

## SOCIAL MATTERS

### Impact on the society

PKO Bank Polski follows the principles of social responsibility and takes into account the impact of its actions on all stakeholders: shareholders, suppliers, employees and the general public. [GRI 102-12] In accordance with our strategy, we actively engage in activities that benefit local communities whose participation we encourage. For many years, we have initiated and implemented social projects that combine our business objectives with initiatives for the benefit of all stakeholder groups. We support a range of educational, civic, cultural and sports events and projects. Our sponsorship activities are aimed at promoting the bank's image as a reliable financial institution, one that is socially involved, modern and open to its customers' needs.

The bank and the [Foundation of PKO Bank Polski](#) in their respective sponsorship and charity activities verify every partner and beneficiary of the support they provide. Care and due diligence in ensuring rationality of the sponsorship and charity policies is also achieved through a synergy of the activities of both institutions. This falls within the scope of responsibilities of the foundation's Program Council, which is composed of the representatives of the bank. In particular, the bank and the foundation implement projects separately or jointly in the most important program areas, i.e. those that have an impact on the institutional brand image such as culture, tradition, education and sport. In addition, the foundation engages in other activities whose objective is to improve social welfare, protect life and health, and promote ecology. No negative impact on the bank's image was identified in these areas in 2020.

19.5%

Funds in sponsorship budget spent  
on supporting business initiatives in 2020

9.4%

Funds in charity budget spent on  
health initiatives in 2020

In 2020, the charity activities of the PKO Bank Polski Foundation focused on fighting the coronavirus pandemic. Priority was given to projects related to public protection from the effects of the pandemic. Out of 561 applications for a financial donation related to social activities, 143 projects received a positive opinion. The foundation allocated over 40% of the budget to educational initiatives, and as part of its continued involvement in multi-year projects. Health initiatives constituted 9.4% of charity budget in 2020. The PKO Bank Polski Group also impacts the social environment and its development through products and services it offers on the financial market:



#### We finance the housing needs of Polish people

In 2020, we granted housing loans to private individuals that amounted to PLN 11.7 bn. Since 2014, we have been involved in a nationwide initiative to support large families and their needs.

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#### We are pioneers in providing access to public administration services

Customers of PKO Bank Polski and Inteligo can use their bank login details to confirm their identity and gain access to public administration portals. The process is convenient and easy.

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#### We support activities and development of public sector entities

Examples of cooperation include supporting their activities in the form of loans for the expansion and renovation of schools, hospitals and roads, for environmental protection or modernization of public buildings.

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#### We educate consumers and raise their cyber awareness

We conduct educational campaigns to counteract financial exclusion and build cybersecurity awareness of customers on multiple levels, including through our financial portal Bankomania.



#### We counteract financial and social exclusion

We counteract economic and social exclusion of disabled people by implementing new solutions tailored to their needs, such as the sign language interpreter Migam available in all branches of the bank.



#### We offer equal opportunities to disabled groups through targeted programs

PKO Bank Polski became the first financial institution to cooperate with the Polish State Fund for the Rehabilitation of the Disabled (PFRON) to support social and professional activation of disabled people (the "Active-Plus" program).

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### We promote long-term savings initiatives

We enable our retail and private banking customers to purchase investment funds and long-term treasury bonds. We also offer an online investment advisory service, the PKO Inwestomat.

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### We engage with local communities and support local budgets

As part of our business activities, we create local vacancies and contribute to local budgets by paying taxes. PKO Bank Polski's Foundation also engages locally by organizing local charity and sports events.

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### We create opportunities for youth education

Students and young graduates may select one of the following paths to complete their internship programme at the bank: sales, IT, data analytics, cybersecurity or business support. We also offer preferential student loans for further education.

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## Anti-corruption system

PKO Bank Polski does not tolerate any form of corruption and counteracts all corrupt practices. Nepotism and accepting or offering any physical items in order to influence decisions or actions are in conflict with the bank's values of credibility and trust.

The bank has a number of internal regulations for prevention of corruption including the [Code of Ethics](#) and the [Principles for ensuring compliance and managing non-compliance risk](#). It also respects the anti-corruption principles from the [Code of Banking Ethics \(Principles of good banking practice\) by the Association of Polish Banks](#). [\[GRI 205-3\]](#) No cases of corruption were identified in 2020 and 2019.

**Corrupt conduct is treated as an incident of non-compliance and as such it is reported to the bank's Management Board and Supervisory Board. Corruption risk is an element of the compliance risk assessment. No critical events in this respect were identified in the bank nor its subsidiaries in 2020 that would result in disrupting the operations of the bank or other entities of the group.**

[\[GRI 205-1\]](#) In the Bank's Capital Group corruption risks are identified in particular in the areas related to the individual and business customer services, the supply of goods and services to the entities of the group, in connection with donation and sponsorship agreements, and in dealing with the bodies of state administration by the group's employees. These areas are closely monitored while decisions that have significant financial consequences require a dual approval. The bank and other entities of the group apply the anti-corruption standards to their potential trading partners by demanding specific declarations upon starting the procurement procedure. With regard to the bank's employees and others acting on its behalf the internal regulations stipulate:

1. Prohibition to accept benefits, presents or gifts intended for a personal use from customers or potential customers, representatives of entities cooperating with the bank or seeking to start such cooperation, which could result in an informal obligation to a given customer or person cooperating with the bank, cause a conflict of interest or otherwise negatively affect the manner of performance of an employee's corporate duties. The prohibition applies in particular to: cash and cash equivalents, physical donations (presents and gifts) and other material benefits (coverage of travel expenses, relaxation or training costs, participation in events or lending of assets such as a car for free use or use on terms that deviate from the market terms).
2. Elimination of possibilities to circumvent the above prohibition, in particular by persuading other people (e.g. people cohabiting in the same household, family members or relatives) to accept the gift on their behalf. Under exceptional circumstances, it is acceptable to receive a benefit or gift in business relations subject to the terms and conditions set out in the bank's internal regulations for acceptance of benefits, presents or gifts.
3. Prohibition to offer to customers, trading partners, representatives of public administration bodies and other entities any benefits, presents, gifts or incentives that are not part of the bank's product and service offering in order to persuade them to behave in a particular way, especially to take steps inconsistent with the provisions of law or good practices. If the bank's employee has doubts whether the acceptance of a benefit, present or gift is admissible in a given situation, he is required to consult his supervisor or the appropriate organizational unit at the bank in charge of compliance risk. Every new employee commencing employment at the bank receives information about these principles.

## System for reporting breaches

The bank has an anonymous system for reporting breaches. The bank's employees are obliged to report any suspicion of crime having been committed in connection with the bank's activities. If the filed report refers to a member of the Management Board, it is directly investigated by the Supervisory Board, while in other cases by the President of the Management Board of the bank. Each case is dealt with on the basis of internal regulations. In addition, there is a requirement at the bank to submit regular reports to the Management Board about all identified cases of fraud, including those that involved corrupt practices.

**No cases of corruption were identified in 2020. In the case of a breach of the generally applicable provisions of law or internal regulations by an employee, including breaches related to corruption, the bank undertakes actions specified in the provisions of the labour law. Reporting persons are protected – nobody can be fired or punished in any other way for having reported a breach.**

The bank holds regular training sessions for employees about reporting breaches and cases of non-compliance (including those bearing signs of corruption) and gives them access to all necessary information and internal regulations in this area. Every employee is required to undergo such training on the principles for counteracting corrupt practices.

## Respect for human rights

In developing the group's regulations, procedures and policies for human rights (including the rights of children), we draw from the fundamental principles established in the International Bill of Human Rights and from the achievements of international organizations such as the Universal Declaration of Human Rights, the UN's International Covenant on Civil and Political Rights, and the UN's International Covenant on Economic, Social and Cultural Rights. The respect for human rights is manifested in our internal regulations, the initiatives that we undertake and in our daily practice.

One of the most crucial elements in the analysis of human rights at the group level is the identification of human rights in our operating activities. The countries where the Group offers its financial services are generally characterized by a similar level of development, and thus similar challenges for human rights, including those related to employment. Respecting human rights in the supply chain is a task of immense importance, which boils down to our relations with suppliers and outsourcing of services by the group's entities. The group adopts the same human rights standards across the entire supply chain in its business activities while compliance with human rights is reflected in the procedures and agreements signed with those entities. **[GRI 407-1]** We have not identified any operations or suppliers characterized by a high risk of restricting the freedom of association and collective bargaining agreements in 2020.

**There were no cases of breaches of human rights identified in the group in 2020. We adopted a proactive approach aimed at preventing their occurrence. In relations with external entities we pay special attention to: ensuring workplace safety, not using child labour, any co-workers or contractors in a difficult position, acting in a manner that does not breach co-workers' personal rights, preventing any discrimination or mobbing activity, ensuring objectivity in selecting bids, and caring for the natural environment and its resources. Subsidiaries monitor the individual risks for human rights and manage them at each entity's level.**

At the bank, the references to respect for human rights are included in the [Code of Ethics of PKO Bank Polski](#), the [Principles for counteracting mobbing and discrimination](#), the [Recruitment principles](#) and the agreements concluded with service providers. The issues regarding forced labour and child labour are not directly reflected in the bank's regulations because the prohibition of forced labour arises from Article 4 of the Convention for the Protection of Human Rights and Fundamental Freedoms, whereas the prohibition to employ people under the age of 16 arises from Article 190, paragraph 2 of the Labour Code. We commit ourselves to:

counteracting mobbing and discrimination,

establishing rules of periodic appraisal based on a dialogue with an employee, his/her involvement in the appraisal and the ability to appeal against the performance review issued by a superior,

applying recruitment principles that ensure an equal treatment of candidates during the selection process without discrimination or prejudice and without obtaining any information that could breach the candidate's rights or personal dignity,

taking decisions about career promotions on an objective appraisal of qualifications, skills and performance,

supporting diversity in management, in particular with respect to age, experience, style of work and thinking – promoting managerial diversity as an asset, not a limitation,

enabling employees to express their opinions and influence important issues regarding the organization and its management, the working conditions and the organizational culture, and providing channels for reporting perceived crimes and fraud by employees, while assuring their anonymity and confidentiality (a whistleblower mechanism),

protecting personal rights (including personal and sensitive data) of employees and customers through carefully-prepared procedures and systems, and by including restrictive entries in contracts concluded with the service providers who have access to such data,

creating conditions for satisfying employees' needs related to recreation and culture, and the principle of work-life balance,

assuring freedom of association of employees,

creating safe working environment.

## Employment

The bank pays close attention to the satisfaction of its employees with their employment in the company. This is facilitated by a fair and transparent remuneration system, a package of non-salary benefits, and by taking into account the development needs of employees, and creating a friendly and cooperative work environment. In accordance with the employment policy, all employees are equal regardless of their sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, health condition, sexual orientation, marital status, full or part-time employment.

**PKO Bank Polski adopted a set of ESG metrics and integrated them with the non-financial objectives of the Bank's Capital Group for the following years. The fulfilment of objectives will be verified using reliable and fully measurable data. The bank will ensure that the employee turnover ratio and the voluntary resignation rate at the group level are not higher than 14% and 7% respectively by 2025.**

**[GRI 102-8]** At the end of 2020, the group's employment reached 25 859 full-time employees (FTEs), 85% of whom were employees of the bank (21 939 FTEs). The majority of employees are women (73% in the group, 75% in the bank), while the largest age cohort are employees aged 30-50 years old (63% and 61% in the group and in the bank respectively). Most employees are employed full-time, while those who work part time are mostly women.

97%

Full-time employees  
at the group

75%

Group's employees with >10  
years of service

12%

Employee turnover  
at the bank (2019: 14%)

**[GRI 401-1]**

## Structure of employment by job type, age, employment contract and gender in 2020

	Bank			Group		
	women	men	total	women	men	total
<b>By job type and gender:</b>						
regular employees	76%	24%	88%	75%	25%	87%
middle management	68%	32%	7%	65%	35%	7%
senior management	57%	43%	5%	54%	46%	6%
Total	75%	25%	100%	73%	27%	100%
<b>By age group and gender:</b>						
up to 30 years old	72%	28%	11%	72%	28%	12%
between 30 and 50 years old	71%	29%	61%	70%	30%	63%
above 50 years old	83%	17%	28%	81%	19%	25%
Total	75%	25%	100%	73%	27%	100%
<b>By employment contract and gender:</b>						
full-time	75%	25%	99%	73%	27%	97%
part-time	80%	20%	1%	65%	35%	3%
Employees in total	75%	25%	100%	73%	27%	100%

**[GRI 401-3]** In 2020, mostly women took parental leave. The share of returns to work after parental leave stood at 94.5% for women (100% for men), while 76.3% of them remained employed until the end of 2020 (100% in the case of men).

### Returns to work after parental leave

Parental leave:	Bank	
	women	men
employees who used parental leave in 2020 and whose parental leave is still ongoing	897	3
employees who returned to work during the reporting period after their parental leave in 2020	532	3
employees who used parental leave only in 2020 and it ended in 2020	563	3
employees who returned to work during the reporting period after their parental leave and remained employed at the end of 2020	406	3
share of returns to work after parental leave	94.5%	100%
share of employees who returned from parental leave and remained employed till the end of 2020	76.3%	100%

### Salaries

**[GRI 102-41]** The bank concluded a collective bargaining agreement that regulates the issue of remunerations with the trade union organizations. In accordance with the agreement, the bank's employees are entitled to the following salary components: (1) basic salary, (2) allowances for working overtime and in conditions particularly onerous and harmful for their health, (3) bonuses and rewards for extraordinary achievements at work. Basic salaries and additional benefits are set on the basis of regular job valuations and analysis of market salaries. Bonus targets for employees are closely related to the bank's key management indicators. The employee remuneration policy ensures a consistent salary system by:

- aligning the salary system with the market trends and acquiring optimal candidates for the job,
- adjusting mechanisms, tools and salary levels to the strategy and goals of the bank and the group,
- taking into account the group's ability to shape the desired mechanisms and salary levels,
- setting fixed salaries on the basis of regular job valuations,
- developing the remuneration structure based on the work achievements and skills appraisals of the employees,
- entrusting employees with responsibilities for the tasks they perform and assessing them on the basis of objective criteria,
- ensuring that variable components of salaries are parameterized to account for the bank's and the group's long-term cost of risk, cost of capital and liquidity risk,
- establishing a system in which monetary and non-monetary forms of remuneration do not encourage employees to favour their own interests or the interests of the bank or other entities of the group to the detriment of customers.

Key actions related to the bank's employee remuneration system in 2020 included an adjustment of the variable remuneration of employees to the operational conditions of the bank in a pandemic situation and to the supervisory guidelines, the sales support campaigns for employees in selected organizational units (in particular employees in the retail network) and ongoing actions for adjusting the bonus system to reflect the Covid-19 pandemic situation.

### Ratio of the average salary of women to men

By employment categories:	2020	2019
distribution network	0.8	0.8
other non-managerial positions	0.7	0.7

managerial positions	0.8	0.8
key managers	0.9	0.9

The bank performs regular salary reviews for different positions. They include analyzing the relationship between the salaries of women and men and take into account the internal benchmarks and data provided in remuneration reports and studies. The gender pay gap at the bank and in the group based on the average salary stood at 35% in 2020 and did not change in relation to 2019. The gender pay gap at the bank based on the median was 36%. [GRI 405-2] The global ratio of women's basic salaries to men's basic salaries in the group and at the bank was 65%. However, the ratio is not a precise reflection of the relationship between women's and men's salaries, because the differences observed between the salaries of women and men on equivalent positions are smaller.

In addition, to ensure comparability of remuneration on the same positions and avoid the impact of other elements on the salary levels, the bank computes the so-called Comparatio (CR) – a comparison of the salary offered to an employee with an appropriate market benchmark. The internal analyzes performed using this ratio demonstrate that there are no differences between the remuneration of women and men at the bank, and that both groups receive remuneration aligned with the market level.

### Additional information about employment at the bank in 2020

Employment:	
on permanent contract (share in total employment)	89.5%
on fixed-term contract (share in total employment), including:	10.5%
- contracts for replacement	1.5%
share of employees with duration of employment >10 years (in total employment)	74.9%
average duration of employment for women (in years)	16
average duration of employment for men (in years)	11
number of women employed (in thousand)	16.4
number of employees in senior management roles (in thousand)	1.2
number of women in senior management roles (in thousand)	0.7
number of new hires (in thousand)	1.0
number of women among the new hires (in thousand)	0.7
number of employed foreigners	21
share of employees with disabilities (in total employment)	1.2%

[GRI 401-2] Caring for the level of satisfaction of our employees, we also offer to them a range of additional non-salary benefits, which are available to all employees irrespective of their type of contract or working time. The bank finds it important to adapt the benefits offered to its employees to trends on the labour market because activities in this respect promote the bank's image as a good employer. The main additional benefits offered to employees include: free medical care (including an annual preventive program "Bank-guaranteed health" for an early detection of diseases and promotion of healthy lifestyles, and additional medical check-ups to detect post-COVID health complications), an Employee Pension Program (EPP) whereby employees can supplement their state-pension income, a cafeteria system through a dedicated MyBenefit platform and sports cards. Other benefits also include product offers and discounts for the bank's employees. The bank also supports sports initiatives (there are numerous sections at the bank – running, mountain sports, football teams) and charity activities of its employees.

### Employee training and internal communication

[GRI 404-2] We give our employees the opportunity to use various forms for improving their professional qualifications. All employees throughout the bank's group may take advantage of the training activities regardless of their age or gender. The bank's intranet portal is updated on a quarterly basis with the latest catalogue of available trainings that contains a number of development activities. Additional projects are conducted for development of both hard and soft skills of employees. A few dozen in-house coaches conduct group and on-the-job trainings and internal workshops, also for the interns. For selected projects, group trainings are conducted by external coach companies. In order to prevent the non-financial risks, we regularly conduct trainings on information security, bank secrecy and security, and labour protection.

The bank conducts both hard and soft skills trainings. A team of several dozen internal trainers conduct group and on-the-job trainings and internal workshops, which are also available for the interns. For selected projects group trainings are held by external companies. Employees in the unit of Digital Transformation have access to both internal and externally-certified training courses in agile methods. Employees also participate in language courses. As part of their professional development, they may apply for partial financing by the employer of their post-graduate studies, MBA courses or solicitor's training. The bank also conducts adaptation trainings for new employees, which are adjusted to the needs of the various business areas. In 2020, a new programme "In a new role" was launched at the bank that targets employees in the retail sales network and prepares them for taking up new positions in the Private and Corporate Banking areas. The year 2020 was exceptional because of the pandemic, which led to most development activities being conducted online.

# 21h

Average hours of training  
per year per employee

[GRI 404-1]

# 82%

Employees receiving regular performance  
and career development reviews

[GRI 404-3]

Principles for employee development and succession planning at PKO Bank Polski set the goals, directions and activities of the bank for management of development of the bank's employees or other co-workers. The main objectives of the adopted training policies include supporting the achievement of the strategic goals of the entities of the group and their business goals, providing induction training to new employees, assuring professional qualifications of employees and adaptation of their knowledge and skills to changing market requirements and entity-specific operating environments, and preparing employees for implementation of new solutions and products offered by the group's entities or changes to the existing solutions and products offered.

The bank's employees may access all employment-related information in one place – by contacting the HR Contact Centre. A team of consultants answers questions in the HR domain, including payroll support, social issues, recruitment and training. This solution accelerates and simplifies the communication process between employees and the HR units responsible for personnel management.

When referring employees to training, the entities of the group take into account the internal appraisal systems, e.g. regular interviews, 360 individual development plans surveys, examinations of training needs, ISO-based assessment system, and employee feedback. Companies that adopted the so-called competence model (this applies to the bank and two other subsidiaries) closely match its objectives with the improvement of the employee's professional qualifications and skills. Based on the competence model, employee appraisals for the general corporate, leadership and specific competences are carried out on an annual basis. As part of the periodic appraisal system, each employee sets an individual development plan together with their supervisor at the time of a review.

## Recruitment policy

The objective of our recruitment policy is to acquire the best external candidates, while simultaneously promoting the internal talents. We employ people with diverse professional experience and skills, and encourage all employees to take part in internal recruitment within the group's entities as part of their professional development in other business areas. In the recruitment process, we exercise care about human rights and ensure equal opportunities. The [Recruitment principles](#) are based on the highest standards for counteracting discrimination and ensuring personal data protection with the support of modern technologies and information systems. We pursue an employee referral programme to encourage the bank's employees to recommend candidates for open positions in return for a financial gratification upon a successful referral.

In order to ensure positive experience of candidates in the recruitment process, we diversify the channels that we use to reach different groups of candidates, reducing the recruitment time. We conduct the candidate experience research whose results are used to improve the recruitment process. Such activities contribute to the perception of the bank as an attractive employer. In 2020, PKO Bank Polski once again received the prestigious title of [Top Employer in Poland 2021](#), which is the result of an independent study of HR management practices of Polish employers.

## Trade unions and occupational health and safety (OHS)

Employees are represented at the bank by the trade unions and the Employee Council. The bank has two trade union organizations: (1) the National Trade Union of Employees of PKO Bank Polski (a representative union), (2) the Independent Self-Governing "Solidarity" Trade Union of Employees of PKO Bank Polski. Cooperation with these social partners takes place in accordance with the applicable regulations, including for holding consultations in the case of any planned organizational changes that would result in significant changes in the organization of work or the level and basis of employment. The employer does not prevent the employees from joining the trade unions or acting as their members in any way.

We have not identified any operations or suppliers characterized by a high risk of restricting the freedom of association and collective bargaining agreements in 2020. No collective disputes were recorded in any of the group's entities.

Employees may report their complaints, opinions and suggestions through the trade unions. They may also file such complaints directly through a special inbox, in accordance with the procedure for reporting complaints and irregularities. [\[GRI 402-1\]](#) Meetings with the trade unions and the bank's Employee Council are organized as necessary – at least several times a year, while information on any planned operational changes are communicated to the employee representatives without undue delay. Employees are given the opportunity to report complaints about breaches of employee rights or other irregularities. [\[GRI 403-4\]](#) An employee representative always participates in the Occupational Health and Safety Commissions and has the opportunity to communicate directly with an occupational health and safety representative.

9.9%

Group's employees who are trade union members (2019: 11%)

100%

Employees who received an up-to-date OHS training

[\[GRI 403-5\]](#)

77

Work-related injuries reported in the group (2019: 122)

[\[GRI 403-9\]](#)

All entities of the group implement their organizational health and safety tasks in accordance with the current provisions of law. These provisions are clear enough to enable a consistent application of the same health and safety rules across the whole Group. Entities that are located outside of Poland operate under corresponding rules specific to the country where they were registered. [\[GRI 403-8\]](#) The basic occupational health and safety management system resulting from the generally applicable laws covers 100% employees. [\[GRI 403-1\]](#) The OHS service at the bank has been established within the structures of the Administration Centre as the Organizational Health and Safety Office. It encompasses a number of field teams that support different units of the bank throughout the country in performing the following tasks: periodical occupational risk assessment, analysis of accidents and incidents that have occurred to date and monitoring events that may potentially lead to accidents, ongoing and periodical OHS control in all units of the bank, and conducting training. [\[GRI 403-2\]](#) There are no positions in the bank that would be associated with an occupational risk classified as high. The main occupational hazards include: falling and hitting against fixed objects, inappropriate lighting, overload of the musculoskeletal system or sight, electrical injury or traffic accidents. Due to dominance of mostly office positions in the group's employment structure, the occupational hazards in other entities of the group are consistent with those assessed at the bank.

[\[GRI 403-7\]](#) Preventive actions taken to improve safety and working conditions at the bank include: support and definition of measures that should be taken in the event of an occurrence of psychological or social hazards such as stress or mobbing, information campaigns concerning ergonomics and safety at work, additional non-mandatory training in first aid and safe driving courses for employees using company cars, vision diagnosis, and provision of personal protective equipment for employees in jobs associated with exposure to external factors. [\[GRI 403-3\]](#) All entities of the group have contracts with external medical service providers for providing occupational health services. Medical examinations are financed or reimbursed by the employer. [\[GRI 403-10\]](#) There were 3 instances of suspected occupational disease reported by former employees of the bank in 2020 (2019: 5). One decision was issued to date, whereby the responsible authority concluded there were no grounds for classifying it as a work-related ill health. The other proceedings are still pending.

[\[GRI 403-6\]](#) All entities of the group undertake additional voluntary actions to promote worker's health: free preventive medical check-ups (e.g. an annual health control package, mammography or flu shots), training to promote healthy lifestyles (incl. exercise guidelines for office workers), access to a number of sports and leisure facilities as part of each employee's benefit package, organization of sports teams, competitions and events supporting physical activity of employees and care for the environment, and cyclical health-promoting campaigns.