Bank Polski

Capital adequacy

and other information
of the Powszechna Kasa Oszczędności
Bank Polski Spółka Akcyjna Group
subject to disclosure
as at 30 June 2026

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1 INTRODUCTION

The report "Capital adequacy and other information subject to disclosure of the PKO Bank Polski SA Group as at 30 June 2026", hereinafter referred to as the "Report", was prepared in accordance with:

- Article 111a of the Act of 29 August 1997 – Banking Law, hereinafter referred to as the "Banking Law",
- Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms, hereinafter referred to as the "CRR", taking into account acts amending the CRR,
- Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637,
- Commission Implementing Regulation (EU) 2021/763 of 23 April 2021, as amended, laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council with regard to the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities.

Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna, hereinafter referred to as "PKO Bank Polski S.A." or the "Bank", meeting the definition of a large institution within the meaning of Article 4(1)(146) of the CRR, in accordance with Article 13(1) and Article 433a of the CRR, discloses information on capital adequacy referred to in Part Eight of the CRR on an annual, semi-annual and quarterly basis in a separate document. In accordance with Article 434(1) of the CRR, this information is submitted to the EBA in electronic format and published on its website.

This Report has been prepared in accordance with the Bank's internal regulations concerning the information policy of PKO Bank Polski S.A. regarding capital adequacy and other information subject to disclosure (hereinafter: "The information policy") shared on the Bank's website (www.pkobp.pl).

Unless otherwise indicated, the figures presented in the Report are expressed in PLN million. Any differences in totals and percentages result from rounding amounts to PLN million and percentages to one decimal place.

The Report has been prepared taking into account all data available as at 30 June 2026. The Report addresses the requirements of the regulations described above insofar as they relate to the Bank and the Bank's Group. Lack of a reference to a particular article means that the related disclosures are not applicable. This Report was subject to an internal verification by the Bank's Internal Audit Department.

According to the CRR, prudential consolidation is used for capital adequacy purposes, which, unlike consolidation in accordance with International Financial Reporting Standards, covers only subsidiaries that meet the definition of an institution or financial institution (including any ancillary services undertaking).

2 MANAGEMENT SYSTEM

The management system constitutes a set of principles and mechanisms relating to decision-making processes within the Bank and to the assessment of its banking activities. The management system in the Bank includes the risk management system and the internal control system.

The risk management system is one of the key internal processes, both in PKO Bank Polski S.A., including its foreign branches, and in the other companies of the Bank's Group. Risk management aims to ensure the profitability of business activities while ensuring that the level of risk is controlled and maintained within the risk tolerance framework and the limits system adopted by the Bank and the Bank's Group in the changing macroeconomic and legal environment. The expected level of risk plays an important role in the planning process.

Within prudential consolidation, the following risks have been identified in the Bank's Group and are subject to management, some of which are considered material: credit risk, risk of mortgage loans in foreign currencies for households, foreign exchange risk, interest rate risk, liquidity risk (including funding risk), operational risk, business risk, risk of macroeconomic changes and model risk.

The risk management system, including the principles of managing significant types of risk, has been described in detail in the Report "Capital adequacy and other information subject to disclosure of the PKO Bank Polski SA Group as at 31 December 2025" and the consolidated financial statements of the PKO Bank Polski S.A. Group for the year ended 31 December 2025.

2.1 Credit risk, including counterparty risk

Credit risk is understood as the risk of incurring losses as a result of a customer defaulting on their liabilities to the Bank's Group or the risk of a decrease in the economic value of the Bank's Group receivables as a result of a deterioration in a customer's ability to service their liabilities.

The objective of credit risk management is to reduce losses on the loan portfolio and changes in the economic value of exposures on the wholesale market and to minimise, to an acceptable level, the risk of credit exposures becoming impaired, while maintaining the expected level of profitability and value of the loan portfolio by appropriately structuring on-balance-sheet and off-balance-sheet items.

2.1.1 Credit risk and dilution risk and credit quality of exposures

Table 2.1 Maturity of exposures [Template EU CR1-A]

		30.06.2026					
		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	-	75 619	104 233	137 144	5 392	322 388
2	Debt securities	-	40 114	144 514	60 837	-	245 465
3	**Total**	**-**	**115 733**	**248 747**	**197 981**	**5 392**	**567 853**

2.1.2 Use of credit risk mitigation techniques

In the process of calculating own funds requirements, the Bank uses the credit assessments assigned by the following external credit assessment institutions (rating agencies):

1) Moody's Investors Service,
2) Standard and Poor's Ratings Services,
3) Fitch Ratings.

The process of transferring the issuer and issue assessment to positions outside the trading book for the purpose of calculating own funds requirements is in accordance with the provisions of the CRR, Part Three, Title II, Chapter 2.

Table 2.1 CRM techniques overview: Disclosure of the use of credit risk mitigation techniques [Template EU CR3]

		30.06.2026				
		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	
						Of which secured by credit derivatives
		a	b	c	d	e
1	Loans and advances	138 477	197 899	197 813	86	-
2	Debt securities	245 465	-	-	-	-
3	**Total**	**383 942**	**197 899**	**197 813**	**86**	**-**
4	Of which non-performing exposures	2 883	3 451	3 422	29	-
EU-5	Of which defaulted	2 883	3 451			

Table 2.2 Credit risk exposure and CRM effects - standardised approach [Template EU CR4]

		30.06.2026					
	Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWEA	RWEA density (%)
		a	b	c	d	e	f
1	Central governments or central banks	219 121	-	235 238	52	4 974	2,1%
2	Non-central government public sector entities	22 369	10 447	22 476	4 746	6 258	23,0%
EU 2a	Regional governments or local authorities	21 747	4 842	22 040	2 470	4 902	20,0%
EU 2b	Public sector entities	622	5 605	436	2 276	1 356	50,0%
3	Multilateral development banks	16 123	-	16 123	-	-	-
EU 3a	International organisations	-	-	-	-	-	-
4	Institutions	7 570	1 528	7 570	753	3 528	42,4%
5	Covered bonds	-	-	-	-	-	-
6	Corporates	65 008	69 294	56 154	21 958	76 595	98,1%
6,1	Of which: Specialised Lending	6 490	6 283	6 008	862	7 902	115,0%
7	Subordinated debt exposures and equity	1 844	-	1 844	-	4 446	241,2%
EU 7a	Subordinated debt exposures	-	-	-	-	-	-
EU 7b	Equity	1 844	-	1 844	-	4 446	241,2%
8	Retail	93 335	26 448	88 878	11 418	69 342	69,1%
9	Secured by mortgages on immovable property and ADC exposures	150 406	15 068	147 777	4 929	74 353	48,7%
9,1	Secured by mortgages on residential immovable property - non IPRE	118 518	1 697	117 096	807	38 814	32,9%
9,2	Secured by mortgages on residential immovable property - IPRE	2 473	34	2 473	33	2 064	82,4%
9,3	Secured by mortgages on commercial immovable property - non IPRE	13 872	5 756	13 205	2 429	12 474	79,8%
9,4	Secured by mortgages on commercial immovable property - IPRE	9 761	1 266	9 501	440	10 917	109,8%
9,5	Acquisition, Development and Construction (ADC)	5 782	6 315	5 502	1 221	10 084	150,0%
10	Exposures in default	6 572	496	6 132	278	8 131	126,9%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	452	-	452	-	262	58,1%
EU 10c	Other items	27 506	-	27 506	-	10 949	39,8%
12	**TOTAL**	**610 306**	**123 280**	**610 150**	**44 135**	**258 841**	**39,6%**

Table 2.3 Standardised approach [Template EU CR5]

	Exposure classes	30.06.2026												
		Risk weight												
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%
		a	b	c	d	e	f	g	h	i	j	k	l	m
1	Central governments or central banks	231 228	-	-	1 651	198	-	-	-	-	-	-	-	-
2	Non-central government public sector entities	-	-	-	-	24 510	-	-	-	-	2 713	-	-	-
EU 2a	Regional governments or local authorities	-	-	-	-	24 510	-	-	-	-	-	-	-	-
EU 2b	Public sector entities	-	-	-	-	-	-	-	-	-	2 713	-	-	-
3	Multilateral development banks	16 123	-	-	-	-	-	-	-	-	-	-	-	-
EU 3a	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Institutions	-	827	-	-	4 516	358	-	-	-	244	-	-	0
5	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Corporates	-	-	-	-	53	-	-	-	-	640	-	-	2 836
6,1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-	2 733	-	-	-	97 150
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	91 350	8	214	-	19	17	4 905	-	29 656
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	90 306	-	-	-	-	-	-	-	27 592
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	8 912
9.1.2	loan splitting applied (secured)	-	-	-	-	90 306	-	-	-	-	-	-	-	-
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	18 681
9,2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	1 044	8	214	-	19	-	16	-	79
9,3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-	17	4 889	-	1 986
9.3.1	no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	1 946
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	4 889	-	-
9.3.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	17	-	-	40
9,4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-
9,5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10c	Other items	12 876	-	-	-	4 601	-	-	-	-	-	-	-	-
EU 11c	**TOTAL**	**260 227**	**827**	**-**	**1 651**	**125 229**	**366**	**214**	**-**	**2 752**	**3 613**	**4 905**	**-**	**129 643**

	Exposure classes	30.06.2026													
		Risk weight												Total	Of which unrated
		80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Others		
		n	o	p	q	r	s	t	u	v	w	x	y	z	aa
1	Central governments or central banks	-	-	-	-	-	-	762	1 450	-	-	-	-	235 290	-
2	Non-central government public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	27 223	20 632
EU 2a	Regional governments or local authorities	-	-	-	-	-	-	-	-	-	-	-	-	24 510	17 919
EU 2b	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	2 713	2 713
3	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	16 123	16 123
EU 3a	International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Institutions	-	-	2 377	-	-	-	1	-	-	-	-	-	8 323	501
5	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Corporates	-	-	71 138	-	-	3 445	-	-	-	-	-	-	78 112	71 642
6,1	Of which: Specialised Lending	-	-	3 425	-	-	3 445	-	-	-	-	-	-	6 870	6 870
7	Subordinated debt exposures and equity	-	-	-	-	-	12	149	1 683	-	-	-	-	1 844	1 844
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	12	149	1 683	-	-	-	-	1 844	1 844
8	Retail exposures	-	-	413	-	-	-	-	-	-	-	-	-	100 296	100 296
9	Secured by mortgages on immovable property and ADC exposures	-	1 476	8 746	4	1 818	-	11 966	-	-	-	-	2 527	152 707	152 707
9.1	Secured by mortgages on residential immovable property - non IPRE	-	-	5	-	-	-	-	-	-	-	-	-	117 903	117 903
9.1.1	no loan splitting applied	-	-	0	-	-	-	-	-	-	-	-	-	8 912	8 912
9.1.2	loan splitting applied (secured)	-	-	4	-	-	-	-	-	-	-	-	-	90 310	90 310
9.1.3	loan splitting applied (unsecured)	-	-	1	-	-	-	-	-	-	-	-	-	18 682	18 682
9,2	Secured by mortgages on residential immovable property - IPRE	-	1	-	4	1	-	1 114	-	-	-	-	7	2 506	2 506
9,3	Secured by mortgages on commercial immovable property - non IPRE	-	-	8 742	-	-	-	-	-	-	-	-	-	15 634	15 634
9.3.1	no loan splitting applied	-	-	6 792	-	-	-	-	-	-	-	-	-	8 737	8 737
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	-	-	4 889	4 889
9.3.3	loan splitting applied (unsecured)	-	-	1 950	-	-	-	-	-	-	-	-	-	2 007	2 007
9,4	Secured by mortgages on commercial immovable property - IPRE	-	1 475	-	-	1 817	-	4 129	-	-	-	-	2 520	9 941	9 941
9,5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	6 723	-	-	-	-	-	6 723	6 723
10	Exposures in default	-	-	2 966	-	-	-	3 444	-	-	-	-	-	6 410	6 410
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	452	452	452
EU 10c	Other items	-	-	10 029	-	-	-	-	-	-	-	-	-	27 506	27 506
EU 11c	**TOTAL**	**-**	**1 476**	**95 670**	**4**	**1 818**	**3 457**	**16 321**	**3 133**	**-**	**-**	**-**	**2 979**	**654 281**	**398 112**

The table above presents the total exposure amount of the on-balance sheet and off-balance sheet items of the Bank's Group, which represents the total exposure net of specific credit risk adjustments and impairment losses and after applying the relevant conversion factors for off-balance sheet exposures, i.e., after multiplying the exposure amounts of off-balance sheet items by the corresponding factors of 0%, 20%, 40%, 50% or 100%.

As at 30 June 2026, the Bank did not use on- and off-balance sheet netting pursuant to Article 205 of the CRR, therefore, Article 453(a) of the CRR, regarding the disclosure of information about the policies and processes for on- and off-balance sheet netting and the extent to which a given entity makes use of such netting is not applicable.

As at 30 June 2026, the Bank took the effect of contractual netting agreements into account when determining the balance sheet equivalent for derivative transactions, in accordance with Article 298 of the CRR. Such agreements are concluded primarily with institutional counterparties. They allow all transactions covered by a given agreement to be settled, including in the event of one party's insolvency, in a single amount equal to the aggregate market value of the individual transactions. The contractual netting agreements used meet the requirements of Articles 295-297 of the CRR.

2.1.3 Exposures to counterparty credit risk

The table below presents the methods used to calculate the own funds requirement for counterparty credit risk (excluding exposures to central counterparties).

Table 2.4 Analysis of CCR exposure by approach [Template EU CCR1]

		30.06.2026							
		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)	-	-		1,4	-	-	-	-
EU2	EU - Simplified SA-CCR (for derivatives)	-	-		1,4	-	-	-	-
1	SA-CCR (for derivatives)	1 023	4 112		1,4	8 597	7 189	7 128	4 479
2	IMM (for derivatives and SFTs)			-	-	-	-	-	-
2a	Of which securities financing transactions netting sets			-		-	-	-	-
2b	Of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c	Of which from contractual cross-product netting sets			-		-	-	-	-
3	Financial collateral simple method (for SFTs)					-	-	-	-
4	Financial collateral comprehensive method (for SFTs)					2 036	6	6	6
5	VaR for SFTs					-	-	-	-
6	**Total**					**10 633**	**7 195**	**7 134**	**4 485**

The table below presents exposures to counterparty credit risk by exposure classes and risk weights applied to calculate the own funds requirement for counterparty credit risk using the Standardised Approach.

Table 2.5 Standardized approach – CCR exposures by regulatory exposure class and risk weights [Template EU CCR3]

	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
		30.06.2026											
		Risk weight											
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Other	Total exposure value
1	Central governments or central banks	24	-	-	1	-	-	-	-	-	-	-	25
2	Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	0	0	-	-	-	-	-	0
4	Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5	International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6	Institutions	-	402	-	-	566	626	-	2	-	31	2 740	4 368
7	Corporates	-	-	-	-	-	1	-	11	3 030	-	-	3 042
8	Retail	-	-	-	-	-	-	-	-	5	-	-	5
9	Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10	Other items	-	-	-	-	-	-	-	-	-	96	-	96
11	**Total exposure value**	**24**	**402**	**-**	**1**	**566**	**627**	**-**	**13**	**3 035**	**127**	**2 740**	**7 536**

The table below presents types of collateral used to calculate the own funds requirement for counterparty credit risk.

Table 2.6 Composition of collateral for CCR exposures [Template EU CCR5]

	Collateral type	a	b	c	d	e	f	g	h
		30.06.2026							
		Collateral used in derivative transactions				Collateral used in SFTs			
		Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
		Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1	Cash – domestic currency	1 184	70	240	15	-	-	-	-
2	Cash – other currencies	100	477	0	129	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-
4	Other sovereign debt	-	-	-	-	-	-	-	-
5	Government agency debt	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-
7	Equity securities	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-
9	**Total**	**1 284**	**547**	**240**	**144**	**-**	**-**	**-**	**-**

The table below presents an analysis of exposures to central counterparties used to calculate the own funds requirement for counterparty credit risk.

Table 2.7 Exposures of central counterparties (CCPs) [Template EU CCR8]

		30.06.2026	
		a	b
		Exposure value	RWEA
1	**Exposures to QCCPs (total)**		**12**
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	402	8
3	(i) OTC derivatives	386	8
4	(ii) Exchange-traded derivatives	16	0
5	(iii) SFTs	-	-
6	(iv) Netting sets where cross-product netting has been approved	-	-
7	Segregated initial margin	240	
8	Non-segregated initial margin	-	-
9	Prefunded default fund contributions	213	4
10	Unfunded default fund contributions	-	-
11	Exposures to non-QCCPs (total)		-
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-
13	(i) OTC derivatives	-	-
14	(ii) Exchange-traded derivatives	-	-
15	(iii) SFTs	-	-
16	(iv) Netting sets where cross-product netting has been approved	-	-
17	Segregated initial margin	-	
18	Non-segregated initial margin	-	-
19	Prefunded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

As at 30 June 2026, the Bank did not hold any credit derivative instruments, therefore table EU CCR6 has not been presented.

2.1.4 Exposures to securitisation positions

On 12 May 2025, the Bank's Group carried out a synthetic securitisation transaction on a portfolio of corporate loans with a total nominal value of PLN 1,892.3 million. As part of this transaction, the Bank's Group transferred a significant part of the credit risk from the selected portfolio subject to securitisation to the Investor. The risk transfer of the securitized portfolio is carried out through a credit protection instrument in the form of a financial guarantee secured by a deposit placed with the Bank. The transaction meets the requirements for the transfer of a significant portion of risk, as set out in the CRR, and has been structured to meet the STS criteria (simple, transparent and standardised securitisation). The Bank's Group deducts from own funds the value of the first-loss tranche, taking into account specific credit risk adjustments for the underlying exposures subject to securitisation, in accordance with the requirements of the CRR.

Table 2.8 Securitisation exposures in the non-trading book [Template EU SEC1]

		30.06.2026														
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Institution acts as originator							Institution acts as sponsor				Institution acts as investor			
		Traditional				Synthetic		Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
		STS		Non-STS			of which SRT		STS	Non-STS			STS	Non-STS		
			of which SRT		of which SRT											
1	Total exposures	-	-	-	-	955	955	955	-	-	-	-	-	-	-	-
2	Retail (total)	-	-	-	-	955	955	955	-	-	-	-	-	-	-	-
3	residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	955	955	955	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	loans to corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Table 2.9 Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor [Template EU SEC3]

		30.06.2026																
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions
1	Total exposures	955	-	-	-	-	-	-	955	-	-	-	94	-	-	-	-	-
2	Traditional transactions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic transactions	955	-	-	-	-	-	-	955	-	-	-	94	-	-	-	-	-
10	Securitisation	955	-	-	-	-	-	-	955	-	-	-	94	-	-	-	-	-
11	Retail underlying	955	-	-	-	-	-	-	955	-	-	-	94	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Table 2.10 Exposures securitised by the institution - Exposures in default and specific credit risk adjustments [Template EU SEC5]

		30.06.2026		
		a	b	c
		Exposures securitised by the institution - Institution acts as originator or as sponsor		
		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period
			Of which exposures in default	
1	Total exposures	1 059	- 2	-
2	Retail (total)	1 059	- 2	-
3	residential mortgage	-	-	-
4	credit card	-	-	-
5	other retail exposures	1 059	- 2	-
6	re-securitisation	-	-	-
7	Wholesale (total)	-	-	-
8	loans to corporates	-	-	-
9	commercial mortgage	-	-	-
10	lease and receivables	-	-	-
11	other wholesale	-	-	-
12	re-securitisation	-	-	-

2.1.5 Specialised lending

The Bank's Group does not apply the IRB Approach for calculating own funds requirements for credit risk.

2.1.6 Non-performing and forborne exposures

In accordance with Guidelines EBA/GL/2018/06, banks are required to monitor and actively manage their non-performing loan portfolios, with a view to keeping the NPL ratio below 5%. As at 30 June 2026, the Group's NPL ratio, calculated in accordance with the above-mentioned Guidelines, was 3.59%, remaining below the threshold set by the regulator.
Therefore, in accordance with Regulation 2024/3172, the following tables: EU CR2a, EU CQ2, EU CQ6, EU CQ8 are not presented.

The tables below contain quantitative information on non-performing and forborne exposures.

Table 2.11 Performing and non-performing exposures and related provisions [Template EU CR1]

		30.06.2026														
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			of which: stage 1	of which: stage 2		of which: stage 1	of which: stage 2		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3			
005	**Cash balances at central banks and other demand deposits**	13 988	13 988	-	-	-	-	- 0	- 0	-	-	-	-	-	-	-
010	**Loans and advances**	**320 660**	**287 452**	**31 177**	**11 955**	**2**	**11 327**	**- 4 599**	**- 1 368**	**- 3 391**	**- 5 628**	**- 1**	**- 5 561**	**- 2 299**	**194 448**	**3 451**
020	Central banks	2 007	2 007	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	7 978	7 551	428	32	-	32	- 62	- 24	- 38	- 2	-	- 2	- 1	1 769	25
040	Credit institutions	3 396	3 396	-	-	-	-	- 2	- 2	-	-	-	-	-	-	-
050	Other financial corporations	8 616	8 187	429	16	-	16	- 92	- 40	- 52	- 10	-	- 10	- 4	3 222	4
060	Non-financial corporations	101 097	84 475	16 563	7 295	0	6 913	- 1 876	- 525	- 1 390	- 3 130	- 0	- 3 060	- 747	56 449	2 664
070	Of which: SMEs	46 845	37 205	9 622	3 318	0	3 189	- 1 118	- 241	- 896	- 1 450	- 0	- 1 443	- 461	37 147	1 633
080	Households	197 566	181 837	13 757	4 611	2	4 366	- 2 567	- 777	- 1 911	- 2 486	- 1	- 2 490	- 1 547	133 009	758
090	**Debt Securities**	**245 523**	**245 131**	**318**	**7**	**-**	**7**	**- 65**	**- 63**	**- 2**	**-**	**-**	**-**	**- 5**	**-**	**-**
100	Central banks	7 996	7 996	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	214 602	214 480	79	-	-	-	- 44	- 43	- 1	-	-	-	-	-	-
120	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	18 005	18 005	-	-	-	-	- 7	- 7	-	-	-	-	-	-	-
140	Non-financial corporations	4 921	4 650	239	7	-	7	- 13	- 12	- 1	-	-	-	- 5	-	-
150	**Off-balance sheet exposures**	**112 328**	**106 330**	**5 887**	**701**	**0**	**623**	**480**	**162**	**318**	**92**	**0**	**91**	**-**	**-**	**-**
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	General governments	8 914	8 822	91	3	-	2	17	12	5	0	-	0		-	-
180	Credit institutions	1 542	1 542	-	-	-	-	1	1	-	-	-	-		-	-
190	Other financial corporations	3 666	3 570	96	0	-	0	12	4	8	0	-	0		-	-
200	Non-financial corporations	76 402	72 408	3 887	674	0	598	347	112	235	83	0	83		-	-
210	Households	21 804	19 987	1 813	25	0	24	103	34	69	9	-	9		-	-
220	**Total**	**692 500**	**652 901**	**37 383**	**12 663**	**2**	**11 957**	**- 5 144**	**- 1 594**	**- 3 711**	**- 5 720**	**- 1**	**- 5 653**	**- 2 303**	**194 448**	**3 451**

Table 2.12 Transactions subject to own funds requirements for CVA risk [Template EU CR2]

		30.06.2026
		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	10 938
020	Inflows to non-performing portfolios	2 366
030	Outflows from non-performing portfolios	- 1 350
040	Outflows due to write-offs	- 342
050	Outflow due to other situations	- 1 008
060	**Final stock of non-performing loans and advances**	11 955

Table 2.13 Credit quality of forborne exposures [Template EU CQ1]

		30.06.2026							
		a	b	c	d	e	f	g	h
		Gross carrying amount/ Nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance
				Of which defaulted	Of which impaired				
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	631	3 260	3 250	3 253	29	- 1 333	1 310	969
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	1	0	0	0	- 0	- 0	1	0
060	Non-financial corporations	182	2 912	2 912	2 912	19	- 1 236	984	850
070	Households	448	347	338	340	11	- 96	325	118
080	Debt Securities	-	7	7	7	-	-	-	-
090	Loan commitments given	43	234	234	234	1	44	-	-
100	**Total**	**675**	**3 500**	**3 490**	**3 493**	**28**	**- 1 377**	**1 310**	**969**

As at 30 June 2026, the Bank did not have non-domestic original exposures in all non-domestic countries in all exposure classes equal to or higher than 10% of total original exposures (domestic and non-domestic); therefore, the data is not subject to disclosure in accordance with template EU CQ4.

Table 2.14 Credit quality of loans and advances to non-financial corporations by industry [Template EU CQ5]

		30.06.2026					
		a	b	c	d	e	f
		Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: non-performing		of which: loans and advances subject to impairment		
				of which: defaulted			
10	Agriculture, forestry and fishing	2 418	96	93	2 417	- 129	-
20	Mining and quarrying	1 065	313	313	1 065	- 49	-
30	Manufacturing	28 742	3 020	2 947	28 739	- 2 006	- 2
40	Electricity, gas, steam and air conditioning supply	7 536	667	667	7 536	- 510	-
50	Water supply	1 235	32	23	1 235	- 22	-
60	Construction	5 350	476	471	5 350	- 394	-
70	Wholesale and retail trade	18 878	699	657	18 878	- 586	-
80	Transport and storage	8 194	1 110	1 104	8 194	- 613	-
90	Accommodation and food service activities	1 513	297	297	1 513	- 80	-
100	Information and communication	6 240	28	27	6 240	- 38	-
110	Financial and insurance actvities	663	2	0	663	- 3	-
120	Real estate activities	10 269	264	264	10 269	- 290	-
130	Professional, scientific and technical activities	5 153	90	89	5 153	- 92	-
140	Administrative and support service activities	7 022	79	79	7 022	- 85	-
150	Public administration and defense, compulsory social security	20	0	0	20	- 0	-
160	Education	406	23	23	406	- 15	-
170	Human health services and social work activities	1 705	21	21	1 705	- 24	-
180	Arts, entertainment and recreation	682	16	16	682	- 13	-
190	Other services	1 303	62	62	1 303	- 52	-
200	**Total**	**108 392**	**7 295**	**7 152**	**108 388**	**- 5 003**	**- 2**

Table 2.15 Collateral obtained by taking possession and execution processes [Template EU CQ7]

		30.06.2026	
		a	b
		Collateral obtained by taking possession accumulated	
		Value at initial recognition	Accumulated negative changes
10	**Property Plant and Equipment (PP&E)**	-	-
20	**Other than Property Plant and Equipment**	45	- 33
30	Residential immovable property	27	- 26
40	Commercial Immovable property	18	- 7
50	Movable property (auto, shipping, etc.)	1	-
60	Equity and debt instruments	-	-
70	Other	-	-
80	**Total**	**45**	**- 33**

2.2 Market risk

2.2.1 Interest rate risk

Interest rate risk is a risk of losses being incurred on the Bank's Group's balance sheet and off-balance sheet items sensitive to interest rate fluctuations, as a result of changes in market interest rates.

The Bank categorises its portfolios from the perspective of interest rate risk management:

- the non-trading book – comprises balance sheet and off-balance sheet items not included in the trading book, in particular items resulting from the Bank's core activities, transactions concluded for investment and liquidity purposes and their hedging transactions,
- the trading book – comprises transactions in financial instruments undertaken as part of proprietary trading and client business.

The Bank pro-actively manages the interest rate risk arising from items in both the trading and non-trading books.

The objective of interest rate risk management is to reduce potential losses due to changes in market interest rates to an acceptable level through appropriate structuring of balance-sheet and off-balance-sheet items. In particular, the Bank's Group aims to reduce the sensitivity of both interest income and economic value to an acceptable level, defined in the form of strategic tolerance limits (risk appetite).

Interest rate risk in the non-trading book

The Bank's Group (in accordance with Article 98(5) of Directive 2013/36/EU) conducts, for supervisory purposes, an analysis of the sensitivity of economic value in six shock scenarios, as well as an analysis of the sensitivity of interest income calculated in accordance with two shock scenarios.

The results as at 30 June 2026 and as at 31 December 2025 were as follows:

Table 2.16 Interest rate risks of non-trading book activities [Template EU IRRBB1]

Supervisory shock scenarios[1]	30.06.2026	31.12.2025	30.06.2026	31.12.2025
	Changes of the economic value of equity		Changes of the net interest income	
Parallel up	- 5 455	- 4 629	69	- 31
Parallel down	3 062	2 550	- 1 725	- 1 917
Steepener	1 314	1 484		
Flattener	- 3 532	- 3 726		
Short rates up	- 5 266	- 5 133		
Short rates down'	2 660	2 626		

[1)] Results of the stress-test analysis are presented only for currencies representing at least 5% of total financial assets in the non-trading book. Stress-tests are presented in accordance with the EBA guidelines on IRRBB and Commission Delegated Regulation (EU) 2024/856 of 1 December 2023 on regulatory technical standards specifying supervisory stress test scenarios

Interest rate risk in the trading book

In order to monitor interest rate risk in the trading book, the Bank uses, among other measures, value at risk (VaR).

IR VaR in the Bank's trading book is presented in Table 2.18 below:

Table 2.17 VaR measure in the Bank's trading book

Measure name	30.06.2026	31.12.2025
10-day VaR with a 99% confidence level (PLN million)[1]		
Average value	9	5
Maximum value	26	12
Value at the end of the year	10	5

[1] Due to the nature of the activities of the Bank's Group companies, the value-at-risk measure is presented for the Bank's trading book.

2.2.2 Foreign exchange risk

Foreign exchange risk is the risk of incurring losses due to exchange rate fluctuations arising from maintaining open currency positions.

The objective of foreign exchange risk management is to limit potential losses arising from exchange rate fluctuations to an acceptable level through appropriate structuring of the currency composition of balance-sheet and off-balance-sheet items. The acceptable level of risk for both the Bank and the Bank's Group is determined as part of the Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group, implemented by the Management Board and approved by the Supervisory Board.

In order to determine the level of foreign exchange risk, the Bank uses the value-at-risk (VaR) model and shock analyses.

In the first half of 2026, the foreign exchange risk of the Bank's Group was low because the Bank, as a rule, follows the policy of limiting its positions in the main currencies, i.e. EUR, USD, CHF, and GBP.

The Bank's VaR and the stress test analysis for the Bank's Group (in aggregate for all currencies exposed to foreign exchange risk) were as follows as at 30 June 2026 and as at 31 December 2025:

Table 2.18 Sensitivity of financial assets exposed to foreign exchange risk

Measure name[1]	30.06.2026	31.12.2025
10-day VaR with a 99% confidence level (PLN million)[2]	7	17
Change in CHF/PLN exchange rate by 10% (stress-test)[3]	- 3	- 15
Change in EUR/PLN exchange rate by 10% (stress-test)[3]	2	- 52
Change in all foreign exchange rates against PLN by 10% (stress test)	- 64	- 47

[1] The positions do not include structural positions in UAH (PLN 751.5 million), for which the Bank obtained approval from the KNF to exclude them from the calculation of the currency positions,

[2] Given the scale of the Bank's operations relative to those of the Bank's Group companies, the value-at-risk measure is presented only for the Bank.

[3] Stress test scenarios assume the appreciation or depreciation of PLN against individual foreign currencies, depending on which change generates a greater loss.

2.2.3 Own funds requirements for market risk

The table below presents the own funds requirements for market risk in the Bank's Group.
Table 2.19 Market risk under the standardised approach [Template EU MR1]

		30.06.2026
		a
Outright products		**RWEAs**
1	Interest rate risk (general and specific)	903
2	Equity risk (general and specific)	12
3	Foreign exchange risk	-
4	Commodity risk	-
Options		
5	Simplified approach	-
6	Delta-plus approach	1
7	Scenario approach	11
8	Securitisation (specific risk)	-
9	**Total**	**928**

The foreign currency position did not exceed the threshold of 2% of own funds, therefore, the respective own funds requirement was not calculated.

As at 30 June 2026, the Bank's Group did not have an open position on commodity price risk, so the own funds requirement for this was zero.

The Bank's Group does not use any internal models for calculating own funds requirements for market risk (Article 455 of the CRR "Use of Internal Market Risk Models" does not apply).

2.3 Liquidity risk including financing risk

Liquidity risk is the risk of being unable to settle liabilities as they fall due to a lack of liquid assets. A lack of liquidity may result from an inappropriate balance-sheet structure, mismatches in cash flows, failure to receive payments from counterparties, sudden withdrawals of funds by customers or other market events.

The purpose of liquidity risk management is to ensure, through appropriate management of the balance-sheet structure and off-balance-sheet liabilities, sufficient funds to meet current and future (including potential) liabilities, taking into account the nature of the activities conducted and needs that may arise due to changes in the market environment.

Table 2.21 below provides quantitative information on the liquidity risk profile of the Bank's Group, as required by external regulations, in particular Regulation 2024/3172.

The liquidity coverage ratio (LCR) is calculated individually by each company in the Bank's Group that is subject to the requirement and on a consolidated basis for the Bank's Group as a whole.

The LCR as at 30 June 2026 was approximately 267.1%, remaining at a high level, significantly above the supervisory limit and internal limits and threshold values. Compared to 31 December 2025, the ratio decreased by approx. 4.7 pp mainly as a result of an increase in gross loans and a decrease in corporate deposits, with a simultaneous increase in retail deposits and issues of own bonds and covered bonds.

The Bank maintains a high and safe level of unencumbered high-quality liquid assets (liquidity surplus), which provide a buffer against the materialisation of liquidity stress scenarios. Readily marketable assets include: cash (less the minimum balance maintained at ATMs and in the Bank's branches), funds in the Bank's nostro accounts (excluding the average level of the mandatory reserve), interbank deposits placed with other banks and liquid securities.

As at 30 June 2026, the outflows in respect of derivative instruments calculated in accordance with the CRR amounted to PLN 1.2 billion, whereas the impact of the unfavourable market conditions scenario on derivative instruments, financing transactions and other agreements accounted for 0.2% of the total unweighted outflows recognised in the liquidity coverage ratio.

As at 30 June 2026, the Bank's Group had 2 currencies for which the ratio of the value of liabilities in a given currency to the total value of liabilities in all currencies amounted to at least 5%: PLN and EUR. The Bank's Group had an LCR above 100% for all currencies in total and for PLN.

The structure of the Bank's sources of financing was described in the Bank's annual financial statements as at and for the year ended 31 December 2025 (Note 56. Liquidity risk management). The Bank follows a strategy which consists of using the stable part of the deposit base as the basic source of financing in all currencies. Bond issues denominated in EUR and PLN, as well as covered bond issues denominated in EUR and PLN, also constitute a significant part of financing for the Bank and the Bank's Group, particularly in foreign currencies. Surplus funds obtained on the market in a given currency (issues of securities) are used to manage the Bank's foreign currency liquidity needs through derivative transactions (mainly CIRS and FX swaps).

Table 2.20 Quantitative information of LCR [Template EU LIQ1]

		a	b	c	d	e	f	g	h
		Total unweighted value (avg)				Total weighted value (avg)			
EU 1a	Quarter ending on	30.06.2026	31.03.2026	31.12.2025	30.09.2025	30.06.2026	31.03.2026	31.12.2025	30.09.2025
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					203 851	195 575	186 959	179 406
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	331 500	322 072	314 281	309 136	23 758	23 163	22 788	22 636
3	Stable deposits	249 104	241 529	234 348	228 843	12 455	12 076	11 717	11 442
4	Less stable deposits	82 381	80 522	79 908	80 266	11 288	11 066	11 045	11 167
5	Unsecured wholesale funding	127 052	124 797	121 779	117 636	44 390	43 494	42 612	41 216
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	34 888	34 177	33 001	31 651	8 336	8 168	7 881	7 552
7	Non-operational deposits (all counterparties)	90 603	89 006	87 017	84 181	34 494	33 711	32 971	31 860
8	Unsecured debt	1 561	1 614	1 761	1 804	1 561	1 614	1 761	1 804
9	Secured wholesale funding	-	-	-	-	-	-	-	-
10	Additional requirements	97 562	94 711	93 793	93 396	12 243	12 148	12 762	13 400
11	Outflows related to derivative exposures and other collateral requirements	2 676	2 717	2 768	2 853	2 676	2 717	2 768	2 853
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	94 886	91 994	91 025	90 544	9 567	9 431	9 994	10 547
14	Other contractual funding obligations	5 033	4 677	4 535	4 389	3 808	3 449	3 363	3 308
15	Other contingent funding obligations	8 869	8 565	8 060	7 746	3 336	3 242	3 129	3 023
16	**TOTAL CASH OUTFLOWS**					87 535	85 497	84 654	83 582
CASH-INFLOWS									
17	Secured lending (e.g. reverse repos)	912	646	549	354	64	45	38	25
18	Inflows from fully performing exposures	11 940	11 880	12 423	13 018	9 785	9 785	10 382	11 032
19	Other cash inflows	1 196	1 186	1 255	1 297	1 196	1 186	1 255	1 297
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	**TOTAL CASH INFLOWS**	14 048	13 712	14 228	14 669	11 045	11 016	11 676	12 354
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	14 048	13 712	14 228	14 669	11 045	11 016	11 676	12 354
TOTAL ADJUSTED VALUE									
EU-21	**LIQUIDITY BUFFER**					203 851	195 575	186 959	179 406
22	**TOTAL NET CASH OUTFLOWS**					76 490	74 481	72 979	71 228
23	**LIQUIDITY COVERAGE RATIO**					266,68%	262,69%	256,35%	252,24%

Table 2.21 Net Stable Funding Ratio [Template EU LIQ2]

		30.06.2026				
		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1 year	≥ 1 year	
Available stable funding (ASF) Items						
1	Capital items and instruments	50 918	-	-	3 837	54 754
2	Own funds	50 918	-	-	3 837	54 754
3	Other capital instruments		-	-	-	-
4	Retail deposits		349 863	-	-	328 082
5	Stable deposits		264 100	-	-	250 895
6	Less stable deposits		85 763	-	-	77 187
7	Wholesale funding:		134 025	54	32 112	93 853
8	Operational deposits		36 409	-	-	18 205
9	Other wholesale funding		97 616	54	32 112	75 648
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	14 820	977	14 814	15 303
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		14 820	977	14 814	15 303
14	Total available stable funding (ASF)					491 992
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					1 924
EU-15a	Assets encumbered for more than 12m in cover pool		245	214	9 869	8 779
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		29 091	17 508	276 409	269 768
18	Performing securities financing transactions with financial customerscollateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial		4 873	0	0	487
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		20 371	15 160	159 193	173 755
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		541	381	16 408	14 540
22	Performing residential mortgages, of which:		2 353	1 992	102 415	81 951
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		1 861	1 597	78 850	60 011
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet		1 494	357	14 802	13 575
25	Interdependent assets		-	-	-	-
26	Other assets:		18 558	297	14 791	19 192
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	1 980	1 683
29	NSFR derivative assets		-			-
30	NSFR derivative liabilities before deduction of variation margin posted		1 998			100
31	All other assets not included in the above categories		16 559	297	12 811	17 409
32	Off-balance sheet items		20 485	23 733	66 762	6 308
33	**Total RSF**					305 971
34	**Net Stable Funding Ratio (%)**					160,8%

2.4 Operational risk

Operational risk is understood as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk includes – but is not limited to:

- legal risk – the risk of incurring a loss resulting from a lack of knowledge or understanding of, or failure to apply, legal rules, the inability to enforce contractual provisions, or unfavourable interpretations or decisions of courts or public administration bodies,
- ICT risk, insofar as it relates to operational risk.

Operational risk excludes reputational risk and business risk.

ICT risk (information and communication technology risk) means any reasonably identifiable circumstance in relation to the use of network and information systems which, if materialised, may compromise the security of the network and information systems, of any technology-dependent tool or process, of operationsand processes, or of the provision of services by producing adverse effects in the digital or physical environment.

The objective of operational risk management is to ensure operational and cost efficiency and the security of operations by limiting the occurrence of operational events and their negative consequences.

3 CAPITAL ADEQUACY

Capital adequacy is a process designed to ensure that available capital is sufficient to cover the level of risk assumed by the Bank and the Bank's Group in developing their business activities, taking into account a specific risk tolerance level and time horizon. The process of managing capital adequacy comprises, in particular, compliance with applicable regulations of supervisory and control authorities, compliance with the risk tolerance level determined within the Bank and the Bank's Group, and the capital planning process, including the policy concerning sources of capital.

Pursuant to Article 92 of the CRR, the minimum capital ratio levels maintained by the Bank's Group are:

1) total capital ratio (TCR) – 8.0%,
2) Tier 1 capital ratio (T1) – 6.0%,
3) Common Equity Tier 1 capital ratio (CET1) – 4.5%.

Pursuant to the CRR and the Act on macroprudential supervision, the Bank's Group is required to maintain a combined buffer requirement which is the total of the applicable buffers. Detailed information on capital buffers is presented in chapter 3.3 of this Report.

Table 3.1 Key metrics [Template EU KM1

		a	b	c	d	e
		30.06.2026	31.03.2026	31.12.2025	30.09.2025	30.06.2025
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	47 737	45 242	45 623	45 726	44 546
2	Tier 1 capital	47 737	45 242	45 623	45 726	44 546
3	Total capital	51 573	49 608	50 122	50 361	47 317
Risk-weighted exposure amounts						
4	Total risk exposure amount	306 913	301 792	293 034	280 615	273 455
4a	Total risk exposure pre-floor	306 913	301 792	293 034	280 615	273 455
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	15,55%	14,99%	15,57%	16,29%	16,29%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	15,55%	14,99%	15,57%	16,29%	16,29%
6	Tier 1 ratio (%)	15,55%	14,99%	15,57%	16,29%	16,29%
6b	Tier 1 ratio considering unfloored TREA (%)	15,55%	14,99%	15,57%	16,29%	16,29%
7	Total capital ratio (%)	16,80%	16,44%	17,10%	17,95%	17,30%
7b	Total capital ratio considering unfloored TREA (%)	16,80%	16,44%	17,10%	17,95%	17,30%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 7e	of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 7g	Total SREP own funds requirements (%)	8,00%	8,00%	8,00%	8,00%	8,00%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2,50%	2,50%	2,50%	2,50%	2,50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0,00%	0,00%	0,00%	0,00%	0,00%
9	Institution specific countercyclical capital buffer (%)	1,00%	1,00%	1,00%	0,99%	0,05%
EU 9a	Systemic risk buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
10	Global Systemically Important Institution buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 10a	Other Systemically Important Institution buffer (%)	2,00%	2,00%	2,00%	2,00%	2,00%
11	Combined buffer requirement (%)	5,50%	5,50%	5,50%	5,49%	4,55%
EU 11a	Overall capital requirements (%)	13,50%	13,50%	13,50%	13,49%	12,55%
12	CET1 available after meeting the total SREP own funds requirements (%)	8,44%	8,44%	9,10%	9,95%	9,30%
Leverage ratio						
13	Total exposure measure	669 125	653 137	639 924	613 745	604 120
14	Leverage ratio (%)	7,13%	6,93%	7,13%	7,45%	7,37%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14c	Total SREP leverage ratio requirements (%)	3,00%	3,00%	3,00%	3,00%	3,00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14e	Overall leverage ratio requirement (%)	3,00%	3,00%	3,00%	3,00%	3,00%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	203 851	195 575	186 959	179 406	173 779
EU 16a	Cash outflows - Total weighted value	87 535	85 497	84 654	83 582	81 889
EU 16b	Cash inflows - Total weighted value	11 045	11 016	11 676	12 354	13 026
16	Total net cash outflows (adjusted value)	76 490	74 481	72 979	71 228	68 864
17	Liquidity coverage ratio (%)	266,68%	262,69%	256,35%	252,24%	252,56%
Net Stable Funding Ratio						
18	Total available stable funding	491 992	485 744	470 948	454 474	439 914
19	Total required stable funding	305 971	302 654	296 740	291 428	284 040
20	NSFR ratio (%)	160,80%	160,49%	158,71%	155,95%	154,88%

3.1 Own funds

For capital adequacy purposes, own funds are calculated in accordance with the provisions of the Banking Law, Part Two of the CRR and the secondary legislation for the CRR.

The own funds of the Bank's Group include Common Equity Tier 1 capital and Tier 2 capital. No Additional Tier 1 items are identified in the Bank's Group.

Common Equity Tier 1 capital includes:
1) share capital presented in accordance with the Articles of Association and the entry in the Commercial Register, at nominal value,
2) supplementary capital created as a result of the annual appropriation of net profit and earmarked for offsetting accounting losses which may arise in connection with the Bank's Group's operations,
3) reserve capital created independently of the supplementary capital as a result of the annual appropriation of net profit, in an amount determined in a resolution adopted by the General Meeting (hereinafter: the "GSM") and earmarked solely for offsetting possible accounting losses,
4) accumulated other comprehensive income (excluding gains and losses relating to cash flow hedges),
5) general risk reserve created by appropriating net profit, in an amount determined in a resolution adopted by the GSM and earmarked for unidentified banking risks,
6) retained earnings (unappropriated profit from previous years),
7) the net profit (loss) pending approval and the net profit (loss) for the current reporting period, calculated in accordance with the applicable accounting policies, less any expected charges and dividends, in amounts not exceeding the profit amounts verified by a registered auditor; net profit (loss) may be recognised in own funds provided that it has been approved by the GSM or, prior to GSM approval, the KNF has consented to its recognition in own funds. Once the aforementioned formal requirements have been met, the Bank makes retrospective adjustments to own funds.[1]

The Common Equity Tier 1 capital is reduced by:
1) losses for the current financial year,
2) intangible assets stated at their carrying amounts, net of the related deferred income tax liability; the amount deducted includes goodwill taken into account in the valuation of significant investments; prudently valued software assets are excluded from the deduction,[2]
3) additional value adjustments to assets measured at fair value resulting from the application of prudential valuation requirements,
4) deferred income tax assets based on future profitability and not resulting from temporary differences,
5) additional fair value adjustments to liabilities and derivative liabilities arising from the Group's own credit risk,
6) deferred tax assets that rely on future profitability and arise from temporary differences, in an amount exceeding 10% of the Bank's Group's Common Equity Tier 1 capital (taking into account deductions for amounts specified in points 1-5 and 7),
7) direct and indirect holdings of own funds instruments of financial sector entities if the Bank's Group has not made significant investments in these entities, in the form of shares held and/or other Common Equity Tier 1 instruments or Tier 2 instruments of these entities, provided that their total exceeds 10% of the Common Equity Tier 1 capital of the Bank's Group (taking into account deductions for amounts specified in points 1-5),
8) direct and indirect holdings of own funds instruments of financial sector entities if the Bank's Group has made significant investments in these entities, in the form of shares held or other Common Equity Tier 1 instruments of these entities, the total of which exceeds 10% of the Common Equity Tier 1 capital of the Bank's Group (taking into account deductions for amounts specified in points 1-5 and 7),
9) the amount by which the total of:
   a) deferred income tax assets based on future profitability and resulting from temporary differences, up to 10% of the Common Equity Tier 1 capital of the Bank's Group (calculated taking into account deductions for amounts specified in points 1-5 and 7) and
   b) direct and indirect holdings of own funds instruments of financial sector entities if the Bank's Group has made significant investments in these entities, in the form of shares held or Common Equity Tier 1 instruments of these entities, up to 10% of the Common Equity Tier 1 capital of the Bank's Group (calculated taking into account deductions for amounts specified in points 1-5 and 7),

   exceeds the equivalent of 17.65% of the Bank's Group's Common Equity Tier 1 capital (calculated taking into account all deductions specified in points 1-7); the amount below the threshold (17.65%) is included in risk-weighted exposures.

[1]In May 2020, the European Banking Authority (EBA) published in the Single Rulebook Q&A its position on the timing of recognition of annual and interim profits for capital adequacy purposes (Q&A 2018_3822 and Q&A 2018_4085). According to this position, once the Bank or the Bank's Group have formally met the criteria for including profit for a given period in Tier 1 capital, that profit should be recognised retrospectively (as at the date to which the profit relates, rather than the date on which the criteria are met), with own funds adjusted accordingly as at that date.

[2]As regards software, the amount deductible from own funds is determined on the basis of accumulated prudential amortisation of software, calculated as from the date on which software assets are available for use and begin to be amortised for accounting purposes. The remaining amount of software is included in risk-weighted assets at a 100% risk weight.

10) the applicable amount of insufficient coverage for non-performing exposures, calculated in accordance with Article 47c of the CRR, except for the amount of insufficient coverage relating to exposures which arose before 26 April 2019, provided that the conditions of these exposures have not been changed in a manner that increases the Bank's exposure to a debtor,
11) securitisation positions – as an alternative to applying the 1,250% risk weight, exposures held by the Group (junior tranche less specific credit risk adjustments for the underlying exposures) reduce own funds.

Tier 2 capital includes subordinated liabilities, understood as liabilities in respect of funds acquired by the Bank, in the amount and on the terms laid down in a KNF decision issued at the Bank's request, where those funds meet the conditions set out in Article 63 of the CRR.

The full amount of instruments with a residual maturity of more than five years is included in Tier 2 capital as subordinated liabilities. During the final five years to maturity, the amortised amount of the liabilities included in Tier 2 capital is calculated by multiplying the carrying amount of the instruments on the first day of the final five-year period of their contractual maturity, divided by the number of days in that period, by the number of remaining days of contractual maturity of the instruments.

Tier 2 capital is reduced by:
1) direct and indirect holdings of Tier 2 instruments of financial sector entities if an institution has made significant investments in these entities,
2) direct and indirect holdings in financial sector entities if an institution has not made significant investments in these entities, in the form of shares or ownership interests held, or other Tier 2 capital instruments, if the total amount of these holdings exceeds 10% of the Bank's Common Equity Tier 1 capital.

If the deductions referred to in points 1 and 2 were to reduce Tier 2 capital below zero, the excess of those deductions over the amount of Tier 2 capital is deducted from Common Equity Tier 1 capital.

Table 3.2 presents the reconciliation of the items in the statement of financial position used to calculate own funds to regulatory own funds as at 30 June 2026.

Table 3.2 Composition of regulatory own funds [Template EU CC1]

		30.06.2026	
		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation *
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	1 250	
	of which: Type 1 - ordinary registered shares	-	
	of which: Type 2 - ordinary bearer shares	-	
	of which: type 3	-	
2	Retained earnings	11 833	
3	Accumulated other comprehensive income (and other reserves)	36 535	
EU-3a	Funds for general banking risk	1 070	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	50 688	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	- 169	
8	Intangible assets (net of related tax liability) (negative amount)	- 2 547	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	63	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	
15	Defined-benefit pension fund assets (negative amount)	-	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	-	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	- 12	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	- 12	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjusments (including IFRS 9 transitional adjustments when relevant)	- 285	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	- 2 951	
29	**Common Equity Tier 1 (CET1) capital**	47 737	

Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	-	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) of CRR	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	-	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42a	Other regulatory adjustments to AT1 capital	-	
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	-	
44	**Additional Tier 1 (AT1) capital**	-	
45	**Tier 1 capital (T1 = Common Equity Tier 1 (CET1) capital and Additional Tier 1 (AT1) capital)**	47 737	note 27.
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	3 837	
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	-	
EU-47a	Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	-	
51	**Tier 2 (T2) capital before regulatory adjustments**	3 837	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions)	-	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
56b	Other regulatory adjusments to T2 capital	-	
57	**Total regulatory adjustments to Tier 2 (T2) capital**	-	
58	**Tier 2 (T2) capital**	3 837	note 27.
59	**Total capital (TC = T1 + T2)**	51 573	note 27.
60	**Total risk exposure amount**	306 913	
Capital ratios and buffers			
61	Common Equity Tier 1	15,55%	
62	Tier 1	15,55%	
63	Total capital	16,80%	
64	Institution CET1 overall capital requirements	10,00%	
65	of which: capital conservation buffer requirement	2,50%	
66	of which: countercyclical buffer requirement	1,00%	
67	of which: systemic risk buffer requirement	0,00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	2,00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0,00%	
68	**Common Equity Tier 1 available to meet buffer (as a percentage of risk exposure amount)**	8,80%	

Amounts below the thresholds for deduction (before risk weighting)		
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short	60
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible	1 683
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	-
Applicable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-
82	Current cap on AT1 instruments subject to phase out arrangements	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-
84	Current cap on T2 instruments subject to phase out arrangements	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-

* Column (b) provides note numbers from the Condensed Interim Consolidated financial statements of the PKO Bank Polski S.A. Group for the six-month period ended 30 June 2026.

Pursuant to Implementing Regulation 2024/3172, Table 3.2 [Template EU CC1] presents information on the nature and amounts of individual own funds items used to calculate the total capital ratio as at 30 June 2026. Only the rows with values equal to 0 were omitted.

Table 3.3 Reconciliation of regulatory own funds to balance sheet in the audited financial statements [Template EU CC2]

	30.06.2026		
	a)	b)	c)
	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference*
	As at period end	As at period end	
ASSETS - Breakdown by asset clases according to the balance sheet in the published financial statements			
Cash and balances with the Central Bank	15 762	15 762	
Amounts due from banks	7 609	7 481	
Hedging derivatives	205	204	note 14
Other derivative instruments	2 108	2 108	note 14
Securities	249 286	246 684	note 15
Reverse repo transactions	2 066	2 066	
Loans and advances to customers	315 047	314 923	note 16
Receivables in respect of insurance activities	103	-	
Property, plant and equipment transferred under operating lease	3 195	3 195	
Property, plant and equipment	3 408	3 239	
Non-current assets held for sale	1	1	
Intangible assets	4 164	3 892	
Investments in associates and joint ventures	288	2 049	
Current income tax receivables	26	26	
Deferred income tax assets	2 046	1 354	
Other assets	3 134	3 121	note 19
TOTAL ASSETS	**608 448**	**606 105**	
LIABILITIES - Breakdown by liability clases according to the balance sheet in the published financial statements			
Amounts due to the Central Bank	10	10	
Amounts due to banks	2 775	2 775	
Hedging derivatives	99	99	note 14
Other derivative instruments	2 420	2 420	note 14
Amounts due to customers	-	-	
Repo transactions	475 762	475 621	note 17
Liabilities in respect of insurance activities	1 762	-	
Loans and advances received	807	807	note 18
Debt securities in issue	34 376	34 692	
Subordinated liabilities	7 694	7 694	
Other liabilities	17 880	17 844	note 19
Current income tax liabilities	914	910	
Deferred income tax provision	765	-	
Provisions	7 281	7 276	note 20
TOTAL LIABILITIES	**552 545**	**550 149**	
EQUITY			
Share capital	1 250	1 250	
Other capital and reserves	38 152	37 605	
Retained earnings	11 225	11 833	
Net profit or loss for the year	5 290	5 268	
Capital and reserves attributable to equity holders of the parent	- 11	- 0	
Non-controlling interests	-	-	
TOTAL EQUITY	**55 903**	**55 956**	

* Column (c) provides note numbers from the Condensed Interim Consolidated financial statements of the PKO Bank Polski S.A. Group for the six-month period ended 30 June 2026.

Carrying amounts reported for regulatory purposes differ from those presented in the published financial statements as at 30 June 2026 because different scopes of consolidation are applied.

3.2 Own funds requirements

Pursuant to the CRR, the Bank's Group calculates own funds requirements for the following types of risk:

1) credit risk – calculated under the Standardised Approach (pursuant to Part Three, Title II, Chapter 2 of the CRR),
2) operational risk – calculated under the approach specified in Part Three, Title III, of the CRR,
3) market risk – calculated under the approach specified in Part Three, Title IV, Chapters 2-4 of the CRR:
    a) foreign exchange risk – calculated under the basic approach,
    b) commodity risk – calculated under the simplified approach,
    c) equity instruments risk – calculated under the simplified approach,
    d) specific debt instrument risk – calculated under the basic approach,
    e) general debt instrument risk – calculated under the duration-based approach,
    f) remaining risks other than delta risk (non-delta risk) – calculated under the scenario approach for options for which the Bank uses its own valuation models and under the delta plus approach for the remaining options;
4) other risks:
    a) settlement/delivery risk – calculated under the approach specified in Part Three, Title V, of the CRR,
    b) counterparty credit risk, including exposures to a central counterparty (CCP) – calculated under the Standardised Approach for counterparty credit risk specified in Part Three, Title II, Chapter 6 of the CRR,
    c) credit valuation adjustment (CVA) risk – calculated under the approach specified in Part Three, Title VI of the CRR,
    d) exceeding the large exposures limit – calculated under the approach specified in Part Four of the CRR.

The total own funds requirement for the Bank's Group is the sum of the aforementioned own funds requirements for individual types of risk.

In calculating the own funds requirement for counterparty credit risk, the Bank uses contractual netting pursuant to the CRR (Articles 295–298).

The table below presents the value of risk-weighted assets and capital requirements for individual types of risk, while the values of individual capital ratios are presented in Table 3.1 [Template EU KM1].

Table 3.4 Overview of total risk exposure amounts [Template EU OV1]

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		30.06.2026	31.03.2026	30.06.2026
1	Credit risk (excluding CCR)	258 841	254 267	20 707
2	Of which the standardised approach	258 841	254 267	20 707
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU 4a	Of which equities under the simple risk weighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk - CCR	4 497	4 143	360
7	Of which the standardised approach	4 479	4 128	358
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	12	10	1
9	Of which other CCR	6	6	0
10	Credit valuation adjustments risk - CVA risk	1 017	767	81
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	1 017	767	81
EU 10c	Of which the simplified approach	-	-	-
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	94	104	20
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	94	104	-
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	928	974	74
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	928	974	74
22	Of which Alternative Internal Model Approach (A-IMA)	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between the trading and non-trading books	-	-	-
24	Operational risk	41 536	41 536	3 323
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	8 006	9 821	640
26	Output floor applied (%)	-	-	-
27	Floor adjustment (before application of transitional cap)	-	-	-
28	Floor adjustment (after application of transitional cap)	-	-	-
29	**Total**	**306 913**	**301 792**	**24 553**

3.3 Capital buffer

Pursuant to the CRR and the Act on macroprudential supervision, financial institutions are required to maintain a combined buffer requirement above the minimum levels set out in the CRR for:

1) total capital ratio (TCR),
2) Tier 1 capital ratio (T1),
3) Common Equity Tier 1 capital ratio (CET1).

The combined buffer requirement is the total of all the applicable buffers, i.e., the capital conservation buffer, countercyclical buffer, and Other Systemically Important Institution buffer. These buffers must be covered with Common Equity Tier 1 capital.

A capital conservation buffer of 2.5% is obligatory for all banks.

The countercyclical buffer is imposed to mitigate systemic risk arising from the credit cycle. The buffer is introduced by the minister responsible for financial institutions during periods of excessive credit growth and lifted when credit growth slows. As at 30 June 2026, the countercyclical buffer rate was 1% for credit exposures in Poland.

Additionally, the Bank's Group calculates the institution-specific countercyclical capital buffer rate, taking into account the value of all credit exposures in other countries and the respective countercyclical buffer rates for those countries. As at 30 June 2026, the institution-specific countercyclical capital buffer rate for the Bank's Group was 1.00%.

Tables 3.5 and 3.6 present information on the geographical distribution of the relevant credit exposures and the amount of the countercyclical buffer specific to the Bank's Group.

Table 3.5 Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer [Template EU CCyB1]

	30.06.2026												
	a	b	c	d	e	f	g	h	i	j	K	l	m
	General credit exposures		Relevant credit exposures – Market risk				Own fund requirements						
Breakdown by country:	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
Poland	**453 789**	**0**	**437**	**0**	**0**	**454 226**	**18 407**	**15**	**0**	**18 422**	**230 277**	**93,06%**	**1,00%**
Germany	3 457	-	-	-	-	3 457	280	-	-	280	3 496	1,41%	0,75%
Czech Republic	2 496	-	-	-	-	2 496	197	-	-	197	2 464	1,00%	1,25%
Dutch	1 989	-	-	-	-	1 989	167	-	-	167	2 087	0,84%	2,00%
Ukraine	1 832	-	-	-	-	1 832	113	-	-	113	1 415	0,57%	0,00%
Luxembourg	1 009	-	-	-	-	1 009	81	-	-	81	1 009	0,41%	0,50%
France	830	-	2	-	-	832	66	0	-	66	830	0,34%	1,00%
Cyprus	779	-	-	-	-	779	62	-	-	62	779	0,31%	1,50%
Austria	665	-	-	-	-	665	51	-	-	51	641	0,26%	0,00%
Malta	640	-	-	-	-	640	51	-	-	51	640	0,26%	0,00%
Ireland	567	-	-	-	-	567	45	-	-	45	567	0,23%	1,50%
South Korea	449	-	-	-	-	449	27	-	-	27	337	0,14%	1,00%
Romania	411	-	-	-	-	411	33	-	-	33	411	0,17%	1,00%
Great Britain	409	-	1	-	-	409	32	0	-	32	404	0,16%	2,00%
Switzerland	395	-	-	-	-	395	31	-	-	31	390	0,16%	0,00%
Norway	261	-	-	-	-	261	21	-	-	21	259	0,10%	2,50%
Italy	260	-	-	-	-	260	21	-	-	21	260	0,11%	0,00%
Denmark	226	-	-	-	-	226	20	-	-	20	250	0,10%	2,50%
Spain	209	-	-	-	-	209	17	-	-	17	208	0,08%	0,50%
Slovakia	180	-	-	-	-	180	14	-	-	14	180	0,07%	1,50%
Hungary	174	-	-	-	-	174	14	-	-	14	174	0,07%	1,00%
Bahamas	133	-	-	-	-	133	16	-	-	16	199	0,08%	0,00%
Lithuania	110	-	-	-	-	110	9	-	-	9	110	0,04%	1,00%
United States of America	52	-	-	-	-	52	2	-	-	2	26	0,01%	0,00%
Sweden	26	-	-	-	-	26	2	-	-	2	25	0,01%	2,00%
Finland	13	-	-	-	-	13	1	-	-	1	13	0,01%	0,00%
Slovenia	3	-	-	-	-	3	0	-	-	0	3	0,00%	1,00%
Belarus	1	-	-	-	-	1	0	-	-	0	1	0,00%	0,00%
Belgium	1	-	-	-	-	1	0	-	-	0	1	0,00%	1,00%
United Arab Emirates	1	-	-	-	-	1	0	-	-	0	1	0,00%	0,00%
Georgia	1	-	-	-	-	1	0	-	-	0	1	0,00%	1,00%
Central African Republic	0	-	-	-	-	0	0	-	-	0	0	0,00%	0,00%
Australia	0	-	-	-	-	0	0	-	-	0	0	0,00%	1,00%
Colombia	0	-	-	-	-	0	0	-	-	0	0	0,00%	0,00%
Canada	0	-	-	-	-	0	0	-	-	0	0	0,00%	0,00%
Other	2	-	-	-	-	2	0	-	-	0	2	0,00%	-
	471 368	0	440	0	0	471 808	19 781	15	0	19 797	247 461	-	

Table 3.6 Amount of institution-specific countercyclical capital buffer [Template EU CCyB2]

		30.06.2026
		a
1	Total risk exposure amount	306 913
2	Institution specific countercyclical capital buffer rate	0,9983%
3	Institution specific countercyclical capital buffer requirement	3 064

The Other Systemically Important Institution (O-SII) buffer is an additional requirement for institutions which may generate systemic risk. The Bank was identified as an Other Systemically Important Institution (O-SII) based on the KNF's decision of 10 October 2016. Under the KNF's decision of 20 December 2022, the Bank is required to maintain an Other Systemically Important Institution (O-SII) buffer equal to 2.00% of the total risk exposure amount, calculated in accordance with Article 92(3) of the CRR. The buffer must be maintained both on an individual and consolidated basis.

Therefore, as at 30 June 2026 the capital ratios for the Bank's Group should be no lower than:
1) TCR - 13.50%,
2) T1 - 11.50%,
3) CET1 – 10.00%.

3.4 Minimum requirement for own funds and eligible liabilities (MREL)

Pursuant to Article 99a(6) of the BGF Act, the Bank is required to publicly disclose information on its own funds and eligible liabilities, as well as the amount of the minimum requirement for own funds and eligible liabilities (MREL) set by the Bank Guarantee Fund.

In accordance with Article 97(4) of the BGF Act, the BGF exempted PKO Bank Hipoteczny S.A. from the requirement to maintain a minimum level of its own funds and eligible liabilities. Following this decision, the TREA and TEM levels of PKO Bank Hipoteczny S.A. are excluded from consolidation for the purpose of determining MREL. In addition, the BGF indicated that Kredobank S.A. is not part of the group subject to resolution and should also be excluded from consolidation for the purposes of determining MREL. The exclusion of PKO Bank Hipoteczny S.A. and Kredobank S.A. from consolidation does not apply to the TREA level for the purpose of calculating the amount of Common Equity Tier 1 capital held to cover the combined buffer requirement.

The MREL TREA requirement for the Bank was set on a consolidated basis at 15.36% of TREA (total risk exposure amount). In addition, the combined buffer requirement as at 30 June 2026 was 5.5% for the Bank's Group, and the amount of Common Equity Tier 1 capital used to cover it cannot be used to cover MREL TREA.

The MREL TEM (total exposure measure) requirement for the Bank on a consolidated basis has been set at 5.91% of TEM.

As the Bank's resolution group exceeded EUR 100 billion in total assets, it was recognised as a so-called Top Tier Bank, i.e. it met the condition set out in Article 97h(1) of the BGF Act. Consequently, the Bank is required to fulfil the MREL subordination requirement set for Top Tier Banks starting 1 January 2027.

The MREL TREA requirement for the Bank, on a consolidated basis, must be met by own funds and eligible liabilities that fulfil the subordination requirement at 13.91% TREA starting 1 January 2027. Until that time, the Bank is required to maintain own funds and eligible liabilities meeting the subordination requirement at a level of no less than 13.53% of TREA.

The MREL TEM requirement for the Bank, on a consolidated basis, must be met by own funds and eligible liabilities that fulfil the subordination requirement at 5.91% TEM starting 1 January 2027. Until that time, the Bank is required to maintain own funds and eligible liabilities meeting the subordination requirement at a level of no less than 5.50% of TEM.

The EU KM2 table provided corresponds to the template laid down in Commission Implementing Regulation (EU) 2021/763 of 23 April 2021 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council with regard to the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities. The extent of the disclosure is due to the fact that the Bank is a resolution entity, while it is not itself a Global Systemically Important Institution (G-SII), nor is it part of such an institution.

Table 3.7 Key metrics – MREL [Template EU KM2]

		a
		Minimum requirement for own funds and eligible liabilities (MREL)
Own funds and eligible liabilities, ratios and components		**30.06.2026**
1	Own funds and eligible liabilities	72 958
EU-1a	Of which own funds and subordinated liabilities	69 736
2	Total risk exposure amount of the resolution group (TREA)	300 822
3	Own funds and eligible liabilities as a percentage of TREA (row1/row2)	24,25%
EU-3a	Of which own funds and subordinated liabilities	23,18%
4	Total exposure measure of the resolution group	651 596
5	Own funds and eligible liabilities as percentage of the total exposure measure	11,20%
EU-5a	Of which own funds or subordinated liabilities	10,70%
Minimum requirement for own funds and eligible liabilities (MREL)		
EU-7	MREL requirement expressed as percentage of the total risk exposure amount	15,36%
EU-8	Of which to be met with own funds or subordinated liabilities	13,53%
EU-9	MREL requirement expressed as percentage of the total exposure measure	5,91%
EU-10	Of which to be met with own funds or subordinated liabilities	5,50%

The table omits columns and rows relating only to entities that are Global Systemically Important Institutions (G-SIIs) covered by the TLAC requirement.

As at 30 June 2026, the Bank's Group had PLN 9,868 million of own funds and eligible liabilities in excess of the level implied by the MREL TREA requirement plus the combined buffer requirement. The excess over the subordinated MREL TREA requirement plus the combined buffer requirement was PLN 12,151 million. The surplus over the MREL TEM requirement was PLN 34,449 million, while the surplus over the subordinated MREL TEM requirement was PLN 33,898 million.

3.5 Leverage

The Bank's Group calculates the leverage ratio as one of the capital adequacy measures.

The objective of managing the risk of excessive leverage is to ensure an appropriate relationship between the amount of Tier 1 capital and the total balance-sheet assets and off-balance-sheet commitments granted by the Bank and the Bank's Group.

As at 30 June 2026, the leverage ratio remained above the internal and external limits as well as above the minimum levels recommended by the KNF.

Table 3.8 Summary reconciliation of accounting assets and leverage ratio exposures [Template EU LR1 – LRSum]

		30.06.2026
		a
		Applicable amount
1	Total assets as per published financial statements	608 448
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	- 2 343
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	1 808
9	Adjustment for securities financing transactions (SFTs)	-
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	46 935
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	14 277
13	**Leverage ratio total exposure measure**	**669 125**

Table 3.9 Leverage ratio common disclosure [Template LR2Com]

		CRR leverage ratio exposures	
		30.06.2026	31.12.2025
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	612 386	585 656
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	- 62	- 132
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	- 2 761	- 2 737
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	609 563	582 787
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	3 310	3 220
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	7 251	5 741
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	10 561	8 962
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	2 066	2 011
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	- 1	- 1
16	Counterparty credit risk exposure for SFT assets	1	1
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures	2 066	2 011
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	123 781	115 989
20	Off-balance sheet exposures at gross notional amount	- 76 845	- 69 824
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)	-	-
22	Off-balance sheet exposures	46 935	46 165
Capital and total exposure measure			
23	Tier 1 capital	47 737	45 623
24	Total exposure measure	669 125	639 924
Leverage ratio			
25	Leverage ratio (%)	7,13%	7,13%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	7,13%	7,13%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	7,13%	7,13%
26	Regulatory minimum leverage ratio requirement (%)	3,00%	3,00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	Not applicable	Not applicable
EU-26b	of which: to be made up of CET1 capital	Not applicable	Not applicable
27	Leverage ratio buffer requirement (%)	Not applicable	Not applicable
EU-27a	Overall leverage ratio requirement (%)	3,00%	3,00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional

Table 3.10 Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) [Template EU LR3 – LRSpl]

		30.06.2026
		a
		CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	**612 386**
EU-2	Trading book exposures	2 080
EU-3	Banking book exposures, of which:	610 306
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	235 244
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	22 369
EU-7	Institutions	7 570
EU-8	Secured by mortgages of immovable properties	150 406
EU-9	Retail exposures	93 335
EU-10	Corporate	65 008
EU-11	Exposures in default	6 572
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	29 801

4 Disclosure of environmental, social and governance risks (ESG risks)

The PKO Bank Polski S.A. Group is subject to an obligation to disclose information on environmental, social and governance risks (ESG risks) under Article 449a of the CRR.

In accordance with the consultation paper EBA/CP/2025/07 of 22 May 2025 "*Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2024/3172, as regards the disclosures on ESG risks, equity exposures and the aggregate exposure to shadow banking entities*", the PKO Bank Polski S.A. Group, as a large listed institution subject to the requirements of Article 449a of the CRR, during the transitional period (i.e. until the amendments to that Regulation are adopted and enter into force, with their adoption and entry into force planned by 31 December 2026), discloses information in accordance with the applicable Regulation 2024/3172 without presenting the templates showing the GAR, the BTAR and climate change mitigation actions based on standards other than EU standards (templates 6–10), which is in line with the position of the Office of the Polish Financial Supervision Authority regarding prudential requirements for credit institutions[3].

4.1 Prudential information on environmental, social and governance risks

4.1.1 Qualitative information on environmental risks

Business strategy and processes

In October 2024, the Bank's Management Board adopted the **Growth and Development Strategy 2025-2027**, in which it defined seven main pillars outlining the goals of the Bank's Group. One of these pillars is to become the "Number 1" in financing the energy transition. In this respect, the Bank aims to achieve a share of over 20% in bank financing, focusing on the following activities:

1) Financing low-emission energy;
2) Financing low-emission buildings;
3) Financing the purchase and leasing of zero-emission vehicles.

In the Strategy, the Bank declared:

1) A share of over 20% in bank financing of Poland's energy transition;
2) achieving net zero by 2050 in accordance with the Paris Agreement[4]:
    - Reducing own emissions through infrastructure modernisation and investments in technologies that improve the energy efficiency of buildings (Scope 1);
    - Using at least 90% electricity from renewable energy sources (Scope 2);
    - Covering more than 50% of the credit portfolio with a transformation plan by the end of 2027 (Scope 3).

The Bank has been making climate disclosures in the global CDP system for several years[5]. As part of the CDP 2025 *Climate Disclosure Request*, the Bank maintained a score of "C", as in 2024. The CDP assessment uses a scale from the highest "A" to the lowest "D–".

The product offering of the Bank's Group is being adjusted to the changing needs of its customers and is progressively being expanded to include both proprietary solutions and solutions developed in cooperation with other institutions (e.g., green guarantees from KUKE[6]), to support the competitiveness of Polish companies in the face of rising energy prices and changing business and regulatory requirements. These measures are intended to help redirect capital towards activities that will significantly contribute to the achievement of European Green Deal[7] goals such as climate neutrality and resilience, zero pollution, protection of biodiversity and ecosystems, transition to a circular economy and sustainable use of water and marine resources. The Bank's product offering includes:

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[3] Letter from the Office of the Polish Financial Supervision Authority dated 10 July 2025 (DRR-DRR3.7115.1.2025.MK) concerning the application of disclosure requirements under Articles 449a and 449b of the CRR, confirmed by a letter from the Office of the Polish Financial Supervision Authority dated 12 February 2026 (DRF-DRF0.070.6.2026.AC), which stated that the position of the Office of the Polish Financial Supervision Authority was consistent with the EBA Opinion on the application of the provisions relating to disclosures on ESG risks (EBA/Op/2025/11) of 5 August 2025.

[4] Paris Agreement –agreement from 2015 concluding the 21st UN Climate Change Conference, whose main objective is to limit global warming to well below 2°C, and ultimately to 1.5°C, above pre-industrial levels.

[5] CDP is a global non-profit organisation that has been running the world's environmental disclosure system for investors, companies, cities, states and regions for 25 years.

[6] KUKE S.A. – Korporacja Ubezpieczeń Kredytów Eksportowych S.A. – an entity providing export insurance guaranteed by the State Treasury, ensuring security in trade on high-risk markets.

[7] The European Green Deal – a set of policy initiatives by the European Commission, whose overarching goal is to achieve climate neutrality in Europe by 2050.

1) SLL loan for corporate clients, developed on the basis of the *Sustainability Linked Loan Principles* (SLLP) and related guidelines developed by the *Loan Market Association*[8];
2) ProEnergy loan, whose margin is linked to an improvement in the company's energy transition financing indicator.

Work is currently underway to implement additional products intended to provide financing supporting sustainable development for both corporate banking customers and business banking customers.

The Bank cooperates with the Employers of Poland association, which, in cooperation with the European Investment Bank, obtained access to the ELENA (European *Local ENergy Assistance*) grant. The Bank's customers may benefit from refinancing of 90% of the costs of technical documentation (including an energy audit) for investment projects that deliver an environmental benefit in the form of a reduction of at least 30% in primary energy consumption.

In August 2024, the Bank's Group adopted the *Green Bond Framework*, which is based on the *Green Bond Principles* (2021). Based on the adopted Green Bond Framework, in September 2024 the Bank issued its first green bonds with a total nominal value of EUR 750 million. In June and November 2025 and in June 2026, the Bank carried out further green bond issuances, each with a total nominal value of EUR 500 million. The proceeds from these issues will be allocated to financing/refinancing housing loans that meet the conditions specified in this Framework. PKO Bank Hipoteczny S.A. plans to issue green covered bonds based on this Framework.

In February 2025, the Bank adopted the "Transformation Plan of the PKO Bank Polski S.A. Group" (hereinafter: the "Transformation Plan"), which covered medium-term decarbonisation targets and actions relating to the Bank's own operations (Scopes 1 and 2) and the Bank's Group's financed greenhouse gas emissions (Scope 3 – credit portfolio, sectors: power generation and retail residential real estate).

Table 4.1. Assumptions of the Transformation Plan for the power generation and residential real estate sectors

SECTOR NAME	SCOPE OF SECTOR EMISSIONS	GHG INTENSITY IN THE BASE YEAR - 2023	REDUCTION TARGET FOR GHG INTENSITY BY 2030	THE CHOSEN TRAJECTORY FOR DECARBONISING THE SECTOR
Electricity and heat generation and supply*	Scope 1	349 kg CO_2e/MWh	Achievement of a 47% reduction in emissions intensity in 2023-2030	International Energy Agency 1.5°C
Residential property (mortgages)	Scopes 1 and 2	58.8 kg CO_2e/m^2	Achievement of a 31% reduction in emissions intensity in 2023-2030	By 2030, convergence towards CRREM[9] 2°C; ultimately CRREM 1.5°C

* the emissions intensity indicator is calculated with reference to credit exposures in the electricity and heat generation and supply sector within the Bank's Group (the portfolios of the Bank, PKO Leasing S.A., PKO Faktoring S.A. and KredoBank S.A.)

** the indicator is calculated with reference to the exposures of the Bank and PKO Bank Hipoteczny S.A.

In the second half of 2025, the Bank prepared an extension to the Transformation Plan. The extension covered additional areas of activity – the PKO Leasing S.A. portfolio (including Prime Car Management S.A.) and the commercial real estate sector. The document was adopted by the Bank's Management Board on 10 February 2026.

[8] *Loan Market Association* (LMA) – an international association whose activities focus on improving the liquidity, efficiency and transparency of syndicated lending in Europe, the Middle East and Africa, in both the primary and secondary markets. The Association seeks to achieve its objective by establishing widely accepted market practices, thereby contributing to the promotion of syndicated lending.
[9] CRREM (Carbon Risk Real Estate Monitor) is a global standard for aligning the real estate sector with climate targets and managing transition risk.

Table 4.2. Assumptions of the Transformation Plan for the PKO Leasing portfolio and the commercial real estate sector

SECTOR NAME	SCOPE OF SECTOR EMISSIONS	GHG INTENSITY IN THE BASE YEAR - 2024	REDUCTION TARGET FOR GHG INTENSITY BY 2030	THE CHOSEN TRAJECTORY FOR DECARBONISING THE SECTOR
Leasing and loans for financing vehicles, machinery and equipment (PKO Leasing S.A. portfolio)*	Scope 1 and 2	120 t CO_2e/PLN million 3% low-emission financing** in new sales	Achievement of a 13% reduction in emissions intensity in 2024-2030 Increase in the share of financing for low-emission assets in new sales to 27%	consistent with the transport emissions reduction trajectory in the National Energy and Climate Plan to 2030 (WAM scenario)
Commercial real estate***	Scope 1 and 2	91 kg CO_2e/m^2	Achievement of a 19% reduction in emissions intensity in 2024-2030	By 2030 – CRREM 2°C; ultimately CRREM 1.5°C

* includes the PKO Leasing S.A. portfolio (including Prime Car Management S.A.), excluding the portion financing the power and heat generation sector and commercial real estate, as these are included in the other parts of the Transformation Plan for the respective sectors

** financing of low-emission assets is understood as financing vehicles and machinery and equipment powered by electricity or hydrogen

*** includes all credit exposures in the commercial real estate sector within the Bank's Group (the portfolios of the Bank and PKO Leasing S.A.)

By the end of 2027, the Bank planned to cover more than 50% of the Bank's Group's credit portfolio with the Transformation Plan. This target was achieved earlier as a result of the extension of the Transformation Plan. As at the reporting date, 52% of the credit portfolio was covered by the Transformation Plan. Detailed information on the Transformation Plan is provided in the Sustainability Report, which forms part of the PKO Bank Polski S.A. Group Directors' Report.

The Bank launched the EnergiaTransformacji.pl website in response to the growing needs of customers in the area of energy transition and ESG-related matters. The platform serves an educational and informational function, and its scope is systematically expanded to include new content and tools covering additional areas related to sustainable development.

The website currently offers a range of solutions supporting customers in implementing energy transition processes and ESG requirements, including:

- a carbon footprint calculator;
- a platform supporting CBAM (*Carbon Border Adjustment Mechanism*) reporting;
- an electricity cost savings calculator;
- a guide to ESG legislation;
- a comprehensive "Entrepreneur's Guide" on the Voluntary Sustainability Reporting Standard for SMEs;
- a search engine for available grant programmes;
- a practical *Local Content* guide, i.e. a guide to the domestic content component for companies in supply chains.

In addition, the website offers an extensive knowledge base containing educational materials on sustainable development and ESG.

The Bank offers consultations and engineering support in selecting appropriate financing for investment projects related to the energy transition, tailored to customers' individual needs. A dedicated team supports the Bank's business units by analysing customers' applications for financing energy transition projects. The team assesses whether the planned energy model is effective, in particular whether energy production is aligned with energy consumption and storage capacity. In addition, in cooperation with the Bank's business units, the team monitors energy transition solutions used by customers and proposes measures to improve the effectiveness of those solutions.

Sector policies are one of the environmental risk management tools within the credit risk framework for counterparties in selected industries/sectors. In the corporate customer segment, the Bank has the following policies: Renewable Energy Sources (RES), High-Emission Energy Sector, Chemicals-Oil-Gas, Income-Generating Real Estate, Construction Contractors, Automotive Parts Manufacturers & Car Dealers, Public Hospital Financing Policy, Trade, Local Government Units, and Agriculture and Food Industry. The assumptions underlying the policies are described in the Sustainability Report, which forms part of the PKO Bank Polski S.A. Group Directors' Report. In 2025, the Bank updated the following sector policies: Automotive Parts Manufacturers & Car Dealers, Income-Generating Real Estate, RES, Agriculture and Food Industry, Local Government Units, Public Hospital Financing Policy, while in 2026 it updated the sector policy: Construction Contractors. The Bank regularly reviews its sector policies and also does so as needed. In addition to the aforementioned policies, the Bank continuously monitors changes and market trends in various industries/sectors, publishes internal materials (e.g. industry leaflets that identify current market trends) and organises industry meetings. These activities are intended to gradually change the structure of the credit portfolio by actively supporting high-emission entities in their transition and emissions reduction efforts, as well as by developing a credit portfolio that supports sustainable development, including one aligned with the EU Taxonomy[10].

[10] EU Taxonomy – Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

Governance

The Bank's Management Board defines the risk framework, oversees the implementation of the objectives, strategies and policies set, and defines the principles for managing them in the context of environmental risk management. Within their respective areas of competence, organisational units are responsible for coordinating and managing ESG risk and its impact on the risk associated with the Bank's operations.

The committees operating within the Bank, within the scope of their tasks and powers, consider studies and opinions on activities related to ESG risk in their decision-making.

The Sustainable Development Committee supports the Management Board in setting priorities, courses of action and objectives in the area of sustainable development and energy transition, and also oversees, in this area, the Transformation Plan, the development of policies, systems and solutions supporting financing, and the *Green Bond Framework*. The Committee's responsibilities also include oversight of material impacts, risks and opportunities related to sustainable development in the short, medium and long term. The Committee provides a platform for dialogue and monitors the implementation of the Bank's Group's objectives and initiatives, helping to shape policies, solutions and the management system in the area of sustainable development and energy transition. The Committee, which comprises selected members of the Management Board and directors of selected divisions, is chaired by the Vice President of the Management Board supervising the Finance and Accounting Division, with the Vice President of the Management Board supervising the Administration Division serving as deputy.

The Operational Risk Committee supports the Management Board in operational risk management and, within the scope of its tasks and powers, makes decisions and issues recommendations, guidelines and opinions, including on ESG risk-related activities where operational risk arises from environmental ESG risk factors. Starting from the reporting period for Q4 2023, the Bank includes data on ESG risk factors in internal operational risk reports.

The Credit Risk Committee supports the Management Board in credit risk management and, within the scope of its tasks and powers, makes decisions and issues recommendations, guidelines and opinions, including in the area of activities related to ESG risk. In particular, the Committee supports the Management Board in the process of decarbonising the credit portfolio by analysing and providing opinions on strategies for reducing exposures to high-emission assets.

The ESG Sustainability Department is responsible for coordinating activities to ensure that the Bank's and the Bank's Group's strategic ESG objectives are met.

The Credit Risk Department is responsible for managing ESG risk in the credit portfolio, including, among other things, calculating the emissions intensity of the credit portfolio and monitoring decarbonisation pathways. The Department develops and creates solutions and tools supporting ESG risk management, including obtaining information for ESG risk management purposes and implementing solutions arising from generally applicable laws (including the EU Taxonomy and Pillar 3 disclosures) and regulations of supervisory or control authorities concerning ESG risk management. The Department's responsibilities include monitoring strategic credit risk limits and strategic climate risk limits within credit risk, as well as monitoring the utilisation of internal portfolio limits, in particular climate risk limits. In addition, the Department coordinates the implementation of consistent risk management standards across the Bank's Group aimed at limiting the impact of climate factors on individual types of risk, in particular on the risk level of the Bank's Group portfolio.

The Corporate Banking Credit Products and ESG Public Programmes Department is responsible for supporting the development of the Bank's offering for business banking and corporate banking customers in the area of products and services linked to public and EU programmes, including those supporting ESG-related sustainable development, in particular climate transition.

Units responsible for strategic planning, sustainability disclosures, legal services and compliance assessment are also involved in ESG risk management.

The Bank implements a comprehensive approach to ESG risk management, integrating it into planning, implementation and monitoring processes. This includes approving relevant plans, overseeing their implementation and taking remedial action in the event of significant deviations from the objectives set. Detailed sales plans supporting climate and sustainability objectives have been developed as part of the Bank's Group Strategy and the Transformation Plan.

The Bank has the "Transition Plan of the PKO Bank Polski S.A. Group" within the meaning of EBA Guidelines EBA/GL/2025/01 of 8 January 2025 on the management of environmental, social and governance (ESG) risks.

The Bank's Group manages ESG risk, including climate risk, at three independent, mutually complementary levels:
1) the first level comprises Bank units that identify ESG risks at an early stage and assess ESG risk when establishing a customer relationship, during dialogue with the customer or during a periodic review. As part of the first line of defence, activities relating to the use and offering of products that support customers' transition towards sustainable development are also carried out.
2) the second level comprises specialised organisational structures of the Bank responsible for identifying, measuring, controlling, monitoring and reporting ESG risk, as well as threats and irregularities, to ensure that activities carried out at the first level are properly designed and that second-level structures effectively manage this risk and support the effectiveness of the Bank's operations. In

addition, these units carry out tasks aimed at developing tools for identifying and assessing ESG risk, developing the climate stress-testing process and integrating it with other regulatory processes, e.g. the Internal Capital Adequacy Assessment Process (ICAAP[11]). The second level also includes the activities of the compliance function.

3) the third level comprises the internal audit of the Bank and the individual companies of the Bank's Group (hereinafter: the "Group Companies"), which independently assesses the operation of the management system, including ESG risk management. For example, the internal audit plans of the Bank and individual Group Companies periodically include audits covering ESG matters, including, among other things, verification of compliance with obligations arising from ESG regulations. Information on identified irregularities, including an assessment of their materiality and the results of monitoring actions taken to eliminate them, is presented to the relevant bodies of the Bank or the Company, as appropriate [the Management Board, the Audit Committee of the Supervisory Board (if established), and the Supervisory Board].

Environmental risks are monitored and reported on an ongoing basis in:
1) The Sustainability Report, which forms part of the PKO Bank Polski S.A. Group Directors' Report, once every 12 months;
2) this Report, every 6 months;
3) the Report on the review of the Internal Capital Assessment and Capital Management Process, every 12 months;
4) the Credit Risk Report, every 3 months;
5) materials and documents (including meeting minutes) prepared for the Sustainable Development Committee.

The "Policy for remunerating the employees of the Bank and the Bank's Group" in force at the Bank guarantees a consistent compensation plan, including by ensuring compliance with the environmental, social and governance risk strategy. The variable remuneration of members of the Bank's Management Board depends on the achievement of the ESG targets set out in the Bank's Strategy. The Bank does not operate a bonus scheme for Members of the Supervisory Board, who are entitled to fixed remuneration. The members of the Supervisory Board assess the Management Board's effectiveness in achieving ESG objectives, which is indirectly linked to their role in the sustainability governance system. The Remuneration Policy for Members of the Supervisory Board and Management Board of the Bank stipulates that the management goals of individual members of the Management Board should, in accordance with their area of responsibility, also take into account criteria such as the Bank's due regard for the social interest and the Bank's contribution to environmental protection and to preventing or eliminating potential negative social impacts of the Bank's activities. In 2026, the variable remuneration of the Bank's Management Board Members depends, inter alia, on the implementation of the Bank's strategic initiatives concerning the financing of Poland's energy transition, including, inter alia, financing the development of low-emission energy.

Risk management

The Bank manages ESG risk as part of its management of other risks because, due to the nature of ESG risk, it is not a separate type of risk but a cross-cutting risk that may affect the materialisation of individual types of risk at the Bank, in particular credit risk.

Definitions of ESG factors and cross-cutting ESG risk are set out in the "Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group".

The Bank verifies and assesses financial, capital and strategic plans in terms of the level of risk they generate and their alignment with sustainable development (taking into account ESG risks over the short, medium and long term).

In December 2024, the Bank introduced a regulation regarding the assessment of compliance with minimum safeguards and the implementation of a due diligence mechanism for assessing the negative impact of the activities of the Bank's customers and counterparties on human rights within the framework of minimum safeguards. The assessment of compliance with minimum safeguards is linked to the examination of areas such as: anti-corruption, taxation, fair competition, science, technology and innovation, as well as human rights and labour rights. The method of assessing compliance with minimum safeguards is subject to review, no less frequently than once a year, with regard to conformity with generally applicable law.

In the credit portfolio assessment process, the Bank uses definitions of environmental (including climate-related) physical risk and transition risk that are consistent with the CRR.

The Bank puts in place mechanisms to implement the principle of "*double materiality*" by taking into account the following perspectives:
1) the impact of ESG factors on the Bank's operations, financial results and development,
2) the impact of the Bank's activities on society and the environment.

For the purposes of ESG risk management and reporting, the Bank has rules for classifying the credit portfolio which define, in particular, criteria for identifying and classifying exposures financing environmental, social and governance activities.

The Bank distinguishes four classes of exposures that finance environmental, social and governance activities, namely:
1) class of exposures supporting sustainable development – light green exposures (exposures included, among others, in the BTAR calculation), relating to the financing of:

[11] ICAAP (Internal Capital Adequacy Assessment Process) – a process for estimating internal capital and capital management aimed at developing risk measurement and determining internal capital.

   a) environmental objectives;
   b) the transition towards a climate-neutral and sustainable economy – exposures supporting the environmental objectives described in Article 9 of the EU Taxonomy;
   c) sustainable development (including the sustainable transition of the economy) – exposures meeting market standards for sustainable finance;
   d) transactions supporting sustainable development co-financed with public funds and co-financed by national and supranational institutions;
   e) activities supporting social objectives by having a positive impact on society and local communities;
2) class of environmentally sustainable (taxonomy-aligned) exposures – dark green exposures (exposures included in the GAR calculation), relating to the financing of economic activities meeting the conditions set out in Article 3 of the EU Taxonomy, i.e.:
   a) making a substantial contribution to at least one of the six environmental objectives;
   b) doing no significant harm to any of the other environmental objectives (DNSH principle);
   c) carrying out activities in compliance with the minimum safeguards;
   d) meeting the technical screening criteria (set out in delegated regulations issued by the European Commission supplementing the EU Taxonomy Regulation).
3) environmentally neutral exposures – white exposures, which relate to the financing of economic activities to which no environmental objective can be assigned and which have not been classified as exposures supporting sustainable development, environmentally sustainable exposures or exposures with a negative environmental impact;
4) exposures with a negative environmental impact – brown exposures, which relate to the financing of economic activities that contribute to significant greenhouse gas emissions, air, water and soil pollution, deforestation, waste generation, destruction of biodiversity or overexploitation of natural resources.

The Bank assesses, in each case, the impact of environmental, social and governance factors on a customer's creditworthiness as part of the lending process for corporate banking customers and business banking customers assessed using the rating method. The Bank also assesses the impact of lending transactions on ESG matters and classifies them into the aforementioned ESG classes. The lending process also includes an assessment of the loan transaction. On the one hand, the Bank assesses the impact of a given loan transaction on ESG issues, and on the other hand, it examines how ESG factors affect the loan transaction. When assessing ESG factors, the Bank takes into account, among other things, climate change risk and its impact on the customer's operations, the customer's potential impact on climate change, factors related to human capital or health and safety, and governance factors (including organisational culture and internal supervision).

In terms of activities of local government units (LGUs) and lending transactions with LGUs, the Bank applies the principle that their impact on the environment, social and governance issues is neutral, provided that the Bank has no customer- or transaction-specific information; where such information is available, the assessment of the customer and transaction reflects that information.

The ESG risk assessment in the lending process is also carried out through the application of credit policies for industries/sectors described in the Sustainability Report.

The Bank has guidelines on financing the energy transition of enterprises to improve energy efficiency and generate energy from renewable energy sources (RES). The guidelines include:
- good practices for financing investments related to the energy transition;
- types of investments financed;
- recommended forms of legal security for transactions;
- the scope of documentation related to the implementation of investments.

Poland, being a signatory to international agreements concerning, among others, the environment, incorporates their provisions into national legislation. Accordingly, the Bank's Group, acting in accordance with national law, complies with international agreements to the extent that they relate to the group's activities.

The industry in which the Bank's Group operates does not have a significant direct impact on the climate. This impact is primarily indirect and arises through the financing provided to customers. Therefore, the Bank carries out a number of projects and analyses at customer and portfolio level aimed at developing solutions and tools to support ESG risk management.

The Bank analyses exposures in the loan portfolio sensitive to:
1) the impact of chronic and acute physical events related to climate change by sector and the geographical location of the customer's activities or the location of real estate collateral;
2) transition risk associated with the transition to a low-carbon and climate-resilient economy, by sectors that contribute significantly to climate change in terms of, among other things, the volume of financed greenhouse gas emissions, the energy efficiency of collateral or indicators of alignment with decarbonisation trajectories.

Based on the double materiality analysis performed, the risk associated with biodiversity and ecosystem functioning was considered immaterial at this stage. At the same time, the Bank recognises the growing importance of this issue and takes it into account in its analyses.

The Bank takes climate risk into account when assessing credit collateral for corporate customers, in particular by examining environmental risk arising from the manner in which real estate is used, the impact of environmental factors on its value, including physical risk and risk associated with the energy transition. The Bank also analyses exposures in the loan portfolio associated with collateral in the form of developed real estate, based on the value of the EP indicator[12]. In the process of valuing credit collateral for corporate customers, the Bank takes into account the impact of ESG factors on the value of the property. The Bank's regulations include a requirement to submit, together with the appraisal report, certificates issued for the property with regard to compliance with environmental standards, in particular the energy performance certificate. If the property generates above-average risks, in particular environmental risks, it can only serve as supporting collateral. Detailed information on the outcome of these analyses is provided later in the report. For the purpose of verifying the aforementioned documents, the Bank obtains data on the energy performance of buildings for all types of developed properties and for premises from the Central Register of Energy Performance of Buildings, records these data in its internal CBN (Central Real Estate Database) and uses them in the property assessment process.

At the same time, the Bank is developing its approach to assessing ESG aspects in the analysis of collateral in the form of commercial real estate for retail and business customers. The Bank has further specified in its internal regulations concerning the collateral assessment process the requirement to take into account the impact of ESG factors. The Bank has also adjusted its guidelines for property appraisers, expanding and detailing how ESG-related sustainability aspects are to be taken into account in the valuation report.

One component of environmental risk management is a strategic ESG risk tolerance limit. The definition of the indicator is consistent with the Pillar 3 disclosure (ITS Template 3). The measure of tolerance for this risk is the ratio of loans to customers from the sectors: Energy and Fossil Fuel Combustion to the Bank's total assets. As at 30 June 2026, the share of loans to customers in the aforementioned sectors was 0.39% for the Bank and 0.48% for the Bank's Group, against a tolerance limit of ≤ 1.6% applicable to both the Bank and the Bank's Group (as at 31 December 2025, the value of the indicator was 0.54% for the Bank and 0.64% for the Bank's Group). The decrease in the value of the indicator compared with year-end results from the inclusion in its numerator of an adjustment for lending transactions based on market standards for sustainable loans (SLL, ProEnergy). This limit is monitored quarterly and reported to the Bank's Management Board and the Risk Committee of the Supervisory Board.

One of the analytical tools used to assess the resilience of the loan portfolio to environmental risks as part of climate risk management in financial institutions is climate stress testing. The Bank has developed its own climate stress-testing methodology, designed on the basis of standards set by the European Central Bank (European Central Bank report on the climate risk stress test, July 2022), NGFS[13] climate scenarios and available recognised publications on the materialisation of climate risk from the perspective of credit losses of financial institutions. This methodology enables the incorporation of a wide range of climate factors, provided they can be quantified from the perspective of customers' financial statements or variables used in credit risk models.

In accordance with regulatory requirements, in December 2024 the Bank conducted a separate climate stress test for the corporate customer credit portfolio. The analysis examined the impact of physical risk (droughts and floods) and transition risk (policy and legal – changes in greenhouse gas emission allowance prices; technological – the costs of transitioning to low-emission technologies) on customer ratings over the short and long term, as well as probability of default (PD) and expected credit loss (ECL) indicators. The scenarios were analysed over three time horizons (up to 1 year, up to 3 years and up to 30 years), allowing for a detailed analysis of risk over both the short and long term. Detailed information on climate stress tests is provided in the Sustainability Report.

In 2025, the Bank incorporated short-term climate scenarios into the corporate customer rating assessment process for physical risk (flood) and transition risk (an increase in GHG emission prices and the associated costs of transitioning to low-emission technologies). For each type of risk, a rating is determined on the basis of appropriately adjusted financial statements. These ratings provide important support in assessing the impact of ESG factors on a customer's creditworthiness in the lending process. By directly adjusting the ratings used in the calculation of internal capital, the Bank is gradually building a buffer for unexpected losses arising from the materialisation of ESG risk, in particular environmental risk. This mechanism allows ESG factors to be reflected earlier in capital requirements, thereby increasing the institution's resilience to future events related to climate change and the transition towards a low-carbon economy.

The Bank continues to disclose the GHG emissions associated with the credit portfolio (Scope 3, categories 13 and 15 from the Bank's Group's perspective, in line with the *Greenhouse Gas Protocol* (GHG Protocol)). One of the key steps in achieving this was the Bank joining the *Partnership for Carbon Accounting Financials* (PCAF) in December 2023, which has developed a single global standard for calculating and reporting greenhouse gas emissions for the financial sector. The PCAF methodology enables the quantification of GHG emissions associated with, among other things, corporate loans, securities, mortgage loans and car loans. The results of the greenhouse gas emissions calculations are presented in Template 1 "Banking book – Indicators of potential climate change transition risk: Credit quality of

[12] The EP indicator describes the annual non-renewable primary energy demand required for heating, ventilation, cooling and domestic hot water, and, in the case of public buildings, collective housing, production, utility and storage buildings, also for lighting.

[13] NGFS (The Network of Central Banks and Supervisors for Greening the Financial System) – an international forum established at the initiative of central banks and financial market supervisory institutions, aimed at fostering cooperation in environmental and climate risk management and taking action towards the broadly defined sustainable development of the financial sector.

exposures by sector, emissions and residual maturity" and in the Sustainability Report. The Bank uses the calculations of credit portfolio emission levels to determine the decarbonisation pathways of the credit portfolio in the Transformation Plan and to assess transaction risk levels through the application of climate stress tests.

The Bank uses taxonomy questionnaires, which are crucial for assessing compliance with the technical screening criteria of the EU Taxonomy for financing where the use of proceeds is known. The questionnaires form the basis for obtaining information from the Bank's customers regarding the minimum requirements that financed investments/business activities should meet in order to be considered environmentally sustainable. The questionnaires are used to determine/classify sustainable assets. The taxonomy data obtained through the taxonomy questionnaires, together with the KPIs[14] obtained from the sustainability reports[15] of customers required to report under the EU Taxonomy, form the basis for calculating the Green Asset Ratio (GAR)[16] and the Non-trading Book Taxonomy Alignment Ratio (BTAR)[17]. The Bank is working on identifying (flagging) the Bank's credit exposures that are taxonomy-eligible, are taxonomy-aligned, and relate to the financing of enabling activities, transitional activities or specialised financing. Simultaneously, the Bank is adapting its infrastructure and IT tools, which enables the collection, analysis, processing and aggregation of an increasing amount of ESG data. This is in response to the growing scope of the Bank's reporting obligations in the coming years.

ESG risk management requires systemic and sector-specific solutions. The key challenge is the availability of information to assess the ESG risk. The Bank systematically analyses opportunities to obtain the data necessary for ESG risk management and prudential reporting.

The Bank is developing the Credit Risk Engine (SRK) application and the internal SRK-ESG database, expanding them to include new sources of information that support GAR calculation, calculations of financed greenhouse gas emissions from the credit portfolio and climate risk assessment.

For ESG risk management purposes, the Bank uses the following key external data sources:

- Notoria Online ESG Module – a database containing information resulting from the sustainability reporting obligations of Polish companies, including key performance indicators (KPIs) for taxonomy-eligible and taxonomy-aligned activities and data on actual greenhouse gas emissions of the Bank's Group's customers;
- EMIS information and analytical platform – a database enabling the identification of subsidiaries belonging to the corporate groups of the Bank's customers;
- INSTRAT – the ESG.INSTRAT.pl platform created by the INSTRAT Foundation – a database of entities required to report on sustainability;
- Central Register of Energy Performance of Buildings – a database maintained by the Ministry of Development and Technology containing information from energy performance certificates for buildings in Poland; these data are used, among other things, to calculate financed emissions for the Bank's Group's commercial and residential real estate portfolio;
- Klimada 2.0 – a portal of the Institute of Environmental Protection – National Research Institute, containing climate models used as a basis for determining the impact of physical risk (including drought, water shortages, flooding, floods and hurricanes) on exposures in the Bank's Group's credit portfolio by reference to the location of the customer's registered office or collateral;
- PCAF database (*Partnership for Carbon Accounting Financials*) – a database containing greenhouse gas emission factors that enable the estimation of financed emissions for the Bank's Group portfolio;
- National Emissions Database (KOBIZE) – a database maintained by the National Centre for Emissions Management, a public institution responsible for collecting data and monitoring and managing pollutant and greenhouse gas emissions. The data from the database include, among other things, greenhouse gas emissions from stationary installations and fuel combustion in mobile installations and form the basis for calculating Scope 1 emissions for some of the Bank's Group's customers (DQS 2[18]).

Biuro Informacji Kredytowej S.A.[19] (BIK), in cooperation with the banking sector, Sustainable Investment Forum Poland (POLSIF[20]) and the Polish Bank Association, implemented a uniform standard for obtaining ESG data from customers on the BIK ESG Platform. The

[14] Turnover KPI (Key Performance Indicator – Turnover) – a key performance indicator relating to turnover that shows what percentage of an undertaking's turnover is taxonomy-aligned; and CapEx KPI (Key Performance Indicator – CapEx) – a key performance indicator relating to capital expenditure that shows what percentage of an undertaking's capital expenditure is taxonomy-aligned.

[15] The preparation of sustainability reporting by non-financial and financial undertakings results from the disclosure obligation laid down in Article 19a or Article 29a of Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC, as amended.

[16] GAR (Green Asset Ratio) – the key performance indicator for credit institutions that reflects the extent to which their financed activities are taxonomy-aligned.

[17] BTAR (Banking Book Taxonomy Alignment Ratio) – the ratio that measures the degree to which banking book exposures are taxonomy-aligned.

[18] DQS (Data Quality Score) – a data quality indicator used in greenhouse gas emissions calculations in accordance with the PCAF standard on a scale from 1 to 5, where 1 represents the highest data quality based on actually reported and audited emissions and 5 the lowest data quality based on the Bank's estimates.

[19] Biuro Informacji Kredytowej S.A. (Credit Information Bureau) – an institution established under Article 105(4) of the Banking Law, with the statutory right to process data constituting banking secrecy in order to support banks and credit unions (SKOKs) in assessing the creditworthiness of their clients.

[20] Sustainable Investment Forum Poland (POLSIF) – an organisation that sets standards and directions for the development of sustainable investment and finance in the Polish and European markets; its mission is to develop and promote the Polish and European sustainable investment and finance market by creating and disseminating best practices.

initiative is intended to standardise sustainability reporting, support businesses in accessing bank financing and support banks in meeting growing regulatory requirements.

Two standard ESG questionnaire templates were developed as part of the project:
1) CSRD (*Corporate Sustainability Reporting Directive*) questionnaire for customers required to report sustainability information;
2) VSME (*Voluntary Sustainability Reporting Standard* for non-listed Small and Medium Enterprises) questionnaire offered as a voluntary standard to small and medium-sized customers not listed on regulated markets in the European Union.

The new EBA Questionnaires module will enable companies to provide ESG data once to multiple banks, reducing administrative burdens and improving the quality and comparability of data used in ESG risk assessment. The Bank actively participated in the project, which culminated in the signing of an agreement with BIK S.A. in April 2026; work is currently underway to implement the solution in the Bank's processes, with completion planned for Q3 2026.

The Bank's Group monitors risks arising from changes in ESG regulations aimed at the financial sector on an ongoing basis. New external regulations governing climate policy may cause an increase in legal risk associated with environmental risk in the future. In addition, the Bank participates in the work of the Polish Bank Association and ESG working groups as part of interbank cooperation aimed at interpreting ESG-related regulations and developing systemic solutions that facilitate the disclosure of ESG information in a transparent and comparable manner for all financial market participants.

The Bank conducts an assessment of the materiality of traditional types of banking risk, under which it establishes a catalogue of material risks and risks subject to monitoring. The assessment takes into account the impact of ESG factors, with particular emphasis on climate risk factors, in the risk cards for those types of risk where the Bank identifies their potential materialisation, i.e. credit risk, market risk (interest rate risk, foreign exchange risk), liquidity risk (including funding risk), operational risk, reputational risk, compliance risk and conduct risk.

Based on the Bank's methodology for identifying and monitoring material types of risk, the materiality assessment identified ESG factors as loss-generating factors only for credit risk.

In terms of liquidity and funding risk, the Bank considers ESG-related risk factors that have a direct or indirect impact on liquidity and funding risk. Aspects related to ESG risk factors have been incorporated into liquidity risk measures and into the methodology for determining internal capital to cover this risk – by recognising additional costs arising from the inability to obtain sustainable finance in the wholesale market (which represents a cheaper form of funding) in the case of rolling over or raising long-term funding sources. The impact of ESG risk within liquidity risk on internal capital is assessed as immaterial. In addition, ESG risk is reflected indirectly in stress-test deposit outflows, e.g. as a factor increasing energy transition costs, which will directly translate into higher current consumption outflows due to significantly higher electricity bills.

With regard to market risk and ESG factors, the Bank:
1) interest rate risk – performs ESG-related credit spread stress tests for individual debt security issuers for a defined portfolio of bonds measured at fair value (both through profit or loss and through other comprehensive income);
2) foreign exchange risk – at least annually assesses the materiality of ESG risk factors by analysing foreign exchange exposure subject to ESG risk factors (in particular governance-related factors);
3) financial institution risk – takes ESG risk factors into account when determining the internal credit rating;
4) derivative instrument risk – does not perform a separate direct assessment of whether ESG risk factors are taken into account. ESG risk factors in this area are managed as part of other types of risk, primarily foreign exchange risk, interest rate risk and credit risk of financial institutions.

Starting from the reporting period for Q4 2023, the Bank incorporates data on ESG risk factors into its internal operational risk reports. The Bank considers the environmental (E) factor to occur in cases where:
1) the natural environment, including the climate, affects the activities of the Bank, its customers and counterparties, i.e. if an operational event results from the negative effects of the materialisation of:
   - physical risk, i.e. extreme/acute events in the natural environment, e.g. storms, floods, fires or heat waves;
   - long-term effects of changes in the natural environment, e.g. temperature changes;
2) the Bank, customers, counterparties have a negative impact on the environment, i.e.:
   - transition risk, i.e. an event relates to the energy transition, e.g. financing mines/investments/companies with an adverse environmental impact if prohibited by law or the Bank's internal policy, or
   - if an operational event causes a negative impact on the environment (e.g. pollution by the Bank).

The Bank monitors the impact of environmental risk (including physical risk and transition risk) on reputational risk. When assessing ESG factors, the Bank takes into account the impact of the natural environment on its activities and on the activities of stakeholders, including the effects of natural disasters, extreme weather events and long-term environmental changes. The Bank also assesses its own impact and that of its stakeholders on the natural environment, in particular pollution risk and the financing of activities that may have adverse environmental impacts. The Bank has introduced principles for preventing greenwashing, in particular concerning the identification and mitigation of greenwashing risk, which may materialise within compliance risk, reputational risk, operational risk (including legal risk), as well as strategic and business risk. In addition, in order to obtain information on reputational risk, the Bank monitors the impact of environmental risk (including physical risk and transition risk) on reputational risk, taking into account greenwashing risk, by analysing publicly available information about the Bank, primarily media publications that negatively affect its image and relate to all areas of its activities. Furthermore, to obtain information on reputational risk, including reputational risk arising from environmental matters, the Bank gathers information from its units, inter alia, as part of a cyclical survey identifying sources and factors of reputational risk. Bank units, as part of their ongoing activities, also have the opportunity to report identified risks, including ESG risks.

Compliance risk and conduct risk in the ESG area are identified through the analysis of internal regulations and marketing materials and by monitoring work to adapt to changes in legislation. These activities also include adapting to the requirements of supervisory authorities and market standards, assessing the potential for conflicts of interest and reviewing regulations and marketing communications for greenwashing. These activities are carried out on an ongoing basis, and risk identification takes place at least once a year. ESG risk reporting occurs within compliance risk reporting if ESG factors contained in compliance risk are significant.

Table 4.3. Mapping of ESG risks to traditional risks:

Type of banking risk	The impact of physical risk	The impact of transformation (transition) risk
Credit risk	physical risk through transmission channels (increased costs, decreased revenues, decreased collateral value) may have a negative impact on borrowers and reduce their ability to service debt or decrease the value of the loan collateral	EU or national regulations, technological changes and shifts in market preferences may adversely affect the debt-servicing capacity of entities operating in high-emission sectors, in particular the energy sector, the fuel industry, and the transport and logistics sectors.
Market risk (interest rate, foreign exchange)	highly material physical events may lead to changes in market expectations and may cause sudden revaluation, greater volatility and losses in asset values in some markets	transition risk factors may cause sudden revaluation of securities and derivative instruments, e.g. in relation to products associated with sectors affected by stranded assets
Liquidity risk (including funding)	climate change, including natural disasters and sudden weather phenomena, may cause a sudden increase in demand for funds	transition risk factors may affect the profitability of some business lines and lead to the risk of reduced inflows from repayments of loans by customers who fail to implement solutions in time, or a decrease in the volume of funds placed by these customers with the Bank; sudden revaluation of securities, e.g. due to stranded assets, may lower the value of the Bank's high-quality liquid assets, thereby affecting liquidity buffers; a downgrade in the Bank's ESG rating may affect funding risk by making it more difficult to attract new investors and increasing funding costs
Operational risk	extreme/acute events in the natural environment, floods, fires or long-term effects of changes in the natural environment, e.g. temperature changes, may prevent or hamper operations, including at the Bank's branches	an operational event related to the energy transition, e.g. financing mines/investments/companies with an adverse environmental impact where prohibited by law or the Bank's internal policy, may result in penalties for breaches of guidelines or standards and legal costs (claims brought by customers or market participants)
Reputational risk	may result from the materialisation of other types of risk and from their consequences adversely affecting how the Bank is perceived by customers, counterparties, investors, external supervisory and regulatory authorities and the general public	further financing of high-emission sectors negatively perceived by regulators, stakeholders, market participants and rating agencies may affect the Bank's reputation and, consequently, result in loss of profits and/or a decrease in market capitalisation

Compliance risk and conduct risk	it may result from the materialisation of the above risks, including in the case of inability or significant difficulties in conducting the Bank's activities, resulting in, for example, inability to fulfil the Bank's obligations	Bank's failure to adapt to changes in legal regulations, interventions by external supervisory and regulatory bodies and market standards may lead to the materialisation of compliance risk, and thus the imposition of financial penalties on the Bank by supervisory and control bodies, or customers filing claims in court proceedings

The Bank's Group companies take ESG factors into account in the materiality assessment of relevant types of banking risk at the entity level.

4.1.2 Qualitative information on social risks

Business strategy and processes

In its Growth and Development Strategy 2025-2027, the Bank set out its social responsibility objectives, focusing on the following areas:
1) closing the gender pay gap to less than 5% - achieving this goal will require systematic monitoring of remuneration and implementation of systemic solutions at all levels of the organisation;
2) increasing the representation of the underrepresented gender on the Bank's governing bodies – aiming to achieve at least 33% representation of the underrepresented gender on the Bank's governing bodies (Management Board and Supervisory Board). In addition, for senior management positions (B-1, B-2), the Bank aims for the underrepresented gender to account for at least 40%. In the long term, the Bank envisages gender balance in these positions;
3) educational initiatives – achieving the ambitious target of carrying out 6,000 educational initiatives per year, which will be geared towards building the competences of the future, including financial education, so that the Bank's activities have a positive impact on the development of society, the improvement of professional skills and the financial inclusion of different social groups.

The Bank plans that by 2027:
1) at least 33% of positions on the Bank's governing bodies will be held by women;
2) the participation rate of women in senior management positions will be at least 40%;
3) the gender pay gap will be less than 5%;
4) inclusion of ESG targets for Management Board and MRT[21] staff in remuneration schemes;
5) more than 90% of employees will have completed mandatory ESG training.

The strategic indicators are monitored periodically, and their achievement is presented annually in the Sustainability Report.

The Bank treats the risk of its products, services and distribution channels being used for money laundering or terrorist financing as a component of social risk, reputational risk and the risk of non-compliance with applicable regulations. This risk is managed in accordance with a risk-based approach that takes into account the nature, scale and complexity of the activities conducted and the Bank's role as the parent undertaking of the Bank's Group.

The Bank ensures effective mechanisms to counter money laundering and terrorist financing by:
1) assigning personal responsibility for the AML/CFT process at the appropriate organisational levels;
2) exercising oversight over the AML/CFT process in the Bank's Group through the implementation of the "Strategy for Counteracting Money Laundering and Financing of Terrorism in the PKO Bank Polski S.A. Group" and the "Group Policy for Counteracting Money Laundering and Financing of Terrorism in the PKO Bank Polski S.A. Group";
3) implementing the "Strategy for Counteracting Money Laundering and Financing of Terrorism in the PKO Bank Polski S.A. Group", which sets out the directions for the development of the AML/CFT[22] system and risk management principles;
4) ensuring that operations comply with applicable laws and supervisory authorities' expectations by continuously updating internal regulations, developing processes and implementing changes in IT systems supporting the fulfilment of AML/CFT obligations.

For the purposes of counteracting money laundering and terrorist financing, as well as minimising operational risk, the Bank applies customer due diligence measures, monitors business relationships and customer transactions, and fulfils obligations arising from applicable laws. Where necessary, it also applies mitigating measures, including freezing assets and restricting access to them. If money laundering or terrorist financing risk is identified, the Bank takes measures provided for by law, such as suspending a transaction or blocking an account. These measures are intended to protect customers and the financial market from being used for criminal activities.

The Bank continuously monitors regulatory, technological, economic and geopolitical changes that may affect the level of social risk associated with money laundering and terrorist financing. In particular, the Bank takes into account new legislation, supervisory guidelines, technological developments, financial crime methods and requirements relating to sanctions and financial market security.

The Bank is carrying out preparatory work aimed at adapting its processes, internal regulations and IT solutions to the new EU legislation on anti-money laundering and countering the financing of terrorism (EU AML Package[23]). These activities support the further development

[21] MRT staff (Material Risk Takers) are key employees of financial institutions. A detailed definition of MRT staff is set out in the Policy for remunerating the employees of the Bank and the Bank's Group.

[22] AML (Anti-Money Laundering Procedure) and CFT (Countering Financing of Terrorism).

[23] EU AML Package – a comprehensive European Union reform aimed at strengthening the financial system and combating money laundering and terrorist financing, comprising three key legal acts: Regulation (EU) 2024/1624 of the European Parliament and of the Council (AMLR), Regulation (EU) 2024/1620 of the European Parliament and of the Council (AMLA), and Directive (EU) 2024/1640 of the European Parliament and of the Council (AMLD6).

of the risk management system, compliance with future regulatory requirements and increased effectiveness in counteracting money laundering and terrorist financing.

In response to changing conditions, the Bank is developing IT systems supporting the identification, assessment and monitoring of ML/FT risk and improving its risk management processes. These activities are intended to reduce the risk of the Bank and the Bank's Group entities being used for activities that may cause adverse social, economic or reputational effects and support the maintenance of trust among customers, investors, supervisory authorities and other stakeholders.

The PKO Bank Polski Foundation carries out its own projects and provides financial and operational support to non-governmental organisations engaged in educational activities, supporting local communities and seniors, promoting equal opportunities, strengthening social resilience and assisting victims of the war in Ukraine. The Bank and the PKO Bank Polski Foundation implement projects jointly or separately. The PKO Bank Polski Foundation also encourages employees of all the Bank's Group companies to become involved in initiatives supporting local communities. In 2025, volunteer activities included involvement in projects such as assisting people affected by floods and the All4Kids Charity Race, in which more than 1,200 of the Bank's employees took part in a sporting race and fundraiser for childcare facilities across the country.

The "Policy on Diversity, Equal Treatment and Mutual Respect in the Bank and the Bank's Group" is in force at the Bank and constitutes a declaration of shared commitment to creating a workplace where everyone feels valued, heard and treated as equals.

As part of implementing the values and principles of cooperation reinforced in 2025, the Bank introduced the "Działam i Reaguję" (I Act and React)Cooperation Standard, addressed to all employees, and the "Działam i Reaguję" (I Act and React) Management Standard, supporting the development of an organisational culture based on responsibility, mutual respect and open communication.

The Bank continues to organise #RotundaRóżnorodności (#RotundaofDiversity) events, during which invited guests share their experience and knowledge in the field of diversity. An important element of the Bank's efforts to promote diversity is the #BankKobiet (#Women's Bank) initiative, which aims to build an active and engaged community whose members support one another in achieving professional goals. As part of this initiative, the first Bank-wide mentoring programme for female leaders was completed and its second edition was launched. In the first half of 2026, five events were held as part of this initiative, with more than 7,300 participants. In addition, workshops were held on creating space for personal and professional development using self-coaching methods. The workshops were attended by 41 women. To promote diverse career paths and inspire development, a new meeting format, "Na pierwszym planie" (In the foreground), was also launched. As part of this format, a female member of the Bank's Management Board holds conversations with women performing a variety of professional and leadership roles.

The Bank is also continuing the #JestemUSiebie (#Iamatmyplace) initiative, which, through a range of communication and educational activities, helps to build an inclusive work environment. As part of the #PonownieUSiebie (#Backatmyplace) programme, the Bank continues activities supporting parents returning to work after an absence related to the birth of a child. In addition, welcome meetings and moderated online "Rodzicielska e-kawa" (#Parenting e-Coffee) meetings are organised for employees, during which parents can share experiences and ways of coping with the challenges of combining parenthood with professional life.

The Bank once again became involved in the #Proud to be a Working Mum campaign. Its aim is to promote working mothers who can combine their professional and private lives and inspire others. As part of this initiative, in 2026 the Bank once again received the Proud Employer certificate. In addition, the Bank joined the group of employers most advanced in diversity and inclusion management in Poland, as confirmed by the results of the *DiversityINCheck* survey conducted by the Responsible Business Forum.

An important element of the Bank's efforts to promote diversity and build an inclusive work environment is the #Neuroentuzjaści employee network operating at the Bank. This initiative carries out educational and communication activities aimed at increasing awareness of neurodiversity and supporting neurodivergent people in the workplace. As part of these activities, the webinar "Spectrum of Effectiveness – Neurodiversity in the Workplace" was organised to promote a better understanding of the needs, potential and challenges associated with neurodiversity. The event was attended by 558 employees. The Bank carries out educational activities aimed at building and strengthening psychological safety within the organisation. Members of the Management Board and B-1 leaders are actively involved in these initiatives. One of the key outcomes of this joint work was the development of the Culture Code, which sets out desired attitudes and behaviours and serves as a reference point for further activities supporting the development of an organisational culture based on trust, openness and mutual respect. In the first half of 2026, three webinars for management staff were held on building psychological safety in teams. More than 1,800 leaders participated in these events. In addition, two webinars were organised for all Bank employees to disseminate knowledge and good practices in this area.

Another important element of efforts to create a friendly and safe work environment was the webinar "Where Does Workplace Bullying Begin?", led by an expert specialising in the prevention of workplace bullying. The meeting familiarised participants with the issue of undesirable conduct in the workplace, explained key concepts and provided practical guidance useful in day-to-day cooperation. More than 3,000 employees participated in the webinar.

The Bank consistently conducts the periodic #JakCiSięPracuje (#HowDoYouFind WorkingHere?) employee experience and engagement survey, aimed at monitoring employees' views on key aspects of the work environment, such as team relationships, development opportunities, a sense of purpose in their work, effectiveness and cooperation between units. In the first half of 2026, a shortened edition of the survey was conducted in the *Pulse Check* format, focusing on measuring employee engagement and assessing progress in implementing actions taken following the previous survey. In addition, the Bank continued to conduct systematic employee opinion surveys at various stages of their interaction with the organisation. These included candidate experience surveys (*Candidate Experience*), surveys of new employees' experiences #PierwszyKrok (#FirstStep), an assessment of the #StażNaDzieńDobry (#InternshipforaGoodStart) Internship Programme and exit interviews (*Exit Interview*).

In addition, the Bank runs programmes under the following initiatives:

1) Przywództwo#1 (Leadership#1), which supports leaders in developing leadership within the Bank and provides a range of development activities focused on cultural change priorities and aligned with the Bank's leadership model;
2) #FokusNaCiebie (#FocusOnYou) – which prevents professional burnout and supports employees' mental and physical well-being;
3) #CzasNaFeedback – which serves as a summary of work outcomes across all the Bank's employees;
4) "Mogę więcej" (I Can Do More) – a talent programme (the first edition covered 72 people).

The Bank employs people from different generations. Accordingly, it adapts its training offer so that it is attractive to all employees. The Bank's offering includes traditional classroom workshops, online workshops, as well as sessions using modern solutions and tools such as VR goggles and educational games.

In 2026, for the seventh time, the Bank received the *Top Employer* certificate, confirming the highest standards in human capital management and the consistent development of positive employee experiences. This distinction confirms the effectiveness of the initiatives undertaken and the Bank's commitment to creating a modern and employee-friendly work environment. A key element of the Bank's approach is actively listening to employees. The Bank consistently invests in skills development, offering employees broad access to training, workshops, e-learning courses, development programmes and mentoring programmes. At the same time, it continues to digitise HR processes, streamlining recruitment, onboarding and the organisation's day-to-day operations. It places particular emphasis on developing leadership skills and supporting managers in building engaged, diverse and effective teams. These activities contribute to strengthening the organisational culture, increasing employee satisfaction and achieving the Bank's long-term strategic objectives.

Employees are also offered a range of benefits, including additional hours off work for personal matters or time with family, co-financing of benefits available through the cafeteria system from the Company Social Benefits Fund, lunch cards for employees who use their annual leave on time, newborn gift packages for Bank employees, and preferential terms for using the Bank's product offering.

As part of developing employees' digital experience, the Bank is implementing an initiative supporting the development of the organisation's digital culture. Its aim is to create conditions in which modern digital tools support day-to-day tasks, cooperation and effectiveness. An important element of the initiative is the implementation of solutions based on artificial intelligence and new technologies that facilitate the performance of professional duties and improve working conditions. One of these enhancements is the Onboarding Assistant for new managers. It is a digital pathway that supports managers taking on a new role by providing key information, structuring activities during their first weeks and ensuring easy access to materials and tools supporting effective team management.

The Bank ensures the security of its branches and the highest standard of customer service by implementing security standards adapted to identified threats and risk levels. To this end, it applies modern systems and devices that guarantee the physical protection of customers and employees, as well as the safeguarding of cash, deposits, banking secrecy and personal data. As part of its security measures, the Bank uses, among others:

1) security systems (alarm systems, CCTV and access control);
2) direct physical protection of selected facilities;
3) continuous security monitoring of the Bank's branches.

Governance

The Management Board's responsibilities in the area of social risk include management and supervisory actions relating to the development of internal regulations and the Bank's operating strategy, taking into account, among other things:

1) respect for human and labour rights, defining appropriate attitudes and behaviours, preventing ethical violations, bullying and discrimination;
2) cooperation with the Bank's counterparties on principles consistent with corporate social responsibility, as well as
3) monitoring the implementation of the adopted principles for social risk management, including through established control and reporting mechanisms.

The Bank maintains a register of employee reports concerning breaches of the Policy on Diversity, Equal Treatment and Mutual Respect in the Bank and the Bank's Group, including breaches of employee rights. Twice a year, an extract from the register is submitted to the HR

Division Director, the President of the Management Board, and the relevant Management Board Members and Functional Division Directors with respect to complaints raised by employees in the Bank's supervised units. The persons listed are authorised to access the documentation related to the handling of such reports.

The verification of adherence to ethical standards within the Bank, including monitoring of risk associated with violations, with a comprehensive approach that includes:

1) the ethics of Bank employees and other persons performing tasks for the Bank;
2) ethics in relations with customers;
3) ethics in business activity;
4) ethics in the Bank's relations with its external environment.

is subject to an annual assessment carried out by the Management Board. The Supervisory Board is informed at least once a year of the results of the assessment carried out by the Management Board.

The assessment of the functioning of the Bank's remuneration policy, in terms of its compliance with "Corporate Governance Principles for Supervised Institutions" issued by the PFSA, as well as other regulatory requirements, is carried out annually as part of a review of the Bank's corporate governance. The report is accepted by the Supervisory Board and then presented to the General Meeting.

The Bank operates an anonymous reporting system through which employees, contractors and other authorised persons can report actions that are inconsistent with the law, internal regulations or ethical standards adopted by the Bank. Anonymous reports can be submitted electronically, by phone, by post or a dedicated, independent and encrypted communication channel[24]. Individuals who choose to submit anonymous reports are guaranteed full confidentiality of their data and the information provided. If, based on the contents of the report, the reporting person's identity can be established, such information is deleted by the recipient of the report before further action is taken. Employees reporting irregularities, even if the allegations they make are not confirmed, are protected in particular against retaliatory measures, discrimination or other forms of unfair treatment. If they experience any retaliation, they may seek assistance from the President of the Bank's Management Board. Information on reported irregularities and the results of their verification is periodically reported to the Bank's Management Board and Supervisory Board as part of quarterly Compliance Risk reports. Once a year, the Supervisory Board assesses the adequacy of the anonymous reporting system operating in the Bank.

The "Policy for remunerating the employees of the Bank and the Bank's Group" applies within the Bank's Group, takes social risk into account and is intended to ultimately ensure a consistent compensation plan, among other things, by setting remuneration levels based on market trends and job valuation, ensuring gender neutrality, taking into account remuneration practices for employees of the Bank's Group, and ensuring compliance with the strategy for environmental, social and governance-related risk.

The achievement of ESG-related objectives is duly reflected in the assessment of the Bank's Management Board Members and key managers as part of the evaluation of objectives for the purpose of determining variable remuneration.

In 2026, the bonus scorecards of Members of the Bank's Management Board include an "Employee Engagement Index" objective covering three aspects: whether employees speak positively about the Bank ("I Say"), whether they engage in achieving objectives ("I Act") and whether they continue to want to work at the Bank ("I Stay"). In addition, Members of the Bank's Management Board have been assigned a bonus objective: Assessment of progress towards achieving the long-term assumptions and objectives of strategic initiatives. This objective includes, among others, the strategic initiative "Sustainable Development", where one of the key indicators is the share of the underrepresented gender in senior management positions (B-1 and B-2 levels).

Risk management

As part of social risk management, the Bank uses adopted guidelines of national and European supervisory authorities, WSE best practices[25], recommended benchmark values and market standards. They provide for:

1) striving to achieve gender balance on the Bank's Management Board and Supervisory Board and, at a minimum, achieving 33% representation of the underrepresented gender,
2) maintaining the share of the underrepresented gender in senior management positions at no less than 40% of the total number of managers.

In addition, the Bank continuously monitors the evolving regulatory environment in this area and updates its policies and other internal regulations.

[24] https://www.pkobp.pl/sygnanet/.
[25] "Best Practices for WSE Listed Companies 2021" – corporate governance principles for joint-stock companies that are issuers of shares, convertible bonds or bonds with pre-emptive rights admitted to trading on a regulated market operated by Giełda Papierów Wartościowych w Warszawie S.A.;

Social risk issues are continuously monitored and reported on, and internal reporting on this matter is multi-faceted. As part of social risk management in terms of gender pay equality, a method developed by the financial market is applied to determine the ratio of the average remuneration of women to that of men in the Bank, based on the weighted average of total remuneration paid in a given year.

The Bank continuously monitors the level of basic salaries of employees to ensure compliance with:
1) the generally applicable legal provisions determining the minimum wage, taking into account gender pay equality;
2) the Bank's internal regulations concerning non-discrimination and determining the level of remuneration in the Bank.

In socially sensitive areas such as employment diversity, employee satisfaction resulting from implemented standards and working conditions, labour rights, and the prevention of bullying and discrimination, the Bank continuously monitors employee satisfaction, staff turnover – including the voluntary attrition rate – as well as the proportion of women and men in key management positions. At least once a year, the Bank conducts remuneration reviews, taking into account job evaluation, and establishes appropriate strategies in this respect.

Social risk may materialise in particular as:
1) operational risk, which takes into account the impact of socially harmful events, such as unequal treatment of a group of employees or breaches of data protection or disclosure requirements towards customers; such events may result in financial losses for the Bank's Group arising from lawsuits or fines imposed by supervisory authorities;
2) reputational risk arising from the Bank's failure to take the social interest into account in its activities, in particular by engaging in unethical conduct or conduct inconsistent with generally applicable laws, supervisory recommendations and best practices, which may relate to:
   - employees, e.g. failure to respect human rights and labour law, lack of transparency in internal and external communication concerning employee matters, including in external reporting;
   - customers, e.g. failure to ensure an adequate level of security or personal data protection, failure to meet disclosure requirements, participation in socially controversial projects, or dissemination of claims that may constitute greenwashing and be misleading;
   - other stakeholders, e.g. their inappropriate selection through cooperation with entities whose activities do not represent the highest ethical standards or in respect of which material breaches of generally applicable laws, including in the ESG area, have been identified.

Compliance risk and conduct risk in the ESG area are identified through the analysis of internal regulations and marketing materials and by monitoring work to adapt to changes in legislation. These activities also include adapting to the requirements of supervisory authorities and market standards, assessing the potential for conflicts of interest and reviewing regulations and marketing communications for greenwashing. These activities are carried out on an ongoing basis, and risk identification takes place at least once a year. ESG risk is reported as part of compliance risk reporting if ESG factors are material.

In evaluating the credit risk of corporate customers, the Bank assesses social and employee-related issues, as well as issues concerning the respect for human rights. The financial activities and projects undertaken by a customer (counterparty) constitute an investment in human capital or in communities. The assessment covers inequality risk, social cohesion and inclusion, as well as labour relations. During loan origination and monitoring, factors related to the customer's social policy are assessed on an expert basis and may affect the customer's rating.

For companies, the impact of socially harmful events occurring at the counterparty on its financial results and the way this risk is managed are assessed during loan origination and monitoring (this applies to customers assessed using the rating method with exposure above PLN 1 million).

With regard to operational risk management, starting from the reporting period for Q4 2023, the Bank has included data on ESG risk factors in its internal operational risk reports. The Bank has adopted the approach that the "S" factor (social policy) is deemed to occur when an operational event relates to the Bank's failure to take into account the social interest in its activities, particularly with respect to employees, customers, and counterparties.

With regard to reputational risk management, the Bank takes into account the impact of ESG risk factors on reputational losses and, where such losses occur, records data in the Reputational Events Database.

In the context of the relationship between social risk and reputational risk, the Bank identifies and assesses situations in which information about a possible breach of social norms at the Bank or in its value chain may adversely affect how the Bank is perceived by customers, counterparties, investors, external supervisory and regulatory authorities and the general public.

Bearing in mind the key role of banks in financing the economy, the Bank continuously raises its employees' awareness of sustainability and carries out extensive educational activities. The development of basic and expert-level competencies enables the Bank to carry out its ESG transformation effectively. As part of the #ESGo! initiative, in the first half of 2026 the Bank organised a live event entitled: "Green

Intelligence and Other Sustainability Trends for 2026", attended by 146 employees. A dedicated intranet page provides content on, among other things, greenwashing, climate change, carbon footprint and the climate competitiveness of enterprises.

In the first half of 2026, 1,722 employees participated in ESG conferences, training sessions and workshops, while 1,983 people completed the "ESG – Sustainable Development from the Bank's Perspective" e-learning course. In total, 96% of employees have now completed the training. The "ESG in Practice" programme was continued, developing the competencies needed to promote and implement ESG principles and to support advisers and customers in the energy transition. The programme ended in June 2026. In addition, social partners participated in a workshop entitled: "ESG in Practice – How Sustainable Development Affects Employees, the Organisation and the Future of the Bank", while Members of the Bank's Management Board and Members of the Supervisory Board participated in an online workshop on decarbonisation trends and strategies conducted by *Climate&Strategies*. Some employees continued postgraduate studies in ESG across a total of nine programmes.

In the area of employee education and competence development, the Bank enabled employees to participate in a range of new development activities, including the #CzasNaRozwój (#Time for Development) live event (promoting the general development offering for a given month), as well as programmes focused on digital skills and effectiveness. In addition, in 2026 the Bank made the LinkedIn Learning platform available to employees, offering access to more than 24,000 online courses supporting the development of professional, technological, business and personal competencies, together with the opportunity to obtain course completion certificates. As part of the Foreign Language Zone, employees developed their language skills by participating in *Rock Your English* grammar webinars and the "1000 słów na początek" (1000 words to start with)microlearning series, supporting the systematic expansion of practical English vocabulary used in everyday communication. Furthermore, employees can attend weekly one-hour online webinars under the "Wiedza w Pigułce" (Knowledge in a Nutshell) programme, during which Bank employees share practical knowledge on personal development and sales.

In addition, another edition of the #PerspekTYwy (#Perspectives) event was organised at the Bank, comprising individual consultations with recruiters. The aim of the event was to support employees' internal mobility within the organisation

4.1.3 Qualitative disclosures on corporate governance risks

Governance

As part of the credit risk assessment of corporate customers, the Bank evaluates factors related to the client's corporate governance. The assessment covers, among others, the organisational structure and management, compliance of the risk management process, organisational and supervisory culture, as well as transparency and management reporting. The assessment of ESG risk factors related to corporate governance is based on an expert assessment carried out using the customer's sustainability information and publicly available data. This assessment may affect the customer's rating level. The Bank is working to improve its methods and enable tools to be used for assessing corporate governance risk factors at the loan origination and monitoring stage.

In the case of companies, the impact of corporate governance-related factors on the enterprise's financial performance and the way corporate governance risk is managed is assessed at the credit granting and monitoring stage (applies to customers evaluated using the rating method with an exposure above PLN 1 million).

The "Code of Ethics for Entities Cooperating with PKO Bank Polski S.A. in the Procurement Process" is in force at the Bank and sets out detailed standards and principles for building business relationships between the Bank and Suppliers, Bidders or Potential Bidders from Poland or abroad. At the same time, the Bank is working on preparing and implementing the New Model of Cooperation with Companies in the area of purchasing goods and services. The Model is intended to ensure that the Companies' procurement procedures comply with the Bank's procurement policy and other documents, including the Code of Ethics.

The Bank's objective is that by 2027, 70% of all its suppliers and partners will have declared compliance with the Code of Ethics. Since 2025, the Bank has analysed compliance with the Code of Ethics by new suppliers. In addition, it exercises full control over the achievement of the aforementioned objective.

In its procurement processes, in all tender procedures, the Bank assesses how potential suppliers and partners manage environmental, social and corporate governance aspects. ESG criteria constitute mandatory evaluation criteria in tender procedures. In 2025, the Bank selected a supplier of a new IT system to support its procurement process and supplier database. The platform was implemented at the beginning of 2026. The purpose of the new Procurement Platform is to optimise procurement processes and enable more efficient monitoring of compliance with ESG requirements. All entities intending to establish business relationships with the Bank must register in the Supplier Database on the Procurement Platform. The database is a centralised source of information on entities and enables their qualification and subsequent assessment.

In June 2024, the Bank's procurement processes were successfully verified by CIPS (*Chartered Institute of Procurement and Supply*), the world's largest procurement organisation, and the Bank again received the Procurement Excellence certificate confirming the application of the best market standards in procurement processes conducted by the Bank. The certificate was valid until 30 June 2026.

The Anti-Corruption Policy is in force in the Bank's Group. The purpose of the Policy is to ensure the highest standards of the Group's operations by applying the principle of zero tolerance for corruption, cronyism and nepotism, as well as by supporting the achievement of the objectives set out in the United Nations Convention against Corruption, adopted by the UN General Assembly on 31 October 2003.

Risk management

As part of non-compliance and conduct risk management, each product is evaluated, alongside the associated marketing communication and the manner in which the product is sold.

The Bank makes every effort to ensure that, among other things:
1) products are appropriate to customers' needs;
2) the manner and form of offering products are appropriate to their nature;
3) within the scope provided for by law and market practice, reliable, transparent, comprehensive and accurate information about the product is provided to customers before the agreement is entered into and during its performance, eliminating the potential risk of greenwashing.

The management of non-compliance and conduct risks also comprises the management of conflicts of interest, which aims to limit their negative impact on the Bank's operations and on the relationships that the Bank and persons holding key positions have with customers and other entities. Actions that could cause a conflict of interest are avoided by the Bank, including by establishing control mechanisms to eliminate conflicts of interest and minimise the risk of their occurrence. The Bank records cases of non-compliance, their causes, and their consequences. In addition, the Bank has an anonymous whistleblowing system that protects employees making reports against negative consequences in the form of retaliatory or discriminatory measures or other forms of unfair treatment.

In the area of governance, the Bank identifies and assesses ESG factors affecting its reputation. This concerns, among other things, the Bank's management, business model, organisational culture, internal rules, transparency of information, ethics, remuneration policy, control and risk management systems, and measures to combat corruption, fraud, money laundering and terrorist financing.

The Bank requires its employees and entities acting on its behalf to adhere to ethical standards such as honesty, integrity and professionalism, as set out in the PKO Bank Polski S.A. Code of Ethics and in the Code of Banking Ethics (Good Banking Practices) adopted by the Polish Bank Association.

In 2025, the Bank carried out a comprehensive revision of its procurement regulations, which, among other aspects, takes into account the implementation
of obligations arising from the entry into force of the DORA Regulation[26], the increased importance of ESG in procurement, and the impact of the supply chain on the environment and society.

Starting from the reporting period for Q4 2023, the Bank includes data on ESG risk factors in internal operational risk reports. The Bank considers the governance (G) factor to occur where an operational event results from improper management of, for example, the business model, organisational culture, information policy, information transparency, ethics, remuneration policy, internal control and risk management systems, anti-corruption, fraud and money laundering measures, or from unethical business conduct.

To ensure the physical security of the Bank's facilities, as well as the protection of its employees and customers, the Bank has implemented internal regulations concerning the protection of persons and property, as well as the technical security of its branches and agencies. These regulations set out security standards, including protection against environmental threats and extraordinary events such as fires, floods and other crisis situations.

4.2 Quantitative information on climate change transition risk and physical risk

The Bank's Group has developed a disclosure policy for information on transition risk and physical risk related to climate change, in accordance with the applicable regulation on implementing technical standards (ITS[27]). The limited availability of certain data, such as

[26] Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011, aimed at enhancing the digital operational resilience of financial entities and regulating the provision of ICT (Information and Communications Technology) services in the financial market.
[27] Commission Implementing Regulation (EU) 2024/3172 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637.

actual energy efficiency data or the exact coordinates of a company's registered office, requires the use of expert estimates for some of the data disclosed in the following templates.

The Bank uses the Polish Classification of Activities (PKD 2007) for the presentation of quantitative data.

Table 4.4 Banking book- Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity [Template 1]

	30.06.2026	Gross carrying amount (mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Sector/subsector		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions						
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
1	Exposures towards sectors that highly contribute to climate change*	25 492	1 250	123	3 855	1 798	- 1 269	- 340	- 804	21 480 131	14 411 604	21,05%	19 063	3 978	2 376	75	4
2	A - Agriculture, forestry and fishing	623	-	-	197	28	- 36	- 14	- 17	532 934	222 990	4,86%	460	153	10	0	4
3	B - Mining and quarrying	432	81	0	5	71	- 11	- 0	- 9	368 829	174 487	62,57%	322	99	11	-	4
4	B.05 - Mining of coal and lignite	70	70	-	0	70	- 9	- 0	- 9	174 911	87 511	99,90%	70	-	-	-	2
5	B.06 - Extraction of crude petroleum and natural gas	6	6	0	-	0	- 0	-	- 0	25 640	22 752	100,00%	6	-	-	-	-
6	B.07 - Mining of metal ores	288	-	-	-	-	- 1	-	-	129 031	43 565	64,95%	194	93	-	-	5
7	B.08 - Other mining and quarrying	64	-	-	4	1	- 1	- 0	- 0	38 505	20 565	10,18%	47	6	11	-	4
8	B.09 - Mining support service activities	4	4	-	1	0	- 0	- 0	- 0	742	94	13,59%	4	0	-	-	2
9	C - Manufacturing	7 580	202	25	1 054	736	- 493	- 80	- 379	8 546 738	6 834 002	27,54%	6 330	1 160	89	0	3
10	C.10 - Manufacture of food products	1 527	-	-	166	31	- 40	- 15	- 18	1 805 810	1 553 962	19,33%	1 218	285	24	-	3
11	C.11 - Manufacture of beverages	157	-	-	1	1	- 2	- 0	- 1	55 478	37 065	6,46%	156	1	-	-	2
12	C.12 - Manufacture of tobacco products	3	-	-	2	-	- 0	- 0	-	1 907	1 634	5,20%	3	-	-	-	1
13	C.13 - Manufacture of textiles	55	-	-	11	2	- 2	- 1	- 1	22 768	16 707	4,01%	52	2	1	0	2
14	C.14 - Manufacture of wearing apparel	26	-	-	4	2	- 2	- 0	- 1	7 252	4 840	3,33%	21	5	0	-	3
15	C.15 - Manufacture of leather and related products	7	-	-	1	1	- 0	- 0	- 0	1 777	1 137	1,85%	7	0	-	-	2
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	276	-	-	84	30	- 20	- 9	- 9	177 436	92 341	24,64%	244	29	4	0	3
17	C.17 - Manufacture of pulp, paper and paperboard	298	-	-	24	4	- 5	- 1	- 2	173 932	131 855	7,59%	163	131	4	-	5
18	C.18 - Printing and service activities related to printing	103	-	-	8	6	- 5	- 0	- 4	49 047	35 325	2,90%	81	16	5	-	4
19	C.19 - Manufacture of coke oven products	202	202	3	1	76	- 70	- 0	- 70	484 631	429 545	60,83%	99	104	-	-	5
20	C.20 - Production of chemicals	919	-	1	137	356	- 176	- 5	- 169	1 785 645	1 087 095	66,51%	833	85	0	-	2
21	C.21 - Manufacture of pharmaceutical preparations	141	-	-	1	0	- 0	- 0	- 0	13 856	8 129	60,61%	141	-	-	-	3
22	C.22 - Manufacture of rubber products	639	-	0	153	7	- 21	- 14	- 4	397 808	308 964	19,15%	494	135	10	-	3
23	C.23 - Manufacture of other non-metallic mineral products	300	-	0	74	32	- 15	- 6	- 8	205 570	125 102	19,82%	232	62	6	-	3
24	C.24 - Manufacture of basic metals	212	-	3	17	17	- 11	- 2	- 8	290 090	231 048	51,68%	205	7	0	-	2
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	1 010	-	2	119	56	- 53	- 10	- 39	1 254 339	1 121 096	23,78%	890	106	15	0	3
26	C.26 - Manufacture of computer, electronic and optical products	69	-	2	3	0	- 1	- 0	- 0	550 743	545 528	43,05%	68	1	-	-	2

	30.06.2026	Gross carrying amount (mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Sector/subsector		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions						
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
27	C.27 - Manufacture of electrical equipment	272	-	-	68	2	- 4	- 3	- 1	505 058	485 825	17,90%	241	30	1	-	2
28	C.28 - Manufacture of machinery and equipment n.e.c.	346	-	13	47	28	- 15	- 3	- 11	200 809	171 670	23,08%	278	61	6	-	3
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	245	-	1	55	23	- 23	- 4	- 16	189 832	168 498	48,10%	221	23	1	-	2
30	C.30 - Manufacture of other transport equipment	194	-	-	6	34	- 7	- 0	- 4	108 353	101 799	3,73%	188	5	1	-	3
31	C.31 - Manufacture of furniture	324	-	-	38	21	- 12	- 4	- 7	146 569	105 907	8,89%	279	39	5	-	3
32	C.32 - Other manufacturing	89	-	-	18	1	- 2	- 1	- 1	32 126	24 527	4,12%	74	12	2	-	3
33	C.33 - Repair and installation of machinery and equipment	166	-	-	17	7	- 6	- 1	- 4	85 901	44 403	10,78%	142	21	3	-	3
34	D - Electricity, gas, steam and air conditioning supply	1 907	495	54	293	155	- 124	- 55	- 65	1 480 010	631 045	24,93%	700	211	922	74	10
35	D35.1 - Electric power generation, transmission and distribution	1 781	451	54	280	155	- 123	- 53	- 65	1 334 533	546 612	23,35%	630	165	912	74	11
36	D35.11 - Production of electricity	1 698	451	39	278	155	- 122	- 53	- 65	1 091 450	481 612	20,82%	560	151	912	74	11
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	44	44	-	1	0	- 0	- 0	- 0	72 007	68 949	93,86%	43	0	-	-	4
38	D35.3 - Steam and air conditioning supply	83	-	-	12	0	- 1	- 1	- 0	73 471	15 485	22,46%	27	46	10	-	6
39	E - Water supply; sewerage, waste management and remediation activities	439	-	-	24	7	- 6	- 1	- 4	500 738	145 219	37,49%	234	52	153	-	7
40	F - Construction	1 799	-	2	334	153	- 130	- 27	- 92	941 994	575 627	11,18%	1 671	106	22	0	2
41	F.41 - Construction of buildings	814	-	2	102	68	- 61	- 9	- 47	365 147	278 225	16,40%	744	60	10	0	2
42	F.42 - Civil engineering	311	-	0	77	19	- 17	- 6	- 10	210 334	127 921	9,28%	288	21	2	-	2
43	F.43 - Specialised construction activities	674	-	-	155	66	- 52	- 12	- 35	366 513	169 480	5,77%	639	26	9	-	3
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	5 578	227	0	616	233	- 195	- 40	- 126	5 126 376	4 085 833	25,64%	4 666	856	56	0	3
45	H - Transportation and storage	3 547	244	41	852	288	- 173	- 76	- 70	3 199 439	1 480 045	17,94%	2 725	530	292	0	4
46	H.49 - Land transport and transport via pipelines	2 600	244	-	609	231	- 133	- 51	- 57	2 427 165	873 695	18,42%	2 061	361	178	0	4
47	H.50 - Water transport	169	-	-	128	39	- 17	- 15	- 3	23 995	9 623	0,46%	52	46	71	-	8
48	H.51 - Air transport	25	-	-	14	0	- 0	- 0	- 0	28 267	22 574	14,33%	12	12	1	-	4
49	H.52 - Warehousing and support activities for transportation	625	-	-	95	15	- 21	- 9	- 9	686 964	564 138	23,39%	472	110	43	-	4
50	H.53 - Postal and courier activities	129	-	41	7	2	- 2	- 0	- 1	33 047	10 016	5,31%	128	1	0	-	3
51	I - Accommodation and food service activities	437	-	-	59	56	- 28	- 3	- 22	117 621	48 137	4,24%	358	55	24	0	4
52	L - Real estate activities	3 150	-	0	421	70	- 73	- 45	- 20	665 454	214 218	1,63%	1 595	756	798	1	7
53	**Exposures towards sectors other than those that highly contribute to climate change***	5 098	-	7	485	110	- 96	- 24	- 53				4 020	852	226	0	4
54	K - Financial and insurance activities	272	-	-	10	3	- 3	- 0	- 2				266	5	-	-	4
55	Exposures to other sectors (NACE codes J, M - U)	4 826	-	7	475	107	- 93	- 23	- 51				3 754	846	226	0	4
56	**TOTAL**	**30 589**	**1 250**	**130**	**4 340**	**1 908**	**- 1 365**	**- 364**	**- 857**	**21 480 131**	**14 411 604**	**21,05%**	**23 083**	**4 829**	**2 602**	**75**	**4**

* In accordance with Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 with regard to minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks – the Regulation on climate benchmark standards – Recital 6: sectors listed in Sections A–H and Sections I and L of Annex I to Regulation (EC) No 1893/2006; the exposures do not include municipal bonds, the LGU (Local Government Units) sector or financial

Template 1 discloses exposures to non-financial corporations that are more vulnerable to transition risk associated with the shift towards a low-carbon and climate-resilient economy, broken down into sectors that significantly contribute to climate change (NACE codes: A, B, C, D, E, F, G, H, I, L), and exposures to non-financial corporations operating in sectors other than those that significantly contribute to climate change (NACE codes: K, J, M–U).

The benchmark administrator, GPW Benchmark S.A. has not made available a list of entities that significantly harm at least one environmental objective. According to the information contained in the Rules of the Stock Exchange Index Family, none of the Stock Exchange Indices qualifies as an EU Climate Transition Benchmark or an EU Paris-aligned Benchmark. In connection with the above, the Bank does not identify exposure to the aforementioned entities within this disclosure.

Disclosure is made in column b only with regard to entities that meet the criteria under Article 12(1)(d)-(g) of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 with regard to minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks. The identification of exposures to these entities was based on an expert review of the portfolio of non-financial corporations, which involved assigning customers to groups of companies operating in the fossil fuel, oil fuel and natural gas sectors, and electricity-generating companies.

Given the current characteristics of the Polish energy sector, the Bank adopted the conservative assumption that electricity-generating companies (other than entities generating electricity exclusively from renewable energy sources) qualify as companies deriving at least 50% of their revenues from electricity generation with a high emission intensity (emission intensity above 100 gCO_2/kWh). This assumption is based on the emission factor for electricity generation from stationary installations, published in December 2025 by KOBiZE, according to which the average emission factor for 2024 was 717 gCO2/kWh (excluding greenhouse gases other than CO_2).

Column c discloses exposures to entities reporting in accordance with Directive 2013/34/EU[28] or entities voluntarily reporting sustainability information, whose economic activities are environmentally sustainable, taxonomy-aligned and contributing to the achievement of the first environmental objective – climate change mitigation (CCM).

The scope of financed greenhouse gas emissions calculations covered the exposures of the Bank and its subsidiaries: PKO Leasing S.A. (including Prime Car Management S.A.) and PKO Faktoring S.A., within the following asset classes:
1) Business loans (PCAF asset class: *Business loans and unlisted equity*);
2) Listed equity and corporate bonds (PCAF asset class: *Listed equity and corporate bonds*);
3) Project finance (PCAF asset class: *Project finance*);
4) vehicle financing (including vehicle leasing and rental) (PCAF asset class: *Motor vehicle loans*);
5) commercial real estate loans (PCAF asset class: *Commercial real estate*).

Calculations for individual asset classes were carried out in accordance with the Global GHG Accounting and Reporting Standard for the Financial Industry, developed by the Partnership for Carbon Accounting Financials (PCAF). For vehicle leasing, the PCAF methodology adapted to the requirements of the GHG Protocol was applied, according to which the leasing company is responsible for the operational emissions of leased assets. For Prime Car Management S.A., guidelines for calculating the carbon footprint for leasing companies developed by the Polish Leasing Association and based on the GHG Protocol and PCAF standards and the *Global Logistics Emissions Council* (GLEC) guidelines were used.[29]

For the purpose of calculating financed emissions, the Bank's Group used internal and external data sources. Data obtained from external sources included, among other things:
1) actual emissions data for customers obtained from the Notoria database or directly from companies' non-financial reports;
2) actual emissions data from stationary fuel combustion installations and fuel consumption in combustion engines obtained from the National Database on greenhouse gas and other substance emissions, used to calculate Scope 1 financed emissions;
3) data contained in the Central Register of Energy Performance of Buildings maintained by the Ministry of Development and Technology, used to calculate financed emissions related to commercial real estate loans;
4) emission factors contained in the PCAF online emission factor database, used for calculating financed emissions related to business loans, listed equity and corporate bonds, Project Finance, and motor vehicle financing;
5) emission factors contained in the European building emission factor database maintained by PCAF, used for calculating financed emissions related to commercial real estate loans.
6) Eurotax emission factor data, data from the Central Vehicle and Driver Register (CEPiK), the National Inventory Report, and information on fuel consumption and CO2 emissions in passenger cars published by the Ministry of Infrastructure pursuant to the Regulation of the

[28] Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC, as amended.
[29] *Global Logistics Emissions Council* (GLEC) – a platform for measuring greenhouse gas emissions across different modes of transport.

Prime Minister of 29 April 2004 on statements of product information relevant to environmental protection, used to calculate the financed emissions of Prime Car Management S.A.

As part of the financed emissions calculation, the Bank's Group based its calculations on:

1) reported emissions (information on emissions of the customer or the company financed, or the parent undertaking of the client's group);
2) emissions estimated based on physical activity data of the customer or investee company, including: energy consumption, production, information from energy performance certificates (actual or estimated) of financed properties;
3) emissions estimated based on economic activity data of the customer or investee company, including, among others, revenue information obtained by the Bank from customers' financial statements;

and, in accordance with the PCAF methodology, estimated an attribution factor for each asset class, indicating the share of the customer's emissions allocated to the Bank's Group based on its share of the financing.

Compared with the previous reporting period, exposures to sectors that significantly contribute to climate change increased at a rate similar to the growth of the Bank's Group's portfolio. As a result, the share of these exposures in the portfolio remained stable. At the same time, the level of exposure to entities excluded from EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks remained stable.

Financed emissions increased despite the scale and structure of financing remaining broadly unchanged compared with the previous reporting period. The increase was primarily due to a change in the method used to estimate emissions for certain PCAF asset classes, i.e. business loans, listed equity and corporate bonds, and project finance.

In the current reporting period, for the first time, the Bank's Group used factors from the CEDA (Comprehensive Environmental Data Archive) database to estimate financed emissions, replacing the previously used factors from the Exiobase (Extended Multi-Regional Input-Output Database) database, in line with the PCAF recommendation. CEDA factors are used to estimate emissions where data availability is limited, corresponding to data quality scores DQS4 and DQS5. They are based on more up-to-date data, cover a broader range of countries and economic sectors, and allow their specific characteristics to be reflected more accurately. Analyses conducted by PCAF showed that CEDA factors show greater consistency with, and are closer to, emissions reported by companies than Exiobase factors. The implementation of this approach also meant a shift from regional parameters to more granular country-specific data.

The increase in financed emissions, particularly Scope 3 emissions, was also driven by a greater share of data reported by customers. The factors made available by PCAF and used to estimate emissions include upstream emissions, i.e. emissions arising at earlier stages of the value chain. They do not, however, include downstream emissions related, among other things, to further processing, use or end-of-life treatment of products. Data reported by customers may also include the above-mentioned emissions. The greater share of data reported by customers may therefore have affected the level of reported Scope 3 emissions.

The impact of these factors on the increase in financed emissions was partly offset by a decline in emissions in the PCAF Motor vehicle loans asset class. This was primarily due to improvements in the quality of the Bank's Group's data, which enabled more detailed mapping of the types and models of financed vehicles to the appropriate PCAF emission factors, thereby increasing the accuracy of emissions estimates for this asset class

Table 4.5. Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral [Template 2]

	30.06.2026	Total gross carrying amount amount (mln EUR)															
			Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
	Counterparty sector		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G		Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
1	**Total EU area**	**39 184**	**18 591**	**13 076**	**5 456**	**1 070**	**406**	**219**								**39 184**	**59%**
2	Of which Loans collateralised by commercial immovable property	6 441	927	1 780	3 217	281	88	88	-	-	-	-	-	-	-	6 441	59%
3	Of which Loans collateralised by residential immovable property	32 742	17 664	11 296	2 239	789	318	131	-	-	-	-	-	-	-	32 742	60%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	-	-	-	-	-	-	-	-	-	0	55%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	23 274	9 523	8 343	4 298	801	293	5								23 274	100%
6	**Total non-EU area**	**190**	**-**	**-**	**-**	**-**	**-**	**-**								**190**	**-**
7	Of which Loans collateralised by commercial immovable property	159	-	-	-	-	-	-	-	-	-	-	-	-	-	159	-
8	Of which Loans collateralised by residential immovable property	30	-	-	-	-	-	-	-	-	-	-	-	-	-	30	-
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	-	-	-	-	-	-	-								-	-

Template 2 discloses all exposures that are linked to collateral in the form of developed real estate. Expert, conservative estimates of the EP indicator, the level of energy efficiency (primary non-renewable energy consumption per square metre of property per year in kWh/m²), were applied to all types of properties based on the year of construction, where known. For some exposures, actual EP indicator values were disclosed; the Bank's Group is currently obtaining data on energy performance certificates from the Central Register of Energy Performance of Buildings and is progressively updating these data in its internal systems. As the scope of data obtained from the Central Register expands, the share of actual EP indicator values in the mortgage loan portfolio is increasing, allowing more precise reporting of the energy efficiency of properties.

Where it was necessary to estimate the value of the EP indicator, data published by the Ministry of Development and Technology and the Announcement of the Minister of Development and Technology of 15 April 2022 on the publication of the consolidated text of the Regulation of the Minister of Infrastructure on the technical conditions to be met by buildings and their location were used. Columns h–n are empty, as the Bank's Group does not hold in its portfolio exposures secured by collateral with assigned energy performance certificate labels (building energy efficiency classes A–G).

Table 4.6. Banking book Indicators of potential climate change transition risk: Alignment metrics [Template 3]

	30.06.2026	NACE Sectors (a minima)	Portfolio gross carrying amount (mln EUR)	Alignment metric*	Year of reference	Distance to IEA NZE2050 in % **	Target (year of reference + 3 years)
	a	b	c	d	e	f	g
1	Power	D35.11, D35.30	1 780	180 kgCO2e/MWh	2023	-3%	269 kgCO2e/MWh
2	Fossil fuel combustion	Mapping of NACE codes to PKD sectors in accordance with EU regulations	409	74,44 tCO2e/TJ	2022	23%	72,11 tCO2e/TJ
3	Automotive		246	0,060 kgCO2/tkm	2022	42%	0,05559 kgCO_2/tkm
				0,140 kgCO2/pkm	2022	130%	0,1536 kgCO2/pkm
4	Aviation		109	-	-	-	-
5	Maritime transport		440	-	-	-	-
6	Cement, clinker and lime production		155	-	-	-	-
7	Iron and steel, coke, and metal ore production		818	1,01 tCO2e/t	2022	-6%	0,5492 tCO2e/t
8	Chemicals		1 060	1,39 tCO2e/t	2023	4%	1,43 tCO2e/t

* "Year of reference" means the baseline year, i.e. the year of the alignment metric for the given sector, as disclosed in the Capital Adequacy Report as at 30 June 2024. For individual sectors, in the years indicated, the following alignment metric values are applied: Energy – 349 kgCO_2e/MWh (in line with the Transformation Plan), Fossil fuel combustion – 74.74 tCO_2e/TJ, Automotive – trucks – 0.0623 kgCO_2/tkm, Automotive – passenger cars – 0.1727 kgCO_2/pkm, Production of iron and steel, coke and metal ores – 0.5492 tCO_2e/t, Chemicals – 1.43 tCO_2e/t.
**shortfall to the 2030 data points under the NZE2050 scenario, % (in accordance with the formula specified by the regulator, i.e. the difference between the value of the emission intensity metric in the reference year and the target value of the metric specified in the IEA scenario for 2030, divided by that target value and expressed as a percentage.)

Template 3 discloses the Bank's Group's exposures broken down by sectors that have a significant impact on financed greenhouse gas emissions.

The Bank's Group analysed its alignment efforts against the objectives of the Paris Agreement in relation to the sectors indicated in Template 3, namely: the energy sector, fossil fuel combustion, automotive, aviation, maritime transport, cement, clinker and lime production, iron and steel, coke and metal ores production, and chemicals.

In accordance with the Regulation, the Bank's Group discloses information on sectors that are material to its financing activity. The Group adopted a conservative approach and set a materiality threshold at 1% of the total value of on-balance-sheet exposures in the business portfolio. Accordingly, sectors whose share in the total exposure value was below 1%, namely aviation and cement, clinker and lime production, were considered immaterial. For maritime transport, the Bank's Group did not determine an alignment metric or targets due to the lack of reference data of sufficient quality.

To calculate the values reported in column f, the Bank's Group used the metric values projected for 2030 under the International Energy Agency (IEA) "Net Zero Emissions by 2050" scenario. Metric values were adopted separately for each sector.

Some of the targets presented in column g relate to 2025. This results from the methodology used to set them, under which the targets were set for a three-year horizon from the base year. Although the period for which they were established has elapsed, the Bank's Group decided to retain them in disclosures as at 30 June 2026 to ensure continuity of presentation and comparability of data between successive reporting periods until new regulatory requirements are published.

For the **energy** sector, the Bank's Group adopted an alignment metric expressed in kgCO2e/MWh. The metric covers only customers' direct greenhouse gas emissions - Scope 1 emissions. The unit of the metric, the scope of emissions and sectors covered by the analysis, and the target set for three years from the reference year are consistent with the Transformation Plan.

To calculate the portfolio metric reported in column d, the Bank's Group determined the emissions intensity for individual exposures. For this purpose, it used:
1) actual emissions intensity data published by key customers with the largest on-balance-sheet exposures;
2) PCAF database factors for exposures financing electricity or heat generation from gas, waste incineration or renewable energy sources;
3) a metric based on the latest data from the National Support Centre for Agriculture for exposures financing electricity or heat generation from biogas;
4) the average emissions intensity for power generation in Poland, published by KOBiZE, for the remaining exposures.

In addition, for exposures related to energy storage, the Bank's Group assumed zero emissions intensity. The value was determined based on expert judgement. This approach reflects the technological characteristics of energy storage facilities and the methodology for determining the alignment metric, which covers only direct greenhouse gas emissions (Scope 1).

The Bank's Group calculated the portfolio metric as the average emissions intensity of individual exposures, weighted by the amount of on-balance-sheet exposure. The value of the metric at the end of Q2 2026 was below the assumed target. The target is based on the pathway for the energy sector under the IEA "Net Zero Emissions by 2050" scenario and the Bank's Group's decarbonisation pathway.

The alignment metric decreased compared with the previous reporting period (from 183 to 180 kgCO_2e/MWh) due to an increase in financing for renewable energy sources and the gradual reduction in emissions intensity by companies in the energy sector as a result of their decarbonisation measures. This is confirmed by the decline in both the actual emissions intensity of customers and the sectoral metric applied to the remaining exposures.

As at the reporting date, the Bank's Group had PLN 4.3 billion of off-balance-sheet investment financing (including PLN 2.5 billion intended for gas investments), which was not included in the calculation of the emissions intensity metric. Including this financing would increase the value of the metric to approximately 228 $kgCO_2e$/MWh. For gas-related exposures, the estimate was based on the statistical emissions intensity for this technology. However, the final value of the metric may differ depending on the technical parameters and emissions intensity of the financed installations.

For the **fossil fuel combustion** sector, the Bank's Group adopted an alignment metric expressed in tCO2e/TJ. The metric represents greenhouse gas emissions from fossil fuel combustion per unit of energy. The Bank's Group set a target for three years from the reference year based on the rate of decline of the metric under the IEA "*Net Zero Emissions by 2050*" scenario. The adopted pathway is therefore parallel to the pathway specified in that scenario.

To calculate the portfolio metric reported in column d, the Bank's Group used actual emissions intensity data published by key customers with the largest on-balance-sheet exposures and a statistical metric for the remaining exposures. The statistical metric was determined on the basis of data on emissions from fuel combustion in Poland and the corresponding energy supply, published in the National Inventory Report. On this basis, the Bank's Group calculated the portfolio metric as the average emissions intensity of individual exposures weighted by on-balance-sheet exposure.

The value of the metric increased slightly, from 74.10 tCO_2e/TJ in the previous reporting period to 74.44 tCO2e/TJ as at the reporting date. The main reason was an increase in the emissions intensity metric reported by one of the key customers. The portfolio metric slightly exceeds the maximum level specified in the adopted pathway.

For the **automotive** sector, the Bank's Group adopted alignment metrics expressed in kgCO2/tonne-kilometre (tkm) for trucks and kgCO2/passenger-kilometre (pkm) for passenger cars. The targets for three years from the reference year were set in line with the rate of decline of the metrics under the IEA "*Net Zero Emissions by 2050*" scenario. The adopted pathways are therefore parallel to the pathways specified in that scenario.

The values of the portfolio metrics reported in column d correspond to the statistical metric values because, as at the reporting date, detailed actual data for individual exposures were not available. Due to the lack of updated statistical data on passenger and freight transport volumes, the metric values did not change compared with the previous reporting period. The metric for passenger cars remains below the level specified in the IEA "*Net Zero Emissions by 2050*" scenario and the target adopted by the Bank's Group. The metric for trucks remains slightly above both pathways.

For the **iron and steel, coke and metal ores production** sector, the Bank's Group adopted an alignment metric expressed in tCO2e/t (tonne of output). The target for three years from the reference year was set at the reference-year value because it was below the level implied by the IEA "Net Zero Emissions by 2050" scenario.

To calculate the portfolio metric reported in column d, the Bank's Group used actual emissions intensity data published by key customers with the largest on-balance-sheet exposures. For the remaining exposures, it applied a statistical metric (source: *WiseEuropa*). The portfolio metric was then calculated as the average emissions intensity of individual exposures, weighted by on-balance-sheet exposure.

The value of the metric increased from 0.77 tCO2e/t in the previous reporting period to 1.01 tCO_2e/t as at the reporting date. The main reason for the increase was a significant rise in the emissions intensity of one of the key customers, accompanied by an increase in the Bank's Group's exposure to that customer. Despite the increase, the metric remained below the level resulting from the IEA "*Net Zero Emissions by 2050*" pathway, but exceeded the target adopted by the Bank's Group.

For the **chemicals** sector, the Bank's Group adopted an alignment metric expressed in tCO2e/t (tonne of output). The target for three years from the reference year was set at the reference-year level because it was below the level resulting from the IEA "*Net Zero Emissions by 2050*" scenario.

To calculate the portfolio metric reported in column d, the Bank's Group used actual emissions intensity data published by key customers with the largest on-balance-sheet exposures. For the remaining exposures, it used statistical data for Poland from the National Inventory Report. The portfolio metric was then calculated as the average emissions intensity of individual exposures weighted by the value of on-balance-sheet exposure. As at the reporting date, the value of the metric decreased slightly, from 1.40 to 1.39 tCO_2e/t. The change was mainly due to a decrease in emissions intensity reported by key customers, while the level of on-balance-sheet exposure remained broadly unchanged. The portfolio metric remained below both the level specified in the IEA "*Net Zero Emissions by 2050*" scenario and the Bank's Group's decarbonisation pathway.

The Bank's Group continues its efforts to improve the quality of the data used in the calculations. The Bank aims to increase the share of actual data obtained directly from customers so that future disclosures more accurately reflect the characteristics of the portfolio.

Table 4.7 Banking book Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms [Template 4]

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	2	<0,01%	-	1	1

*For counterparties among the top 20 carbon-intensive companies in the world.

Template 4 discloses the Bank's Group's exposures to the top 20 carbon-emitting companies in the world included in the *Carbon Majors* list published in January 2026 (2024 data). The disclosure takes into account exposures to the entities on the aforementioned list and their subsidiaries identified on the basis of consolidated financial statements.

Table 4.8. Banking book Indicators of potential climate change physical risk: Exposures subject to physical risk [Template 5]

	30.06.2026	Gross carrying amount (mln EUR)													
			of which exposures sensitive to impact from climate change physical events												
	Variable: Geographical area subject to climate change physical risk - acute and chronic events		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate	of which exposures sensitive to impact from acute climate change	of which exposures sensitive to impact both from chronic and acute climate	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
1	A - Agriculture, forestry and fishing	509	1	0	-	-	3	0	1	-	0	0	- 0	- 0	- 0
2	B - Mining and quarrying	432	0	93	-	-	6	93	0	-	-	0	- 0	-	- 0
3	C - Manufacturing	4 992	82	68	0	-	4	63	87	-	2	2	- 2	- 0	- 1
4	D - Electricity, gas, steam and air conditioning supply	1 905	0	24	303	-	14	327	0	-	37	-	- 8	- 8	-
5	E - Water supply; sewerage, waste management and remediation activities	353	0	2	3	-	8	4	0	-	0	-	- 0	- 0	-
6	F - Construction	1 400	11	3	0	-	3	2	12	-	4	2	- 2	- 1	- 1
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4 686	-	-	-	-	-	-	-	-	-	-	-	-	-
8	H - Transportation and storage	3 328	0	0	-	-	1	0	0	-	0	0	- 0	- 0	- 0
9	L - Real estate activities	1 836	3	25	71	-	13	69	30	-	0	0	- 0	- 0	- 0
10	Loans collateralised by residential immovable property	32 772	10	34	211	432	21	-	686	-	51	7	- 10	- 6	- 4
11	Loans collateralised by commercial immovable property	6 601	145	17	9	0	4	-	171	-	64	13	- 12	- 8	- 4
12	Repossessed colalterals	0	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Template 5 discloses the sensitivity of the portfolio to the impact of chronic and acute physical events related to climate change. The assessment is performed using the climate model developed by the Institute of Environmental Protection – National Research Institute (KLIMADA 2.0 project), based on the IPCC RCP 8.5 scenario. The template presents information on assets located in Poland.

Regional-level data (municipality) are analysed with reference to the geographical location of the customer's operations or the location of collateral in the form of real estate. The assessment covers the level of gross risk (hazard), in relation to both chronic risks (droughts and water shortages) and acute risks (inundations and floods, as well as hurricanes – winds above 30 m/s). The analysis covers three time horizons (to 2030, 2040, and 2050) and takes into account the maturities of the Bank's credit portfolio. With regard to mortgage collateral, the Bank's Group distinguished between residential and commercial real estate, taking into account maturities, sensitivity levels (chronic and acute climate-related events), Stage buckets and the related accumulated impairment. The Bank's Group does not disclose exposures to business entities in the construction, services, transport and sales network sectors broken down by the impact of climate-related phenomena. This is due to the assumption that physical risk has a low impact on the overall operations of these entities as a result of the highly dispersed nature of their activities.

Compared with the previous reporting period, the portfolio's exposure profile to physical risks related to climate change remained stable. The value of exposures identified as being exposed to chronic and acute physical events related to climate change increased, while the sectoral and product structure of the portfolio remained broadly unchanged. Loans secured by residential and commercial real estate continue to account for the largest part of the portfolio analysed. The increase in the value of exposures covered by the analysis was primarily a consequence of the growth in these portfolios rather than changes in their level of exposure to physical risks. As a result, the changes observed during the reporting period do not indicate a material change in the overall sensitivity of the portfolio to physical risks related to climate change.

5 VARIABLE REMUNERATION COMPONENTS

The following tables supplement the quantitative data presented in the Report as at 31 December 2025 in the tables on remuneration awarded for 2025.

Compared to the information presented in the report "Capital adequacy and other information subject to disclosure of the PKO Bank Polski SA Group as at 31 December 2025", the data regarding the recognition of fixed remuneration components for 2025 have been adjusted at the consolidation level.

Table 5.1 Remuneration awarded for the financial year [Template EU REM1]

			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	10	8	56	184
2		Total fixed remuneration	1,75	11,86	39,58	63,31
3		Of which: cash-based	1,75	11,38	37,60	59,47
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	-	-	-	-
5		Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x		Of which: other instruments	-	-	-	-
6		(Not applicable in the EU)				
7		Of which: other forms	-	0,48	1,98	3,84
8		(Not applicable in the EU)				
9	Variable remuneration*	Number of identified staff	-	8	56	184
10		Total variable remuneration	-	11,38	35,48	44,14
11		Of which: cash-based	-	5,12	18,54	26,83
12		Of which: deferred	-	2,57	6,09	5,71
EU-13a		Of which: shares or equivalent ownership interests	-	-	-	-
EU-14a		Of which: deferred	-	-	-	-
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	-	6,26	15,63	17,31
EU-14b		Of which: deferred	-	3,14	6,85	6,98
EU-14x		Of which: other instruments	-	-	1,31	-
EU-14y		Of which: deferred	-	-	0,60	-
15		Of which: other forms	-	-	-	-
16		Of which: deferred	-	-	-	-
17	**Total remuneration (2 + 10)**		**1,75**	**23,23**	**75,06**	**107,45**

Table 5.2 Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) [Template EU REM2]

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards					
1	Guaranteed variable remuneration awards - Number of identified staff	-	-	-	-
2	Guaranteed variable remuneration awards -Total amount	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
Severance payments awarded in previous periods, that have been paid out during the financial year					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	-	-	5	-
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	-	0,51	-
Severance payments awarded during the financial year					
6	Severance payments awarded during the financial year - Number of identified staff	-	-	3	8
7	Severance payments awarded during the financial year - Total amount	-	-	0,38	1,08
8	Of which paid during the financial year	-	-	0,38	1,08
9	Of which deferred	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	0,95
11	Of which highest payment that has been awarded to a single person	-	-	0,38	0,69

Table 5.3 Deferred remuneration [Template EU REM3]

	Deferred and retained remuneration	a	b	c	d	e	f	EU - g	EU - h
		Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e.changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	**MB Supervisory function**	-	-	-	-	-	-	-	-
2	Cash-based	-	-	-	-	-	-	-	-
3	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
4	Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
5	Other instruments	-	-	-	-	-	-	-	-
6	Other forms	-	-	-	-	-	-	-	-
7	**MB Management function**	10,33	1,76	8,57	1,15	3,27	0,47	1,22	0,88
8	Cash-based	4,98	0,88	4,10	0,58	1,63	0,03	0,33	-
9	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
10	Share-linked instruments or equivalent non-cash instruments	5,35	0,88	4,47	0,58	1,63	0,44	0,89	0,88
11	Other instruments	-	-	-	-	-	-	-	-
12	Other forms	-	-	-	-	-	-	-	-
13	**Other senior management**	27,74	4,42	23,33	0,28	0,95	1,72	5,41	2,21
14	Cash-based	13,39	2,21	11,18	0,14	0,47	0,25	2,32	-
15	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
16	Share-linked instruments or equivalent non-cash instruments	13,46	2,05	11,40	0,14	0,48	1,43	2,90	2,05
17	Other instruments	0,90	0,15	0,74	-	-	0,04	0,19	0,15
18	Other forms	-	-	-	-	-	-	-	-
19	**Other identified staff**	30,79	4,73	26,07	0,05	0,29	1,37	5,22	2,36
20	Cash-based	14,85	2,36	12,49	0,02	0,14	0,21	2,55	-
21	Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
22	Share-linked instruments or equivalent non-cash instruments	13,98	2,06	11,92	0,02	0,15	1,14	2,43	2,06
23	Other instruments	1,96	0,31	1,66	-	-	0,02	0,23	0,31
24	Other forms	-	-	-	-	-	-	-	-
25	**Total amount**	**68,87**	**10,90**	**57,97**	**1,48**	**4,51**	**3,56**	**11,85**	**5,45**

Table 5.4 Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) [Template EU REM5]

		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										258
2	Of which: members of the MB	10	8	18							
3	Of which: other senior management				1	10	-	30	3	12	
4	Of which: other identified staff				15	48	17	54	37	13	
5	Total remuneration of identified staff	1,75	23,23	24,98	10,40	46,75	11,01	69,39	22,36	22,60	
6	Of which: variable remuneration	-	11,38	11,38	4,61	21,75	4,74	30,18	8,78	9,56	
7	Of which: fixed remuneration	1,75	11,86	13,61	5,79	25,00	6,27	39,22	13,58	13,04	

6 GLOSSARY OF TERMS AND ABBREVIATIONS

ESG *(environmental, social responsibility and corporate governance)*	environmental, social and governance issues
Greenwashing	marketing communication of a company based on false or misleading statements regarding the compliance of the product or its components with environmental protection principles
IRB (*Internal Ratings Based Approach*)	an internal ratings method used to determine the capital requirement for credit risk
Internal capital	amount of capital, that is required to cover all identified significant types of risk present in the Bank or the Bank's Group's business activity and the effect of changes in its business environment, taking into account the anticipated risk level
KOBiZE	National Centre for Emissions Management operates within the structure of the Institute of Environmental Protection – National Research Institute, administering the EU Emissions Trading System in Poland, and maintaining a national database of greenhouse gas emissions.
TCR *(Total Capital Ratio)*	the main measure of capital adequacy, calculated as the quotient of own funds and total own funds requirements multiplied by 12.5
MREL *(Minimum Requirement for own funds and Eligible Liabilities)*	the minimum requirement for own funds and eligible liabilities pursuant to Article 97 of the BGF Act
MRT *(Material Risk Takers)*	members of the Management Board and key managers with a significant impact on the risk profile of the Bank
IFRS	International Financial Reporting Standards
NACE *(nomenclature statistique des activités économiques dans la Communauté européenne)*	The Statistical Classification of Economic Activities in the European Community. NACE is a four-digit classification providing a framework for collecting and presenting a wide range of statistical data according to economic activity in economic statistics and other statistical areas developed within the European Statistical System (ESS).
Non-trading book (Banking book)	the book containing operations not included in the trading book, specifically related to credit facilities and loans and deposits extended or accepted within the bank's basic business activity or for the purposes of liquidity and interest rate risk management
Business risk	the risk of failing to achieve the assumed financial goals, including incurring losses, due to adverse changes taking place in the business environment, making bad decisions, incorrect implementation of the decisions made or failing to take appropriate action in response to changes taking place in the business environment
Credit risk	the risk of losses resulting from customer's failure to meet obligations towards the Bank or the risk of a decrease in the economic value of the Bank's receivables as a result of deterioration of the customer's ability to service obligations
Model risk	the risk of suffering losses as a result of wrong business decisions taken on the basis of functioning models

Operational risk	the risk of loss resulting from the inadequacy or failure of internal processes, people, systems, or external events; operational risk includes—but is not limited to: • legal risk – the risk of loss resulting from a lack of knowledge, misunderstanding, or failure to apply legal standards, the inability to enforce contractual provisions, or adverse interpretations or rulings by courts or public administration bodies, • ICT-related risk, insofar as it pertains to operational risk. Operational risk does not include reputational risk or business risk. ICT-related risk (risk associated with information and communication technologies) – means any reasonably identifiable circumstance related to the use of network and information systems which, if it materializes, may compromise the security of network and information systems, of any technology-dependent tool or process, or of operations and processes, or the provision of services, by causing adverse effects in the digital or physical environment.
Liquidity risk	the risk of inability to timely discharge of liabilities due to non-availability of liquid means
Interest rate risk	the risk of loss on the Bank's balance sheet and off-balance sheet items sensitive to interest rate changes, resulting from unfavourable interest rate changes on the market
Foreign exchange risk	the risk of loss due to changes in the foreign exchange rates, generated through maintaining open currency positions in individual currencies
Reputation risk	current or future risk of reputation deterioration among customers, counterparties, investors, external supervisory and control bodies, and public opinion as a result of business decisions, operational incidents, security incidents, cases of non-compliance or other events that may have an unfavourable impact on financial results, own funds, or liquidity
Macroeconomic risk	the risk of deterioration of the Bank's financial condition as a result of adverse impact of changes in macroeconomic conditions, macroeconomic risk includes geopolitical risk, understood as the macroeconomic effects taking into account the negative effects of the geopolitical environment on the economy and financial markets.
Strategic tolerance limit	the level of risk appetite set by the Management Board
EU taxonomy	A set of regulations supporting companies in sustainable activities for the environment and climate. The primary document is the Regulation of the European Parliament and of the Council of the European Union 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088.
TEM *(Total Exposure Measure)*	the total exposure measure calculated in accordance with Article 429 and Article 429a of the CRR
Stress tests	a risk management tool used for assessment of the potential impact of a specific event or changes in the market parameters on the Bank or the Bank's Group
TLAC *(Total Loss-Absorbing Capacity)*	requirements for own funds and eligible liabilities for global systemically important institutions and material subsidiaries of non-EU global systemically important institutions
TREA *(Total Risk Exposure Amount)*	the total risk exposure amount calculated in accordance with Article 92(3) and (4) of the BGF Act
EP indicator	determines the level of energy efficiency of a property, which is the unit consumption of non-renewable primary energy in kWh/m2 of the property per year
LCR (liquidity coverage ratio)	liquidity coverage ratio that describes the ratio of high-quality liquid assets to total net cash outflows (including cash inflows) over a 30-day period under stress scenario – European measure defined in CRDIV/CRR package

Tier 1 (T1) capital ratio	capital adequacy measure, calculated as the ratio of Tier 1 capital and the sum of own funds requirements, multiplied by 12.5. No elements of additional Tier 1 capital are identified in the Bank and the Bank's Group, consequently the Common Equity Tier 1 (CET1) ratio is equal to the Tier 1 capital ratio (T1)
Requirements for own funds	total own funds requirements for particular risk types and own funds requirements for exceeded limits and other violations of norms described in the CRR and CRD, BRR and decisions of external supervisory and control bodies

Representation by the Management Board of PKO Bank Polski S.A. The Management Board of PKO Bank Polski S.A.:

- represents that, to the best of its knowledge, the information has been prepared in compliance with the internal control processes;
- represents that, to the best of its knowledge, the adequacy of risk management arrangements at PKO Bank Polski S.A. ensures that the risk management systems used are appropriate to the risk profile and strategy of the Bank and the Bank's Group;
- approves this Report "Capital Adequacy and other information subject to disclosure of the Group of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna as at 30 June 2026", which includes information on risk, discusses the overall risk profile of the Bank and the Bank's Group related to the business strategy and includes key indicators and figures that provide external stakeholders with a holistic view of the risk management of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group, including interactions between the Bank's risk profile and risk tolerance expressed in the form of strategic tolerance limits determined by the Management Board and approved by the Supervisory Board.

Signatures of the Management Board of PKO Bank Polski S.A. on the original version.