supervision Authority of 8 April 2014**. The authorisation was later extended under the decision of the Polish Financial Supervision Authority of **9 August 2016**.

The legal basis of the activity of KDPW_CCP in 2019 included:

Legal acts which govern the procedures of conducting the operating activity:

- Act of 29 July 2005 on Trading in Financial Instruments (Journal of Laws of 2020, item 89, “Act on Trading in Financial Instruments”);
- Act of 29 July 2005 on Capital Market Supervision (Journal of Laws of 2019, item 1871, as amended “Act on Capital Market Supervision”);
- Act of 24 August 2001 on the finality of settlement in payment systems and securities settlement systems and on the terms of supervision over such systems (Journal of Laws of 2019, item 212, “Act on the finality of settlement”);
- Act of 2 April 2004 on Certain Financial Collateral (Journal of Laws of 2020, item 103, “Act on Financial Collateral”);
- Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EU Official Journal L 201 of 27.7.2012, p. 1, as amended, “EMIR”), and the regulatory technical standards issued under the Regulation;

CORE BUSINESS

1.3 Legal basis of activity

Legal acts governing the financial market, including:

- Regulation No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (EU Official Journal L 176 of 27.6.2013, p. 1, as amended, “CRR”);
- Regulation of the European Parliament and of the Council (EU) No 236/2012 of 14 March 2012 on short selling and certain aspects of credit default swaps (EU Official Journal L 86 of 24.03.2012, p. 1, as amended, “Short Selling Regulation”);
- Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (EU Official Journal L 173 of 12.6.2014, p. 84, as amended, “MiFIR”), and the regulatory technical standards issued under the Regulation;
- Rules of Transaction Clearing (organised trading) and KDPW_CCP Detailed Rules of Transaction Clearing issued under the Rules of Transaction Clearing (organised trading);
- Clearing Fund Rules;
- Rules of the GPW BondSpot ATS Guarantee Fund;
- Rules of Transaction Clearing (non-organised trading), including Rules of the OTC Guarantee Fund, and Detailed Rules of the OTC Clearing System issued under the Rules of Transaction Clearing (non-organised trading).

CORE BUSINESS

1.3 Legal basis of activity

Key regulations governing corporate affairs:

- Act of 15 September 2000 – Commercial Companies Code (Journal of Laws of 2019, item 505, as amended, “Commercial Companies Code”);
- Act of 16 December 2016 on Management of State Property (Journal of Laws of 2019, item 1302, as amended, “Act on Management of State Property”);
- KDPW_CCP Statute;
- Rules of the KDPW_CCP Supervisory Board;
- Rules of the Audit Committee;
- Rules of the Remuneration Committee;
- Rules of the Risk Committee;
- Rules of the KDPW_CCP Management Board;
- KDPW_CCP Organisational Rules.
- other internal regulations adopted by the Company including the conflict of interest prevention and management policy, the compliance policy, the risk management policy, the audit and control policy.

INFORMATION ABOUT CURRENT OPERATIONS

2.1 Transaction clearing – organised trading

In performing the clearing of transactions in organised trading, KDPW_CCP performs the following functions:

- operating a system of clearing and collateral accounts;
- registering transactions that are to be cleared and transfers of open positions following transactions executed in the derivatives market in the relevant clearing accounts;
- registering in clearing accounts positions arising from transactions that are to be cleared and operations related to such positions;
- calculating the amounts of cash and non-cash payments that parties to transaction clearing or KDPW_CCP are obliged to meet;
- sending to KDPW instructions to settle cleared transactions in securities;
- sending to the National Bank of Poland (NBP) instructions to execute cash payments arising from the clearing of transactions in derivatives;
- submitting derivatives transaction reports to the KDPW trade repository.

Market	Number of transactions cleared in 2018	Number of transactions cleared in 2019	Change (%)
Regulated cash market (GPW and BondSpot)	18,224,235	18,119,896	-0.57
Alternative trading systems (GPW and BondSpot)	800,770	861,376	7.57
Derivatives market (GPW)	3,359,258	2,982,595	-11.21
Total:	22,384,263	21,963,867	-1.88

KDPW_CCP operations in 2019

The total turnover volume in derivatives decreased year on year in 2019. The turnover volume in derivatives by class in 2019 was as follows:

	Turnover volume in 2018	Turnover volume in 2019	Change (%)
Futures:	7,870,725	6,728,343	-14.51
index futures	4,529,922	3,950,420	-12.79
single-stock futures	1,296,270	1,444,397	11.43
FX futures	2,044,463	1,333,516	-34.77
Treasury bond futures	42	2	-95.24
WIBOR futures	28	8	-71.43
Index options:	292,949	251,893	-14.01
Total:	8,163,674	6,980,236	-14.50

The number of transactions in single-stock futures increased year on year in 2019 while the number of transactions in all other categories of futures decreased sharply. Interest in FX futures was supported throughout 2019 by promotional transaction and clearing fees offered jointly by GPW and KDPW_CCP.

2.2 Transaction clearing – OTC trade

In performing the clearing of transactions in OTC trading, KDPW_CCP performs the following functions:

- operating a system of clearing and collateral accounts;
- accepting for clearing transactions concluded or confirmed on relevant electronic platforms;
- registering in clearing accounts positions arising from transactions that are to be cleared and operations related to such positions;
- calculating the amounts of cash and non-cash payments that parties to transaction clearing or KDPW_CCP are obliged to meet;
- sending to KDPW instructions to settle cleared transactions in securities;
- sending to NBP instructions to execute cash payments arising from the clearing of transactions in derivatives;
- submitting derivatives transaction reports to the KDPW trade repository.

In 2019, KDPW_CCP's clearing system was ready to clear OTC transactions in the following PLN and EUR derivatives covered by the clearing guarantee system based on a multi-tiered VaR risk management system:

- Forward Rate Agreement (FRA);
- Interest Rate Swap (IRS);
- Overnight Index Swap (OIS);
- Basis Swap;
- REPO and sell/buy-back (in Polish Treasury bonds).

KDPW_CCP operations in 2019

The number of transactions sent by domestic banks for clearing in KDPW_CCP increased year on year in 2019.

The table below presents the number of OTC transactions cleared by KDPW_CCP in 2018 and 2019:

	Number of transactions in 2018	Number of transactions in 2019	Change (%)
Number of cleared transactions	1,463	1,989	35.95
Transactions by instrument:			
Number of FRAs	51	56	9.80
Number of IRS and Basis Swaps	1,409	1,933	37.19
Number of OIS	3	0	-100.00

The value of OTC transactions accepted for clearing by KDPW_CCP in 2019 was as follows:

	Value of transactions in 2018 (PLN'000)	Value of transactions in 2019 (PLN'000)	Change (%)
Value of cleared transactions	159,786,700	227 121,300	42.14
Transactions by instrument:			
Value of FRAs	22,701,000	27,100,000	19.38
Value of IRS and Basis Swaps	134,885,700	200,021,300	48.29
Value of OIS	2,200,000	-	-100.00

As the number of transactions accepted for clearing increased in 2019, so did the value of OTC transactions accepted for clearing.

Despite actual interest (activity in test environments) and price incentives (waiver of clearing fees on EUR transactions), banks did not decide in 2019 to start clearing EUR transactions in KDPW_CCP. The first OTC transactions in EUR were cleared in January 2020.

KDPW_CCP operations in 2019

In the transaction clearing liquidity guarantee system, KDPW_CCP performs the following functions:

- collecting and managing assets that form the clearing fund and the relevant guarantee fund;
- organising the automatic securities lending and borrowing system and the negotiated securities lending and borrowing system in co-operation with KDPW;
- collecting and managing assets that form margins.

The table below presents the amount of resources of the funds as at 31 December 2019. The number of fund participants decreased mainly due to changes implemented in early October 2019 aiming to aggregate calculations at the level of entity identified with an LEI instead of the level of a participant code in KDPW_CCP.

Fund	Number of fund participants, 2018 YE	Number of fund participants, 2019 YE	Value of participants' contributions, 2018 YE	Value of participants' contributions, 2019 YE	Change (%)
Clearing Fund (regulated market GPW and BondSpot)	36	26	151,139.25	174,598.80	15.52
GPW BondSpot ATS Guarantee Fund	33	24	3,012.84	2,496.14	-17.15
On-demand Securities Lending Guarantee Fund	0	0	0.00	0.00	0.00
OTC Guarantee Fund	12	12	220,269.02	420,000.94	90.68
Total:	81	62	374,421.11	597,095.88	59.47

KDPW_CCP operations in 2019

The table below presents the value of margins deposited by clearing members as at 31 December 2019. The decrease of the value of clearing members' initial margins is a reflection of a lower value of turnover on the cash and derivatives markets combined with a large share of institutions participating in the High Volume Provider programme which offers price incentives:

Margin	Value of participants' margins, 2018 YE (PLN'000)	Value of participants' margins, 2019 YE (PLN'000)	Change (%)
Initial deposit	617,368.36	470,487.69	-23.79
Initial margin	582,139.05	435,142.61	-25.25
OTC initial deposit	69,080.06	70,580.06	2.17
OTC initial margin	167,693.11	317,311.75	89.22
Total:	1,436,280.57	1,293,522.10	-9.94

Participation in legislative initiatives

3.1 National legislation – participation in legislative initiatives

In 2019, KDPW_CCP (within the KDPW Group) participated in a number of legislative initiatives relevant to the capital market in Poland including the work on:

- a draft Act amending the Commercial Companies Code and certain other Acts;
- a draft Act amending the Act on Public Offerings and certain other Acts.

Furthermore, KDPW_CCP (within the KDPW Group) participated in work on implementing regulations relevant to the capital market in Poland. These included in particular:

- a draft Regulation of the Minister of Digital Affairs concerning organisational and technical conditions for cybersecurity service providers and the internal organisation of key service operators responsible for cybersecurity;
- a draft Regulation of the Minister of Finance concerning reporting of trade details and the obliged institution identification form;
- a draft Act amending the Personal Income Tax Act, the Corporate Income Tax Act, the Tax Law, and certain other Acts.

Participation in legislative initiatives

3.2 European legislation – consultations and opinions

To ensure KDPW_CCP's compliance and prepare for harmonisation, we analysed draft European legislation in 2019. Furthermore, KDPW_CCP participated in the drafting of European legislation governing the financial market, including as a participant in the issuance of opinions on draft legislation and a participant in consultations opened in the drafting process, in collaboration with industry organisations, the national administration and supervisory authorities. These included in particular:

- draft Regulation of the European Parliament and of the Council on a framework for the recovery and resolution of central counterparties and amending Regulations (EU) No 1095/2010, (EU) No 648/2012, and (EU) 2015/2365 **(CCP Recovery & Resolution)**;
- draft Regulation of the European Parliament and of the Council amending Regulation (EU) No 648/2012 as regards the clearing obligation, the suspension of the clearing obligation, the reporting requirements, the risk-mitigation techniques for OTC derivatives contracts not cleared by a central counterparty, the registration and supervision of trade repositories and the requirements for trade repositories **(EMIR REFIT)**;
- Regulation of the European Parliament and of the Council amending Regulation (EU) No 1095/2010 establishing a European Supervisory Authority (European Securities and Markets Authority) and amending Regulation (EU) No 648/2012 as regards the procedures and authorities involved for the authorisation of CCPs and requirements for the recognition of third-country CCPs **(CCP Supervision)**;
- Regulation of the European Parliament and of the Council on the law applicable to the third-party effects of assignments of claims;
- Commission Delegated Regulation supplementing Regulation (EU) No 648/2012 of the European Parliament and of the Council with regard to regulatory technical standards on the specification of criteria for establishing the arrangements to adequately mitigate counterparty credit risk associated with covered bonds and securitisations, and amending Delegated Regulations (EU) 2015/2205 and (EU) 2016/1178.

Representatives of KDPW_CCP are members of international organisations and associations and their working groups which discuss and issue opinions on draft legislation, recommendations and proposed modifications to clearing practice and standards proposed on European and global markets.

4.1 EACH (European Association of Central Counterparty Clearing Houses)

EACH is the European association of CCPs and supports co-operation and the exchange of information among clearing institutions.

In 2019, EACH followed new initiatives, draft laws and standards in the area of clearing and issued opinions concerning a number of consultation papers. In 2019, EACH published positions on the following issues: agreement between the European Parliament (EP) and the European Union (EU) Member States concerning EMIR REFIT (raising the issue of the risk that the clearing obligation could be circumvented); EP's vote on CCP Recovery & Resolution and EACH's concerns with EP's proposal to raise capital; temporary agreement between the Romanian Presidency and EP concerning European regulations on CCP supervision (in the light of EMIR 2.2); press release in support of the European Council's position on CCP Recovery & Resolution; implementation of regulations concerning margins for derivatives not cleared by a CCP.

In 2019, EACH discussed the following issues: joint position with the Futures Industry Association (FIA) and the International Swaps and Derivatives Association (ISDA) concerning auction design, development of best practice and the terms and conditions for auction participants; EACH position concerning the EMIR REFIT; proposed joint session of EACH - European Central Securities Depositories Association (ECSDA) - Federation of European Securities Exchanges (FESE) with EP representatives (EACH's decision to hold a three-hour session focused exclusively on CCP Recovery & Resolution); quantitative data published quarterly by CCPs, available on the EACH website; EACH Securities Operations Working Group's work on CSDR (penalty calculation and distribution system); European Council's position on CCP Recovery & Resolution.

Participation in the work of international organisations

KDPW_CCP representatives participate in the work of EACH and its four committees:

The **EACH Policy Committee** is responsible for reviewing legal issues and standards of CCP clearing, CCP interoperability, as well as the exchange of information among CCPs. In 2019, the Committee focused on CCP Recovery & Resolution, EMIR CCP Supervision, EMIR REFIT (money market funds, services mitigating post-trade risk including portfolio compression, website tools simulating additional margins which may be required after the clearing of new transactions, the clearing obligation).

The **EACH Risk Committee** is responsible for the development of risk management systems and tools, including margins and clearing funds, participation requirements, default procedures, legal aspects of clearing by the central counterparty (mainly, risk management). In 2019, the Committee focused on the 2019 EU-wide CCP Stress Test and consultations of proposed regulatory amendments and risk management recommendations.

The **EACH Legal Committee** is mainly responsible for the exchange of views and opinions, and for legal aspects of clearing in the European context and beyond Europe, where necessary. In 2019, the Committee focused on EMIR REFIT, CCP Recovery & Resolution, Porting, CSDR – CCP penalty system, EACH's position on certain aspects of the Commission proposal of a Regulation on the third-party effects of assignments of claims.

The **EACH Working Group** on EMIR Trade Reporting by CCPs is a temporary working group established to specify the conditions of trade reporting, develop the standards of reporting to trade repositories, and harmonise measures related to the fulfilment of obligations by CCPs, their clearing members and members' clients. In 2019, the Working Group focused on the new UTI position reporting system, the reporting of new zero positions, the ESMA Guidelines concerning changes to reconciliation including the comparing of positions in addition to trades, and buy-in.

4.2 CCPI2 (The Global Association of Central Counterparties)

CCPI2 is an international organisation with a membership encompassing clearing houses from all over the world aiming to exchange information and experience in the clearing of financial instruments. In 2019, CCPI2 focused on CCP Recovery & Resolution; leverage used by clients clearing derivatives (joint position with EACH on a consultation paper of the BASEL Committee on Banking Supervision) – the CCPI2 position was published in July 2019; incentives for central clearing of OTC derivatives; the ESMA Technical Advice on Comparable Compliance. A Special General Meeting was held in 2019. It was preceded by discussions concerning risk management in crisis. In July 12, CCPI2 published the CCP Best Practices Third-Party Risk Management Position Paper and stressed its support for effective risk management by third parties which mitigates risk, improves the transparency of relations with third parties, and offers operational and commercial benefits; in August 2019, CCPI2 drafted and published its position on the CPMI-IOSCO paper Central Counterparty Default Management Auctions and stressed the importance of default management to CCPs; in October 2019, CCPI2 published a PQD Newsflash containing Q2 2019 risk management data provided by global CCPs, stressing the role of CCPs in risk mitigation and management on markets cleared by CCPs.

Participation in the work of international organisations

KDPW_CCP representatives participate in meetings of CCP12 and its Committees held as videocalls.

The **CCP12 Risk Working Committee** is responsible for CCP risk management, in particular stress test programmes. In 2019, the Committee focused on drafting the CCP Best Practices – A CCP12 position paper and continued to develop best practice of clearing member default procedures.

The **CCP12 Policy Working Committee** is responsible for discussions and drafting of CCP12's positions, and provides a platform of exchange of information on current issuers relevant to CCPs, including CCP recovery and resolution. In 2019, the Committee focused on CCP Recovery & Resolution, the ISDA/FIA/Institute of International Finance (IIF) consultation paper CCP recovery and resolution incentives analysis, leverage used by clients clearing derivatives (joint position with EACH on a consultation paper of the BASEL Committee on Banking Supervision), incentives for central clearing of OTC derivatives, ESMA consultation papers on fees for third-country CCPs under EMIR 2.2, comparable requirements, and classification of third-country CCPs under Article 25(2a) EMIR 2.2.

The **CCP12 Operations Working Committee** is responsible for current issues relevant to CCP operations and technologies, including CPMI-IOSCO/FSB technical standards regarding UTI, fintechs, cyber security. In 2019, the Committee focused on the Best Practices around Default Management and Liquidation from an operational stand point and the Third Party Due Diligence Questionnaire, discussed the best practice of Third-Party Risk Management, and decided to draft a CCP12 paper describing best practice of operational excellence.

Promotional and information activities

Information, promotional and educational activities in 2019 focused mainly on strengthening the promotion of KDPW_CCP as the key provider of clearing services for the regulated and OTC markets.

A representative of KDPW_CCP took part in the International Derivatives Expo in London and met with representatives of international investment firms. KDPW_CCP was a partner of major events of the capital market supporting key market organisations and projects, including the WallStreet conference (Association of Individual Investors), the National Investor Survey (Association of Individual Investors), the Public Company of the Year Awards (Puls Biznesu), the Year on the Exchange Awards (Warsaw Stock Exchange), the Capital Market Christmas Party (GPW and KDPW).

KDPW_CCP's offer was presented at industry events including the 11th Derivatives Market Forum (ZBP), Trading CEE (FOW), the 9th European Financial Congress (IBnGR).

Information about services offered by KDPW and KDPW_CCP was presented in articles and commercials in partnership with hosts of conferences, seminars and market events.

Information about the activity and services of KDPW_CCP was published on the KDPW_CCP website and in the KDPW Group social media channels.

Main areas of development in 2019

6.1 Extension of the authorisation of KDPW_CCP under EMIR to include new types of instruments (commodity market, financial market)

On 31 October 2019, the Polish Financial Supervision Authority (KNF) approved the extension of the authorisation of KDPW_CCP as a CCP to include clearing of EUA/EUAA (emission allowances) under the Statute and the Rules of Clearing and Settlement of EUA/EUAA Sale Transactions for transactions made at auctions held on an auction platform.

On 31 October 2019, the Polish Financial Supervision Authority approved the Rules of Clearing and Settlement of EUA/EUAA Sale Transactions. The decision was preceded by a meeting of the Supervisory College held on 15 October 2019 which issued an opinion to the effect that KDPW_CCP meets all requirements under EMIR and the Commission Delegated Regulations supplementing EMIR.

On 12 September 2019, the Polish Financial Supervision Authority confirmed the completeness of the application of KDPW_CCP for the extension of the authorisation of KDPW_CCP as a CCP to include clearing of EUA/EUAA under the Statute and the Rules of Clearing and Settlement of EUA/EUAA Sale Transactions, lodged with the Polish Financial Supervision Authority on 24 June 2019. During the authorisation process preceding the decision of the Polish Financial Supervision Authority confirming the completeness of the application, on 8 and 21 August 2019,

KDPW_CCP provided the Polish Financial Supervision Authority with additional information and clarifications in reply to comments of 6 August 2019, including among others the account system, the clearing guarantee system, the clearing and settlement of transactions, and the conflict of interest prevention and management policy; KDPW_CCP also submitted all of its risk management procedures.

Amendments to regulations governing the clearing of new products on the commodity market were drafted. New regulations were drafted, including the Rules of Clearing and Settlement of EUA/EUAA Sale Transactions and the Detailed Rules of the EUA/EUAA Sale Transactions Clearing System; existing procedures were updated.

Regulations and procedures governing the planned new service were validated. The Risk Committee raised no comments to the draft regulations; the KDPW_CCP Supervisory Board passed a resolution approving the rules of the new service; the KDPW_CCP Management Board approved the amendments of internal procedures.

Main areas of development in 2019

KDPW_CCP and Towarowa Giełda Energii S.A. (TGE) signed a co-operation agreement concerning clearing and settlement for the TGE auction platform. KDPW_CCP representatives held many meetings concerning the planned clearing of the commodity market with representatives of TGE, the Ministry of the Environment, and the National Centre for Emissions Management (KOBiZE) in order to resolve operational issues and define the currency of settlement with the auction operator KOBiZE. The specification of requirements concerning modifications of kdpw_stream required by the clearing of CO2 auctions was drafted.

A risk management model for repo transactions on the regulated market was developed, including a clearing and settlement concept for transactions sent from Treasury Bondspot Poland (TBSP) to KDPW_CCP.

According to the concept, the KDPW_CCP system will accept repo /BSB/outright transactions from TBSP, a market operated by Bondspot, for clearing of organised trading; as such, those transactions will be subject to collateral monitoring, formal and content checks, margin and guarantee fund requirements, the obligation to deliver cash for settlement, intervention buy-in, and potential payment of compensation for loss.

KDPW_CCP and BondSpot signed an agreement concerning TBSP cash market clearing including a timetable of technical and regulatory developments with a target date of organisational and technical readiness at 27 April 2020. The co-operation with BondSpot will develop a TBSP cash market clearing model with KDPW_CCP acting as a central counterparty. Following consultations with TBSP cash market participants, all TBSP transactions will be cleared in KDPW_CCP.

Main areas of development in 2019

6.2 Alignment of KDPW_CCP with CSDR requirements

In the alignment of KDPW_CCP with the CSDR requirements, the specification of requirements for modifications of IT systems under the CSDR technical standards on settlement discipline was completed in late December 2019. On 8 May 2019, KDPW and KDPW_CCP participants received communications concerning projects in that area, including a detailed description of planned changes taking into account the guidelines defined in the Draft ECSDA Settlement Fails Penalties Framework.

The letter to KDPW and KDPW_CCP participants dated 1 October 2019 confirmed the scope of changes to be implemented in IT systems in connection with the publication of the technical standards on 13 September 2018 (Commission Regulation 2018/1229).

As previously announced, the modifications include the implementation of a new system of charging cash penalties for late settlement and reporting as well as the alignment of functionalities supporting settlement. On 25 October 2019, a meeting with KDPW and KDPW_CCP participants discussed in detail the functionalities supporting settlement, the system of charging cash penalties for late settlement, and the buy-in of securities.

Detailed communications including system message schemas were announced for Q1 2020 (depending on the progress made by ISO working groups). It is the intention of the KDPW Group to use messages based on standard solutions developed by working groups under the ISO standards. Settlement discipline message schemas have not yet been published; we are monitoring progress at the European level.

KDPW Group representatives work with ECSDS in settlement discipline working groups. A series of calls were held to discuss the Draft ECSDA Settlement Fails Penalties Framework which will supplement the technical standards on settlement discipline and which informed the assumptions for modifications to the KDPW Group IT systems.

With that in mind, the test environment will be made available for testing with participants in June 2020, and the implementation of the modifications is scheduled in the second phase of the autumn implementation window on 12-13 September 2020 (however, according to recent information, ESMA is proposing to postpone the date of coming into force of the CSDR requirements concerning settlement discipline to 1 February 2021).

6.3. Alignment of the securities lending and borrowing system with changes in the market environment

KDPW_CCP and KDPW continued consultations concerning a legal analysis and a legal tax opinion, commissioned by GPW from a third-party law firm, regarding the possibility and the terms and conditions of participation of specific categories of financial institutions in Poland in securities lending and borrowing.

On 16 July 2019, the KDPW Group acting jointly with GPW presented a request to the Polish Financial Supervision Authority to clarify doubts in interpretations concerning securities lending and borrowing identified among others in the legal tax analysis. Some of the questions addressed to the Polish Financial Supervision Authority concerned certain modifications to the negotiated securities lending and borrowing system planned by the KDPW Group (including novation and certain transactional functions).

On 27 November 2019, the Polish Financial Supervision Authority issued a reply to the joint letter of the KDPW Group and GPW. In view of the negative opinion of the Polish Financial Supervision Authority concerning the participation of custodian banks in securities lending and borrowing, GPW and the KDPW Group decided to draft legal amendments necessary to form a basis for the participation of custodian banks in securities lending and borrowing.

A project carried out by the KDPW Group defined a specification of requirements concerning modifications to the negotiated securities lending and borrowing system. The specification was reviewed to ensure compliance with the reply of the Polish Financial Supervision Authority dated 27 November 2019. The KDPW development project including the implementation of technology modifications to the negotiated securities lending and borrowing system is expected to be finalised by the end of Q3 2020.

6.4 Preparation of KDPW_CCP for the provision of services in CEE and/or other forms of international co-operation

In 2019, with a view to preparations for the launch of KDPW_CCP's cash, derivatives, and OTC clearing services on a selected CEE market and the development of legal and technological solutions necessary to offer such services in Central and Eastern Europe, we analysed the conditions of access to central banks, central securities depositories, and stock exchanges in CEE.

We drafted a study concerning KDPW_CCP's technical access to exchange systems, cash and securities settlement systems in the Czech Republic, Slovakia, Slovenia, Croatia, Romania, Bulgaria, Malta, Austria, and Hungary, including supplementary information (communication protocols, currency of settlement, market profile, access to central banks).

We monitored developments in CEE on an on-going basis. The study is a knowledge repository which can serve in the future as a reliable source of key information necessary to decide which services are to be offered in CEE. There is, however, no business case for immediate expansion of clearing services to other CEE markets due to local political and technical conditions as well as the on-going integration of trading venues.

Main areas of development in 2019

6.5 Development of the OTC clearing system, including communication with members

In 2019, in the development of the clearing system `kdpw_stream` necessary to ensure comprehensive execution of clearing and reporting of OTC transactions, we finalised the specification of requirements for OTC monitoring in `kdpw_stream`, prepared databases and instructions, and initiated the migration of OTC monitoring to `kdpw_stream`.

We tested software for those functionalities, including communication tests, technical capacity tests, and tests of the formal structure of messages; as a result, we updated the specification of requirements. We developed a specification of requirements for the compression of transactions at the level of member(s) clearing accounts. We reviewed the options of updating trade states on Markit Wire.

In the development of the OTC risk management system, we finalised programming and project work necessary to enable participants to set system parameters for the purposes of OTC risk management calculations. Following a test of QuantLib libraries used for calculations required to determine yield curves, we initiated the implementation of such functions in `kdpw_stream`. We carried out programming work to develop yield curve calculation software.

The expected completion date of the project with regard to IT solutions supporting the clearing and reporting of trades necessary to ensure comprehensive processing of OTC transactions in `kdpw_stream`, direct system interaction with the transaction matching platform Markit Wire, and the development of FpML communication is Q1 2022. The expected completion date of the development of `kdpw_stream` to include new functionalities supporting risk management is Q3 2022.

6.6 Implementation of a new methodology of calculating contributions to the clearing fund and guarantee funds

On 1 October 2019, we implemented a new methodology of calculating contributions to the clearing fund and guarantee funds, including amendments to the terms and conditions of participation and the principles of calculating contributions to the clearing fund and guarantee funds in organised and OTC trading.

The project finalised with the roll-out defined the rules of initiating fund calculations in the production environment, which requires partial data for 60 days prior to the start of the calculations.

On 2 July 2019, we implemented software necessary to collect such data and to provide forecasts of required contributions of participants to the new fund.

In connection with planned modifications to the calculation of fund contributions at the level of institutions identified with an LEI, we modified the calculations of hypothetical capital (calculation of capital and reporting of data also at the level of LEI).

In September 2019, we implemented new versions of messages in the test environment and finalised acceptance tests which validated the IT tools.

On 17 September 2019, we published amendments to the rules of transaction clearing in organised and OTC trade and amendments to the clearing fund rules. We published the parameters used to calculate contributions to the clearing member default fund on the website www.kdpwccp.pl under the tab Risk Management/Funds, dedicated resources and allocation.

The key modifications implemented in the project include: the participation in the fund of institutions identified with an LEI; modifications to the calculation of fund resources and participants' contributions; the requirement for clearing members to present a declaration including the code of the participant who pays contributions to the relevant fund; daily updates of the fund; no additional margins; changes to the minimum amount of contributions paid to the relevant fund.

6.7 Development of the KDPW_CCP recovery plan, alignment of regulations with EU legislation concerning CCP recovery and resolution

In 2019, KDPW_CCP developed a Recovery Plan in view of the prolonged legislative process concerning CCP Recovery and Resolution as well as related legislation (EMIR 2) necessary to approve those regulations, and in connection with the recommendations of the Polish Financial Supervision Authority to develop a recovery plan in accordance with the CPMI-IOSCO guidelines “Recovery of financial market infrastructures” of October 2014, derived from the CPSS-IOSCO paper “Principles for financial market infrastructures”.

The Recovery Plan was consulted with the Risk Committee, which raised no comments, approved by the KDPW_CCP Management Board, and submitted to the Polish Financial Supervision Authority on 3 April 2019. The Recovery Plan was distributed to the Members of the KDPW_CCP Supervisory Board on 5 April 2019.

Following the letter of the Polish Financial Supervision Authority dated 12 June 2019, the KDPW_CCP Recovery Plan was tabled again for discussion to the KDPW_CCP Supervisory Board and a reply to the letter was presented to the Polish Financial Supervision Authority. Following suggestions provided by the KDPW_CCP Supervisory Board, the KDPW_CCP Recovery Plan was reviewed in the light of comments from a member of the KDPW_CCP Supervisory Board and the necessary updates were agreed. The final draft was presented for consultation to the Risk Committee and approved by the KDPW_CCP Management Board in late 2019.

Development strategy

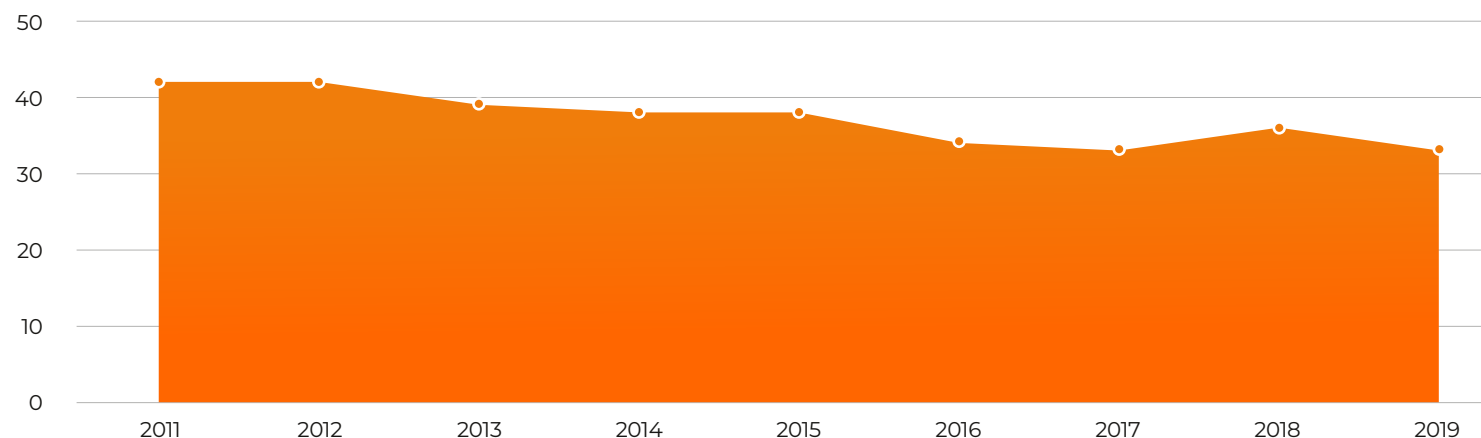
The KDPW Group Strategy 2020-2024 defines the Group's vision and strategic goals. The vision of the KDPW Group is: To provide integrated services to financial market participants in the post-trade value chain in various asset classes based on innovative technology.

The joint vision of the KDPW Group will be pursued according to a number of strategic goals defined for its four distinctive business lines:

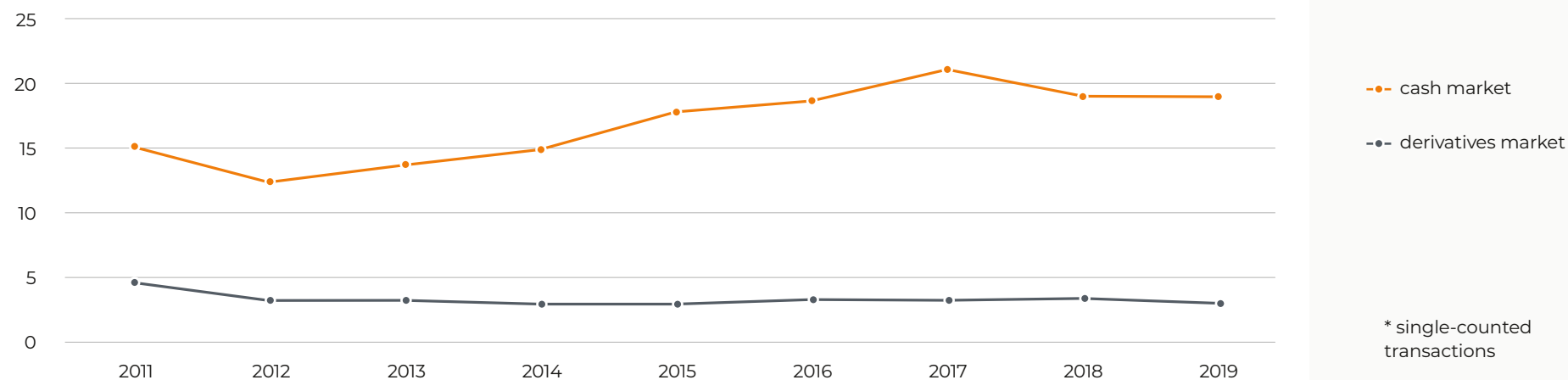
- I. KDPW as a central securities depository;
- II. KDPW as a trade reporting service provider and LEI issuer (KDPW_TR);
- III. KDPW_CCP as a clearing house for organised trade; and
- IV. KDPW_CCP as a clearing house for OTC trade.

Key statistics - Organised trading

Number of KDPW_CCP clearing members (regulated trade)

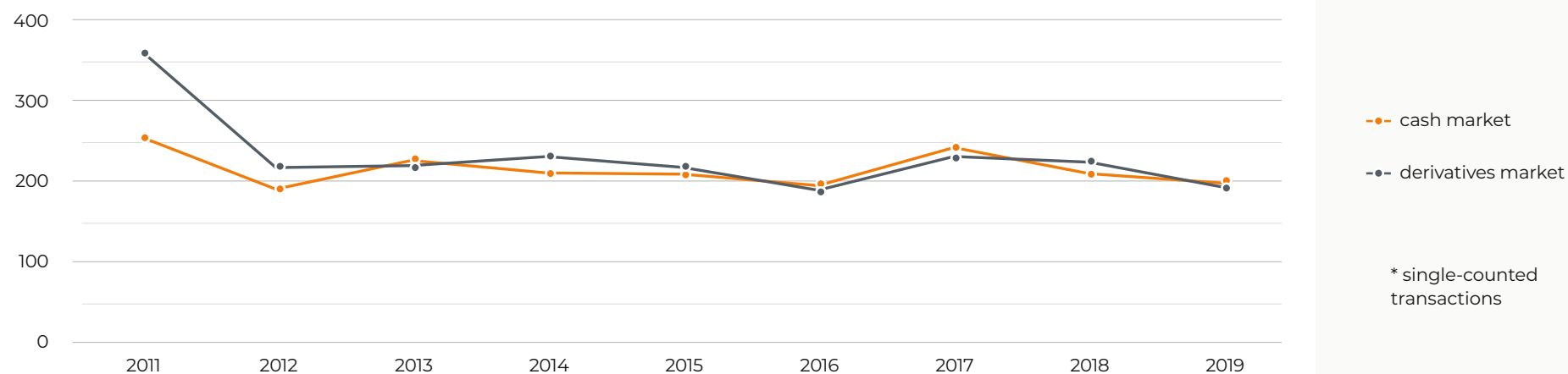


Number of guaranteed transactions cleared on the secondary market by KDPW_CCP (organised trading)*; mn



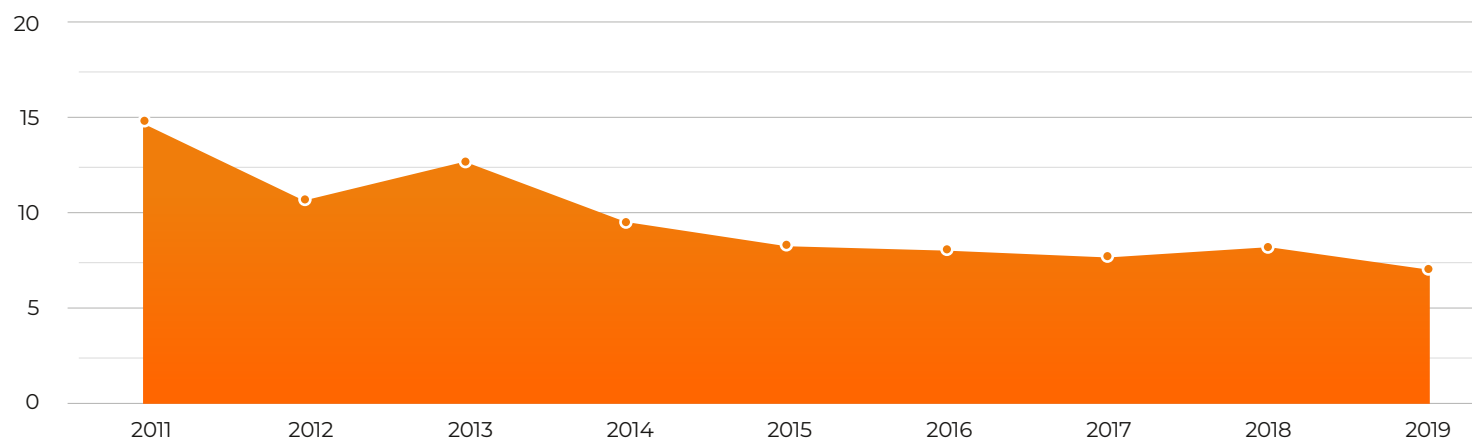
Key statistics - Organised trading

Value of guaranteed transactions cleared on the secondary market by KDPW_CCP (organised trading)*; PLN bn



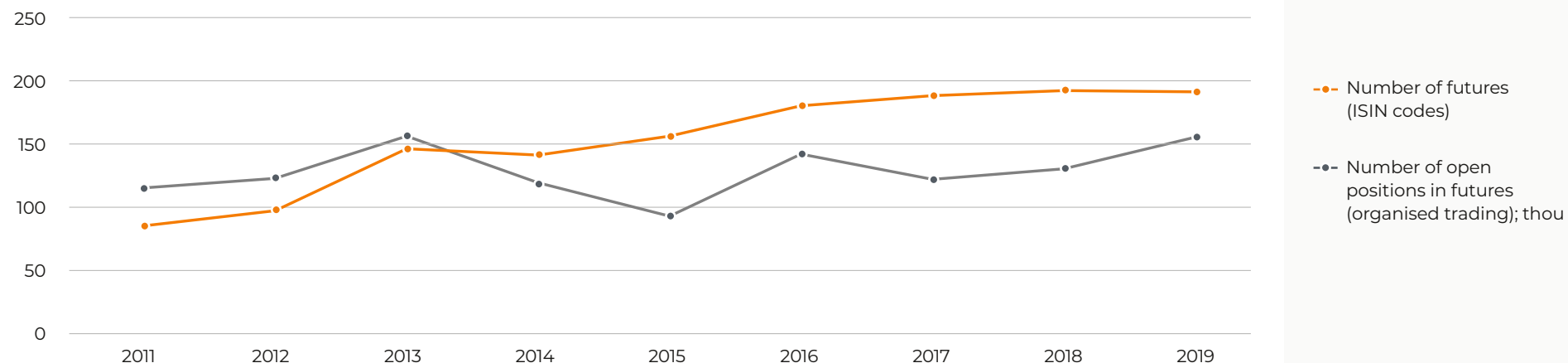
* single-counted transactions

Volume of derivatives cleared on the derivatives market by KDPW_CCP; mn

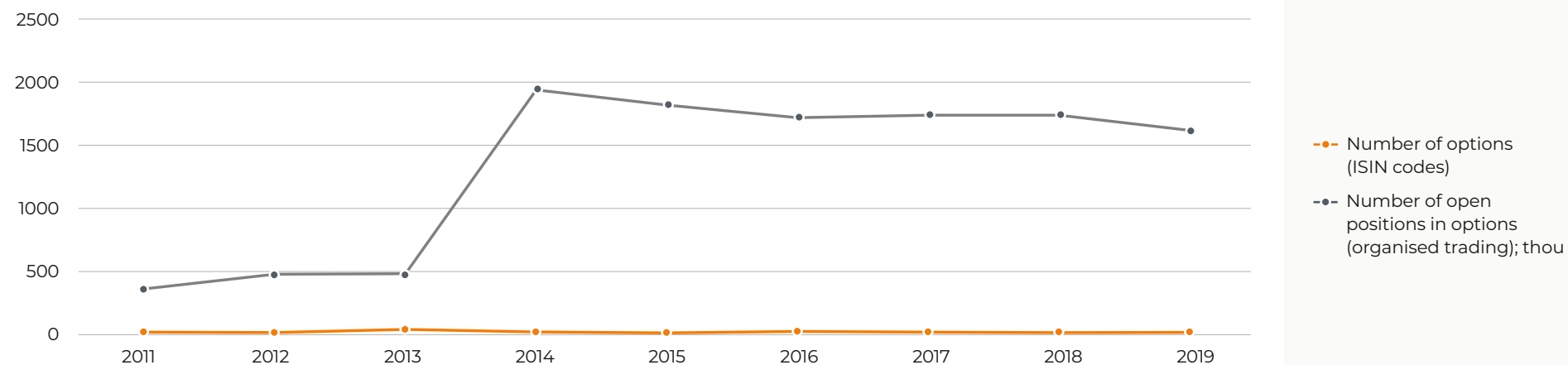


Key statistics - Organised trading

Number of futures (ISIN codes) and number of open positions in futures (organised trading)

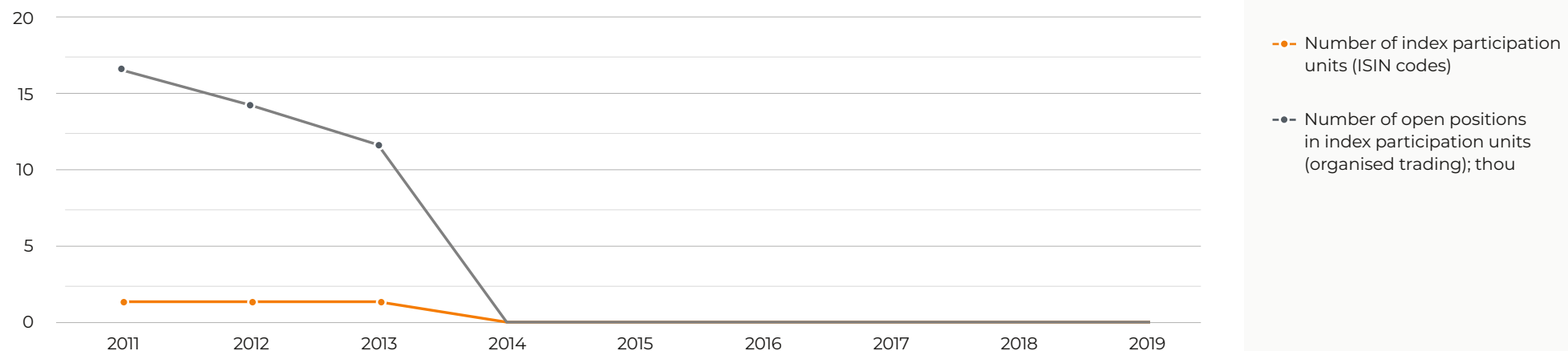


Number of options (ISIN codes) and number of open positions in options (organised trading)



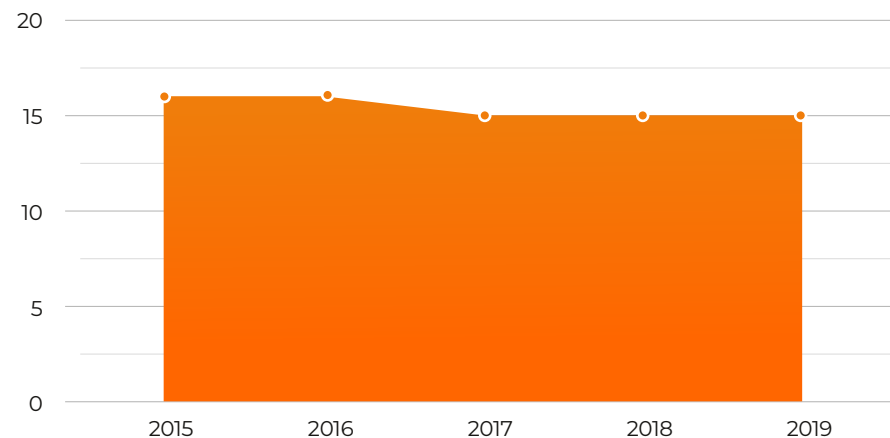
Key statistics - Organised trading

Number of index participation units (ISIN codes) and number of open positions in index participation units (organised trading)

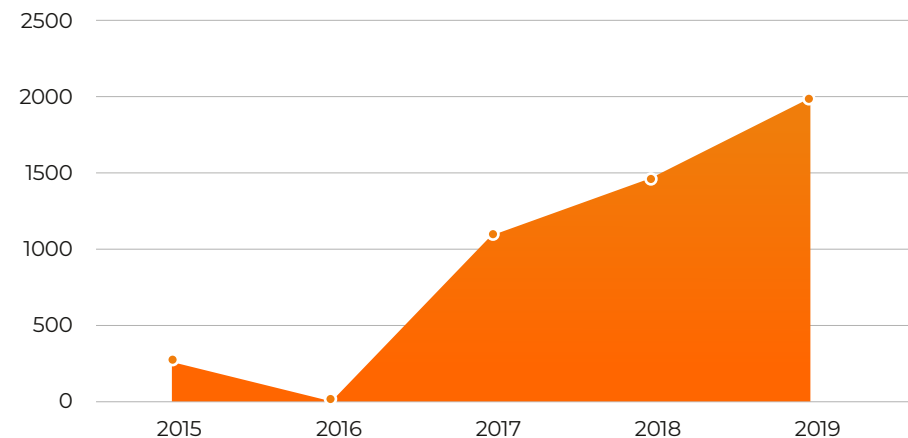


Key statistics - OTC trade

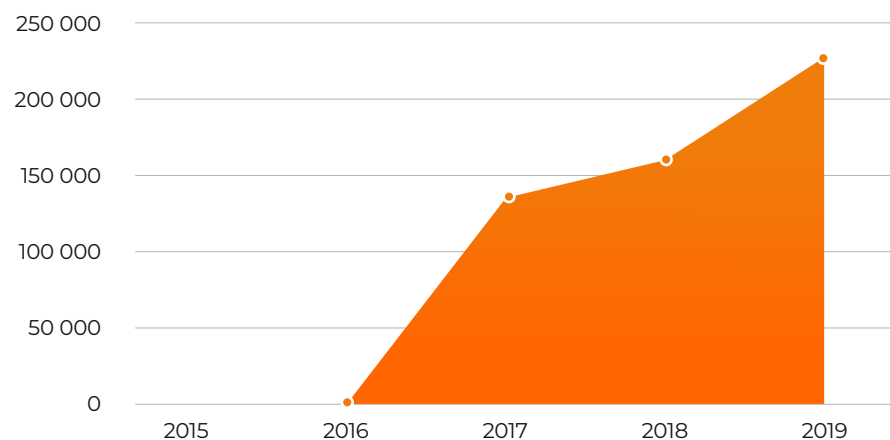
Number of clearing members (OTC trading)



Number of transactions accepted for clearing (OTC trading - derivatives)



Nominal value of transactions accepted for clearing (OTC trading - derivatives) in PLN mn



Balance sheet as at 31 december 2019

ASSETS	AS AT 31.12.2019	AS AT 31.12.2018
Non-current assets	75 714 625.04	83,265,822,59
Intangible assets	5 772 144.13	8,109,964.22
Other intangible assets	5,772,144.13	8,109,964.22
Fixed assets	21,548.62	23,972.61
Fixed assets	21,463.75	23,972.61
buildings, premises, civil and water engineering structures	11,589.63	12,349.92
technical equipment and machinery	2,811.44	3,367.11
other fixed assets	7,062.68	8,255.58
Fixed assets under construction	84.87	0.00
Long-term investments	68,748,972.50	73,831,510.00
Long-term financial assets	68,748,972.50	73,831,510.00
in other entities	68,748,972.50	73,831,510.00
- other securities	68,748,972.50	73,831,510.00

Balance sheet as at 31 december 2019

ASSETS	AS AT 31.12.2019	AS AT 31.12.2018
Long-term prepayments	1,171,959.79	1,300,375.76
Deferred tax assets	655,251.74	612,719.27
Other prepayments	516,708.05	687,656.49
Current assets	176,972,580.88	169,287,764.65
Short-term receivables	122,172,375.96	152,987,624.84
Receivables from other entities	122,172,375.96	152,987,624.84
trade receivables, maturing:	4,113,349.96	4,363,434.08
- up to 12 months	4,113,349.96	4,363,434.08
tax, subsidy, customs, social security, health insurance and other benefits	14,569.92	109,950.68
other	118,044,456.08	148,514,240.08

Balance sheet as at 31 december 2019

ASSETS	AS AT 31.12.2019	AS AT 31.12.2018
Short-term investments	54,081,759.00	15,503,225.30
Short-term financial assets	54,081,759.00	15,503,225.30
in related parties	38,706,913.57	14,964,034.03
- other short-term financial assets	38,706,913.57	14,964,034.03
in other entities	15,115,950.00	0.00
- other securities	15,115,950.00	0.00
cash and other pecuniary assets	258,895.43	539,191.27
- cash in hand and at bank	258,895.43	539,191.27
Short-term prepayments	718,445.92	796,914.51
Other assets	1,714,142,864.90	1,667,275,451.47
Total assets	1,966,830,070.82	1,919,829,038.71

Balance sheet as at 31 december 2019

EQUITY AND LIABILITIES	AS AT 31.12.2019	AS AT 31.12.2018
Equity	240,041,898.76	236,972,303.82
Share capital	190,000,000.00	190,000,000.00
Supplementary capital	3,789,419.85	3,506,429.82
Revaluation reserve	1,998,254.93	2,194,345.58
Other reserve capitals	27,753,628.80	24,629,243.49
Reserve capital to cover losses caused by participant default under transactions accepted for clearing by the Company (dedicated resources) including:	13,104,909.59	13,104,909.59
- part of dedicated resources proportionate to the size of the clearing fund	3,832,064.59	5,350,947.51
- part of dedicated resources proportionate to the size of ATS guarantee fund	54,784.76	106,671.97
- part of dedicated resources proportionate to the size of OTC guarantee fund	9,218,060.24	7,647,290.11
Previous years' profit (loss)	0.00	0.00
Net profit (loss)	3,395,685.59	3,537,375.34

Balance sheet as at 31 december 2019

EQUITY AND LIABILITIES
Liabilities and provisions for liabilities
Provisions for liabilities

Provision for deferred income tax

Provision for retirement and similar benefits

- long-term

- short-term

Other provisions

- short-term

Long-term liabilities

To related parties

other financial liabilities

AS AT 31.12.2019
12,645,307.16
2,891,186.19

748,571.01

2,096,661.78

1,323,027.00

773,634.78

45,953.40

45,953.40

3,925,023.02

3,925,023.02

3,925,023.02

AS AT 31.12.2018
15,581,283.42
2,533,427.01

782,813.98

1,709,254.97

988,067.00

721,187.97

41,358.06

41,358.06

6,658,487.65

6,658,487.65

6,658,487.65

Balance sheet as at 31 december 2019

EQUITY AND LIABILITIES	AS AT 31.12.2019	AS AT 31.12.2018
Short-term liabilities	5,829,097.95	6,389,368.76
To related parties	4,893,385.49	4,954,720.30
trade liabilities, maturing:	2,159,920.84	2,379,374.30
- up to 12 months	2,159,920.84	2,379,374.30
other financial liabilities	2,733,464.65	2,575,346.00
To other entities	482,113.06	1,027,115.71
trade liabilities, maturing:	180,506.20	131,520.06
- up to 12 months	180,506.20	131,520.06
tax, customs, insurance and other liabilities	299,924.61	895,595.65
payroll liabilities	0.00	0.00
other	1,682.25	0.00
Special funds	453,599.40	407,532.75
Accruals	0.00	0.00
Other accruals	0.00	0.00
- short-term	0.00	0.00
Other liabilities	1,714,142,864.90	1,667,275,451.47
Total equity and liabilities	1,966,830,070.82	1,919,829,038.71

Profit and loss account for the period 01.01.2019 - 31.12.2019

ITEM	01.01.2019 - 31.12.2019	01.01.2018 - 31.12.2018
Net revenues from sales and equivalent, including revenues:	30,768,622.84	30,670,638.30
- from related parties	0.00	0.00
Net revenues from sales of products	30,768,622.84	30,670,638.30
Operating expenses	30,626,825.01	30,056,400.78
Amortisation and depreciation	2,348,918.58	2,345,393.69
Consumption of materials and energy	30,379.55	8,259.19
External services	19,624,404.25	19,293,027.68
Taxes and charges	1,276,085.73	2,063,079.78
Payroll	5,157,157.74	4,294,742.07
Social security and other benefits, including:	1,479,983.37	1,342,181.83
- pensions	605,354.03	573,668.26
Other costs by type	709,895.79	709,716.54
Profit (loss) on sales	141,797.83	614,237.52
Other operating revenues	275,100.01	152,727.97
Gains on sale of non-financial fixed assets	300.00	0.00
Other operating revenues	274,800.01	152,727.97

Profit and loss account for the period 01.01.2019 - 31.12.2019

ITEM	01.01.2019 - 31.12.2019	01.01.2018 - 31.12.2018
Other operating expenses	9,527.07	24,789.94
Other operating expenses	9,527.07	24,789.94
Operating profit (loss)	407,370.77	742,175.55
Financial revenues	4,740,534.05	4,556,541.06
Interest, including:	4,740,530.71	4,556,538.50
- from related parties	0.00	0.00
Other	3.34	2.56
Financial expenses	397,841.09	508,949.11
Interest, including:	364,158.90	485,266.26
- for related parties	364,132.90	485,189.66
Other	33,682.19	23,682.85
Profit before tax	4,750,063.73	4,789,767.50
Income tax	1,354,378.14	1,252,392.16
Net profit	3,395,685.59	3,537,375.34

Independent Auditor's Report



BDO spółka z ograniczoną odpowiedzialnością sp.k.
ul. Postępu 12
02-676 Warszawa
Polska

tel.: +48 22 543 16 00
fax: +48 22 543 16 01
e-mail: office@bdo.pl
www.bdo.pl

This document is a translation.

The Polish original should be referred to in matters of interpretation.

Independent Auditor's Report to the General Meeting and Supervisory Board of KDPW_CCP S.A.

Report on the Audit of the Year-end Financial Statements

Opinion

We have audited the year-end financial statements of KDPW_CCP S.A. ("the Company"), which comprise the balance sheet as at 31 December 2019, the profit and loss account, the statement of changes in equity and the statement of cash flows for the year then ended, as well as additional information and explanations ("the financial statements").

In our opinion, the accompanying financial statements:

- give a true and fair view of the Company's financial position as at 31 December 2019, as well as of its financial result and cash flows for the financial year then ended, in accordance with the applicable provisions of the Accounting Act of 29 September 1994 ("the Accounting Act" - 2019 Journal of Laws, item 351 with subsequent amendments) and the adopted accounting methods (policies);
- are consistent, in content and in form, with the applicable laws and regulations and with the Company's Statute;
- have been prepared on the basis of properly kept books of account in accordance with Chapter 2 of the Accounting Act.

Basis for Opinion

We conducted our audit in accordance with the International Standards on Auditing adopted by the National Council of Certified Auditors as National Standards on Auditing ("NSA") and in compliance with the Act of 11 May 2017 on Certified Auditors, Audit Firms and on Public Oversight ("the Certified Auditors Act" - 2019 Journal of Laws, item 1421 with subsequent amendments). Our responsibilities under those standards are further described in the *Responsibilities of the Auditor for the Audit of the Financial Statements* section of this report.

BDO spółka z ograniczoną odpowiedzialnością sp.k., Sąd Rejonowy dla m. st. Warszawy, XII Wydział Gospodarczy, KRS: 0000729684, REGON: 141222257, NIP: 108-000-42-12, Biura BDO w Polsce: Katowice 40-007, ul. Uniwersytecka 13, tel.: +48 32 661 06 00, katowice@bdo.pl; Kraków 31-548, al. Pokoju 1, tel.: +48 12 378 69 00, krakow@bdo.pl; Poznań 60-650, ul. Piątkowska 165, tel.: +48 61 622 57 00, poznan@bdo.pl; Wrocław 53-332, ul. Powstańców Śląskich 7a, tel.: +48 71 734 28 00, wroclaw@bdo.pl

BDO spółka z ograniczoną odpowiedzialnością sp.k. jest członkiem BDO International Limited, brytyjskiej spółki i częścią międzynarodowej sieci BDO, złożonej z niezależnych spółek członkowskich



We are independent of the Company in accordance with the Code of Ethics for Professional Accountants issued by the International Federation of Accountants ("the IFAC Code") and adopted by resolutions of the National Council of Certified Auditors, and with other ethical requirements relevant to the audit of financial statements in Poland. We have fulfilled our other ethical responsibilities in accordance with these requirements and the IFAC Code. During the audit, the engagement partner and the audit firm remained independent of the Company in accordance with the independence requirements laid down in the Certified Auditors Act.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of the Company's Management and Supervisory Board for the Financial Statements

The Company's Management is responsible for the preparation, based on properly kept books of account, of the financial statements that give a true and fair view of the Company's financial position and financial result in accordance with the provisions of the Accounting Act, the adopted accounting methods (policies), the applicable binding regulations and the Company's Statute. The Company's Management is also responsible for such internal controls as it considers necessary to ensure that the financial statements are free from material misstatements resulting from fraud or error.

In preparing the financial statements the Company's Management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, any matters related to going concern and using the going concern basis of accounting, except in situations where the Management intends to either liquidate the Company or discontinue its operations, or has no realistic alternative but to do so.

The Company's Management and members of its Supervisory Board are required to ensure that the financial statements meet the requirements of the Accounting Act.

Members of the Supervisory Board are responsible for overseeing the Company's financial reporting process.

Responsibilities of the Auditor for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatements due to fraud or error, and to issue an independent auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with NSA will always detect an existing material misstatement. Misstatements can arise from fraud or error and are considered material if it could be reasonably expected that they, individually or in the aggregate, could influence the economic decisions of users made on the basis of these financial statements.

The scope of the audit does not include an assurance regarding the Company's future profitability, or regarding the Management's effectiveness in the handling of the Company's affairs now or in the future.

Independent Auditor's Report



Throughout an audit in accordance with NSA, we exercise professional judgement and maintain professional skepticism, as well as:

- identify and assess the risks of a material misstatement of the financial statements resulting from fraud or error, design and perform audit procedures in response to such risks and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, because fraud may involve collusion, forgery, deliberate omission, misrepresentation or override of internal controls;
- obtain an understanding of the internal controls relevant to the audit in order to plan our audit procedures, but not to express an opinion on the effectiveness of the Company's internal controls;
- evaluate the appropriateness of the accounting policies used and the reasonableness of the estimates and related disclosures made by the Company's Management;
- conclude on the appropriateness of the Management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern;
- evaluate the overall presentation, structure and contents of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We provide the Supervisory Board with information about, among others, the planned scope and timing of the audit and significant audit findings, including any significant weaknesses of internal controls that we identify during our audit.

Other Information, Including Report on Activities

Other information comprises a report on the Company's activities for the financial year ended 31 December 2019 ("Report on Activities").

Responsibilities of the Company's Management and Supervisory Board

The Company's Management is responsible for the preparation of the Report on Activities in accordance with binding regulations.

The Company's Management and members of its Supervisory Board are required to ensure that the Report on Activities meets the requirements of the Accounting Act.



Responsibilities of the Auditor

Our opinion on the financial statements does not cover the Report on Activities. In connection with our audit of the financial statements, our responsibility is to read the Report on Activities and, in doing so, consider whether it is materially inconsistent with the financial statements or our knowledge obtained during the audit, or otherwise appears to be materially misstated. If based on the work we have performed, we find a material misstatement of the Report on Activities, we are required to state this fact in our auditor's report. In accordance with the requirements of the Certified Auditors Act, it is also our responsibility to issue an opinion whether the Report on Activities has been prepared in accordance with binding regulations, and whether it is consistent with the information presented in the financial statements.

Opinion on the Report on Activities

Based on the work we have performed during the audit, in our opinion the Report on Activities:

- has been prepared in accordance with Article 49 of the Accounting Act;
- is consistent with the information presented in the financial statements.

Furthermore, based on our knowledge obtained during the audit about the Company and its environment we have identified no material misstatements in the Report on Activities.

The auditor in charge of the audit resulting in this independent auditor's report is Dr. Anna Bernaziuk.

BDO spółka z ograniczoną odpowiedzialnością sp.k. with its registered office in Warsaw
entered on the list of audit firms in number **3355**
represented by the auditor in charge

Dr. Anna Bernaziuk
Certified Auditor No. 173

Warsaw, 12 March 2020