



Bank Polski

REPORT
“ASSESSMENT OF THE FUNCTIONING
OF THE REMUNERATION POLICY
AT PKO BANK POLSKI S.A.
IN 2025”

Table of contents

INTRODUCTION.....	3
DESCRIPTION OF THE REMUNERATION POLICY.....	5
ASSESSMENT OF COMPLIANCE OF THE REMUNERATION POLICY OF PKO BANK POLSKI S.A. WITH THE PFSA'S CORPORATE GOVERNANCE RULES AND OTHER REGULATORY REQUIREMENTS	16
ASSESSMENT OF WHETHER THE REMUNERATION POLICY SUPPORTS THE DEVELOPMENT AND OPERATIONAL SECURITY OF PKO BANK POLSKI S.A., INCLUDING AN ASSESSMENT OF ITS IMPACT ON THE BANK'S MANAGEMENT .	21

INTRODUCTION

The report "Assessment of the functioning of the remuneration policy at PKO Bank Polski S.A. in 2025" was prepared with a view to meeting the requirements of:

- § 15(1)(13) of the Bank's Articles of Association:
 1. *The Supervisory Board exercises continuous supervision over the Bank's activities in all areas of its operations. In addition to powers and duties stipulated by other provisions of these Articles of Association, the competences of the Supervisory Board include: (...)13) evaluation of the functioning of the Bank's remuneration policy and presentation of a relevant report to the General Meeting.*
- § 28 of the "Corporate Governance Rules for Supervised Institutions" constituting an appendix to Resolution No 218/2014 of the Polish Financial Supervision Authority of 22 July 2014 on the issuance of the "Corporate Governance Rules for Supervised Institutions":
 3. *The supervisory body shall prepare and present to the decision-making body once a year a report on the assessment of the functioning of the remuneration policy in the supervised institution.*
 4. *The decision-making body shall assess whether the established remuneration policy is conducive to the development and operational security of the supervised institution*
- § 2(5) and § 5 and 6 of the Remuneration Policy for Employees of the Bank and the PKO BP Group governing the review and assessment of the remuneration policy.
- Item 15.4 of Recommendation Z *"The bank's Supervisory Board should supervise the implementation and application of the bank's remuneration principles by the bank's Management Board and assess its impact on the bank's management on a regular basis (at least once a year)".*

This report constitutes the fulfilment of the aforementioned obligations as at 31 December 2025.

1. SUMMARY OF THE ASSESSMENT

1. THE DEVELOPMENT AND SECURITY OF THE BANK WITHIN THE FRAMEWORK OF THE REMUNERATION POLICY ARE ENSURED THROUGH THE FOLLOWING MEASURES:
 - MOTIVATING EMPLOYEES TO ACT IN LINE WITH THE BANK'S INTEREST,
 - LINKING THE AMOUNT OF REMUNERATION PAID TO THE BANK'S SITUATION,
 - ENSURING AN APPROPRIATE LEVEL OF CONTROL OVER THE AMOUNTS OF FIXED AND VARIABLE REMUNERATION, AS WELL AS NON-FINANCIAL BENEFITS.

2. THE BANK FOLLOWS THE POLICY OF REMUNERATING THE MEMBERS OF THE SUPERVISORY BOARD AND THE MANAGEMENT BOARD, AS WELL AS KEY MANAGERS, SPECIFIED IN THE APPLICABLE INTERNAL REGULATIONS WHICH HAVE BEEN REVIEWED IN TERMS OF CONSISTENCY AND TRANSPARENCY.

3. THE MEMBERS OF THE SUPERVISORY BOARD RECEIVE REMUNERATION ADEQUATE TO THE FUNCTION PERFORMED AND THE SCALE OF THE BANK'S OPERATIONS.

4. THE GENERAL MEETING OF PKO BANK POLSKI S.A. HAS INTRODUCED THE REMUNERATION POLICY FOR MEMBERS OF THE SUPERVISORY BOARD AND THE MANAGEMENT BOARD.

5. THE SUPERVISORY BOARD HAS INTRODUCED REGULATIONS LAYING DOWN THE RULES OF REMUNERATING THE MEMBERS OF THE MANAGEMENT BOARD, IT SUPERVISES COMPLIANCE WITH THESE RULES, ESTABLISHES CRITERIA AND CONDITIONS JUSTIFYING ELIGIBILITY FOR VARIABLE REMUNERATION AND REVIEWS THEM PRIOR TO THE PAYMENT OF VARIABLE REMUNERATION.

6. THE VARIABLE REMUNERATION OF THE MEMBERS OF THE MANAGEMENT BOARD AND KEY MANAGERS DEPENDS ON THE ACHIEVEMENT OF INDIVIDUALLY DEFINED TARGETS LINKED TO THE BANK'S STRATEGY. THESE TARGETS COMPRISE QUANTITATIVE AND QUALITATIVE CRITERIA AND ENSURE MOTIVATION FOR WORK AND FORMS OF CONDUCT THAT ENABLE THE BANK TO ACHIEVE ITS ASSUMED TARGETS.

7. THE AMOUNT OF VARIABLE REMUNERATION OF ALL EMPLOYEES DEPENDS ON THE LEVEL OF ACHIEVEMENT OF THE SET TARGETS.

8. THE MOST IMPORTANT ELEMENTS OF THE REMUNERATION POLICY HAVE BEEN APPROPRIATELY IMPLEMENTED IN KEY COMPANIES OF THE BANK'S GROUP.

DESCRIPTION OF THE REMUNERATION POLICY

2. REMUNERATION POLICY FOR EMPLOYEES OF THE BANK AND THE BANK'S GROUP AND THE BANK'S COMPANY COLLECTIVE LABOUR AGREEMENT

The basic internal regulation concerning the remuneration policy is the Remuneration Policy for Employees of the Bank and the PKO BP Group (the Policy) adopted by a resolution of the Bank's Management Board and approved by Resolution No 148/2024 of the Supervisory Board of 20 June 2024 (on 23 December 2025, the Bank's Management Board adopted a resolution amending the resolution on the adoption of the "Remuneration Policy for Employees of the Bank and the PKO BP S.A. Group"; however, the amendments introduced thereby entered into force on 15 January 2026 and are therefore not covered by this report).

The Policy ensures a coherent remuneration system by:

- using a remuneration system in line with the market trends;
- recruiting optimal candidates for work;
- adjusting the mechanisms, tools and levels of remuneration to the strategy and objectives of the Bank and the Bank's Group (the Group);
- taking into account the Group's capacity to shape the desired mechanisms and levels of remuneration;
- shaping fixed pay based on job evaluation;
- shaping the remuneration structure based on performance and the assessment of employees' competencies;
- building responsibility in employees for the tasks they perform, evaluated on the basis of objective criteria;
- guaranteeing that the variable remuneration components are parameterized in such a manner as to take into account the cost of risk, the cost of capital and the liquidity risk of the Bank and the Group in the long term;
- ensuring that the cash or non-cash forms of remuneration do not encourage the persons involved to favour their own interests or the interests of the Bank and the Group Companies to the detriment of the Customers;
- ensuring gender-neutral remuneration practices for the employees of the Bank and the Group;
- ensuring compliance with the strategy regarding environmental, social and governance risks, the so-called ESG (environmental, social responsibility and corporate governance).

By Resolution No 35/2020 of the Annual General Meeting (AGM) of the Bank of 26 August 2020, the Remuneration Policy for Members of the Supervisory Board and the Management Board was adopted, adapting internal regulations to the requirements of the Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies.

The Bank and the Group Companies apply the rules of remunerating the members of the management and supervisory bodies arising from the provisions of the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies, the so-called "Salary Cap Act". In this respect, the Bank meets the criteria for applying fixed remuneration for the Members of the Management Board in an amount of seven to fifteen times the assessment basis, while not exercising the option to derogate from this restriction as permitted by the "Salary Cap Act". For the members of the Supervisory Board, however, this is a maximum of 2.75 times the assessment basis.

The Collective Bargaining Agreement (CBA) concluded with the company trade union organisations on 28 March 1994 (as amended) constitutes the basis for awarding the Bank's employees the following remuneration components:

- 1) basic salary,
- 2) allowances for overtime work and for work in particularly arduous and health-hazardous conditions,
- 3) bonuses and awards for special achievements in professional work.

The Agreement sets out the minimum guaranteed basic salary rates assigned to the individual job grade levels allocated based on the job evaluation process:

Job grade level according to job evaluation	Minimum basic salary rate – percentage relation to the minimum remuneration for work determined on the basis of generally applicable laws
18 and over	400%
17	300%
16	200%
15	160%
14	150%
13	140%
12	130%
11	120%
10	110%
6-9	100%

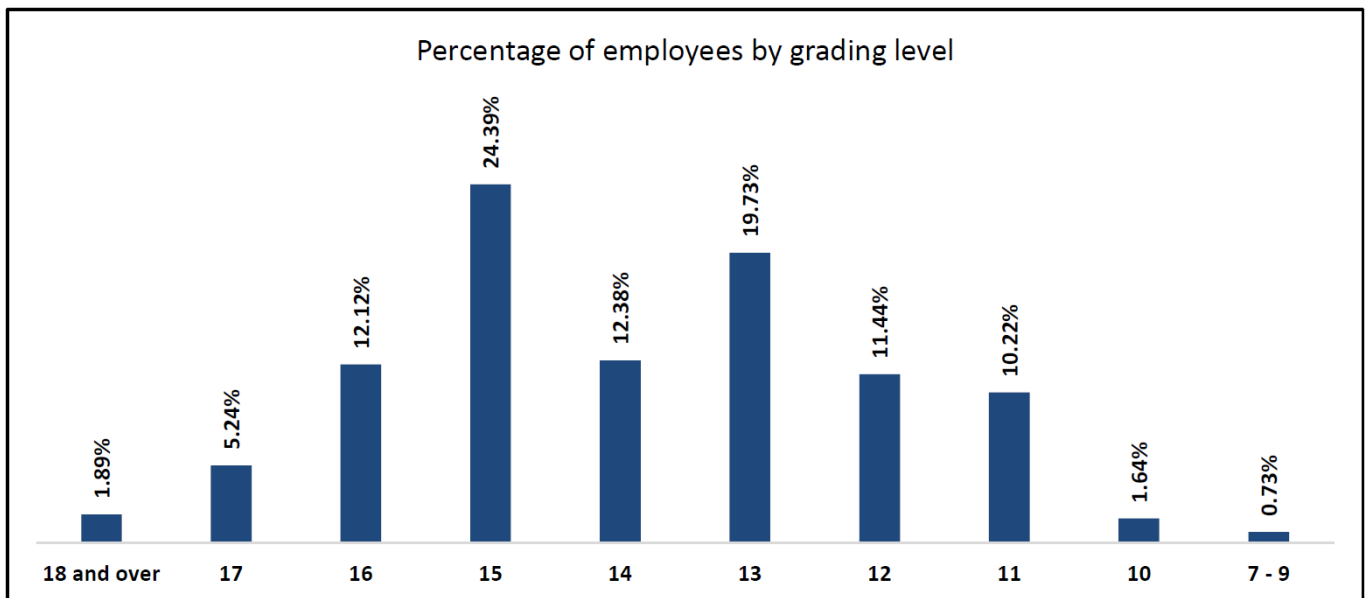
At the same time, in accordance with the CBA:

- the employee's basic salary for the position held shall be determined using the optimal job evaluation method available in the market and compatible salary reports taking into account data from the financial sector;
- when determining the weight of a position in the job evaluation process, the criteria taken into account primarily include: the knowledge necessary to perform the work in the position, the type and complexity of problems in the position, and the scale of impact on the organisation, including the impact on the result.

3. JOB EVALUATION

In 2019, a job evaluation method consistent with market practice was implemented at the Bank. In 2020–2025, the application of the implemented method was continued. Furthermore, in 2025, a detailed review was carried out in cooperation with an independent external consultant. The result was a confirmation that positions at the Bank are classified in a logical manner consistent with market observations.

The Bank uses 16 job grade levels (from 7 to 22), consistent with the methodology provided by the external advisor.



Data as at December 2025

Each position is assigned a job grade level and a specific job family, corresponding to the tasks performed and competencies, and consistent with the applied market job evaluation methodology.

As part of preparations for the implementation of the objectives of Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms, the Bank implemented an approach to remuneration analysis aimed at increasing the transparency of remuneration principles. The job evaluation review conducted in 2025 constituted one of the first key stages preparing the Bank for the implementation of the requirements arising from the Directive. In November 2025, the Bank launched a communication campaign concerning remuneration practice, the continuation of which is planned for 2026. As part of the information activities, employees were provided with data regarding the relation of their remuneration to the market median, which constitutes an important element of raising pay awareness and building a culture of remuneration transparency.

Selected Group companies that evaluate positions use a job evaluation methodology consistent with the Bank's methodology.

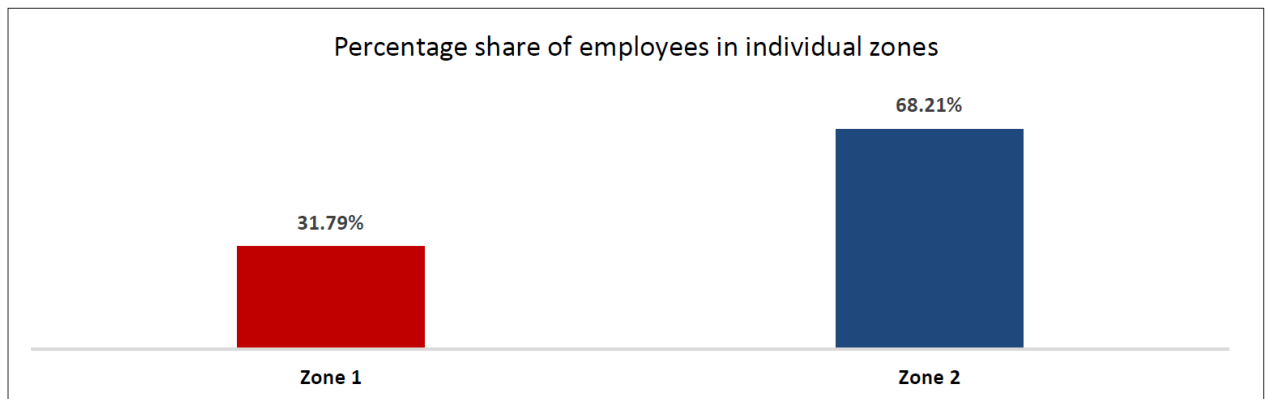
4. MANAGEMENT OF BASIC SALARIES

1) EMPLOYEES

Basic salaries (but also additional benefits, such as medical care) are awarded on the basis of the job grade category and an analysis of market remuneration in the banking sector, (taking into account regionalisation).

As at 31 December 2025, two regionalisation zones were in place at the Bank.

ZONE 1	Warsaw plus locations within a 60 km radius of Warsaw
ZONE 2	Other locations



Data as at December 2025

Basic salaries may be changed as part of the following processes:

- 1) Bank-wide salary increases;
- 2) increases resulting from a change of position or promotion;
- 3) remuneration changes related to specific reorganisation projects concerning individual structures or processes;
- 4) analysis of individual cases (taking into account work performance and the results of periodic employee appraisals).

The Group companies that have adopted the job evaluation model also shape basic salaries with reference to the market and the appropriate job grade levels.

2) CANDIDATES FOR EMPLOYMENT AT THE BANK

On 24 December 2025, new provisions arising from the Act of 4 June 2025 amending the Labour Code entered into force. These changes introduce information obligations on the part of the employer towards candidates applying for employment at the Bank as regards remuneration and strengthen the existing Labour Code

regulations on the conduct of recruitment processes, in order to ensure informed and transparent negotiations for the candidate, ensure equal opportunities, and prevent discrimination in the labour market. The most significant change introduced by the amendment is the imposition on employers of an obligation to inform candidates for employment of the remuneration offered, its initial amount or its range – based on objective, neutral criteria, in particular with regard to gender.

The Bank developed a solution enabling the communication to selected candidates of the remuneration information required by law. Specifically, candidates selected for employment receive, prior to the commencement of negotiations on employment terms, information on the applicable monthly basic salary range offered for the position, the attainable bonus, basic information on benefits, as well as an extract from the relevant provisions of the collective bargaining agreement. The information is placed in the candidate's profile, of which the candidate is notified by email.

3) MEMBERS OF THE BANK'S MANAGEMENT BOARD AND SUPERVISORY BOARD

In accordance with the Remuneration Policy for Members of the Supervisory Board and the Management Board, the fixed remuneration of the Members of the Bank's Management Board is determined within a range of 7 to 15 times the assessment basis, being the average monthly remuneration in the enterprise sector excluding profit-related bonus payments in the fourth quarter of the previous year, as announced by the President of Statistics Poland.

In 2025, the fixed remuneration of the Members of the Bank's Management Board was:

- in the case of the President of the Management Board: 15 times;
- in the case of the other members of the Management Board: 14.5 times;

the average monthly remuneration in the enterprise sector, excluding profit-related bonus payments in the fourth quarter of the previous year, as announced by the President of Statistics Poland.

The monthly remuneration of the members of the Bank's Supervisory Board was determined as a product of the assessment basis referred to in the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies and an appropriate multiple, depending on the functions performed within the Supervisory Board. Following the entry into force of Resolution No 62/2025 of the Annual General Meeting of 13 June 2025 (on the amendment of Resolution No 3/2017 of the Extraordinary General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 13 March 2017 on the determination of the rules of remuneration of the members of the Supervisory Board, as amended by Resolution No 5/2019 of the Extraordinary General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 17 September 2019), the monthly remuneration of the members of the Supervisory Board was set at 2.75 times the assessment basis referred to in Article 1(3)(11) of the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies, taking into account other legal acts amending or modifying the assessment basis, including the provisions of acts on special solutions for the implementation of the Budget Act for a given year.

The remuneration model based on the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies applied to the members of the supervisory boards of the Group Companies. In 2025, the monthly remuneration of the members of the supervisory boards of the Group Companies was determined as a product of the assessment basis referred to in the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies and an appropriate multiple – not exceeding, however, 1x the assessment basis specified in the aforementioned Act. In 2025, no remuneration was payable to the members of the supervisory boards of the Group Companies who were employed at the Bank or other Group Companies (except for serving on the supervisory boards of other Group Companies).

5. VARIABLE REMUNERATION COMPONENTS FOR MANAGEMENT BOARD MEMBERS AND KEY MANAGERS WITH A MATERIAL IMPACT ON THE RISK PROFILE OF THE BANK AND THE GROUP (MATERIAL RISK TAKERS – MRTS)

In accordance with the requirements of the CRD Directives and the Banking Law, the Bank established the rules for awarding variable remuneration components (bonuses and awards) to MRTs through resolutions of:

- 1) the Supervisory Board – for Members of the Management Board;
- 2) the Management Board – for MRTs subordinate to the Management Board.

The list of MRTs – other than Members of the Management Board and the Supervisory Board – is drawn up by the Management Board on the basis of qualitative and quantitative criteria for determining the categories of staff whose professional activities have a material impact on the risk profile, as set out in Commission Delegated Regulation (EU) 2021/923 of 25 March 2021 supplementing Directive 2013/36/EU of the European Parliament and of the

Council with regard to regulatory technical standards setting out the criteria to define managerial responsibility, control functions, material business units and a significant impact on a material business unit's risk profile, and setting out criteria for identifying staff members or categories of staff whose professional activities have an impact on the institution's risk profile that is comparably as material as that of staff members or categories of staff referred to in Article 92(3) of that Directive, the Banking Law, Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, and in accordance with the standards set out in Section 5 of the EBA/GL/2021/04 Guidelines.

MRTs are considered to be:

- 1) members of the Management Board and the Supervisory Board;
- 2) senior management, i.e. persons performing executive functions within an institution who are responsible, and accountable to the management body, for the day-to-day management of the institution;
- 3) senior management responsible for material business units, for the management of specific risk categories, and for control functions;
- 4) positions responsible for providing internal support that are crucial to the operation of the business and have an impact on risk, including operational risk;
- 5) positions generating credit risk and market risk identified using criteria based on limits of authority;
- 6) positions in which employees received total remuneration exceeding the relevant threshold specified in the regulations (provided that the employees do in fact have a material impact on the risk profile);
- 7) positions in which employees are in the same remuneration bracket as senior management and risk takers (provided that they have a material impact on the risk profile).

As at 31 December 2025, the MRT List included 74 positions (however, the number of employees is higher – due to the fact that a single position on the MRT List may be held by more than one employee – this applies, for example, to directors of corporate macro-regions or directors of foreign branches).

Functional division of the Bank	Number of MRT positions
Risk Management Division	18
Corporate and Investment Banking Division	11
Management Board President's Division	6
Finance and Accounting Division	7
Technology Division	2
Retail and Corporate Banking Division	2
Operations and International Banking Division	2
Positions of Functional Division Directors	26

The basis for awarding variable remuneration components to MRTs, including Members of the Management Board, consists primarily of bonus targets set under Management by Objectives (MbO). The assigned MbO targets are intended to ensure that the Bank's business cycle and the risk associated with the Bank's activities are taken into account. The risk is taken into account by setting appropriate, risk-sensitive criteria for evaluating the performance of MRTs. In addition, the management targets of individual Members of the Management Board should, in line with their respective area of responsibility, also take into account criteria such as the Bank's commitment to considering the public interest and the Bank's contribution to environmental protection and to the prevention or elimination of any potential adverse social impacts of the Bank's activities.

The Bank attaches great importance to ensuring that the targets of the members of the Management Board and MRTs, as key managers, form a coherent structure, motivating these persons to perform tasks within their own areas of responsibility at an appropriate level, as well as to cooperate in the achievement of company-wide targets. The goal-setting process is closely linked to the process of setting financial tasks for the Bank as part of the financial planning process, as well as to the process of operationalising the Bank's strategic development directions.

Following the evaluation of bonus targets, the variable remuneration components for a given bonus period (a calendar year) are awarded in the following forms:

- 1) non-deferred – in the amount of 60% of variable remuneration (in the first year after the bonus period);
- 2) deferred – in the amount of 40% of variable remuneration (in equal instalments over the subsequent years after the first year after the bonus period).

Deferred and non-deferred variable remuneration consists of the following components:

- 1) a cash component, which accounts for 45% of the variable remuneration;

- 2) a component in the form of an instrument (phantom shares), which accounts for 55% of the variable remuneration.

Phantom shares are converted at a rate for the first quarter of the year following the bonus period, calculated as the median of the average daily prices of the Bank's shares on the Warsaw Stock Exchange.

In accordance with the Remuneration Policy, if the amount of variable remuneration for a given year exceeds PLN 700 thousand, the non-deferred variable remuneration amounts to PLN 420 thousand plus 40% of the surplus over PLN 700 thousand, and the deferred variable remuneration amounts to PLN 280 thousand plus 60% of the surplus over PLN 700 thousand.

The amount of variable remuneration accrued for a given bonus period (a calendar year) may not exceed 100% of the annual basic salary under the employment contract for MRT positions, and, for the Members of the Bank's Management Board, of the fixed remuneration under the contract for the provision of services.

In the Group Companies, the limit on variable remuneration for management board members is as follows:

- 1) 100% of the annual fixed remuneration for Group Companies which, in at least one of the last two financial years preceding the evaluation year, fulfilled at least two of the following conditions:
 - a. employed an annual average of at least 1,251 employees;
 - b. achieved an annual net turnover from the sale of goods, products and services, and financial operations exceeding the PLN equivalent of EUR 250 million;
 - c. the total assets of their balance sheet drawn up as at the end of one of those years exceeded the PLN equivalent of EUR 215 million;
- 2) 50% of the annual remuneration for the other Group Companies.

Limits on maximum variable remuneration are also applied to MRTs.

The amount of the bonus accrued for a given bonus period (a calendar year) for each MRT, including Members of the management boards of the Bank and the Group Companies, may be adjusted by means of a correction ratio commensurate with the degree of achievement of the targets specified in the so-called Annual Note of the Bank (a set of key management indicators determined for a given calendar year), with the adjustment being capped at 100% of the fixed remuneration.

The condition for awarding and releasing the payment of bonuses to the Members of the Bank's Management Board is the approval by the General Meeting of the financial statements for the given bonus period, the granting of discharge, and the achievement of management objectives related to the obligation to implement within the Group the requirements of generally applicable laws concerning the principles of state property management, as well as the so-called "Salary Cap Act".

Each of the components of accrued variable remuneration may be reduced as a result of:

- 1) breach of employee duties;
- 2) failure to comply with legal provisions or customer service standards;
- 3) improper performance of assigned duties;
- 4) conduct towards other employees in breach of the rules of social coexistence.

The Supervisory Board in respect of the Members of the Management Board, and the Management Board in respect of MRTs, may also, prior to each payment of variable remuneration, decide on a proportionate reduction of the funds allocated to such remuneration, taking into account:

- 1) impact on the regulatory capital, solvency ratio and equity of the Bank, so that the payment of variable remuneration does not limit the ability to strengthen them;
- 2) impact on the cost of capital, so that the payment of variable remuneration does not limit the ability to maintain an adequate capital base;
- 3) the Bank's desired risk profile;
- 4) the Bank's financial results in relation to long-term development plans.

Where the combined buffer or the leverage ratio buffer is breached, variable remuneration components are paid at a level that does not result in either the MDA or L-MDA being exceeded.

In the event of:

- 1) a fall in the ROA ratio below the level triggering the recovery plan and a fall in the Tier 1 capital ratio or the total capital ratio (TCR) below the level of the combined buffer requirement;
- 2) a fall in the NSFR ratio below the level triggering the recovery plan;
- 3) a fall in the total capital ratio (TCR) below the level triggering the recovery plan;
- 4) a significant deterioration in the results of the Bank or the Group Companies;

- 5) establishing that a significant adverse change in the equity of the Bank or the Group Companies has occurred;
- 6) a breach of a legal provision or the commission of material errors by an employee or a Member of the Management Board;
- 7) an adjustment to the performance and degree of achievement of the results or targets of an employee or a Member of the Management Board;
- 8) a deterioration in the results of structures supervised or managed by the aforementioned persons;
- 9) awarding variable remuneration on the basis of incorrect, misleading information or as a result of fraud by an employee or a Member of the Management Board

a *malus* arrangement may be applied – by the Supervisory Board or the Management Board, respectively – reducing the amount of variable remuneration payable to an MRT, including a Member of the Management Board, in subsequent settlement periods.

Members of the Management Board and employees who are MRTs have the right to join the PPE (Employee Pension Scheme), while MRTs who are not Members of the Management Board may also benefit from Bank-funded medical care and the social benefits fund. Members of the Management Board have the option to purchase, from their own funds, benefits from the cafeteria system and a healthcare package for themselves and their family members in accordance with the agreement with the medical service provider for the Bank.

Where an MRT, including a Member of the Management Board, is awarded severance pay in connection with removal from office coupled with the termination of the legal relationship constituting the basis for employment (other than severance pay arising from generally applicable laws and provisions on dismissals for reasons not attributable to employees), its amount reflects the assessment of performance over the past three years of employment. The Bank's regulations set the maximum amount of such severance pay for MRTs, including Members of the Management Board, at three times their fixed remuneration.

A Member of the Management Board is entitled to severance pay on condition that he or she has served as a Member of the Bank's Management Board for a period of at least twelve months prior to the termination of the aforementioned contract. An MRT other than a Member of the Management Board may be awarded severance pay on condition that he or she has held an MRT position for a period of at least twelve months prior to the termination of his or her employment contract or another contract constituting the basis for the performance of work. Severance pay is not payable in the event of remunerated employment in another Group Company following the termination of employment at the Bank.

MRTs, including Members of the Management Board, are also subject to non-competition agreements which, for refraining from taking up employment with a competing firm or engaging in any other form of competitive activity following the termination of employment at the Bank, provide for the payment of compensation – for a maximum period of six months, in the amount of up to 100% of the fixed remuneration under the contract. The non-competition obligation ceases to apply, and thus the compensation is not payable, prior to the expiry of the term in the event of taking up remunerated employment in another Group Company. Compensation is also not payable to the Members of the Management Board in the event of serving on the management or supervisory body of a capital company with the shareholding of the State Treasury, a local government unit or an association thereof, or a state or municipal legal person.

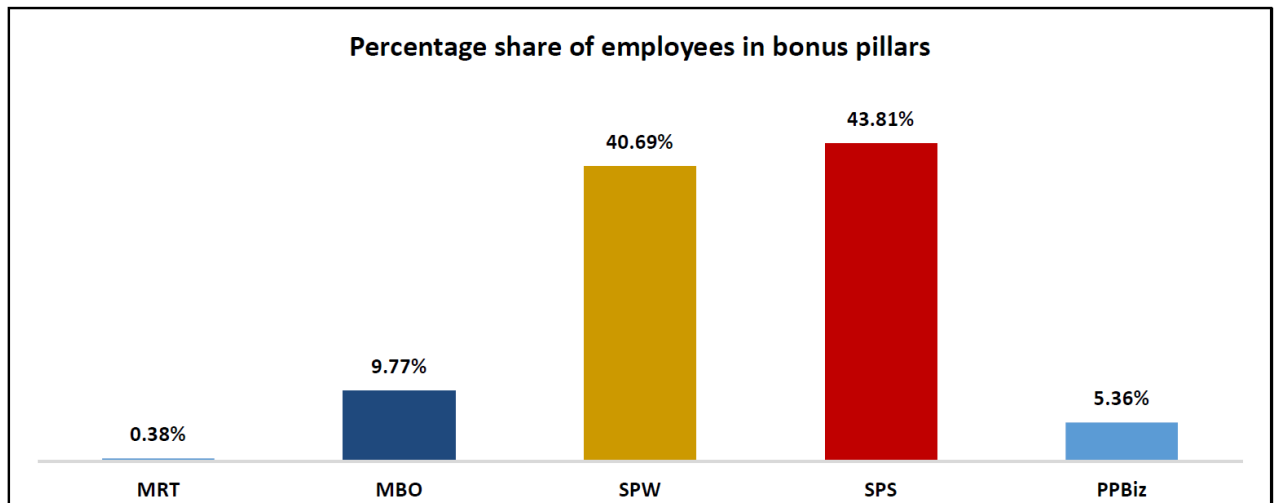
Analogous remuneration rules apply to the positions described above in key Group Companies.

6. VARIABLE REMUNERATION COMPONENTS FOR NON-MRT EMPLOYEES

1) BONUSES

PKO Bank Polski S.A. operates a bonus system consisting of four pillars:

- MbO (Management by Objectives) – covers managerial and expert positions in which the Bank's key objectives, including strategic objectives, are pursued; MbO is a bonus dependent on the quality and degree of achievement of the assigned objectives;
- PPBiz (Business Bonus Scheme) – is a bonus pillar in which the bonus depends on the degree of completion of specific sales or efficiency targets; it covers employees performing business tasks, primarily sales tasks in the area of corporate and investment banking, and debt collection;
- SPS (Sales Bonus System) – is aimed at positions involving the sale of banking products in the area of retail banking;
- SPW (Support Bonus System) – covers the remaining employees whose positions are not subject to the MbO, PPBiz or SPS pillar.



Data as at December 2025

The bonus is linked to the evaluation of the employee's performance. Performance is assessed on the basis of the evaluation of individual or team targets – a specified level of achievement corresponds to a specified bonus indicator in the amount determined by the decision of the President of the Management Board.

Bonus targets remain linked to the Bank's key management indicators incorporated into the bonus targets set for the individual units of the Bank. The cascade principle included in the bonus rules, compliance with which is monitored, requires targets to be assigned to employees within individual structures.

In addition, each target is set in accordance with the SMART principle (S-specific, M-measurable, A-ambitious, R-realistic, T-time-bound), which is also subject to cyclical monitoring.

The correctness of setting and settling targets is supported by applications dedicated to these processes – through system validations contained in the applications.

For employees engaged in sales or supervising sales, bonus targets are set taking into account the relevant qualitative criteria in the cases and on the terms arising from generally applicable laws or other banking sector regulations, or in connection with the implementation of the Bank's adopted strategy for improving customer satisfaction.

Each bonus may be reduced if, by the payment date, the employee has:

- 1) breached employee duties;
- 2) failed to comply with legal provisions or customer service standards;
- 3) improperly performed assigned work tasks;
- 4) engaged in conduct towards other employees in violation of the principles of social coexistence.

In addition, bonus adjustment ratios are applied depending on the performance quality assessment (MbO) and business activity results (PPBiz and MbO in corporate centres). In the retail network, solidarity targets are applied which may increase an individual bonus.

In the Group Companies, bonus and commission systems are in place, tailored to their needs and business model. Bonuses are awarded based on performance assessment and the degree of target achievement. Bonuses are parameterised based on specific achievement levels and the indicators assigned to them.

2) AWARDS

Separately from the bonus system, there is a system of awards for the Bank's employees, under which an award fund may be established for the following purposes:

- individual discretionary awards for the Bank's employees who achieve outstanding results in their professional work, or for achievements that have produced outcomes of significance to the Bank;
- awards for employees recommending candidates for work at the Bank;
- measures related to the retention of employees holding key positions or possessing key competencies.

The Bank also awards special awards for thwarting actions taken to the detriment of the Bank.

Budgets for discretionary awards are also implemented in the Group Companies.

7. NON-FINANCIAL BENEFITS AND PRIVILEGES AVAILABLE TO EMPLOYEES OF PKO BANK POLSKI S.A.

1) MEDICAL CARE

The Bank provides employees with additional medical care – in addition to occupational health benefits, which the employer is obliged to provide under the Labour Code.

All employees have the opportunity to use, free of charge, specialist medical consultations across all fields and a wide range of diagnostic tests, consultations with a dietician, a psychologist and a psychiatrist, as well as dental services, hospital insurance or rehabilitation. Additionally, as part of their benefit package, employees also have the opportunity to take advantage of an annual preventive check-up.

Employees may also extend the medical care coverage to family members and other close persons.

Furthermore, as part of the wellbeing programmes implemented, the Bank is actively involved in promoting a healthy lifestyle and prevention.

2) WELLBEING PROGRAMMES

In 2025, the Bank consistently implemented a strategy of supporting the health and wellbeing of employees, focusing both on prevention and on building an organisational culture based on trust, balance and a high-quality work environment.

A key element of these efforts was the comprehensive wellbeing programme #FokusNaCiebie (#FocusOnYou), providing employees with, for example, access to a wellbeing platform featuring an extensive knowledge library, educational materials and sessions promoting healthy habits, as well as the "Spokojna Głowa" ("Calm Mind") series of meetings aimed at building psychological balance. Throughout 2025, the Bank also organised meetings with experts, with the greatest interest generated by a webinar on effectively combining high productivity with caring for one's own wellbeing.

A notable emphasis this year was on strengthening the role of leaders in creating a healthy work environment. Managers participated in webinars, workshops, mastermind sessions and individual consultations. The programme was designed to raise leaders' awareness in the areas of mental resilience, communication and team energy management.

This year, the Bank decisively strengthened its efforts towards psychological safety – treating it not as a one-off initiative, but as a strategic element of the organisational culture. Numerous educational initiatives, workshops and tools were introduced to support open dialogue about challenges, emotions and work-related strain. The Bank became a partner of the report "What is the level of psychological safety of employees in Poland?". The report emphasised the Bank's role as a socially responsible organisation actively shaping market standards in this area.

Promotion of an active lifestyle was implemented through sports clubs and thematic sections (including running and cycling), enabling employees to socialise and engage in regular physical activity.

3) PPE

The Bank operates an Employee Pension Scheme (PPE), under which employees have the opportunity to save long-term in order to supplement the pension income received from the mandatory parts of the pension system. The Bank's PPE is operated in the form of an agreement on the Bank making a Basic Contribution (3.5% of an employee's salary) and an optional Additional Employee Contribution to the Investment Funds managed by PKO TFI.

The provisions of the PPE company agreement also enable Members of the Management Board to join the PPE.

4) COMPANY SOCIAL BENEFITS FUND

As part of the CSBF, the Bank offers:

- a cafeteria system – an online platform through which every Bank employee can independently manage the funds allocated to them from the Company Social Benefits Fund. The cafeteria system allows for the selection and purchase, using funds from the Fund, of attractive benefits related in particular to recreation, sport, leisure and culture;
- non-repayable financial assistance for employees in a difficult situation;
- housing loans, e.g. for the purchase of a first home or for renovation and modernisation;
- co-financing of organised recreation and childcare in nurseries, children's clubs, kindergartens and other forms of pre-school education, as well as care provided by a day carer or a nanny;
- team-building events for the Bank's employees;
- a platform with audiobooks and personal development podcasts.

- 5) **SPORTS BENEFIT CARDS**
Bank employees can take advantage of classes at sports facilities of their choice located throughout the country as part of sports benefit cards from various providers. The card can be financed from funds allocated under the CSBF or at the employee's own expense.
- 6) **SPECIAL INDUSTRY OFFER**
Banking sector employees have the opportunity to take advantage of a special banking offer on products: personal account, revolving credit facility, credit card, cash loan, mortgage loan.
- 7) **CO-FINANCING OF EDUCATION COSTS**
The Bank's employees have the opportunity to apply for co-financing of the costs of education – foreign language courses, as well as postgraduate studies, MBA programmes, doctoral programmes and legal counsel traineeships. At selected private universities, employees have discounts on, among others, postgraduate studies and MBA programmes.
- 8) **"PKO AFTER HOURS" PROGRAMME**
Co-financing and support for the activities of bank clubs (including running, cycling, triathlon, football, horse riding, basketball, volleyball, tennis and motorcycle clubs), organised locally by employees. The programme includes Club initiatives – activities conducted by clubs bringing employees together around common interests (e.g. sports, hobbies).
 - One-off initiatives – individual events focused on shared sports or artistic activities.
 - Initiatives organised by the programme coordinator – larger, bank-wide events, e.g. Winter competitions.The aim of the programme is to support non-work-related passions, build relationships between employees from different units of the Bank and support social engagement.
- 9) **EYEWEAR REIMBURSEMENT**
Bank employees who require corrective lenses for work at a computer monitor may apply for a refund for glasses or contact lenses in an amount specified by the Bank.
- 10) **COMPANY CARS**
Cars are provided by virtue of the position held or the duties performed. In the case of key management positions, the brand, model and colour of the company car are selected by the car user (from a specified catalogue of brands and models).
- 11) **"#AUTONABANK" PROGRAMME**
#AutoNaBank is a programme for the Bank's employees, prepared by Masterlease (a company in the Bank's Group), offering favourable terms for car rental and purchase:
 - "na chwilę" ("just for now") – a 20% discount and a maximum benefits package at the car rental service;
 - "na dłużej" ("for longer") – attractive long-term rental rates, with no upfront fee and a comprehensive service package (formalities, mechanical servicing, insurance and a replacement car all included in the instalment);
 - "na zawsze" ("forever") – the option to purchase used cars from the Masterlease used car stock.
A seniority-based discount is deducted from the price of the car.
- 12) **DISCOUNTS ON PRODUCTS OF THE GROUP COMPANIES**
The Bank's employees may benefit from a dedicated offer on products of the Group Companies, e.g. travel insurance, car or home insurance, car leasing.
- 13) **GROUP LIFE INSURANCE**
Bank employees are provided with the opportunity to purchase life insurance. Group insurance is offered in several variants on preferential terms compared with the offers available on the individual market. The employee may also enrol his or her spouse/partner, as well as adult children, in the insurance.
- 14) **RETIREMENT RECOGNITION PROGRAMME**
The Bank operates a programme for employees who have reached retirement age and are consequently terminating their employment at the Bank. This project involves the granting of additional benefits in recognition of long-term service.
- 15) **EMPLOYEE DISCOUNTS**
Bank employees have the opportunity to take advantage of attractive discounts negotiated by the Bank.

16) ADDITIONAL TIME OFF

The Bank also offers benefits that support employee wellbeing in the form of additional time off.

The range of the aforementioned employee benefits and privileges available in the Group Companies varies from entity to entity and includes, in particular:

- additional medical care;
- Employee Pension Scheme;
- access to a cafeteria platform, through which, among other things, funds from the CSBF are allocated;
- group insurance;
- sports benefit cards;
- employee discount programme

taking into account the price terms negotiated by the Bank with its counterparties.

The Bank promotes the implementation of the aforementioned benefits in the Group Companies – in accordance with the scale and specific nature of their operations and their budgetary capacity.

8. COMPETENCES REGARDING THE SHAPING OF REMUNERATION

The Bank's internal regulations regarding remuneration are introduced by the Management Board (for the Management Board – the Supervisory Board), while the setting of bonus indicators for employees remains within the competence of the President of the Management Board.

The Management Board has authorised the following to perform legal acts for the Bank in individual labour law matters (i.e. entering into employment contracts and amending remuneration under such contracts):

- 1) the President of the Management Board;
- 2) the Director of the Employee Relations Division (ERD);
- 3) the director of the Employee Capital Department (ECD) – in the absence of the ERD director (with the possibility of granting permanent power of attorney within the scope of permanent competences assigned to the director of the ERD).

In accordance with the Bank's Articles of Association, the employer's competences regarding the staffing of ring-fenced positions, including the so-called senior management of the Bank, are reserved for the President of the Management Board.

Awarding, in particular in employment contracts, preliminary contracts or letters of intent, benefits related to the employment relationship or terms and conditions of an employment contract that go beyond the benefits or terms and conditions arising from generally applicable or internal legal provisions requires the approval of the President of the Management Board; in the case of additional monetary benefits up to a combined amount equivalent to 3 months' basic salary of the employee, the approval of the Director of the Employee Relations Division is required.

Employment in a position, termination of an employment contract, and amendment of employment contract terms regarding a position, carried out in accordance with the employer's decision in respect of the director of the internal audit unit or the director of the compliance unit, require prior approval by the Supervisory Board. Determining the amount of the basic salary and changes thereto for the above-mentioned persons are approved, respectively, by the Supervisory Board or its relevant committee, in accordance with the Bank's separate internal regulations concerning the remuneration of MRTs.

Termination of an employment contract and amendment of employment contract terms regarding a position or resulting in a reduction of the basic salary, carried out at the employer's initiative in respect of an employee of the internal audit unit or an employee of the compliance unit other than the director, require prior approval by the President of the Management Board.

ASSESSMENT OF COMPLIANCE OF THE REMUNERATION POLICY OF PKO BANK POLSKI S.A. WITH THE PFSA'S CORPORATE GOVERNANCE RULES AND OTHER REGULATORY REQUIREMENTS

§ 28. 1. A supervised institution should have a transparent policy of remuneration of members of the management body and the supervisory body, as well as key personnel. The principles of remuneration shall be defined by means of an appropriate internal regulation (the remuneration policy).

The Bank follows the policy of remunerating the members of the Supervisory Board and the Management Board, as well as key managers. This policy is set out in the following internal regulations:

- 1) Remuneration Policy for Employees of the Bank and the PKO BP S.A. Group;
- 2) Resolution of the Annual General Meeting of PKO Bank Polski S.A. on the adoption of the Remuneration Policy for Members of the Supervisory Board and the Management Board;
- 3) Resolution of the Extraordinary General Meeting of PKO Bank Polski S.A. on the determination of the rules of remuneration of the members of the Supervisory Board (as amended);
- 4) Resolution of the Extraordinary General Meeting of PKO Bank Polski S.A. on the rules of shaping the remuneration of the members of the Management Board (as amended);
- 5) Principles for Employment and Remuneration of the Members of the Bank's Management Board;
- 6) Principles of Remunerating the Bank's Employees Whose Activities Have a Material Impact on the Bank's Risk Profile – Material Risk Takers at the Bank;
- 7) Award Rules for the Bank's Employees;
- 8) Bonus Rules for the Bank's Employees;
- 9) Decision of the Director of the Employee Relations Division on the introduction of a recommendation programme;
- 10) Decision of the Director of the Employee Relations Division on the regulations of the retention programme;
- 11) Resolution of the Bank's Management Board on determining competence to perform activities for the Bank in matters relating to labour law;
- 12) Order of the President of the Management Board and Resolution of the Management Board on competence to perform human resources activities in matters relating to labour law;
- 13) the Table of Positions for the Bank's Organisational Units;
- 14) Regulations of the Nomination and Remuneration Committee of the Supervisory Board;
- 15) the Collective Bargaining Agreement;
- 16) Decision of the President of the Management Board on the parameterisation of bonuses in accordance with the bonus rules for the Bank's employees;
- 17) Decision of the President of the Management Board on the parameterisation of bonuses for the Bank's Material Risk Takers,
- 18) the Table of Guaranteed Minimum Monthly Basic Salary Rates according to the CBA,

The aforementioned regulations have been reviewed for consistency with the PFSA's Corporate Governance Rules and for transparency, as well as for compliance with other regulatory requirements (i.e. the CRD, EBA guidelines, the Banking Law and PFSA recommendations).

The remuneration regulations are available for review by all the Bank's employees to whom the respective regulations apply, via the Bank's intranet pages.

§ 28. 2. When establishing the remunerating policy, the financial situation of a supervised institution must be taken into account.

In accordance with the remuneration policy in force at the Bank, the amount of variable remuneration depends on the level of achievement of set targets. These targets are linked to the Bank's results and financial position. They guarantee that the Bank's business cycle and the risk associated with its activities are taken into account. This risk is taken into account both through the establishment of appropriate, risk-sensitive performance evaluation criteria and through the

reduction or non-payment of bonuses in the event of deteriorated financial results, a loss incurred by the Bank or deterioration of other variables.

Pursuant to § 16 of the Principles of Employment and Remuneration of the Members of the Bank's Management Board and § 13(2) of the Principles of Remunerating the Bank's Employees Whose Activities Have a Material Impact on the Bank's Risk Profile – Material Risk Takers at the Bank, variable remuneration may be reduced, up to the complete forfeiture of the entitlement to such remuneration, in the event that, by the payment date, any of the following has occurred:

- 1) a significant deterioration in the results of the Bank and the Group due to:
 - a. the emergence of a balance sheet loss or the threat of a balance sheet loss,
 - b. the emergence of a risk of insolvency or loss of liquidity (taking into account the cost of risk, the cost of capital and the liquidity risk of the Bank or the Group in the long term);
- 2) a significant adverse change in the Bank's equity;
- 3) a fall in the ROA ratio below the level triggering the recovery plan and a fall in the Tier 1 capital ratio or the total capital ratio (TCR) below the level of the combined buffer requirement;
- 4) a fall in the NSFR ratio below the level triggering the recovery plan;
- 5) a fall in the total capital ratio (TCR) below the level triggering the recovery plan;
- 6) a breach of legal provisions, regulations, procedures or obligations arising from the employment relationship of an MRT, including a Member of the Management Board, or the commission of material errors by such person, e.g. conduct inconsistent with the internal code of conduct, compliance guidelines or core values, particularly in the area of risk management;
- 7) an adjustment to the performance and degree of achievement of results or targets of an MRT, including Members of the Management Board;
- 8) a deterioration in the results of structures supervised by the MRT or the area supervised by the Member of the Management Board;
- 9) awarding variable remuneration on the basis of incorrect, misleading information or as a result of fraud by a given MRT, including a Member of the Management Board.

Pursuant to § 14 of the Remuneration Policy for Employees of the Bank and the PKO BP S.A. Group, in the event of extraordinary and unforeseen circumstances requiring a conservative approach to variable remuneration, the following may be subject to temporary change:

- 1) the proportion of the deferred and non-deferred part of variable remuneration so as to increase the deferred part of variable remuneration;
- 2) the length of variable remuneration deferral periods through their extension;
- 3) the dates as of which the base value of variable remuneration is converted into the value of instruments;
- 4) the dates as of which the value of the instruments will constitute the basis for converting the instrument into cash for payment;
- 5) the proportion between the cash component of variable remuneration and the instrument-based component, so as to increase the instrument-based part of variable remuneration.

§ 28. 3. The supervisory body shall prepare and present to the decision-making body once a year a report on the assessment of the functioning of the remuneration policy in the supervised institution.

The Supervisory Board fulfils its duties in terms of preparing this report on the assessment of the functioning of the remuneration policy at the Bank once a year for the purpose of presenting it to the Annual General Meeting.

§ 28. 4. The decision-making body shall assess whether the established remuneration policy is conducive to the development and operational security of the supervised institution.

By Resolution No 51/2025 of the Annual General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 13 June 2025, having considered the report "Assessment of the Functioning of the Remuneration Policy at PKO Bank Polski S.A. in 2024" presented by the Supervisory Board, the General Meeting concluded that the remuneration policy established at PKO Bank Polski S.A. is conducive to the development and operational security of PKO Bank Polski S.A.

§ 29. 1. The remuneration of the members of the supervisory body shall be adequate to their functions and adequate to the scale of the operations of the supervised institution. Supervisory body members appointed to work in committees, including the audit committee, should be remunerated adequately to the additional tasks performed within a given committee.

The members of the Supervisory Board receive remuneration for the tasks entrusted to them. The remuneration was determined as a product of the average remuneration in the enterprise sector excluding profit-related bonus payments in the fourth quarter of the previous year, as announced by the President of Statistics Poland, and a multiple dependent on the functions performed within the Supervisory Board. Following the entry into force of Resolution No 62/2025 of the Annual General Meeting of 13 June 2025 (on the amendment of Resolution No 3/2017 of the Extraordinary General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 13 March 2017 on the determination of the rules of remuneration of the members of the Supervisory Board, as amended by Resolution No 5/2019 of the Extraordinary General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 17 September 2019), the monthly remuneration of the members of the Supervisory Board was set at 2.75 times the assessment basis referred to in Article 1(3)(11) of the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies, taking into account other legal acts amending or modifying the assessment basis, including the provisions of acts on special solutions for the implementation of the Budget Act for a given year. The remuneration of a member of the Supervisory Board is increased by 10% where the member participates in at least one standing committee of the Supervisory Board.

The remuneration awarded by the Bank jointly reflects the performance of supervisory functions and committee work. Members of the Supervisory Board appointed to committees are entitled to reimbursement of costs incurred in the performance of additional duties.

§ 29. 2. Remuneration of supervisory body members, unless regulations prohibit the payment of such remuneration, should be established by the decision-making body.

The amount and the terms of payment of the remuneration of the members of the Supervisory Board were determined by the General Meeting of PKO Bank Polski S.A. by means of Resolution No 35/2020 of the Annual General Meeting of PKO Bank Polski S.A. on the adoption of the Remuneration Policy for Members of the Supervisory Board and the Management Board, and Resolution No 3/2017 of the Extraordinary General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 13 March 2017 on the determination of the rules of remuneration of the members of the Supervisory Board, as amended by Resolution No 5/2019 of the Extraordinary General Meeting of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna of 17 September 2019 and Resolution No 62/2025 of the Annual General Meeting of 13 June 2025.

§ 29. 3. The principles of remunerating supervisory body members should be transparent and included in the relevant internal regulation of a supervised institution.

The rules of remuneration of the members of the Supervisory Board are determined by the above-mentioned resolutions of the General Meeting of PKO Bank Polski S.A., which, pursuant to § 392(1) of the Commercial Companies Code, constitute the appropriate internal regulation in this respect.

§ 30. 1. The supervisory body, taking into account the decisions of the decision-making body, shall be responsible for the adoption of an internal regulation specifying the principles of remunerating the members of the management body, including detailed criteria and conditions justifying eligibility for variable remuneration components.

The Supervisory Board, taking into account the decisions of the General Meeting of PKO Bank Polski S.A., introduced internal regulations determining the rules of remuneration of the members of the Management Board, i.e.:

- ▶ Remuneration Policy for Employees of the Bank and the PKO BP S.A. Group;
- ▶ Principles for Employment and Remuneration of the Members of the Bank's Management Board.

In the Principles of Employment and Remuneration of the Members of the Bank's Management Board, the Supervisory Board introduced provisions corresponding to the Act of 9 June 2016 on the Rules of Shaping the Remuneration of Persons Managing Certain Companies, concerning the determination of the maximum fixed remuneration of the members of the Bank's Management Board expressed as a multiple of the average monthly remuneration in the enterprise sector excluding profit-related bonus payments in the fourth quarter of the previous year, as announced by the President of Statistics Poland, the exclusion of the possibility of receiving fixed remuneration for serving as a member of a governing body in the subsidiaries of the Bank's Group, and the determination of the maximum ratio of variable to fixed remuneration components.

These regulations jointly define the general principles and detailed criteria for the remuneration of the members of the Management Board, including their receipt of fixed and variable remuneration.

§ 30. 2. The supervisory body shall exercise supervision over the introduced remuneration policy, including a review of the fulfilment of the criteria and conditions of eligibility for variable components of remuneration prior to the payment of the whole or a part of such remuneration.

1) Ensuring supervision over the remuneration policy

The Supervisory Board approves the Remuneration Policy for Employees of the Bank and the PKO BP S.A. Group and conducts periodic reviews of this Policy. On the basis of these reviews, the Supervisory Board may recommend updating the Policy.

2) Determining the criteria and conditions of eligibility for variable remuneration prior to the payment of variable remuneration in whole or in part

The Supervisory Board determines the values and weights of targets for the Members of the Bank's Management Board within the Management by Objectives (MbO) system and approves their achievement.

3) Verification of fulfilment of the criteria and conditions of eligibility for variable remuneration prior to the payment of variable remuneration in whole or in part

Pursuant to § 8 and §§ 15–17 of the Principles of Employment and Remuneration of the Members of the Bank's Management Board, the Supervisory Board takes decisions on establishing that the grounds for the payment of variable remuneration have arisen and on the application of malus arrangements to the variable remuneration of individual Members of the Bank's Management Board. A malus arrangement was applied in 2025 due to the occurrence of grounds for the reduction of variable remuneration identical to those applied in respect of the Members of the Management Board in 2024. The reduction of variable remuneration was effected depending on the individual circumstances pertaining to the specific persons concerned. The above confirms that the provisions governing the mechanism for adjusting variable remuneration provide the flexibility to respond to circumstances related to the actions of the Members of the Management Board by applying an appropriate level of malus to specific persons in correlation with the assessment of breaches established by the Supervisory Board.

Analogous decisions may be taken by the Management Board in respect of Material Risk Takers (MRTs) in accordance with the Principles of Remunerating the Bank's Employees Whose Activities Have a Material Impact on the Bank's Risk Profile – Material Risk Takers at the Bank. In 2025, as regards persons holding positions included in the MRT List whose variable remuneration was reduced by the responsible Members of the Bank's Management Board, the Management Board established that the conditions of liability had been met in respect of MRTs who had committed breaches.

§ 30. 3. As regards persons performing key functions, the responsibility for the introduction of a relevant internal regulation and for supervision over that area shall lie with the management body.

The Management Board introduced the relevant regulations by means of Resolution No 694/C/2017 of the Management Board of 19 December 2017 on the introduction of the Principles of Remunerating the Bank's Employees Whose Activities Have a Material Impact on the Bank's Risk Profile – Material Risk Takers (MRTs) at the Bank (as subsequently amended).

§ 30. 4. Variable remuneration components of management body members or key personnel shall depend in particular on objective criteria, the quality of management of the supervised institution, and shall take into account long-term

aspects of the operations and method of implementation of strategic goals. When establishing the variable remuneration components, rewards and perks, including those resulting from motivational schemes and other bonus schemes paid, due or potentially due, shall be taken into account. An established remuneration policy shall not constitute an incentive for undertaking excessive risk in the operations of the supervised institution.

The variable remuneration of both the members of the Management Board and other key managers depends on the achievement of individually defined targets linked to the Bank's strategy. These targets comprise both quantitative and qualitative criteria and also ensure motivation for work and forms of conduct that enable the Bank to achieve its assumed targets. When setting targets, the following are taken into account, inter alia: the achievement, over a long-term horizon, of the best possible and stable financial results, the support of proper and effective risk management, the discouragement of excessive risk-taking that would exceed the Bank's accepted risk appetite, the mitigation of conflicts of interest, and the support of the implementation of the Bank's business strategy (the incentive system takes into account the achievement of strategic objectives).

The management targets of individual Members of the Management Board should, in line with their respective area of responsibility, also take into account criteria such as the Bank's commitment to considering the public interest and the Bank's contribution to environmental protection and to the prevention or elimination of any potential adverse social impacts of the Bank's activities.

At the same time, the rules applicable to the Members of the Bank's Management Board and other MRTs provide for the possibility of reducing payments in the event of a breach of legal provisions, regulations, procedures or obligations arising from the employment relationship of the above-mentioned persons, or the commission of material errors by such persons, particularly in the area of risk management.

§ 30. 5. Remuneration of a management body member or key personnel should be financed and paid from the funds of the supervised institution.

The remuneration of the Members of the Bank's Management Board and other key managers (MRTs) is financed and paid from the Bank's own funds. It is not dependent on the results of the parent entity, as the Bank itself constitutes the parent entity of the capital group.

ASSESSMENT OF WHETHER THE REMUNERATION POLICY SUPPORTS THE DEVELOPMENT AND OPERATIONAL SECURITY OF PKO BANK POLSKI S.A., INCLUDING AN ASSESSMENT OF ITS IMPACT ON THE BANK'S MANAGEMENT

1. General remarks

The Bank, as a public trust institution, conducts its business with the utmost diligence and attaches particular importance to the professionalism and ethics of its employees. Accordingly, the remuneration policy, which is a key element of the development and security of the Bank's operations, is implemented by the Management Board of the Bank with the support of the Employee Relations Division.

In 2025, the remuneration policy at the Bank and the Bank's Group was continued with the aim of ensuring a coherent and transparent remuneration system based on aligning remuneration levels to individual job grade categories and benchmarking them against market remuneration. The Bank continues to pursue a policy consistent with the job evaluation method, relating to the determination of individual position weights according to: skills, problem-solving and impact on results. The Bank also operates a candidate recommendation programme.

The remuneration policy does not encourage excessive risk-taking and – taking into account the Bank's financial position – is balanced in nature, supporting the achievement of the Bank's strategic objectives and its long-term development. This policy is implemented in the three elements described below, each of which meets the requirements set out in the applicable regulations.

2. Fixed remuneration

In the process of awarding fixed remuneration, the Bank is guided by market pay benchmarks and the job grade categories of individual positions as described in more detail in sections 3 and 4 of the remuneration policy description of this report. Positions are subject to evaluation in terms of skills, problem-solving and impact on results. The minimum guaranteed basic salary rates for individual job grade groups are determined by the Collective Bargaining Agreement.

The Bank uses a job evaluation method implemented in 2019. In 2025, a detailed review was conducted in cooperation with an independent external consultant, which resulted in the confirmation that the positions at the Bank are classified in a logical manner consistent with market observations. The Bank thereby strives to guarantee competitive remuneration in relation to market levels. The job evaluation model currently used at the Bank enables the structuring of career paths for individual employees and creates the foundations for introducing a coherent remuneration system at the Bank.

In order to ensure the security and control of remuneration, the Bank takes measures aimed at setting fixed remuneration at market levels while avoiding excessive employee attrition and increased staff turnover costs that could arise if remuneration were set below market levels. To this end, the Bank monitors turnover rates for individual positions in order to adjust, if necessary, the assumptions of the remuneration system in the event of adverse staffing trends. For the purpose of meeting regulatory requirements (Polish and EU), the Bank monitors the gender pay gap.

The authority to define and change remuneration is held by a limited and strictly defined group of employees as specified in the Bank's regulations determining the competence to perform human resources activities in labour law matters.

3. Variable remuneration

The Bank regulates the process of awarding variable remuneration in: the Principles of Employment and Remuneration of the Members of the Bank's Management Board, the Principles of Remunerating the Bank's Employees Whose Activities Have a Material Impact on the Bank's Risk Profile (the Bank's Material Risk Takers) and the Bonus Rules for the Bank's Employees.

The remuneration policy regarding variable remuneration components of the Bank takes into account the specificity of the positions for which targets linked to the Bank's Group strategy are set. The quantitative and qualitative targets set guarantee that the Bank's business cycle and the risk associated with its activities are taken into account. The variable remuneration of employees in the compliance, audit, legal, banking risk and human resources units is not directly dependent on the financial results of the Bank and the Group, so as not to affect their objectivity and independence. As at 31 December 2025, the targets of these employees resulted from the functions they performed.

The Members of the Management Board and other MRTs – as persons with a particular impact on the level of security and the stable development of the Bank – are subject to specific restrictions in the area of remuneration. Variable remuneration components are awarded to MRTs for a given bonus period (a calendar year), after the evaluation of bonus targets, in the following forms: non-deferred and deferred. The non-deferred part constitutes 60% of the variable remuneration, and the deferred part constitutes 40% of the variable remuneration. In the case of variable remuneration higher than the amount specified in the remuneration rules, the percentage share of the deferred remuneration increases accordingly. The deferred and non-deferred variable remuneration of MRTs is paid in the amount of 45% in the form of cash, and the remaining 55% in the form of an instrument, namely phantom shares.

Where good and stable results are achieved, the value of the Bank increases, which results in an increase in the final cash payment arising from the conversion of shares into cash. In the opposite situation, the payment may be reduced. This mechanism motivates MRTs, including Members of the Bank's Management Board, to focus on the Bank's results and long-term development.

The parameterisation of bonuses for all employees is carried out taking into account the Bank's situation and financial sector market benchmarks. The maximum bonus levels and bonus indicators are determined following prior consultation with the human resources and controlling units and following an opinion of the compliance unit.

Each bonus may, in justified cases, be reduced, up to the complete forfeiture of the entitlement to such remuneration, in the event of a breach of the principles of social coexistence or of clients' interests.

In special cases, employees may receive a discretionary award.

4. Non-financial benefits

The Bank offers an attractive, market-competitive range of additional non-financial benefits described in more detail in section 7 of the remuneration policy description of this report. As part of its non-financial benefits, the Bank offers an Employee Pension Scheme, benefits from the Company Social Benefits Fund, medical care, as well as benefits supporting activity in the areas of sports and wellness. Employees manage their non-financial benefits independently through a dedicated cafeteria platform. Additionally, educational benefits translate directly into the Bank's development by enhancing the competencies of its employees.

The benefits awarded, on the one hand, support the motivation and engagement of employees in the achievement of the Bank's objectives and, on the other hand, by increasing job satisfaction and strengthening the relationship with the employer, serve a retention function – separately from dedicated retention programmes safeguarding the Bank's business continuity within individual processes. Employees appreciate the package of available non-financial benefits – this is reflected in the eNPS survey. Investment in benefits has a positive impact on employee experience, which translates into the Positive Employee Experience index.

5. Assessment of the impact on the Bank's management

The Supervisory Board supervised, in particular on the basis of § 15(1), first sentence of the Bank's Articles of Association, the implementation and application of the remuneration rules at the Bank by the Management Board. The Supervisory Board positively assesses the impact of the Bank's remuneration rules arising from the applicable remuneration policy, encompassing the regulations indicated in the section "ASSESSMENT OF COMPLIANCE OF THE REMUNERATION POLICY OF PKO BANK POLSKI S.A. WITH THE PFSA'S CORPORATE GOVERNANCE RULES AND OTHER REGULATORY REQUIREMENTS", on the management of the Bank.