Report No. 3/2026 on an incidental breach of the Best Practices for GPW Listed Companies

Pursuant to §29 (3a) of the Rules of the Warsaw Stock Exchange, PKO Bank Polski S.A. hereby provides information on an incidental breach of the Best Practices for GPW Listed Companies 2021.

The Rule which was breached

MANAGEMENT BOARD, SUPERVISORY BOARD

2.2. Decisions to elect members of the management board or the supervisory board of companies should ensure that the composition of those bodies is diverse by appointing persons ensuring diversity, among others in order to achieve the target minimum participation of the minority group of at least 30% according to the goals of the established diversity policy referred to in principle 2.1.

This rule was breached incidentally.

The company's commentary on an incidental breach of the above rule:

On June 10, 2026, the Bank's Supervisory Board appointed two new members to the Bank's Management Board for the current, joint, three-year term of that body, beginning on March 26, 2024. As a result of this appointment (effective as of a future date), the target composition of this Bank body was achieved. The Bank's Management Board consists of nine members, including one woman, who accounts for 11.1% of the Board's membership. As a result of this election, the target minimum ratio of women on the Bank's Management Board, as well as the combined ratio of women on the Management Board and the Supervisory Board (i.e., a level closest to 33%), was not achieved.

The selection of members of the Bank's Management Board was preceded by a recruitment process, as a result of which—based on objective evaluation criteria—candidates were identified who most closely matched the competency profile defined by the Supervisory Board. The selection process was conducted with particular attention to the diversity of the Management Board's composition, including gender diversity. Below is detailed information on the Bank's rules for selecting members of the Management Board.

Members of the Bank's Management Board are selected in accordance with the principles of suitability and diversity in the composition of governing bodies that is, in a manner that enables the selection of individuals possessing high levels of competence, skills, and experience appropriate to the position entrusted to them, and that ensures that members of the Management Board or the Supervisory Board—individually and as a body- issue independent opinions and make independent decisions across the entire scope of the Bank's operations, ensuring the prudent and stable management of the Bank's affairs.

Suitability also implies a guarantee of proper performance of duties, in that members of the body must demonstrate integrity, ethical conduct, and independent judgment, as well as the ability to devote sufficient time to performing their duties. When selecting members of these bodies, additional criteria that promote diversity in the body's composition—such as gender and age—are also taken into account.

Given the primacy of the requirement that members of governing bodies be qualified, objectives related to gender diversity in the composition of governing bodies are taken into account in the selection process only to the extent that this does not adversely affect the functioning and qualifications of the governing body.

The Bank's Supervisory Board, taking into account the results of the suitability assessment and when selecting members of the Bank's Management Board, strives in each case to achieve gender balance in the Bank's governing bodies, and, at a minimum, to achieve the minimum level of gender diversity, i.e., the level closest to 33% (for each governing body) or, collectively for both governing bodies, at the level and in the manner required by generally applicable laws.

In accordance with the adequacy policy regarding the Bank's Management Board, the target of achieving at least the minimum level of gender diversity in the composition of each Management Board or, collectively, in the Bank's Supervisory Board and Management Board, should be met by a date consistent with generally applicable laws, and no later than upon the appointment of the Bank's Management Board for a new joint term of office after December 31, 2025.

The minimum level of gender diversity will be achieved by applying the principle of equal opportunity in the selection of members of the Bank's Management Board, fostering a culture of diversity within the

organization, and analyzing opportunities to incorporate gender diversity goals whenever the composition of the Bank's Management Board changes.

Since the DPSN 2021 took effect—that is, from July 1, 2021, to the present—there have been three isolated instances of non-compliance with Principle 2.2, as reported by the Bank in Reports No. 3/2024, No. 4/2024 and No. 5/2024.