citi handlowy

2025 Annual Consolidated Report

SELECTED FINANCIAL DATA	PLN'000		EUR'000	
	2025	2024	2025	2024
Interest and similar income	3,106,720	3,044,819	733,201	707,406
Fee and commission income	510,017	470,103	120,367	109,220
Net gain/(loss) from continuing operations before tax	2,153,811	2,327,459	508,310	540,741
Net gain/(loss) from discontinued operations	(91,797)	(24,768)	(21,665)	(5,754)
Net gain/(loss) from continuing and discontinued operations	1,666,344	1,760,457	393,265	409,009
Total comprehensive income	1,962,885	1,559,196	463,250	362,250
Increase/decrease of net cash	3,627,538	4,552,488	856,117	1,057,685
Assets classified as held for sale	6,083,766	-	1,435,799	-
Total assets	78,849,009	72,478,103	18,654,981	16,961,878
Amounts due to banks	3,904,294	4,435,817	923,722	1,038,104
Amounts due to customers	38,429,419	53,985,032	9,092,062	12,633,988
Amounts classified as held for sale	22,294,494	-	5,274,681	-
Shareholders' equity	10,042,307	9,868,531	2,375,921	2,309,509
Share capital	522,638	522,638	123,652	122,312
Number of shares (in pcs)	130,274,482	130,581,136	130,274,482	130,581,136
Book value per share (PLN/EUR)	77.09	75.57	18.24	17.69
Total capital adequacy ratio (in %)	22.2	22.5	22.2	22.5
Earnings per share (PLN/EUR)	12.79	13.48	3.02	3.13
Diluted net earnings per share (PLN/EUR)	12.79	13.48	3.02	3.13
Paid dividends per share (PLN/EUR)	10.29	11.15	2.43	2.59

Explanations to the table:

1) The impact of the IFRS 5 reclassification on the table is the same as in the statement of financial position and income statement.

Additional information on capital ratio is included in the supplementary note no. 5 in the section "Capital Adequacy" and "Information on capital adequacy of Bank Handlowy w Warszawie S.A. as at 31 December 2025" subject to publication on the Bank's website and it's subject to assessment of compliance of disclosures with the requirements for disclosure of information by institutions.

3) On the June 27, 2025, the Ordinary General Meeting of Shareholders of the Bank Handlowy w Warszawie S.A. adopted a resolution on distribution of the net profit for 2024. Additional information concerning dividend payout was presented in Note 34.

4) The following foreign exchange rates were applied to convert PLN into EUR: for the statement of financial position - NBP mid exchange rate as at 31 December 2025 - PLN 4.2267(as at 31 December 2024: PLN 4.2730); for the income statement, statement of comprehensive income and cash flow statement - the arithmetic mean of NBP end-of-month exchange rates in 2025 – PLN 4.2372 in 2024: PLN 4.3042).

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The Annual Consolidated Financial Statements of Bank Handlowy w Warszawie S.A. for the Financial Year Ended 31 December 2025

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Consolidated income statement

PLN'000	For the period Note	2025	2024
CONTINUING ACTIVITY			
Interest income	6	2,803,416	2,766,583
Similar income	6	303,304	278,236
Interest expense and similar charges	6	(1,001,970)	(839,042)
Net interest income	**6**	**2,104,750**	**2,205,777**
Fee and commission income	7	510,017	470,103
Fee and commission expense	7	(79,159)	(69,144)
Net fee and commission income	**7**	**430,858**	**400,959**
Dividend income	**8**	**12,572**	**11,508**
Net income on trading financial instruments and revaluation	**9**	**364,940**	**564,220**
Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income	**39**	**173,621**	**50,652**
Net gain/(loss) on equity and other instruments measured at fair value through income statement		**10,960**	**31,517**
Net gain/(loss) on hedge accounting	**10**	**1,817**	**8,874**
Other operating income	11	18,272	21,249
Other operating expenses	11	(30,632)	(37,110)
Net other operating income and expense	**11**	**(12,360)**	**(15,861)**
General administrative expenses	**12**	**(741,560)**	**(740,546)**
Depreciation expense	**13**	**(42,597)**	**(50,867)**
Profit/loss on sale of other assets		**545**	**885**
Provision for expected credit losses on financial assets and provisions for contingent liabilities	**14**	**(25,925)**	**(18,898)**
Operating profit		**2,277,621**	**2,448,220**
Tax on some financial institutions		**(123,810)**	**(120,761)**
Profit from discontinued operations before tax		**2,153,811**	**2,327,459**
Income tax expense	**15**	**(395,670)**	**(542,234)**
Net profit from continuing operations		**1,758,141**	**1,785,225**
Net profit from discontinued operations	**3**	**(91,797)**	**(24,768)**
Net profit from continuing and discontinued operations		**1,666,344**	**1,760,457**
Including:			
Net profit attributable to the Bank's shareholders		1,666,344	1,760,457
Weighted-average number of ordinary shares (in pcs)	16	130,274,482	130,581,136
Net earnings per share (PLN)	16	12.79	13.48
Diluted net earnings per share (PLN)	16	12.79	13.48

*Comparative data have been restated due to the fulfillment of the conditions of discontinued activity. Additional information disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations"
Explanatory notes on following pages are an integral part of the annual consolidated financial statements.

Consolidated statement of comprehensive income

For the period		2025	2024
PLN'000	Note		
Net profit from continuing and discontinued operations		**1,666,344**	**1,760,457**
Other comprehensive income, that is or might be subsequently reclassified to income statement:		**305,468**	**(193,348)**
Remeasurement of financial assets measured at fair value through other comprehensive income (net)	17	440,822	(152,246)
(Profit) or loss reclassification to income statement after derecognition of financial assets measured at fair value through other comprehensive income (net)	17	(135,308)	(41,028)
Currency translation differences		(46)	(74)
Other comprehensive income, that cannot be subsequently reclassified to income statement		**(8,927)**	**(7,913)**
Net actuarial profits/(losses) on defined benefit program valuation	17	(8,927)	(7,913)
Other comprehensive income net of tax		**296,541**	**(201,261)**
Total comprehensive income from continuing and discontinued operations		**1,962,885**	**1,559,196**
Including:			
Comprehensive income attributable to the Bank's shareholders		1,962,885	1,559,196

Explanatory notes on following pages are an integral part of the annual consolidated financial statements.

Consolidated statement of financial position

As at *PLN'000*	Note	31.12.2025	31.12.2024
ASSETS			
Cash and cash equivalents	18	9,205,484	5,794,345
Amounts due from banks	19	8,245,819	8,787,780
Financial assets held-for-trading	20	4,823,372	4,436,319
Hedging derivatives		-	54,140
Debt financial assets measured at fair value through other comprehensive income, including:	21	30,151,984	30,088,771
Assets pledged as collateral	41	*49,130*	*200,309*
Equity and other instruments measured at fair value through income statement	22	183,908	172,948
Amounts due from customers	23	18,222,892	21,367,246
Tangible fixed assets	24	446,980	521,131
Intangible assets	25	878,388	872,875
Deferred income tax asset	27	221,703	82,284
Other assets	28	384,713	300,264
Assets held-for-sale	3	6,083,766	-
Total assets		**78,849,009**	**72,478,103**
LIABILITIES			
Amounts due to banks	29	3,904,294	4,435,817
Financial liabilities held-for-trading	20	2,690,099	2,755,905
Hedging derivatives		358,677	72,737
Amounts due to customers	30	38,429,419	53,985,032
Provisions	31	77,670	120,992
Current income tax liabilities		11,807	99,600
Deferred tax provisions	27	-	13
Other liabilities	32	1,040,242	1,139,476
Liabilities classified as held for sale	3	22,294,494	-
Total liabilities		**68,806,702**	**62,609,572**
EQUITY			
Share capital	34	522,638	522,638
Supplementary capital	34	3,001,262	3,001,260
Own shares	34	(27,311)	(20,577)
Revaluation reserve	34	240,646	(64,868)
Other reserves	34	4,650,124	4,039,027
Retained earnings		1,654,948	2,391,051
Total equity		**10,042,307**	**9,868,531**
Total liabilities and equity		**78,849,009**	**72,478,103**

Explanatory notes on following pages are an integral part of the annual consolidated financial statements.

Consolidated statement of changes in equity

PLN '000	Ordinary shares	Share premium	Own shares	Revaluation reserve	Other reserves	Retained earnings	Total equity
Balance as at 1 January 2025	**522,638**	**3,001,260**	**(20,577)**	**(64,868)**	**4,039,027**	**2,391,051**	**9,868,531**
Total comprehensive income, including:	**-**	**-**	**-**	**305,514**	**(8,973)**	**1,666,344**	**1,962,885**
Net profit	-	-	-	-	-	1,666,344	**1,666,344**
Other comprehensive income:	-	-	-	305,514	(8,973)	-	296,541
Exchange rate differences from the translation of foreign units	-	-	-	-	(46)	-	(46)
Net valuation of financial assets measured at fair value through other comprehensive income	-	-	-	305,514	-	-	305,514
Net actuarial profits/losses) on defined benefit program valuation	-	-	-	-	(8,927)	-	(8,927)
Equity awards program	**-**	**-**	**(6,734)**	**-**	**8,953**	**-**	**2,219**
Dividends paid	**-**	**-**	**-**	**-**	**(448,551)**	**(1,342,777)**	**(1,791,328)**
Transfer to capital	**-**	**2**	**-**	**-**	**1,059,668**	**(1,059,670)**	**-**
Balance as at 31 December 2025	**522,638**	**3,001,262**	**(27,311)**	**240,646**	**4,650,124**	**1,654,948**	**10,042,307**

PLN'000	Share capital	Supplementary capital	Own shares	Revaluation reserve	Other reserves	Retained earnings	Total equity
Restated balance as at 1 January 2024	**522,638**	**3,001,260**	**-**	**128,406**	**3,190,659**	**2,886,528**	**9,729,491**
Total comprehensive income, including:	**-**	**-**	**-**	**(193,274)**	**(7,987)**	**1,760,457**	**1,559,196**
Net profit	-	-	-	-	-	1,760,457	1,760,457
Other comprehensive income	-	-	-	(193,274)	(7,987)	-	(201,261)
Exchange rate differences from the translation of foreign units	-	-	-	-	(74)	-	(74)
Net valuation of financial assets measured at fair value through other comprehensive income	-	-	-	(193,274)	-	-	(193,274)
Net actuarial profits/(losses) on defined benefit program valuation	-	-	-	-	(7,913)	-	(7,913)
Equity awards program	**-**	**-**	**(20,577)**	**-**	**55,351**	**-**	**34,774**
Dividends paid	**-**	**-**	**-**	**-**	**-**	**(1,454,930)**	**(1,454,930)**
Transfer to capital	**-**	**-**	**-**	**-**	**801,004**	**(801,004)**	**-**
As at 31 December 2024	**522,638**	**3,001,260**	**(20,577)**	**(64,868)**	**4,039,027**	**2,391,051**	**9,868,531**

Explanatory notes on following pages are an integral part of the annual consolidated financial statements.

Consolidated cash flow statement

PLN'000 For the period	2025	2024
A. Operating activities		
I. Net profit	**1,666,344**	**1,760,457**
II. Adjustments:	**2,382,821**	**2,079,760**
Current and deferred income tax recognized in income statement	275,751	555,048
Depreciation expense	48,077	119,338
Net result for expected credit losses on receivables	28,848	(14,869)
Net impairment due to non-financial assets value loss	-	432,512
Net provisions (recoveries), including provisions for contingent liabilities	11,330	19,815
Net interest income	(2,997,882)	(3,216,967)
Dividend income	(12,572)	(11,508)
Profit/loss on sale of fixed assets	63	(585)
Net unrealized exchange differences	(31,019)	(593)
Equity and other investment measured at fair value though the income statement	(10,960)	(31,517)
Other adjustments	467,000	-
Change in amounts due from banks	49,622	68,459
Change in amounts due from customers	573,811	6,550,869
Change in debt securities measured at fair value through other comprehensive income	(3,038,218)	(1,274,090)
Change in financial assets held-for-trading	1,144,352	300,177
Change in assets due to hedging derivatives	(339,320)	(346,334)
Change in other assets	54,140	(47,409)
Change in non-current held-for-sale	(143,081)	(82,756)
Change in amounts due to banks	(517,052)	(12,493)
Change in amounts due to customers	6,603,859	(196,180)
Change in liabilities held-for-trading	(65,805)	(766,298)
Change in liabilities due to hedging derivatives	285,940	(20,132)
Change in other liabilities	(4,063)	55,273
Interest received	**3,468,956**	**3,333,263**
Interest paid	**(1,356,293)**	**(1,210,407)**
Income tax paid	**(644,610)**	**(834,803)**
III. Net cash flows from operating activities– continuing and discontinued operations	**5,517,218**	**5,128,270**
B. Investing activities		
Inflows	43,455	28,798
Disposal of tangible fixed assets	30,893	5,859
Disposal of fixed assets held-for-sale	-	11,368
Received dividends	12,562	11,571
Other inflows from investing activities		
Outflows	**(64,771)**	**(171,621)**
Purchase of tangible fixed assets	(43,814)	(76,258)
Purchase of intangible assets	(20,957)	(95,363)
Net cash flows from investing activities– continuing and discontinued operations	**(21,316)**	**(142,823)**
C. Financing activities		
Inflows	**-**	**1,066,750**
Drawing of long-term loans from financial sector	-	1,066,750
Outflows	**(1,859,412)**	**(1,501,116)**
Dividends paid	(1,791,328)	(1,454,930)
Expenditures related to the repayment of long-term loans from financial sector entities	(16,667)	(33,333)
Outflows for own shares purchase	(37,482)	-
Outflows from lease payments	(13,935)	(12,853)
Net cash flows from financing activities– continuing and discontinued operations	**(1,859,412)**	**(434,366)**
D. Exchange rate differences resulting from cash and cash equivalent calculation	**(8,952)**	**1,407**
E. Net increase/(decrease) in cash and cash equivalent	**3,627,538**	**4,552,488**
F. Cash and cash equivalent at the beginning of reporting period	**5,794,361**	**1,241,873**
G. Cash and cash equivalent at the end of reporting period	**9,421,899**	**5,794,361**

*Cash flows from discontinued operations, broken down into operating, investing and financing activities, will be presented in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

Explanatory notes on following pages are an integral part of the annual consolidated financial statements.

Additional information including the description of adopted accounting principles and other explanatory information

1. General information about the Bank and the Capital Group ("the Group")

Bank Handlowy w Warszawie S.A. ("Bank" or "parent entity") has its registered office in Poland at Senatorska 16, 00-923 Warszawa. The Bank was founded on the basis of Deed of foundation of 13 April 1870 and is registered in the Register of Entrepreneurs in the National Court Register kept by the District Court for the Capital City of Warsaw, XII Commercial Department in Warsaw, under KRS number 0000001538. The Bank operates as a joint stock company. The name of entity did not change during the reporting period.

Parent undertaking was granted a statistical REGON No. 000013037 and tax identification No. (NIP) 526-030-02-91.

The Bank and its subsidiaries are expected to continue the business activity for an unspecified period of time.

The Bank's share capital amounts to PLN 522,638,400 and is divided into 130,659,600 ordinary bearer shares, with a nominal value of PLN 4.00 each. The Bank's shares are listed on the Warsaw Stock Exchange.

The majority and strategic shareholder of the Bank is Citibank Europe Plc based in Dublin, Ireland – a company in the Citi Group (parent company of the Bank). The ultimate parent is Citigroup Inc.

Citi is a leading global provider of a wide range of financial services and products for corporations, institutional investors, public administration and individual clients, operating in more than 160 countries and jurisdictions. Citi provides services to business entities with international ambitions and is also a global leader in the field of wealth management services. Also, Citi offers banking services for individual clients in the United States. For more information, please visit website: **https://www.citigroup.com/global/about-us**

The Bank is a universal commercial bank that offers a range of banking services for individuals and corporate clients on domestic and foreign markets.

These annual consolidated financial statements of the Capital Group of Bank Handlowy w Warszawie S.A. show the data for the Bank as the parent and its subsidiaries (jointly "Group").

The Group consists of the Bank and the following subsidiaries:

Subsidiaries	Registered office	% of share capital/votes at the General Meeting	
		31.12.2025	31.12.2024
Entities fully consolidated			
Handlowy Financial Services Sp. z o. o.	Warsaw	100.00	100.00
Handlowy-Leasing Sp. z o.o. *(apart from indirect shareholding via Handlowy-Inwestycje Sp. z o.o. where the share in equity equals 2.53%).*	Warsaw	97.47	97.47
Handlowy Investments S.A.	Luxembourg	100.00	100.00
Handlowy-Inwestycje Sp. z o.o.	Warsaw	100.00	100.00

Compared to the end of 2024, the structure of the Bank's Capital Group has not changed.

Due to the lack of further investment strategy by Bank Handlowy, as the sole shareholder, towards its subsidiaries: Handlowy Leasing Sp. z o.o. and Handlowy Financial Services Sp. z o.o., liquidation proceedings for both entities were initiated in the first quarter of 2026 and will be continued in 2026.

Financial information on subsidiaries, 31.12.2025

Subsidiaries fully consolidated

Name of subordinate	Location	Capital relationship	Share in equity (%)*	Assets	Liabilities	Equity	Revenues	Profit/ Loss
HANDLOWY – LEASING Sp. z o.o.	Warszawa	Subsidiary	97,47	16,981	712	16,269	581	136
Handlowy Financial Services Sp. z o.o.(*formerly Dom Maklerski Banku Handlowego S.A.)**.	Warszawa	Subsidiary	100	72,974	690	72,284	2,437	1,333
HANDLOWY INVESTMENTS S.A.	Luxemburg	Subsidiary	100	4,386	29	4,357	626	163
HANDLOWY – INWESTYCJE Sp. z o.o. 1/	Warszawa	Subsidiary	100	10,691	69	10,622	359	163

Date in thousands of PLN
**direct share*

Explanation of indirect relationships
1/ Indirect relationship via Handlowy-Inwestycje Sp. z o.o.

Name of subordinate	Location	Capital relationship	Share in equity [%]	Book value of shares	Assets	Liabilities	Equity	Revenues	Profit/ Loss
HANDLOWY - LEASING Sp. z o.o.	Warsaw	Subsidiary	2.53	15 720	414	16,981	712	16,269	581

Date in thousands of PLN

The above presented financial data of the entities available at the time of preparation of the financial statements originate from the non-audited financial statements of the entities. Financial data of Handlowy Investments S.A. originate from the financial statements prepared as at 28 February 2026, which is the entity's balance sheet date.

Financial information on subsidiaries, 31.12.2024

Subsidiaries fully consolidated

Name of subordinate	Location	Capital relationship	Share in equity (%)*	Assets	Liabilities	Equity	Revenues	Profit/ Loss
HANDLOWY – LEASING Sp. z o.o.	Warszaw	Subsidiary	97,47	17,108	704	16,404	690	273
Handlowy Financial Services Sp. z o.o.(*formerly Dom Maklerski Banku Handlowego S.A.)**.	Warszaw	Subsidiary	100	73,988	653	73,335	3,978	2,385
HANDLOWY INVESTMENTS S.A.	Luxembu	Subsidiary	100	4,380	29	4,351	500	48
HANDLOWY – INWESTYCJE Sp. z o.o. 1/	Warszaw	Subsidiary	100	10,801	63	10,738	481	278

Date in thousands of PLN
**direct share*

Explanation of indirect relationships:

1/ Indirect relationship via Handlowy-Inwestycje Sp. z o.o

Name of subordinate	Location	Capital relationship	Share in equity [%]	Book value of shares	Assets	Liabilities	Equity	Revenues	Profit/ Loss
HANDLOWY - LEASING Sp. z o.o.	Warsaw	Subsidiary	2.53	414	17,108704		16,404	690	273

Data in thousands of PLN

The above-mentioned financial data of the entities available at the time of preparation of the financial statements originate from the audited financial statements of the entities. Financial data of Handlowy Investments S.A. originate from the financial statements prepared as at 28 February 2025, which is the entity's balance sheet date.

2. Significant accounting policies

Declaration of conformity

The annual consolidated financial statements of the Group have been prepared in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union ("IFRS EU") and in respect to matters that are not regulated by the above standards, in accordance with the requirements of the Accounting Act dated 29 September 1994 respective operating regulations and regulations relating to issuers of securities admitted or sought to be admitted to trading on the official stock exchange quotation market.

The financial statements of the Group were prepared on the assumption that the Group will continue as a going concern for at least 12 months from balance sheet day. As at the date of signing these financial statements, the Management Board of the Bank does not state any facts or circumstances that would indicate a threat to the Bank's ability to continue as a going concern for at least 12 months from the balance sheet date as a result of an intentional or forced discontinuance or material limitation of the Bank's existing business.

The annual consolidated financial statements were approved on 16March 2026 by the Management Board of the Bank for publication. The financial statements will be finally approved by the General Shareholders' Meeting of the Bank.

Basis of preparation

These annual financial statements of the Group were prepared as at 31 December 2025, and the comparable financial data are presented as at 31 December 2024.

The consolidated financial statements are presented in PLN (presentation currency), rounded to the nearest thousand.

The financial statements have been prepared on the fair-value-basis for financial assets and financial liabilities measured at fair value through profit and loss including derivatives and equity investments (minority shareholdings) as well as financial assets measured at fair value through other comprehensive income. Other financial assets are presented at cost decreased by depreciation/amortization and impairment losses. Other financial liabilities are presented at amortized cost.

The preparation of consolidated annual financial statement of the Group in accordance with IFRS requires the Management to make estimates and adopt assumptions that affect the amounts reported in financial statement. The most important accounting policies, estimations and assessments applied in the preparation of this annual financial statements were applied by the Group in all the years presented on a continuous basis.

Estimates and associated assumptions are made on the basis of available historical data and many other factors that have been considered as relevant in the presented period. These factors form the basis for estimates of the balance-sheet value of assets and liabilities whose value cannot be estimated on the basis of other sources. Actual results may differ from those estimates.

Estimates and associated assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects both current and future periods. In connection with the sale of the retail business to VeloBank S.A., the Bank adopted additional assumptions and estimates, which are described in detail in Note 3 "Assets and liabilities classified as held for sale and result from discontinued operations."

Significant estimates applied in the year ending 31 December 2025 related to:

- Provisions for expected credit losses of financial assets (Note 4);
- Assets and liabilities classified as held for sale and the result on discontinued operations (Note 3)
- Fair value of derivatives (Note 20);
- Cash-generating units impairment testing (Note 26);
- Reserves (including provisions for disputes, Note 31);
- Employee benefits (Note 45).

Significant accounting policies applied to prepare the financial statements are presented either in the notes to the financial statements or below:

Income statement	No of note with accounting policy description
Net interest income	6
Net fee and commission income	7
Dividend income	8
Net income on trading financial instruments and revaluation	2.1
Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income	2.1

Income statement	No of note with accounting policy description
Net gain/(loss) on equity and other instruments measured at fair value through income statement	2.1
Net gain/(loss) on hedge accounting	37
Provisions for expected credit losses on financial assets and provisions for off–balance-sheet commitments	14
Net gain/(loss) from discontinued operations	3

Statement of financial position	No of note with accounting policy description
Amounts due from banks	2.1
Financial assets held-for-trading	2.1
Debt financial assets measured at fair value through other comprehensive income	2.1
Equity and other instruments at fair value through the income statement	2.1
Amounts due from customers	2.1
Tangible fixed assets	24
Intangible assets	25
Deferred income tax asset	27
Non-current assets classified as held for sale	3
Amounts due to banks	2.1
Financial liabilities held-for-trading	2.1
Hedging derivatives	37
Amounts due to customers	2.1
Provisions	31
Other liabilities	32
Liabilities classified as held for sale	3

Standards applicable from 1 January 2025

- IAS 21 “Effects of changes in foreign exchange rates”, issued August 15, 2023, clarifies when a currency is convertible into other currencies, how an entity determines the exchange rate when a currency is non-convertible, and specifies the scope of disclosures that will help the financial statements’ users to understand the impact of the lack of convertibility of currency on entity’s financial position, financial performance and cash flows. The amendment is effective from 1 January 2025. In the Group's opinion, the amendment to the standard has no material impact on the financial statements.

The above-mentioned changes will not impact the financial statement significantly.

Standards and interpretations issued but awaiting endorsement by the European Union and not yet obligatory

- On May 9, 2024, the IASB issued IFRS 19 “Subsidiaries without Public Accountability: Disclosures”, which allows eligible subsidiaries to apply reduced information disclosure requirements, instead of the requirements of other IFRS Accounting Standards. The new standard will be applicable to the annual reporting periods beginning January 1, 2027, and the Group believes it will not have a significant impact on the financial statements.
- On November 13, 2025, the International Accounting Standards Board published amendments to IAS 21, "The Effects of Changes in Foreign Exchange Rates." The amendments apply to entities whose presentation currency is the currency of a hyperinflationary economy and whose functional currency or foreign operations currency is the currency of a non-hyperinflationary economy. The amendments provide guidance on the translation of assets, liabilities, equity items, and income and expenses from the functional currency of a non-hyperinflationary economy to the presentation currency of a hyperinflationary economy. The amendments will be effective for annual periods beginning on or after January 1, 2027. These amendments will have no impact on the Bank's financial statements.

Standards and interpretations issued but awaiting endorsement by the European Union but not yet obligatory

- On 9 April 2024, the IASB issued IFRS 18 “Presentation and Disclosure in Financial Statements”. The standard will be effective for annual reporting periods beginning on January 1, 2027. The new standard is intended to

replace IAS 1 – "Presentation of Financial Statements" and will help to achieve comparability of the financial performance of similar entities. The new standard:

- ✓ introduces a defined structure for the statement of profit or loss. Items in the statement of profit or loss will be classified into one of five categories: operating, investing, financing, income taxes and discontinued operations. The standard requires also to present totals and subtotals, including mandatory inclusion of "Operating profit or loss";
- ✓ introduces an additional note presenting management-defined performance measures which are subtotals of income and expenses an entity uses in public communications outside financial statements, an entity uses to communicate to users of financial statements management's view of an aspect of the financial performance of the entity as a whole. The disclosure will have to contain a description of the aspects of financial performance that in management's view, is communicated by the management-defined performance measures, how the management-defined performance measure is calculated and reconciliation between the management-defined performance measure and the position form financial statement measured in accordance with other standards;
- ✓ clarifies the guidelines for data aggregation and disaggregation which focus on grouping items based on their shared characteristics enabling entities to decide which items are presented in the primary financial statements and what information is disclosed in the notes.

The new IFRS 18 standard will also result in certain changes to the statement of cash flow and the statement of financial position, as well as changes to other standards harmonizing disclosure requirements. The Group is in the process of assessing the impact of the new standard on the financial statements.

- The amendments to IFRS 9 "Financial Instruments" and IFRS 7 "Financial Instruments: Disclosures" issued May 30, 2024, clarify:
  - ✓ The timing of discontinuation of recognition of financial liabilities from the balance sheet, introducing an option for early derecognition of financial liabilities that are settled through an electronic payment system that meets certain criteria
  - ✓ How to assess the characteristics of contractual cash flows from "non-recourse" financial assets and financial assets in cases where contractual provisions refer to contingent events, including, for example, related to ESG objectives (for the purpose of classifying financial assets)

  The amendments to the aforementioned standards also introduce additional disclosure requirements for financial assets and liabilities whose contractual terms make cash flows contingent on contingent events and for equity instruments designated at fair value through other comprehensive income. The amendments will be applicable from January 1, 2026. The Group is in the process of assessing the impact of the new standard on the financial statements.

  Since May 1, 2026, the Bank adjusted its approach to the amended standard for selected outgoing international transfers that are executed with a date later than the order date. In such cases, the liability will be reduced when the obligation is executed. This change affects the Liabilities and Cash and Cash Equivalents items in the Bank's statement of financial position. The impact of this change on the Bank's financial statements is variable and depends on the number and value of such transactions ordered on the balance sheet data (D) with an execution date after that date (D+1).

- Due to the growing role of Power Purchase Agreements (PPAs) in mitigating the effects of climate change and decarbonizing production processes, the International Accounting Standards Board has introduced amendments to IFRS 9 "Financial Instruments" and IFRS 7 "Financial Instruments: Disclosures" (issued on 18 December 2024), which are intended to help better reflect the impact of such agreements on financial statements. The amendments will be effective from 1 January 2026 and will not affect the Group's financial statements.

- On 18 July 2024, amendments to the International Financial Reporting Standards and International Accounting Standards (Volume 11) were issued, resulting from the annual review. These changes are intended to clarify the wording used in the standards, in order to improve their legibility, consistency and eliminate possible ambiguities. The changes introduced in this review relate to IFRS 1 ' First-time Adoption of International Financial Reporting Standards', IFRS 7 'Financial Instruments: Disclosures', IFRS 9 'Financial Instruments', IFRS 10 'Consolidated Financial Statements', IAS 7 "Statement of Cash Flows". The changes will be effective from 1 January 2026 and will not have a material impact on the financial statements.

Comparative data

In connection with the signed agreement to demerge the Bank's retail business into VeloBank, the Group separated its discontinued operations. Detailed information regarding the signed agreement can be found in Note 3.

The Group has appropriately transformed the comparative data, for the period of 12 months ended December 31, 2024, as presented in the table below. The change in presentation did not affect the profit and loss account.

The impact of changes on the comparative data of the consolidated statement of financial positions for the period of 12 months ended December 31, 2024 is presented in the tables below:

Consolidated income statement	01.01.2024 -31.12.2024 before transformation	Change	01.01.2024 - 31.12.2024 after transforation
CONTINUING ACTIVITY			
Interest income	4,141,650	1,375,067	2,766,583
Similar income	278,312	76	278,236
Interest expense and similar charges	(1,202,995)	(363,953)	(839,042)
Net interest income	**3,216,967**	**1,011,190**	**2,205,777**
Fee and commission income	686,448	216,345	470,103
Fee and commission expense	(115,088)	(45,944)	(69,144)
Net fee and commission income	**571,360**	**170,401**	**400,959**
Divident income	**11,508**	**-**	**11,508**
Net income on trading financial instruments and revaluation	**597,877**	**33,657**	**564,220**
Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income	**50,652**	**-**	**50,652**
Net gain/(loss) on equity and other instruments measured at fair value through income statemen	**31,517**	**-**	**31,517**
Net gain/(loss) on hedge accounting	**8,874**	**-**	**8,874**
Other operation income	24,191	2,942	21,249
Other operating expense	(59,441)	(22,331)	(37,110)
Net other operating income and expense	**(35,250)**	**(19,389)**	**(15,861)**
General administrative expenses	**(1,428,042)**	**(687,496)**	**(740,546)**
Depreciation and amortization	**(119,338)**	**(68,471)**	**(50,867)**
Net impairment on non-financial assets	**(432,512)**	**(432,512)**	**-**
Profit on sale of other assets	**585**	**(300)**	**885**
Provision for expected credit losses on financial assets	**16,557**	**35,455**	**(18,898)**
Operating profit	**2,490,755**	**42,535**	**2,448,220**
Tax on some financial institutions	**(175,250)**	**(54,489)**	**(120,761)**
Profit before tax	**2,315,505**	**(11,954)**	**2,327,459**
Income tax expense	**(555,048)**	**(12,814)**	**(542,234)**
Net profit from continuing operations	**1,760,457**	**-**	**1,798,388**
Net profit from discontinued operations	**-**	**(24,768)**	**(24,768)**
Net profit from continuing and discontinued operations	**1,760,457**	**-**	**1,760,457**

Comparative data in subsequent disclosures were adequately restated.

Basis of consolidation

Subsidiaries are all entities controlled by the Group. The Group controls an entity when it has power over the entity, is exposed to or has rights to variable returns from its involvement with the entity and has the ability to affect these returns through its power over the entity.

The Group uses the purchase method of accounting to account for the acquisition of subsidiaries. The cost of an acquisition is measured as the fair value of the assets given, equity instruments issued, and liabilities incurred or assumed at the date of exchange. Any identifiable purchased assets and assumed liabilities, including contingent liabilities, acquired in a business combination, are measured initially at fair value at the acquisition date, irrespective of the extent of any minority interest. Any excess of the cost of acquisition over the fair value of the Group's interest in the acquired identifiable net assets is recognized as goodwill. If the cost of acquisition is lower than the fair value of the net assets of the acquired subsidiary, the difference is recognized directly in the income statement.

Intra-group transactions and balances are eliminated on consolidation. Material unrealized gains and losses on transactions between Group companies are also eliminated.

Accounting policies of subsidiaries have been standardized in the process of preparing the consolidated financial statements, where necessary, to ensure consistency in all material aspects with the accounting policies adopted by the Group.

Foreign currency

The values reported in annual consolidated financial statement are presented in PLN, which is the functional currency and currency of presentation of the Group.

The statement of financial position and contingent liabilities received and granted items denominated in foreign currencies are converted to PLN equivalents using the average exchange rate of the currency determined by the Governor of the National Bank of Poland ("NBP") prevailing at the date of preparation of the statement of financial position.

Foreign currency transactions are converted at initial recognition to the functional currency (PLN) using the exchange rates prevailing at the date of transactions.

Foreign exchange profits and losses resulting from revaluation of the statement of financial position items denominated in foreign currencies and settlement of transactions in foreign currencies are included in net profit on foreign exchange, within the trade financial instruments and revaluation income.

The exchange rates of the major currencies applied in the preparation of these financial statements are:

PLN		31 December 2025	31 December 2024
1	USD	3.6016	4.1012
1	CHF	4.539	4.5371
1	EUR	4.2267	4.2730

2.1 Financial assets and liabilities – classification and measurement

Classification

The Bank classifies financial instruments into the following categories:

- financial assets measured at fair value through profit and loss,
- financial assets measured at amortized cost,
- financial assets measured at fair value through other comprehensive income,
- financial liabilities measured at fair value through profit and loss,
- financial liabilities measured at amortized cost.

Group classifies financial assets to specific categories on initial recognition considering 2 criteria:

1) business model assessment of how assets are managed, which determines whether cash flows will result from collecting contractual cash flows, selling financial assets or both

2) features of contractual cash flows of an asset, which is estimated using SPPI test (solely payment of principal and interest), under which it is determined if contractual cash flows are solely payments of principal and interest on the principal amount. The test is passed if above-mentioned cash flows are consideration for the time value of money, credit risk, other basic lending risks (for example liquidity risk), costs (for example administration) associated with holding the financial asset for a particular period of time and profit margin.

Business model assessment

In order to classify a financial asset, the Group assesses its business models and takes into account the specificity of entire portfolio the asset belongs to. The considered information include:

- the purpose of a given business model and generating assets
- how the performance of the portfolio is evaluated and reported to the management
- the risks of a portfolio and how they are managed
- the frequency, volume and types of sales.

Receivables from customers are managed to receive the contractual amounts and sales generally relate to impaired assets.

In case of treasury functions in relation to financial instruments there are two models:

- the model which objective is to achieve by both collecting contractual cash-flows and selling financial assets as the sale may be realized in accordance with current business needs and the instrument may also be held until maturity;
- held for trading.

Financial assets measured at fair value through profit and loss (Financial assets held-for-trading and Equity and

other instruments at fair value through the income statement)

This category comprises:

1) financial assets that were classified neither as measured at amortized cost nor as measured at fair value through other comprehensive income
2) financial assets classified at initial recognition as measured at fair value through profit or loss if doing so eliminates or significantly reduces a measurement or recognition inconsistency (sometimes referred to as an "accounting mismatch") that would otherwise arise from measuring assets or liabilities or recognizing the gains and losses on them on different bases
3) equities and minority shareholdings

Assets are included in this category especially if they are held-for-trading (held-for-trading model), that is: they were purchased with the primary objective of selling or repurchasing to generate short-term profits, they are a part of a portfolio of identified financial instruments that are managed together and for which there is evidence of generating short-term profits, they are derivatives.

Minority shareholdings, both trading and non-trading, are valued at fair value through the income statement.

Minority shareholdings due to selected strategic exposures in the so-called infrastructure companies operating for the financial sector are presented in the consolidated financial statement as "Equity and other investments at fair value through the income statement".

Financial assets measured at amortized cost (Amounts due from banks and due from customers)

A financial asset is measured at amortized cost if both conditions are met:

a) the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows
b) the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

This category comprises, in the first instance, loans, deposit margins, purchased receivables and debt securities that are not quoted on the active market and interbank deposits and also reverse repo transactions.

Purchased or originated credit-impaired assets (POCI)

Purchased or originated credit-impaired assets on initial recognition may be identified when the Bank has originated or purchased exposures already impaired at the moment of initial recognition or the Bank has significantly modified an impaired exposure and a derecognition criterion has been met. POCI assets are recognized at fair value at initial recognition and subsequently at amortized cost using the effective interest rate adjusted by expected credit losses. Life-time expected credit losses are recognized in relation to such instruments.

Financial assets measured at fair value through other comprehensive income (Debt financial assets measured at fair value through other comprehensive income)

A financial asset is measured at fair value through other comprehensive income if both conditions are met:

a) the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and
b) the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

The Bank includes selected debt instruments in this category.

In the statement of cash flows, adjustment for change in debt securities measured at fair value through other comprehensive income are recognized in cash flows from operating activities.

Financial liabilities measured at fair value through profit and loss (Financial liabilities held-for-trading)

The category comprises derivative liabilities which are not hedging instruments and 'short sale' liabilities.

Financial liabilities measured at amortized cost (Amounts due to banks and clients)

This category primarily includes customer deposits, deposit margin, and liabilities resulting from repo transactions.

Recognition, derecognition and insignificant modifications

Transactions of purchase or sale of financial assets at fair value through profit or loss and financial assets at fair value through other comprehensive income are recognized in the Bank's statement of financial position and derecognized at the transaction settlement date, i.e. the date on which the Bank will receive or transfer the ownership right to assets. The rights and liabilities from a concluded transaction are measured at fair value from the transaction conclusion day to the transaction settlement day.

Loans and receivables are recognized at the time of disbursement of funds for the borrower.

Financial assets are derecognized when the rights to receive cash flows from the assets have expired or have been transferred and the Bank has transferred substantially all risks and rewards of ownership.

Financial liabilities are derecognized when and only when they are extinguished, i.e., the obligation described in the agreement was discharged, cancelled or expired.

The Group applies the following criteria, which result in asset derecognition from the balance sheet and obligation to recognize them according to the classification rules:

- introduction to the loan agreement resulting in failure to pass the cash flow characteristics,
- a change of debtor,
- currency conversion,
- change of legal form/type of financial instrument,
- granting additional loan amount of at least 10% of the outstanding loan principal,
- extension of the schedule loan by min. 1 year, and a mortgage min. 4 years,
- renewal/extension of a non-schedule loan by min. 1 year preceded by a credit decision.

At the moment of derecognition, an unamortized part of the commission is recognized fully in interest income. The newly charged commission is settled in time using the effective interest rate method.

If there is a change in the cash flows of financial assets, that does not result in the financial asset being derecognized from the balance sheet and containing the repayment schedule measured at amortized cost that results from the annex to the contract, the Bank recalculates the gross balance-sheet value of financial assets and recognizes modification profit or loss in profit and loss. The gross balance-sheet value of that financial asset is calculated as present value of renegotiated or modified contract cash flows, discounted at the original effective interest rate of financial assets (or credit risk adjusted effective interest rate for credit risk for originated or purchased financial assets credit-impaired at initial recognition). All origination costs and fees in connection with the modification adjust the balance-sheet value of modified assets and are amortized until the maturity date of modified financial assets.

Derivative financial instruments are measured at fair value from the trade date and are derecognized from the balance on the settlement date.

Valuation

When financial assets or financial liabilities are recognized initially, they are measured at fair value increased by, in the case of assets and liabilities not measured at fair value through profit or loss, significant transactional costs that are directly attributable to the acquisition or issue of the financial assets or financial liabilities.

After initial recognition, the Bank measures financial assets:

- at fair value without deducting transactional costs which it may incur in connection with the sale or disposal of assets. This measurement relates to financial assets held-for-trading, debt financial assets measured at fair value through other comprehensive income and equity and other instruments at fair value through the income statement),
- at amortized cost using the effective interest rate method – for amounts due from banks and from clients. Amounts measured at amortized cost include provisions for expected credit losses.

Financial liabilities:

- financial liabilities held-for-trading are measured at fair value through profit and loss,
- amounts due to banks and amounts due to clients after initial recognition are measured at amortized cost using the effective interest rate method.

Profits or losses resulting from the change of fair value of financial assets or financial liabilities, which are not part of the hedging relationship, are recognized in the following way:

- in the case of financial assets or financial liabilities measured at fair value through profit or loss, they are included in profit or loss;

- profits or losses resulting from measurement of financial assets classified as measured at fair value through other comprehensive income are recognized in other comprehensive income. Effect of expected credit losses on debt financial assets measured at fair value through other comprehensive income, interest income and exchange rate differences on monetary assets and liabilities are recognized in the income statement. When financial assets are excluded from the statement of financial position, accumulated profits or losses which were previously included in equity are recognized through profit or loss.

The fair value of derivatives is estimated based on quotations in active markets, prices of transactions recently closed, and measurement techniques, including discounted cash flow models and option measurement models, depending on which method is appropriate in a given case. The derivatives that were not designated as hedging instruments according to hedge accounting principles are classified as trading assets or liabilities measured at fair value through profit or loss.

Embedded derivatives in host contracts that are liabilities are separated from the host and accounted for as derivatives, if their characteristics and risks are not closely related to the characteristics and risks of the host, and if the hybrid contract is not measured at fair value through profit or loss.

Impairment of financial assets

For financial assets measured at amortized cost, contingent liabilities and financial assets measured at fair value by other comprehensive income (FVOCI), the Group creates provisions for expected credit losses, in accordance to the developed internal rules and impairment methodologies. The estimated effect of expected credit losses on debt financial assets measured at fair value through other comprehensive income is recognized in the profit and loss account.

They are aggregated for each of the three stages:

- Stage 1: Credit exposures that have not had a significant increase in credit risk since initial recognition
- Stage 2: Credit exposures that have experienced a significant increase in credit risk since initial recognition
- Stage 3: Impaired credit exposures

On the balance sheet date, the Group assesses if there is objective evidence of impairment of a financial asset or a group of financial assets.

A financial asset or a group of financial assets are impaired only when there is objective evidence of impairment resulting from one or more events taking place after the initial recognition of an asset (the loss event) and the loss event (or events) influences the future expected cash flows resulting from a financial asset or a group of financial assets which may be reliably estimated.

Objective evidence of impairment of a financial asset or a group of assets includes information obtained by the Bank concerning events, which are provided in the later part of the note 3 “Risk management”.

The classification of exposures to Stage 1 and 2 depends on the occurrence of a significant increase in credit risk since the moment of initial recognition. Assignment of the exposure depends on the approach to management over the client (individual vs. collective approach), taking into account the wide range of information obtained as part of standard risk management processes (including the Early Warning process) regarding both current and future events, including macroeconomic factors and delinquency.

The portfolio of securities available for sale (measured at fair value by other comprehensive income), due to the fact that they consist of exposures to governments and central banks with investment ratings, is considered a low default portfolio, so all reserves are classified to Stage 1.

The methodology and assumptions used to determine the provisions for amounts due to customer and banks are regularly reviewed and updated, as required. Furthermore, results are back-tested and actual amounts are compared to with estimated expected credit losses.

For financial assets measured at amortized cost, the provisions for expected credit losses are calculated using statistical parameters for the groups of assets combined in portfolios having similar credit risk characteristics.

In order to calculate the expected credit losses for assets measured at fair value through other comprehensive income, the Bank uses an internal methodology to define default probability (PD parameter), loss value at default (LGD parameter) and exposure value at the time of default (EAD parameter).

In the case of institutional exposures fully provided for, where debt collection activities have been carried out for at least 3 years and did not result in full debt repayment and there are no justified prospects for recovering all or part of the contractual cash flows associated with financial assets the Group writes off the exposure against impairment allowances. Such exposures are recognized in off-balance sheet records, including the corresponding expected credit loss provision. If a written-off amount is subsequently recovered, it is presented in “Provision for expected credit losses on financial assets and provisions for off–balance sheet commitments”.

If the exposure meets one of the following conditions:

- The Group does not expect future cash flows and based on tax regulations, the conditions necessary to include a written-off receivable as uncollectible and as tax deductible costs, have been met or
- receivable has been forgiven or
- the receivable has been otherwise extinguished.

based on the decision, the Group:

a) writes off the receivables from balance sheet records or

b) when receivable from institutional customer has already been written off to off-balance sheet, it is removed from thereof.

If the present value of the estimated cash flows increases after an event occurring after impairment was identified, the provision that was previously created will be reversed through profit or loss.

Provisions for amounts due from banks and customers adjust the value of respective assets. Provisions for contingent liabilities are presented in as liabilities in line “Provisions”.

For financial assets measured at fair value through other comprehensive income, the increase or decrease in expected credit losses is recognized in the profit and loss account under the item “Provision for expected credit losses on financial assets and provisions for off-balance-sheet commitments”.

The Group classifies assets measured at amortized cost into the portfolio of assets that are individually significant and the portfolio of assets that are not individually significant (portfolio basis).

Expected credit losses for impaired receivables that are deemed as individually significant are calculated as the difference between the carrying amount of an asset and the present value of the expected future cash flows resulting from repayments by the borrower, cash settlement of collateral or the sale of receivables. The future cash flows are discounted to the present value with the effective interest rate of a given instrument.

Expected credit losses for impaired receivables that are deemed as individually not significant are calculated on the basis of a portfolio assessment which is based on the history of losses incurred on assets with similar risk characteristics.

Forborne exposures are exposures for which concessions were granted due to economic or legal reasons (in the area of financial conditions), resulting from financial difficulties of the obligor that would not have otherwise been extended. Financial hardship refers to borrowers who are experiencing or are likely to experience problems meeting their financial obligations.

The process of assigning "forborne" status for exposures is closely related to the credit risk management process, including the impairment recognition.

The "forborne" status may refer to both impaired and non-impaired exposures. As "forborne" not-impaired exposures are treated receivables if restructuring activities were applied but change of financing conditions has not implied any deterioration of future payment streams.

In case the Group grants a concession to the debtor, if it does not change significantly the terms and expected cash flows of the financial asset, the expected cash flows from the financial asset subject to the concession are included in the measurement of the asset using the original effective interest rate for the instrument.

If the concession granted significantly changes the important terms or expected cash flows, the financial asset is derecognized, and the new one is recognized at fair value on the day of the initial recognition.

In the case of receivables resulting from activities other than the core business, the Group has adopted the approach of creating provisions for expected credit losses in the full amount once a certain threshold of overdue payments is exceeded.

2.2 Accounting estimates and judgments

Determination of the carrying values of selected assets and liabilities as well as revenue and expense requires estimating the effect of uncertain future events on these items at the balance sheet date. The estimates and assumptions are subject to continuous evaluation and are based on historical experience and other factors, including expectations of future events which seem justified in a given situation. The most crucial estimates applied in the preparation of the financial statements are presented below.

Fair value of derivatives

The fair value of financial instruments not quoted on active markets is determined using valuation techniques. If valuation techniques are used to determine fair values, these methods are periodically assessed and verified. All the models are tested and approved before application. As far as possible, only observable data are used in the models, although in some areas, the entity’s management must use estimates. Changes in the assumptions relating to the estimated factors may affect the fair value of financial instruments disclosed.

The Group applies the following methods for measuring particular types of derivative instruments:

- FX forwards – discounted cash flows model;
- options – option market-based valuation model;
- interest rate transactions – discounted cash flows model;
- futures – current quotations.

The Group uses a Credit Default Swap quotation for valuation of counterparty credit risk.

The Group differentiates the valuation of counterparty risk due to the availability of quotations of credit derivatives (CDS):

- Counterparty Credit Risk of companies for which there is an active CDS market: It is considered that the CDS quotes reflect the market value of the credit risk;
- Counterparty Credit Risk of companies for which there is no active CDS market: On the basis of the credit rating (external or internal, when an external rating is not available) and industry, the CDS index (for a given industry) is assigned to the company. It is considered that the industry index CDS quotes reflect the market value of the credit risk.

In the case of valuation of own credit counterparty risk (DVA), the Group is using a method defined for clients for which there is no active CDS market.

The main factors determining the change of counterparty credit risk estimations are: (i) change of fair value of derivative instruments correlated with a change of, inter alia, fix rates and interest rates, (ii) a change of CDS quotes (iii) changes in credit risk ratings.

Provisions for expected credit losses

The methodology of estimating provisions for expected credit losses has been described in section *Impairment of financial assets.*

Impairment of goodwill

The Group carries out obligatory annual impairment tests of goodwill in accordance with the model based on guidance from IAS 36. The basis of valuation of the recoverable amount of cash-generating units to which the goodwill is assigned is their value in use which is estimated by the Bank's management based on the financial plan reflecting the adopted assumptions on future economic conditions and expected Bank performance, as well as the discount rate used in cash flow forecasts and the growth rate used to extrapolate cash flow forecasts beyond the period covered by the financial plan.

Reserves

The methodologies have been described in note 31 and note 40.

Employee benefits

Provisions for future payments in respect of employee benefits such as retirement and pension allowances are subject to periodic actuarial estimation by an independent actuary. The number of provisions corresponds to the current value of future long-term liabilities of the Group to its employees according to employment and salaries on reporting day and is based on a number of assumptions in the field of staff statistics. Provisions are calculated on the basis of a number of assumptions including probability of a given person reaching the retirement age as the Group's employee, including staff turnover, risk of death and risk of total work incapacity.

3. Assets and liabilities classified as held for sale and profit from discontinued operations

On 27 May 2025, the Bank signed an Agreement with VeloBank S.A. („VeloBank"), Promontoria Holding 418 B.V. (the only shareholder of VeloBank) („Promontoria") and Citibank Europe Plc regarding the merger by separation of the consumer business (the "Consumer Business") of the Bank in favor of VeloBank.

In accordance with the conclusion of the Agreement, the exit transaction of Bank's Consumer Business will proceed in two related stages. The first stage is demerger of the Bank by separation, because of which the Retail Business will be transferred to VeloBank and in exchange the Bank will receive newly issued shares of VeloBank. The second stage is shares repurchase by Promontoria of all VeloBank shares that the Bank will acquire because of the demerger. This buyout will take place immediately after the registration of the division by the competent registry court, but no later than the day

following such registration.

In the day of registration by the registry court, VeloBank will purchase the Consumer Business covering activities in the scope of credit card servicing, granting retail loans and credits, including PLN mortgage loans, accepting deposits, asset management (including brokerage services of the Consumer Business) and servicing entrepreneurs classified by the Bank as micro-entities, as well as the Bank's branches and other assets and liabilities of the Bank's Consumer Business, with the exception of certain assets and liabilities related to the above activities, which will not be transferred to VeloBank, including, in particular, foreign currency loans.

The agreement also contains provisions for the Bank to grant indemnification for certain identified risks, with a specified amount limit. As of the date of preparation of the financial statements, the Bank does not consider the probability of their materialization to be high. Consequently, there was no need to quantify these risks in the financial statements.

The number of shares acquired by Bank due to the demerger will be determined in accordance with the mechanism specified in the division plan, provided that it does not reach 25% of all shares in the share capital of VeloBank.

The shares will be repurchased by Promontoria from the Bank for the estimated amount of PLN 532 million consisting of two components based on financial indicators:

1. Fixed value component payable in connection with transaction closing in the estimated amount of PLN 432 million based on net assets transferred by the Bank to VeloBank in the moment of transaction closing and with the subject to any standard price adjustments that may occur upon closing of the transaction; and
2. Variable component payable in connection with achieved business volumes by Consumer Business in the day of transaction closing in the amount not higher than PLN 100 million

In connection with the conclusion of the Agreement, the Bank, at the time of classification of the consumer operations as held for sale in accordance with IFRS 5, recognized a net loss in the amount of PLN 329 million in 2025 based on the fixed price component and the net asset value of the Consumer Business, taking into account the tax effect. Based on transaction conditions, the Group conservatively did not account for the variable component.

In the opinion of the Bank, IFRS 5 does not contain precise provisions regarding the timing and method of recognizing a loss in the case of held-for-sale group that mainly includes assets and financial liabilities in scope of IFRS 9 and consequently the Bank decided that the recognition of the loss at the moment of reclassification of the business to the held-for-sale group most clearly shows the expected economic consequences of the planned transaction. This loss, in terms of the balance sheet, has been accounted for as a reduction in the value of the assets of the group held for sale as a whole, without allocation to specific items.

The completion of the transaction is subject to the following activities and the fulfilment of certain conditions precedent, including, among others:

1. obtaining needed consents or decisions of the Polish Financial Supervision Authority (“KNF”) by the Bank, VeloBank and its dominant entities;
2. obtaining consents of the relevant antitrust authority and other relevant authorities;
3. obtaining tax interpretations;
4. adoption of resolutions on approval of the division at general meetings of shareholders;
5. achieving readiness of the parties to perform the technical and operational activities concerning the migration of systems in connection with the demerger.

Second condition is met in full.

The parties have received tax interpretations which constitute the conditions for the execution of the transaction for the sale of the retail business. The ruling received by the Bank, regarding the possibility of classifying the assets transferred to the buyer as tax-deductible costs, partially challenges the Bank's approach. The final resolution may affect the ability to recognize the loss on the sale of the retail business as a tax cost. The Bank disagrees with the position presented in the ruling and, given its right to appeal, intends to take appropriate legal steps to challenge it. Tax effect related to the revaluation of assets and liabilities held for sale amounting to PLN 141 million was accounted for as a component of deferred tax assets.

As at 25 July 2025, The Management Board of the Bank and the Management Board of VeloBank agreed and signed the Bank's division plan in accordance with Article 534 of the Act of 15 September 2000 – the Commercial Companies Code.

The transaction is expected to be completed in mid-2026.

In connection with the signed Agreement, in the Bank's opinion, the Consumer Business meets the criteria of IFRS 5 required for reclassification of the assets and liabilities in scope of transaction as held for sale and separation of discontinued operations

Non-current assets held for sale are measured at the lower of their carrying amount or fair value less costs to sell. Non-current assets reclassified as held for sale are not subject to further depreciation.

The provisions of IFRS 5 do not apply to financial assets within the scope of IFRS 9 Financial Instruments, deferred tax assets (IAS 12 Income Taxes), or employee benefit assets (IAS 19 Employee Benefits). Therefore, the valuation method for these components of the group held for sale has not changed and is consistent with the principles set out in these standards.

Assumptions and estimates related to the presentation of discontinued operations

In the Agreement regarding the sale of the Bank's Consumer Business for VeloBank the principles of separating the assets and liabilities covered by the transaction were defined. In these financial statements, the balances have been allocated between continuing and discontinued operations in accordance with the Agreement and the requirements of IFRS 5. Therefore, the following assumptions and estimates were used for the balance sheet items:

1. Liabilities assigned to the discontinued operation exceed its assets, and as part of the transaction settlement, additional funds in the form of liquid assets are expected to be transferred (so-called excess liquidity to be transferred as part of the transaction settlement). The expected amount of assets to be transferred as part of the transaction settlement is not recognized in the statement of financial position as a component of the group of assets held for sale because the assets will be determined in the future and are not identifiable at the balance sheet date.
2. The consumer business includes dual-currency deposits with embedded derivatives. The fair value of the embedded derivatives was presented in the statement of financial position under "Financial assets held for trading" and was transferred to "Assets classified as held for sale."
3. Due to the recognized gross result on the transaction, a deferred tax asset was recognized. As the current tax will be paid by the Bank, the deferred tax asset is not included in the group of assets held for sale.

The following assumptions and estimates were used in the income statement:

1. The result on the disposal of the consumer business was recognized in 2025 and was included in the result from discontinued operations. The transaction price assumes certain variable component, so the Bank reported the result on the transaction based on its best estimate, as mentioned above.
2. Net interest income allocated to discontinued operations includes interest income and expenses on assets and liabilities classified as held for sale, increased by interest income on excess liquidity related to discontinued operations. A detailed description of the calculation of the excess liquidity result can be found below. Its reflection in the result from continuing operations is presented in Note 6.
3. General and administrative expenses allocated to discontinued operations include employee salaries, external services, IT services, space rental, and depreciation and were estimated based on the allocation keys used by the Bank in segment reporting adjusted for the scope of the transaction.
4. Tax expense in discontinued operations is driven by the change of net deferred tax classified as held-for-sale and does not include tax charges settled by the Bank (including the effect of tax ruling described in Note 15). The profit and loss effect of the recognition of a deferred tax asset resulting from the recognized gross profit on the transaction is allocated to discontinued operations, as the deferred tax is directly related to the sale of the business classified as discontinued operations.

Assets and liabilities held-for-sale at as 31 December 2025 are presented in the table below:

PLN '000	31.12.2025
Cash and cash equivalents	216,403
Financial assets held for trading	3,731
Amounts due from customers	6,168,098
Tangible fixed assets	46,882
Deferred income tax assets	57,016
Other assets	58,636
Total assets	**6,550,766**
Impairment of assets not held for sale	(467,000)
Total assets held for sale	**6,083,766**
Amounts due to customers	22,152,903
Provisions	23,289
Other liabilities	118,302
Total labilities held for sale	**22,294,494**
Net assets and liabilities held for sale	**(16,210,728)**
Expected amount of assets to be transferred as a part of the transaction settlement	**16,642,728**
Net assets and liabilities held for sale after including assets to be transferred as a part of the transaction settlement (taking depreciation into account)	**432,000**

Expected amount of assets to be transferred as a part of the transaction settlement is the amount that will be transferred to VeloBank in order to settle the transaction. For the purposes of these financial statements and the table above, this surplus was calculated as of December 31, 2025. At the time of transaction settlement, the surplus will be transferred to

VeloBank in the form of liquid assets in the appropriate currencies (cash and/or non-cash assets in the form of treasury bonds and bills denominated in PLN, USD, and EUR, with characteristics agreed upon between the parties to the transaction). Due to the volatility of the balance sheet structure and the expected settlement date of the transaction, it is not possible to precisely identify them at the time of preparation of these financial statements.

In connection with the recognized gross result on the transaction, the tax effect related to the revaluation of assets and liabilities held for sale in the amount of PLN 141 million was recognized. Because the current tax will be paid by the Bank, the deferred tax asset is not included in the group of assets held for sale. However, the group of assets held for sale includes net deferred tax asset in the amount of PLN 57 million directly related to the business held for sale.

The income statement of the discontinued operations is presented below:

PLN 'OOO	01.01.-31.12.2025	01.01.-31.12.2024
Interest income	1,272,607	1,375,067
Similar income	213	76
Interest expense and similar expenses	(379,687)	(363,953)
Interest income	**893,133**	**1,011,190**
Interest income and similar charges	218,684	216,345
Interest expense and similar charges	(52,492)	(45,944)
Net fee and commission income	**166,192**	**170,401**
Net income from trading financial instruments and revaluation	**32,281**	**33,657**
Other operating income	5,356	2,942
Other operating expenses	(19,579)	(22,331)
Net income from other operating income and expenses	**(14,223)**	**(19,389)**
General and administrative expenses	**(767,949)**	**(687,496)**
Depreciation of property, plant and equipment and intangible assets	**(5,480)**	**(68,471)**
Net impairment of non-financial assets	**-**	**(432,512)**
Net income from the sale of other assets	**(608)**	**(300)**
Net income from expected credit losses on financial assets and provisions for contingent liabilities	**4,194**	**35,455**
Operating profit	**307,540**	**42,535**
Tax on certain financial institutions	**(49,122)**	**(54,489)**
Profit before tax	**258,418**	**(11,954)**
Income tax expense	**(20,776)**	**(12,814)**
Net profit	**237,642**	**(24,768)**
Revaluation of assets and liabilities held-for-sale of a goodwill less costs to sell	**(470,135)**	**-**
Tax effect related to the revaluation of assets and liabilities held for sale	**140,696**	
Net profit from discontinued operations	**(91,797)**	**(24,768)**

The value of the interest income from discontinued operations includes interest income and expenses from transactions with Consumer Business clients. Since Consumer Business is characterized by the surplus of deposits over assets, these funds were invested by Corporate Banking. After the transaction is settled, the Bank will no longer be able to invest funds derived from the excess of deposits over assets generated by Consumer Business. In the Management Board's opinion, presenting the interest income on the excess of deposits over assets in Consumer Business as an element of discontinued operations provides information that is relevant to the recipients of the financial statements. The Group eliminated internal transactions entered before the settlement of the exit transaction (internal interest income and interest expense) from continuing operations.

The Bank determined the level of interest income/net interest income generated by the Corporate Banking segment for the Retail Banking Segment based on this surplus using the formally adopted internal transfer rate methodology between the mentioned segments and presented it separately in Note 6 (Adjustment for excess liquidity related to discontinued operations). The internal transfer rate system is based on market rates at the relevant dates. For products with fixed maturities, rates corresponding to the maturities are selected, while for products with undefined schedules, these rates are adjusted based on behavioral assessments (primarily O/N or 1Y). The revenues thus determined in the amount of PLN 951,291 thousand in 2025 and PLN 1 027,401 thousand in 2024 were reduced by the cost of financing credit products in the amount of PLN 315,878 thousand in 2025 and PLN 346,621 thousand in 2024 using 3M rates for retail loans and O/N, 3M, and 1Y rates for credit cards.

Cash flows from discontinued operations are presented in the table below:

PLN '000	For the period	01.01.-31.12. 2025	01.01.-31.12. 2024
Cash flows from operating activities		675,100	5,188
Cash flows from investing activities		(10,051)	(81,595)
Cash flows from financial activities		(12,451)	(11,047)
		652,598	**(87,454)**

4. Risk management

RISK MANAGEMENT ORGANIZATIONAL STRUCTURE AND PROCESSES

The Group performs analysis, assessment, approval and management of all kinds of risks associated with its business, arising from the applied business strategy. The risk management process is performed by all units and at all levels of the organization and covers among others: credit risk (including counterparty credit risk, residual risk limited by accepted collateral, and concentration risk), liquidity risk, market risk, and operational risk.

The foundation of the Group's risk strategy is balanced risk taking while maintaining the rules of shared responsibility. The concept of risk management based on the shared responsibility, is organized at three independent levels ("three lines of defense"):

- Level 1 i.e.: organizational units responsible for business activities resulting in risk taking and for risk management in the Group's operational activity as well as risk identification and reporting to the units of second line of defense,
- Level 2 i.e.: risk management in organizational units, independently from the risk management by the first line, and compliance – organizational units or employees responsible for establishing standards for the risk management including risk identification, measurement or assessment, mitigation, control, monitoring and reporting and for overseeing the control mechanisms applied by other organizational units to mitigate the risk – organizational units in Risk Management Sector, Compliance Division, Financial Division Legal Division; Human Resources Division; Supervision and Internal Control Unit in Brokerage Department of Bank Handlowy,
- Level 3 i.e.: Internal Audit that provides an independent assessment of risk management processes and internal control system.

In the risk management area, the Supervisory Board of Bank resolves upon:

- approving a strategy of the Group's activity and the Principles of prudent and stable risk management, including operational risk strategy,
- approving acceptable level of risk in the Group ("Risk appetite") contained in the Policy specifying the Risk Appetite for the Capital Group of Bank Handlowy w Warszawie S.A.,
- approving the fundamental organizational structure of the Group, determined by the Bank's Management Board adapted to the scope and profile of risks taken,
- Approving an annual assessment of the adequacy and effectiveness of the risk management system.

In addition, the Supervisory Board supervises the compliance of the Group's policy related to risk-taking with the Group's strategy and financial plan and performs the duties resulted from mentioned above strategies, regulations or other documents approved by the Supervisory Board.

The Management Board of the Bank, by way of a resolution, approves:

- the organizational structure of the Group, with defined roles and responsibilities adequate for the size and risk profile, ensuring that the functions of risk measurement, monitoring and control are independent from risk taking activities,
- the Group's Risk's Profile by determining significant types of risk, at the same time providing implementation of processes to manage them and/or allocation of interior equity,
- Group's strategy, the Principles of prudent and stable risk management constituting the risk management strategy, including operational risk strategy,
- the acceptable risk level ("Risk appetite"), included in the Policy specifying the Risk Appetite for the Capital Group of Bank Handlowy w Warszawie S.A.

The Principles together with the approved by the Supervisory Board Policy specifying the Risk Appetite and ESG Risk Management Framework constitute the BHW's Risk Management Strategy (including the operational risk management strategy).

The Management Board of the Bank nominates an independent Member of the Management Board responsible for Risk Management Sector (Chief Risk Officer) reporting directly to the President of the Management Board and responsible for the management and control of credit risk, market risk, and operational risk, including:

- introducing a risk management system in the Group as well as risk identification, measurement, control and reporting methods,
- developing the risk management policy and developing risk assessment and control systems,
- making credit decisions in compliance with the principles resulting from the credit procedures as well as documents determining the Group's credit policy,
- ensuring the proper safety level of the credit portfolio,
- managing the problem loans portfolio (including collections and debt restructurings).

Additionally, CRO is responsible for:

- developing, implementation and updating written policies, strategies and procedures in term of risk management system, internal control system and internal capital estimation;
- reviewing the process of estimating and maintaining internal capital and the policy of variable remuneration components.

Risk management processes are implemented in the Group on the basis of written policies and principles concerning identification, measurement, mitigation, control, monitoring and reporting of risks to which the Group is exposed, approved by the Management Board, persons authorized in accordance with the rules for issuing normative acts in the Group or appropriately appointed Committees.

Following committees have been established within the risk management framework:

- Assets and Liabilities Management Committee (ALCO),
- Risk and Capital Management Committee (RCMC), overseeing Model Commission, Consumer Group (GCB) Risk Commission and Sustainable Development Products ("ESG") Commission,
- New Products Committee,
- Business Risk and Control Committee (BRCC)

Member of the Management Board responsible for Risk Management Sector presents the organizational structure of the Risk Management Sector to the Management Board of the Bank, which takes into account the specifics of credit, market, liquidity and operational risk management in the respective customer segments. For this purpose, organizational units have been set up within the Risk Management Sector that are responsible for:

- managing credit risk of institutional clients i.e., of the Corporate Bank and the Commercial Bank,
- managing credit risk of the Consumer Bank
- managing impaired receivables,
- managing market risk, including interest rate risk in banking book,
- managing liquidity risk,
- managing operational risk,
- managing the equity process and model risk,
- model validation,
- supporting risk management support in the above-mentioned areas including in control functions,
- the process of comprehensive and continuous assessment of credit risk (Fundamental Credit Risk Assessment).

The management of Risk Management Sector and of Business units are responsible for developing and implementing risk management policies and practices in their respective business units, overseeing risks in the business units, and responding to the needs and issues of the problems occurring in business units.

Risk management in the Group is supported by a range of IT systems in the following areas:

- obligor and exposure credit risk assessment,
- credit, market and operational risk measurement, reporting and monitoring,
- valuation, monitoring and reporting of collateral,
- calculation and reporting of write-offs on expected credit losses.

Material Risks

The Group manages all material risks arising from the implementation of its business strategy As a result of risk identification and assessment process, in 2025, the Management Board considered the following type of risk as material:

- Credit Risk,
- Counterparty Credit Risk,
- Market Risk in trading book and in banking book,
- Liquidity Risk,
- Operational Risk,

- Compliance Risk,
- Strategic Risk,
- Climate Risk for: Credit Risk, Strategic Risk, Reputation Risk and Compliance Risk,
- Environmental Risk for Compliance Risk.

The Group monitors all the above types of risk. Due to portfolio characteristics in this chapter are presented principles related to management of credit risk (including counterparty risk and concentration), operational risk, liquidity risk, and market risk.

Credit risk, including also counterparty credit risk, is a potential loss resulting from a customer's breach of contract or insolvency, considering the loss mitigation methods used for the product or the financing.
Credit risk arises in many of the Group's business activities, hereinafter "products," including:

- Loans and advances,
- Guarantees and letters of credit,
- FX and derivatives transactions,
- Securities transactions,
- Financing and handling settlements, including trade (domestic and foreign),
- Transactions in which the Group acts as an intermediary on behalf of its clients or other third parties.

The principles described in the "Credit Risk" section of this document covers different types of exposure, as defined in relevant Credit Policies of the Group.

Additionally, within the risk management system, the Group applies credit risk mitigation rules (incl. accepting collateral) thus mitigating the inherent **residual risk** and managing **concentration risk**, taking into account material concentration risk factors.

Liquidity risk is the risk that Bank will not be able to efficiently meet both expected and unexpected current and future cash flows and collateral needs without adversely affecting either daily operations or financial condition of the Bank. Risk may be exacerbated by the inability of the firm to access funding sources or monetize assets and the composition of liability funding and liquid assets. Liquidity risk is measured in accordance with the applicable law, in particular with the Banking Act, under standards set by the regulator (regulatory liquidity measures) and with internal measures which support liquidity risk management.

Market risk is the risk of loss arising from changes in the value of Bank's assets and liabilities resulting from changes in market variables, such as interest rates, exchange rates or credit spreads. Losses can also result from the presence of basis risks. Market risk arises in trading book, as well as in banking books. Market risk is measured in accordance with established standards to ensure consistency across businesses and the ability to aggregate risk.

Operational Risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. This definition of operational risk includes legal risk - which is the risk of loss (including litigation costs, settlements and penalties) resulting from instable legal environment as well as wrongly defined contractual obligations in any aspect of the bank's business - but excludes strategic and reputation risks. This definition of operational risk includes also conduct risk as a risk related to the Bank's operations, that employees of the Bank or persons associated with the Bank, but not its employees – intentionally or negligently – cause damage to customers or the integrity of financial markets, with an effect on the Bank. As part of this risk, we also recognize ICT risk (Information, Communication and Technology). Bank also recognizes the impact of Operational Risk on the reputation risk associated with Bank's business activities.

CREDIT RISK

The main objective in the field of credit risk management is to support the long-term plan for the stable development of the credit portfolio while maintaining its proper quality. Credit risk management is executed based on the policies and procedures that consistently and clearly define and communicate standards for risk identification, measurement, acceptance, control, monitoring and reporting. In the current reporting period, the Group continued activities related to credit risk management in perspective of the external environment situation development including, in particular, the impact of war between Russia and Ukraine, conflict in Palestine, high inflation and economic slowdown. In the reporting period the Group did not observe significant impact of the above factors on the credit portfolio quality neither of Corporate Banking nor Retail Banking. In case of lending, the Bank is not active in Ukraine, Israel, Russia or Belarus, and the Bank's credit exposure to companies significantly involved in these countries is marginal.

Principles of the Credit Risk Management Policy

The Risk Management unit is responsible for establishing the principles of the Credit Policy for the Corporate Bank, the Credit Policy for the Commercial Bank and credit policies for the Consumer Bank as well as for approving other policies, programs and procedures, monitoring credit risk management performance, providing ongoing assessment of the credit

risk of the portfolio and approving individually significant credit risk limits.

The rules for approving risk are matched with the strategy of the Group, generally accepted risk level, credit portfolio performance and internal control results.

For corporate and commercial clients as well as investment banking activities across the organization, the credit process is based on a range of fundamental policies, including:

- joint business and independent risk management responsibility for the quality of the credit portfolio and process as well as for credit loss,
- adherence to portfolio guidelines to ensure diversification and maintain risk/capital alignment,
- credit authorization system assuming that credit authority can be given to authorized, trained and experienced staff based upon their professional experience and tested qualifications concerning risk assessment and making credit decisions,
- a minimum of two authorized credit approves with delegated credit authority required for all significant exposures,
- dependence of approval level from the risk taken – exposures with a higher risk (including size and risk assessment) require approval at a higher decision-making level,
- diverse risk rating standards, adequate to every obligor and exposure, including remedial actions,
- risk rating of every obligor and exposure in a consistent rating process using risk rating models and scorecards (scoring),
- periodic monitoring of customers' business results and identification of negative changes in their standing which require immediate reclassification of exposure or remedial actions,
- collateral selection, valuation, establishing legal basis and monitoring,
- exceptions to Credit Policies are approved at higher levels within the organization to ensure control over risk policy implementation by higher level managers in accordance with internal Group's normative acts and generally applicable laws and regulations issued by the appropriate regulators.

In the Consumer Bank (GCB), the Management Board of the Group has approved credit policy as well as detailed principles of its deployment for each credit product offered.

Credit risk in this area is managed by means of:

- detailed credit policies which define the credit scoring rules,
- a system for allocation of credit authority and independent supervision of the quality of credit analyst performance,
- a system of monitoring the quality of IT tools supporting credit scoring,
- a system of risk measurement and control for credit portfolios including: a detailed management information system covering the quality of the credit portfolio and debt collection, identification of impaired exposures, monitoring of delinquencies, monitoring of benchmarks, etc., internal limits of credit portfolio parameters approved by the Management Board,
- debt collection policy rules as well as a fraud prevention policy,
- credit portfolio quality reports to the GCB Risk Commission, the Risk and Capital Management Committee and the Supervisory Board's Risk and Capital Committee,
- stress testing rules,
- monitoring of the performance of scoring models and measurement and identification of impaired exposures,
- checking the behavior of Group customers in the Credit Information Bureau (BIK),
- collateral valuation policy for mortgage-secured credits offered by GCB.

Each portfolio is subjected to stress testing at least on an annual basis.

Credit risk assessment and rating

The Group maintains consistent risk ratings methodology across the corporate and commercial credit portfolio, which facilitates comparison of credit exposure across all lines of business, geographic regions and products.

Obligor Risk Rating and Obligor Limit Rating are elements of the assessment of credit risk associated with granted products. Obligor Risk Ratings reflect an estimated probability of default for an obligor within 1 year and are derived primarily through the use of statistical models, external rating agencies, or scoring models.

Obligor Limit Rating (OLR) as a measure of medium to long-term risk of the obligor is subject to assessment in terms of qualitative factors including sector seasonality, management quality, client's business strategy, influence of vulnerability to regulatory environment on client, transparency and quality of control processes.

Facility Risk Ratings are assigned using the obligor risk rating and facility-level characteristics such as collateral, thus decreasing the potential loss on a facility in case of default. As a result, Facility Risk Rating reflects a potentially expected loss-given default.

Credit Risk is measured at a number of levels, including:

- Aa a limit level, which may include one or more contracts, disposals or transactions,
- at an obligor level, if there are multiple facilities approved for an obligor where the risk associated with an obligor default can be assessed jointly,
- at a group level, considering the group structure of connected clients,
- at a portfolio level where Portfolio Risk Rating is calculated as the average rating of individual facility exposure ratings weighted with the size of exposure.

For ICG and CCB customers' credit exposures, the Group uses scoring models of the various levels of complexity i.e., depending on the size of customer's portfolio and customer's industry.

For retail credit exposures, the Group uses scoring models developed on the basis of the history of behavior of the Group's customers. Such models analyze the behavior of customers in the Credit Information Bureau, own data as well as customer demographics. The quality of performance of scoring models is reviewed on an ongoing basis and monitored annually. As a result, modifications are made in the model or the credit policy.

Credit risk of the retail credit portfolio is measured based on dedicated scoring models and reporting techniques including an analysis of ratios for new customers and existing portfolios with and without impairment.

The effectiveness of scoring models used in risk assessment processes is monitored regularly with population stability reports, KS (Kolmogorov-Smirnov) test reports and portfolio quality reports (delinquency and loss ratios). Each scoring model is validated annually.

Credit risk monitoring

Risk management units, supported by business units responsible for the cooperation with customers, are responsible for monitoring the probability of obligor default.

Credit risk exposure is monitored and managed at three levels: (a) exposure level, (b) customer level, and (c) portfolio level.

Exposure monitoring and management at a customer level includes periodic control reports, an early warning system and periodic reviews of the customer's standing.

Monitoring portfolio performance and identification of portfolio trends include regular management reports and control reports which also support active response to negative signals or trends.

In addition to management information reports analysis, risk managers and business representatives take part in regular round tables regarding the portfolio in order to review business pipelines and discuss the credit issues.

In GCB, monitoring covers scoring models, impairment measurements, delinquencies, the effectiveness of debt collection, internal limits, customer behavior checks with BIK, benchmarks, etc.

Risk mitigation

Credit risk mitigation within the set risk appetite is an ongoing and key element of the Group's risk management processes. It is achieved as described below:

- customers selection and credit confirmation:
  - Target market and customer selection criteria are determined;
  - Maximum credit exposure against the obligor is determined through obligor limits related to customer risk ratings and/or through risk acceptance criteria;
  - Limits are established and monitored in order to mitigate exposure concentration risk;
  - Robust credit due diligence standards are established and maintained;
  - Credit process standards are established in order to ensure a consistent approach to each segment;
  - Credit documentation standards are applied;
- collateral is used in order to minimize the risk and to manage residual risk:
  - Establishing acceptable collaterals and their classification in view of regain possibility in case of execution;
  - Setting collaterals in right law's form (documentation standards);
  - Expected collateral structure or credit value in relation to collateral value is determined;
  - The value of collateral on property and equipment is determined by dedicated specialty functions within the Group using external valuation where required;
- monitoring and early warning system:
  - Credit exposures periodic monitoring and an early warning system are used;
  - Regular inspection of portfolio ensuring identification of adverse tendencies and concentration;

- Active portfolio management includes implementation of necessary modifications to the credit strategy based on portfolio reviews or stress testing.

Policy of collateral acceptance

Apart from general rules of credit risk mitigation, the Group has defined specific Corporate and Consumer rules of accepting, assessing, establishing and monitoring various types of collateral, including mortgages, pledge on fixed and current assets, guarantees and similar forms of support and assignment of receivables (jointly: "collateral"). The risk is limited by the requirement to insure the collateral for the time of credit exposure. These rules serve to minimize the residual risk.

As an additional element limiting the risk, in financing of companies and individuals who pursue business activity, is the rule that revenues from the customer's ongoing business are the key element of creditworthiness assessment of potential borrowers and the primary source of repayment of debt to the Group.

In order to diversify risks associated with collateral, the Group accepts various types of collateral:

- in the Consumer Bank, the most common type of collateral is residential real estate,
- in the Corporate and Commercial Bank, the following types of collateral are among other:
  - guarantees,
  - cash,
  - securities,
  - receivables,
  - inventory,
  - real estate,
  - equipment and machines,
  - vehicles.

Detailed procedures outlining the types of collateral acceptable to the Group and the rules of their establishment and valuation as well as the creation of a special risk unit responsible for the collateral management process allow for the development of appropriate standards for this process, including:

- criteria for acceptance and valuation of collateral,
- documentation standards,
- rules and frequency of collateral value monitoring and updating (including inspections).

In addition, Corporate Banking credit regulations set such parameters as:

- the structure of collateral required for different types of credit receivables,
- the relationship of loan value to collateral value for each type of collateral,
- the desirable structure of the different types of collateral in the credit portfolio.

The Group periodically controls whether the current structure of the collateral portfolio in Corporate Banking is compatible with the objectives and whether the value of the collateral is appropriate.

Within the Corporate Bank, the expected ratio of loan value to collateral value is determined in each case in a credit decision. This ratio is also subject to periodic inspection / monitoring.

The principal type of collateral in GCB is a mortgage register for mortgage-secured loans. The Group also uses bridge insurance to mitigate the risk of the borrower's default between the time of disbursement of a loan and the time of a mortgage register.

The rating of the collateral value is measured at each time on the basis of an expert valuation of real estate commissioned by the Group. Expert valuations are reviewed by an independent valuation division according to valuation guidelines for real estate used as collateral of real estate loans for individuals who are GCB customers. The quality of the division's performance is monitored.

Concentration in credit risk

In order to prevent adverse events resulting from excessive concentration, the Group reduces the concentration risk by setting limits airing from law and concentration standards adopted internally, in order to ensure adequate diversification of risk in the portfolio. The Group establishes General and specific limits to mitigate the risk of credit concentration, adequate to the approved risk appetite in the Group as well as business strategy

In its credit risk management, the Group takes into account in particular the risk arising from:

- exposure to single entities (including taking into account the effect of exposure to a single clearing house – KDPW CCP on the level of concentration risk exposure, particularly in the event of potential inability to meet the obligations of the clearing house), or related entities capitally or economically (counterparty concentration risk),
- exposure to the same industry, economic sector, similar type of activity or trading similar goods (industry concentration risk),
- exposure to the same geographical region, as well as individual countries (risk of geographical concentration),
- exposure to the entities belonging to the Capital Group of the Bank,
- exposure to counterparties in derivative transactions,
- used credit risk mitigation techniques (exposures secured by the same type of collateral), including due to large indirect credit exposures such as a single issuer (collateral concentration risk),
- specific of Group products/portfolio and exposure tenor,
- individual products, markets or currencies.

General concentration limits are approved on the Management Board level and monitored according to relevant Policy rules, primarily by the Risk and Capital Management Committee. Credit Risk and Business managers define (where appropriate) detailed internal concentration limits, control and reporting frequency and rules of approval for excesses and corrective action plans. Exceeding of established limits is reported, depending on the specific requirements of the Policy, to the approval of appropriate persons, the Risk and Capital Management Committee and the Bank Management Board together with corrective action plans.

In hedge concentration, appropriate limits are settled and controlled, including commitments hedged with a mortgage in accordance with S Recommendation.

Obligor exposure concentration risk

The Group limits the concentration of its exposure to a single customer or a group of customers with common ownership and/or organization. As at 31 December 2025, the Group's exposure in bank portfolio transactions with groups of customers whose aggregate exposure exceeded 10% of the Group's equity (as defined below in this report) amounted to PLN thousand, i.e., 97.94% of equity (31 December 2024: 6,094,545 thousand, i.e., 87.30%). In 2025 and 2024 the Group complied with the provisions on limits of concentration of exposure.

Concentration of exposure to the top non-banking borrowers of the Group:

PLN'000	31.12.2025			31.12.2024		
	Balance sheet exposure*	Financial commitments and guarantees	Total exposure	Balance sheet exposure*	Financial commitments and guarantees	Total exposure
GROUP	1,474,788	219,672	1,694,460	1,352,976	229,893	1,582,869
CLIENT	1,408,710	-	1,408,710	-	-	-
CLIENT	1,279,050	-	1,279,050	1,099,430	-	1,099,430
GROUP	1,002,149	-	1,002,149	1,002,896	-	1,002,896
GROUP	62,822	787,933	850,755	197,656	679,866	877,522
GROUP	820,166	-	820,166	836,507	-	836,507
CLIENT	766,096	30,000	796,096	-	30,000	30,000
GROUP	412,224	328,075	740,299	266,525	315,928	582,453
GROUP	652,880	23,334	676,214	552,871	23,565	576,436
GROUP	579,403	71,472	650,875	197,920	462,406	660,326
Total	**8,458,288**	**1,460,486**	**9,918,774**	**5,506,781**	**1,741,658**	**7,248,439**

**Excluding investment in shares and other securities.*
As at 31.12.2025; data from 31.12.2024 are comparative and do not illustrate concentration of exposures as at 31.12.2024.
The Group is understood as a capital group consisting of entities in relation to which the Capital Group of Bank Handlowy w Warszawie S.A. has exposures.

The limits of the Group's maximal exposure are determined in the Grouping Law Bill from 29 August 1997 and 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 and amending Regulation (EU) No 648/2012 (Regulation No 575/2013). When keeping conditions determined in Regulation 575/2013, it is allowed for the Group to maintain an overdraft of liabilities level over limits determined in paragraph 71 of the Grouping Law Bill only in the case of liabilities resulting from operations rated in trade portfolio. Own funds for determining limits of exposure purposes were determined according to Regulation No

575/2013.

As at 31 December 2025, the Group did not have an exposure to one entity exceeding the statutory exposure concentration limits.

Concentration of exposure in individual industries*

Given that there is a large diversity of customers representing individual industries, the table below shows aggregate data for the Group's exposure to the industrial sectors.

Sector of the economy according to NACE*	31.12.2025		31.12.2024	
	PLN'000	%	PLN'000	%
Financial service activities, excluding insurance and pension funds	14,785,832	36.8%	1,868,664	35.4%
Wholesale trade, except of motor vehicles	3,701,961	9.2%	14,050,812	4.7%
Financial services, insurance and pension funds supporting activities	2,068,880	5.1%	1,806,950	4.5%
Production and supply of electricity, gas, steam, hot water and air for air conditioning systems	1,980,679	4.9%	1,942,595	4.9%
Production of food products	1,383,230	3.4%	1,566,630	3.9%
Retail trade, except of motor vehicles	1,254,440	3.1%	1,383,112	3.5%
Activities of head offices; consulting related to the management	1,213,236	3.0%	1,455,548	3.7%
Production of other transport equipment	1,202,953	3.0%	1,033,543	2.6%
Rental and lease	1,117,619	2.8%	-	-
Production of electrical equipment	920,922	2.3%	950,298	2.4%
„10" industries total	**29,629,752**	**73.7%**	**26,058,152**	**65.6%**
Other industries	**10,557,367**	**26.3%**	**13,681,322**	**34.4%**
Total	**40,187,119**	**100.0%**	**39,739,474**	**100.0%**

**Balance-sheet and off-balance-sheet exposure gross to institutional customers (including Groups) as at 31.12.2025, based on NACE Revision 2 (The Statistical Classification of Economic Activities in the European Community), data from 31.12.2024 are comparative and do not illustrate concentration of exposures as at 31.12.2024.*

Gross amounts due from customers and Groups by type of business

PLN'000	31.12.2025	31.12.2024
Gross amounts due from economic entities and Groups		
Financial	15,205,613	13,892,311
Production	3,656,802	3,536,234
Services	3,508,066	3,231,131
Other	4,361,659	3,681,436
	26,732,140	**24,341,112**
Gross amounts due from individual customers	**6,432,345**	**6,360,276**
Total (see Note 18, 22)	**33,164,485**	**30,701,388**

Determination of Expected Credit Loss

The Group creates provisions for expected credit losses, according to developed internal rules and methodologies for calculating provisions for all financial assets. They are made based on aggregated level for each of the 3 Stages:

- Stage 1: Credit exposures that have not had a significant increase in credit risk since initial recognition
  - For these assets, a 12-months ECLs are recognized (representing the portion of lifetime expected credit losses that result from default events that are possible within 12 months after the reporting date),
- Stage 2: Credit exposures that have experienced a significant increase in credit risk since initial recognition, but for which the exposure is not yet defaulted
  - For these assets, a lifetime ECLs are recognized,
- Stage 3: Credit exposures with credit loss that has already been suffered on the assets
  - For these assets, ECL is established as for defaulted assets.

The assignment of the exposure to particular Stage is based on the approach to client management (individual vs. group approach), taking into account:

- the wide range of information obtained as part of standard risk management processes (including the Early Warning process) regarding both current and future events, including macroeconomic factors and
- the number of days passed due (where days past due calculation, for the purpose of exposure assignment to Stages, is done in line with EBA/GL/2016/07 guidance and the regulation of Ministry of Finance, Investment and Development of October 3rd, 2019, on the significance level of overdue credit exposure).

Stage 1

All exposures not classified as Stage 2 and Stage 3 are classified as Stage 1.

Stage 2

In case of credit exposures from the retail banking area the overdue criterion of over 30 days (incl. materiality of overdue credit exposure) as well as of above 90 days (regardless of the materiality of overdue credit exposure) are a direct trigger for identifying a significant increase in credit risk. Additionally, qualitative premises are considered, such as modification activities carried out, including forborne category, and the fact that information about the probability of default is not available, as well as a quantitative criterion – analysis of the change in the PD level since initial recognition. Under this criterion, the change in the PD level is analyzed for exceeding relative and absolute thresholds, obtained at the level of homogeneous product portfolios using a dedicated model, the purpose of which is to determine the thresholds above which an increase in risk is considered significant. Due to the product characteristics, absolute thresholds are applied only to credit cards and credit lines portfolios.

For credit exposures in the area of institutional banking, except from overdue by more than 30 days criterion in order to assess if a significant increase in credit risk took place within the internal classification process and ongoing monitoring process, the Group analyses changes in risk of default by comparing the current assessment of default with the assessment of default in the initial recognition.

Assessment of change in risk of default for given credit exposure is conducted during internal classification process and monitoring process and includes:

- qualitative indicators (including Early Warning System),
- quantitative information (change of the Lifetime PD at the reporting date with the Lifetime PD at initial recognition above the relative and absolute threshold for a given sensitivity class, financial data),
- expected exposure life period,
- occurrence of economic or legal reasons related to the borrower's financial difficulties and granting to the borrower a concession to financial conditions that the lender would not otherwise consider, (assuming that those changes do not imply deterioration in future payment flows).

Stage 3

The Group applies the general principle that the creditor's default occurs when one or both of the following events occur:

a) delay in the debtor's repayment of any material loan obligations to the Group is 90 days or more,
b) it is unlikely that the debtor fully fulfills his credit obligations towards the Group, without the institution having to undertake activities such as collateral execution.

The Group assesses for each balance sheet date if there is an objective prerequisite for impairment for given financial asset of group of financial assets.

A financial asset or a group of financial assets lost their value and the impairment loss was incurred only when there is objective evidence of impairment resulting from one or more events taking place after the initial recognition of the asset (event causing the loss), and the event (or events) causing a loss has an impact on the expected future cash flows resulting from a financial asset or a group of financial assets whose reliable estimation is possible.

In the institutional banking area, materialization of credit exposure value loss takes place if there is objective evidence of impairment, which can be a result of, among others, events as below:

- obtaining information on significant financial difficulties of the client,
- reduction of the client credit rating by an accepted by the Bank External Credit Assessment Institution[1],
- occurrence of economic or legal reasons related to the borrower's financial difficulties and granting to the borrower a concession to financial conditions that the lender would not otherwise consider (forborne non-performing), including granting a forbearance measure as referred to in Article 47b of the credit obligation where that measure is likely to result in a diminished financial obligation due to the material forgiveness, or postponement, of principal, interest or, where relevant, fees; high likelihood of bankruptcy, gaining information on:
  - declaration of bankruptcy,
  - commencing bankruptcy proceedings or submitting a bankruptcy petition/ petition for bankruptcy proceedings,

[1] Below risk level corresponding to internal 7- rating (i.e. to CCC- for Standard & Poor's, Caa3 Moody's)

  - putting the debtor into bankruptcy or liquidation,
  - dismissing the bankruptcy petition because the debtor's assets are insufficient or only sufficient to cover the costs of bankruptcy proceedings,
  - dissolution or annulment of the company,
  - appointing of a guardian,
  - establishing a trustee (bancupcy administrator),
  - submitting an application for restructuring proceedings within the meaning of the Restructuring Law, or granting to the obligor a similar protection if it would allow him to avoid or delay repayment of credit obligations,
- Bank initiates procedure to obtain an enforcement title,
- delay in payment equal to 90 days or more (where days past due are calculated in line with EBA/GL/2016/07 guidance and the regulation of Ministry of Finance, Investment and Development of October 3rd, 2019, on the significance level of overdue credit exposure),
- obtaining information from an external database about the delay in payment of debtor's financial liabilities in other financial institutions by 90 days or more in line with the materiality thresholds
- default contagion in line with EBA/GL/2016/07 guidance,
- status of exposure has been changed from "accrual"/ "performing" to "non-accrual"/ "non-performing",
- exposure has been classified (as per internal classification) to category: "Substandard non–performing/ non-accrual"/ "Doubtful" or "Loss",
- obligor Risk Rating (ORR) is worse than 7- which is applied for obligors that are defaulted,
- justified suspicion of abuse or extorting credit exposure, or identifying cases of a probable criminal act related to a credit exposure, documented by submitting a notification of suspected crime to the competent state authority
- termination of the loan agreement due to high credit risk,
- obtaining information on the execution of a court judgment process against the debtor in an amount which, in the opinion of the bank, may result in the loss of creditworthiness,
- lack of payment by the debtor the amount of the realized Government guarantee,
- death, permanent disability or serious illness of the debtor (in the case of debtors running a company in the form of entrepreneurship), resulting in the inability to continue the activity,
- staying in custody or prison of the debtor (in the case of debtors running a company in the form of entrepreneurship), resulting in the inability to continue the activity.
- obtaining information about a customer's default under agreements with other Citi group entities,
- in case the Economic Loss (L) resulted from the sale of credit obligations is higher than 5%, all other remaining client exposures should be considered as defaulted,

or any other events that may have an impact on the estimated future cash flows from the financial asset that can be reliably estimated.

Objective evidence of impairment of a financial asset or a group of assets in the Retail Banking area includes the fulfillment of even one of the following conditions by any of the customer's exposures:

- occurrence of delays in repayment of principal and interest, the minimum amount to be paid, commission or exceeding the permitted limit. For the purpose of default identification, it is assumed that the delay in repayment is equal to or exceeds 90 days at the moment of calculating the provision (where days past due are calculated in line with EBA/GL/2016/07 guidance and the regulation of Ministry of Finance, Investment and Development of October 3rd,2019, on the significance level of overdue credit exposure,
- granting modifications to the terms of the agreement (restructuring), as a result of which the current value of cash flows falls below the book value before the modification,
- termination of the contract for reasons other than a delay in the repayment of mortgage products,
- default contagion in line with EBA/GL/2016/07 guidance,
- occurrence of qualitative circumstances:
  - death,
  - bankruptcy,
  - permanent disability or serious illness,
  - fraud,
  - obtaining information about initiating bankruptcy proceedings of the client or announcing bankruptcy by the client,
  - impairment or threat of collateral impairment,
  - obtaining information about significant financial problems of the client,
  - justified suspicion of extortion of credit exposure or identifying cases of the substantiated criminal offense concerning credit exposure,
  - obtaining information about the execution of the debtor in the amount, which in the bank's opinion may result in the loss of creditworthiness,
  - the client's stay in custody or prison,

- partial capital write-off,
- agreement termination,
- the Group's request to initiate enforcement proceedings against the client.

In the case of clients who do not meet the restructuring criteria, and in particular, for which the legal path has been implemented (bankruptcy, enforcement, court dispute) without the prospects of returning the repayment formula from the client's core operations, the debt collection process is carried out and the receivables are written off. The main goal of this process is to maximize the number of outstanding exposures recovered by the Group. In the debt collection process, the Group will develop a cooperation formula with the client, in the course of which the Group's activity is not limited only to legal actions, but also, if possible, ongoing cooperation. In the event that the repayment of the exposure is jeopardized due to the poor financial standing of the debtor or by the transfer of assets beyond the scope of recovery, the exposures can be sold in exceptional cases.

The Group has established and applies a quarantine period for exposures that cease to be classified as Stage 3 assets.

In the area of institutional banking, a change in status from "impairment" to "no impairment" may take place when there are no arrears to the Bank within a minimum period of 6 months and the principal amount and related additional claims under the contract are recoverable in full. The main premise for changing the status from impairment to no impairment is complete recovery of creditworthiness.

In the Retail area, the quarantine mechanism relies on maintaining the customer in the status of impairment for the next 9 months after all indications of impairment have ceased to exist.

The expected credit loss, which is the basis for determining the level of the provision for impaired receivables and with a significant increase of credit risk since the initial recognition is determined throughout the lifetime of the exposure. In the case of installment exposures, this is the period to the contractual maturity date. For revolving exposures, the contractual maturity is not specified, in replacement of the so-called behavioral maturity resulting from the empirical estimation of the life of the credit product.

Provisions for expected credit losses for consumer banking portfolio are calculated on the basis of statistical models for groups of assets combined in portfolios with common credit risk features. The Group aggregates financial instruments for the purpose of measurement of expected credit losses on product level in consumer banking and on segment level for homogenous micro-entrepreneurships portfolio with minimal shareholding in the sum of gross receivables of the Group. In terms of product aggregation, the following portfolios are defined: credit cards, cash loan within credit card, credit line, cash loan and mortgages.

In the financial statements, the Group adjusts the value of credit exposures by provision for expected credit losses. In case individually significant exposure is at Stage 3, provisions are measured using individual approach. Exposures are deemed to be individually significant, if an expected credit loss for the borrower in Stage 3 exceeds 10% of average provisions related to receivables in Stage 3 in the last quarter.

In the area of Institutional Banking, the main sources of parameters included in the methodology of expected credit losses ('ECL') are the results of internal customer assessment processes and the results of loan models:

- the rate of expected credit losses is derived from the client's rating determined based on internal rating models. The ECL methodology describes the process of applying existing migration ratings, expected in a given macroeconomic scenario, to migration schedules. In this way, in the following forecast periods, the probability of migration to a given rating range is obtained,
- the value of the LGD parameter results directly from the dedicated model for impaired clients,
- the exposure value for subsequent forecast periods is based on available repayment schedules as well as (for renewable products) on the expected change in exposure described by the value of the CCF parameter. The basis for estimating this parameter was internal data on amounts used by customers before the Group identified impairment of value,
- the assignment to the stage is based on the customer assessment process used in the Group to manage the client. This process includes both quantitative factors (e.g., customer rating) and a number of qualitative factors (e.g., Early Warning Signals),
- the maturity dates adopted by the Group result directly from agreements with customers and periods in which the Group is exposed to possible risks.

In the area of Retail Banking, the basis of parameters included in the ECL methodology are the existing internal models of the client's creditworthiness assessment in the Group, information about the stage of debt collection proceedings and information from the Group's data warehouse:

- the rate of expected credit losses is the submission of a number of models of customer creditworthiness assessment, connected to each other by process called integration logic. The ECL methodology, based on forecasts provided by the Chief Economist, transforms the results of integration logic so that the result reflects the expected changes in the economy. The parameters thus obtained are then applied to the loss vectors during the life of the product, estimated on the basis of historically observed loss rates. Recovery value vectors are the result of the analysis of the amount of historically collected receivables for homogeneous populations. The populations were segmented against similar features such as product type, time from default, amount of exposure left for repayment or historically observed repayments,

- the value of the EAD parameter is based on installment products on the expected repayment schedules generated based on the length of the contract and the interest rate on the product. For renewable products, EAD is based on the internally estimated CCF vector.

The Group uses macroeconomic scenarios including explanatory variables in models used to measure expected credit losses. Scenarios are prepared by the Chief Economist of the Group min. once a quarter in a 3-year horizon divided into quarters (base scenario with 60% weight and positive and negative variation from scenario with 20% weight).

In the area of institutional banking, the Group divided the loan portfolio into industries in terms of their sensitivity to macroeconomic conditions, identified macroeconomic variables that best explained the historical changes in credit quality and analyzed the dependence on macroeconomic factors using statistical methods. Finally, the Group has built a model for two classes with a higher level of industry sensitivity, allowing for the dependence of the coefficient determining the level of client migration between ratings from these factors. For the class with low sensitivity, the Group did not make the level of migration dependent on macroeconomic factors.

In the area of Retail Banking, at the level of homogeneous product portfolios, the Group, using statistical methods, built equations making the level of annual loss rates dependent on macroeconomic factors. The models allow for dynamic shaping of the provision for expected credit losses depending on the expected changes in the economy.

Macroeconomic scenarios in the area of Institutional Banking include below variables:

- annual amendment of index WIG,
- NBP reference rate

However, Retail Banking uses two variables in modeling the expected credit losses:
- unemployment rate „BAEL",
- index WIG.

Macroeconomic scenarios for the variables used to estimate expected credit losses as at 31 December 2025, are presented below.

Basic macroeconomic scenario	4q25	1q26	2q26	3q26	4q26	1q27	2q27	3q27	4q27	1q28	2q28	3q28	4q28
NBP reference rate	4.00	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75	3.75
Unemployment rate „BAEL"	3.20	3.40	3.00	2.90	2.70	3.10	2.80	2.80	2.60	2.90	2.60	2.70	2.70
WIG (end of the period)	110,171	110,894	111,617	112,340	113,063	114,117	115,170	116,224	117,277	118,030	118,782	119,535	120,288

Pessimistic macroeconomic scenario	4q25	1q26	2q26	3q26	4q26	1q27	2q27	3q27	4q27	1q28	2q28	3q28	4q28
NBP reference rate	4.00	3.50	3.25	2.50	2.00	1.75	1.50	1.50	1.50	1.75	2.00	2.25	2.50
Unemployment rate „BAEL"	3.23	3.47	3.13	3.17	3.10	3.58	3.37	3.58	3.51	3.89	3.76	3.88	3.98
WIG (end of the period)	105,741	102,031	98,447	94,985	95,596	96,487	97,378	98,269	99,159	99,796	100,432	101,068	101,705

Optimistic macroeconomic scenario	4q25	1q26	2q26	3q26	4q26	1q27	2q27	3q27	4q27	1q28	2q28	3q28	4q28
NBP reference rate	4.00	4.00	4.50	5.00	5.50	5.75	6.00	6.00	6.00	5.75	5.50	5.25	5.00
Unemployment rate „BAEL"	3.17	3.19	2.72	2.48	2.19	2.47	2.07	2.09	1.89	2.16	1.92	1.99	2.07
WIG (end of the period)	114,601	120,126	125,912	131,971	132,821	134,058	135,296	136,534	137,771	138,655	139,540	140,424	141,308

Macroeconomic scenarios for the variables used to estimate expected credit losses as at 31 December 2024, are presented below.

Basic macroeconomic scenario	4q23	1q24	2q24	3q24	4q24	1q25	2q25	3q25	4q25	1q26	2q26	3q26	4q26
NBP reference rate	5.75	5.50	5.50	5.00	4.75	4.25	4.00	3.75	3.75	3.75	3.75	3.75	3.75
Unemployment rate „BAEL"	2.70	2.90	3.00	2.90	2.70	3.00	2.90	2.90	2.56	3.00	2.80	2.88	2.70
WIG (end of the period)	82,762	84,431	86,101	87,770	89,440	90,746	92,053	93,359	94,666	96,073	97,481	98,889	100,296

Pessimistic macroeconomic scenario	4q23	1q24	2q24	3q24	4q24	1q25	2q25	3q25	4q25	1q26	2q26	3q26	4q26
NBP reference rate	5.75	5.25	5.00	4.25	3.75	3.00	2.75	2.50	2.50	2.50	2.50	2.50	2.50
Unemployment rate „BAEL"	2.72	3.01	3.19	3.26	3.15	3.50	3.54	3.66	3.38	3.90	3.75	3.76	3.63
WIG (end of the period)	79,293	77,591	75,893	74204	75,616	76,720	77,825	78,930	80,034	81,224	82,414	83,604	84,794

Optimistic macroeconomic scenario	4q23	1q24	2q24	3q24	4q24	1q25	2q25	3q25	4q25	1q26	2q26	3q26	4q26
NBP reference rate	5.75	6.00	6.50	6.50	6.75	6.25	6.00	5.75	5.50	5.25	5.00	4.75	4.50
Unemployment rate „BAEL"	2.66	2.79	2.80	2.64	2.26	2.40	2.24	2.17	1.76	2.17	1.97	1.90	1.73
WIG (end of the period)	86,230	91,560	97,184	103,116	105078	106,613	108,148	109,683	111,217	1128,71	114,525	116,179	117,832

As part of the adequacy assessment of the methodology used to determine expected credit losses, the Group regularly (at least annually) carries out an analysis to verify to what extent the provision covered actual losses. In addition, the provisioning models are subject to evaluation by an independent Model Validation Office.

The Group assesses sensitivity of expected credit losses with respect to applied methods and underlying assumptions, in particular concerning macroeconomic parameters. The table below presents change of expected credit losses for not impaired exposures that were determined as a difference between the expected credit losses estimated assuming one particular scenario and expected credit losses estimated using probability-weighted approach (the "-" sign means lower and the "+" sign means higher expected losses).

Change of expected credit losses for stage 1 and 2 assuming 100% scenario weight as at 31.12.2025	Optimistic scenario	Pessimistic scenario
Consumer Bank	(3,580)	3,158
Stage 1	(998)	899
Stage 2	(2,582)	2,259
Institutional Bank	(844)	1,403
Stage 1	(420)	756
Stage 2	(424)	647
	(4,424)	**4,561**

Change of expected credit losses for stage 1 and 2 assuming 100% scenario weight as at 31.12.2024	Optimistic scenario	Pessimistic scenario
Consumer Bank	(2,141)	1,701
Stage 1	(365)	291
Stage 2	(1,776)	1,410
Institutional Bank	(1,395)	1,626
Stage 1	(924)	892
Stage 2	(471)	734
	(3,536)	**3,327**

The Group recognizes and manages counterparty credit risk in transactions in financial instruments based on internal limits for pre-settlement and settlement engagement. The exposures also include credit ratings.

In 2025, the Group introduced methodological changes to expected credit losses estimation, which entailed:

- In Institutional Banking, the change in PD parameter assignment to unify attributes used in the credit process and for calculating provisions. The changes resulted in an increase in expected credit losses in the amount of PLN 2.9 MM.
- in case of credit exposures from the retail customers, change to the provisioning model in terms of identifying a significant increase in credit risk since initial recognition, consisting of implementation, in addition to existing relative threshold, an absolute threshold of significant increase in credit risk for credit cards and unsecured overdrafts portfolios. Change resulted in a decrease in expected credit losses in the amount of PLN 3.3 million and a significant drop in Stage 2 portfolio.

The table below presents the maximum exposure of the Group to credit risk:

PLN'000	Note	31.12.2025	31.12.2024
Gross receivables due from the Central Bank	18	9,421,899	5,794,361
Gross receivables due from banks	19	8,250,519	8,788,431
Gross receivables due from institutional customers**	(below)	18,481,621	15,552,681
Gross receivables due from individual customers**	(below)	6,432,345	6,360,276
Debt securities held-for-trading	20	2,294,275	1,801,904
Derivative instruments	20	2,497,556	2,623,860
Debt investment financial assets measured at fair value though other comprehensive income	21	30,151,984	30,088,771
Other financial assets	28	337,035	239,546
Contingent liabilities granted	40	18,735,331	20,724,650
		96,602,565	**91,974,480**

The table above includes assets and liabilities held for sale. Additional information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

**As at 31 December 2025, the value of mortgage collateral (limited to net exposure value) for receivables from institutional clients amounted to PLN 1,800,667 thousand (December 31, 2024: PLN 1,719,596 thousand) and for receivables from individual clients amounted to PLN 2,397,078 thousand (December 31, 2024: PLN 2,356,824 thousand).*

The table below presents the mortgage-backed receivables from individual customers in a given Loan-to-value (LtV) interval. The amount of exposure is measured by unpaid principal amount.

PLN'000	31.12.2025	31.12.2024
Less than 50%	1,412,658	1,340,156
51 - 80%	941,477	956,511
81 - 100%	39,040	27,432
	2,393,175	**2,324,098**

Collateral values are included in the process of calculating expected credit losses by multiplying their value by an estimate of any potential recovery parameter that provides for the sale of collateral. Hypothetical impact of mortgage collateral onto expected credit losses for receivables from individual customers as at 31 December 2025 amounts to PLN 10.2 million. This scenario assumes that the collateral amount is not taken into account in the estimation of expected credit losses.

The collateral amount (mainly mortgage) used to estimate expected credit losses for impaired receivables from institutional customers as at 31 December 2025 equaled PLN 108.9 million (before reflecting time-value-of-money). For particular exposures the collateral amount was decreased to account of accommodate the expectations in collection processes, capped by exposure amount, and weighted with a probability of a collateral collection scenario.

The tables below present the portfolio grouped whether they are impaired or not. The tables also present the details of expected credit losses provision.

According to credit management process, Group groups assets into assessed individually and collectively.

Exposures without impairment are classified based on the internal risk ratings from 1 to 7, where risk category 1 is the best rating.

Impaired exposures have assigned internal risk ratings from 8 to 10.

The internal risk ratings are received in the complex credit assessment process, which consists of rating models and methodologies, additional adjustments resulting, among others, from the acquired support and collateral, and all the defined processes used in order to determine risk ratings.

The risk rating defines the probability of breach of contract by the debtor within the 1-year period. Ratings from 1 to 4- inclusive are treated as the equivalent of ratings at investments levels of external credit rating agencies, which implies that they indicate a low or medium level of credit risk. Ratings below 4- indicate increased credit risk, wherein the rating 7 means high credit risk and low ability to service debt obligations, even in favorable macroeconomic conditions.

The structure of the portfolio of exposures to banks and clients from the point of view of credit risk as at 31 December 2025:

PLN '000	Receivables from institutional customers	Receivables from individual customers	Receivables from banks	Total	Including receivables from assets held for sale
Not impaired receivables (Stage 1)					
By risk rating					
Risk rating 1-4-	12,938,453	-	8,059,475	20,997,928	32,233
Risk rating +5-6-	3,542,729	-	191,034	3,733,763	-,
By delinquency					
No delinquency	-	5,413,725	-	5,413,725	5,393,121
1-30 days	-	26,736	-	26,736	26,736
31-90 days	-	38	-	38	38
Gross amount	**16,481,182**	**5,440,499**	**8,250,509**	**30,172,190**	**5,452,128**
Provision for expected credit losses	(25,562)	(14,007)	(4,461)	(44,030)	(14,854)
Net amount	**16,455,620**	**5,426,492**	**8,246,048**	**30,128,160**	**5,437,274**
Not impaired receivables (Stage 2)					
By risk rating					
Risk rating 1-4-	402,183	-	-	402,183	1,332
Risk rating +5-6-	1,104,230	-	10	1,104,240	-
Risk rating +7 and greater	195,898	-	-	195,898	-
By delinquency					,
No delinquency	-	581,570	-	581,570	581,570
1-30 days	-	81,007	-	81,007	81,007
31-90 days	-	12,822	-	12,822	12,822
Gross amount	**1,702,311**	**675,399**	**10**	**2,377,720**	**676,731**
Provision for expected credit losses	(48,257)	(30,697)	-	(78,954)	(31,132)
Net amount	**1,654,054**	**644,702**	**10**	**2,298,766**	**645,600**
Impaired receivables (Stage 3)					
By delinquency	-	299,441		299,441	298,050
By risk rating					
Risk rating +7 and greater	297,007	-	-	297,007	14,092
Gross amount	**297,007**	**299,441**	**-**	**596,448**	**312,142**
Provision for expected credit losses	(171,170)	(233,095)	-	(404,265)	(243,497)
Net amount	**125,837**	**66,346**	**-**	**192,183**	**68,645**
Purchased or originated credit-impaired receivables					
By delinquency	-	17,006		17,006	17,006
By risk rating					
Risk rating +7 and greater	1,121	-	-	1,121	-
Gross amount	**1,121**	**17,006**	**-**	**18,127**	**17,006**
Provision for expected credit losses	-	(426)	-	(426)	(426)
Net amount	**1,121**	**16,580**	**-**	**17,701**	**16,580**
Total gross value	**18,481,621**	**6,432,345**	**8,250,519**	**33,164,485**	**6,458,007**

PLN '000	Receivables from institutional customers	Receivables from individual customers	Receivables from banks	Total	Including receivables from assets held for sale
Provision for expected credit losses	(244,989)	(278,225)	(4,461)	(527,675)	(289,909)
Total net value	**18,236,632**	**6,154,120**	**8,246,058**	**32,636,810**	**6,168,098**

The structure of the portfolio of exposures to banks and clients from the point of view of credit risk as at 31 December 2024:

PLN '000	31.12.2024			
	Receivables from institutional customers	Receivables from individual customers	Receivables from banks	Total
Not impaired receivables (Stage 1)				
By risk rating				
Risk rating 1-4-	10,173,771	-	8,779,409	18,953,180
Risk rating +5-6-	3,815,106	-	673	3,815,779
By delinquency				
No delinquency	-	4,524,788	-	4,524,788
1-30 days	-	55,909	-	55,909
31-90 days	-	-	-	-
Gross amount	**13,988,877**	**4,580,697**	**8,780,082**	**27,349,656**
Provision for expected credit losses	(27,095)	(14,900)	(307)	(42,302)
Net amount	**13,961,782**	**4,565,797**	**8,779,775**	**27,307,354**
Not impaired receivables (Stage 2)				
By risk rating				
Risk rating 1-4-	338,066	-	-	338,066
Risk rating +5-6-	757,175	-	8,349	765,524
Risk rating +7 and greater	186,980	-	-	186,980
By delinquency	-	-	-	-
No delinquency	-	1,342,659	-	1,342,659
1-30 days	-	64,109	-	64,109
31-90 days	-	13,027	-	13,027
Gross amount	**1,282,221**	**1,419,795**	**8,349**	**2,710,365**
Provision for expected credit losses	(36,630)	(42,577)	(344)	(79,551)
Net amount	**1,245,591**	**1,377,218**	**8,005**	**2,630,814**
Impaired receivables (Stage 3)				
By delinquency	-	341,339	-	341,339
By risk rating				
Risk rating +7 and greater	280,708	-	-	280,708
Gross amount	**280,708**	**341,339**	**-**	**622,047**
Provision for expected credit losses	(159,574)	(265,668)	-	(425,242)
Net amount	**121,134**	**75,671**	**-**	**196,805**
Purchased or originated credit-impaired receivables				
By delinquency	-	18,445	-	18,445
By risk rating				
Risk rating +7 and greater	875	-	-	875
Gross amount	**875**	**18,445**	**-**	**19,320**
Provision for expected credit losses	166	567	-	733
Net amount	**1,041**	**19,012**	**-**	**20,053**
Total gross value	**15,552,681**	**6,360,276**	**8,788,431**	**30,701,388**
Provision for expected credit losses	(223,133)	(322,578)	(651)	(546,362)

PLN '000	31.12.2024			
	Receivables from institutional customers	Receivables from individual customers	Receivables from banks	Total
Total net value	**15,329,548**	**6,037,698**	**8,787,780**	**30,155,026**

As described above, one of the main factors influencing the management of individual customers portfolio are days of delay, while in the institutional customers segment rating is the key determinant of credit risk.

Impaired receivables are characterized by a relatively lower and, in some circumstances, positive allowance for expected credit losses, as disclosed in the table above. Upon initial recognition, POCI assets are recognized at fair value and the fair value adjustment, which primarily reflects credit risk, is included in the gross carrying amount of the receivable.

Structure of derivatives in terms of credit risk:

PLN '000	31.12.2025			31.12.2024		
	Transactions with institutional customers	Transactions with individual customers	Transactions with banks	Transactions with institutional customers	Transactions with individual customers	Transactions with banks
Derivatives by risk rating						
Risk rating 1-4-	1,741,216	-	749,500	1,523,080	-	1,085,301
Risk rating+5-6-	6,554	-	-	14,579	-	900
Risk rating +7 and greater	286	-	-	-	-	-
Total	**1,748,056**	**-**	**749,500**	**1,537,659**	**-**	**1,086,201**

The classification of exposures in the portfolio of debt securities held for trading and portfolio of debt securities measured at fair value through other comprehensive income by ratings agency Fitch is presented below:

PLN '000	31.12.2025		31.12.2024	
	Debt securities held-for-trading*	Debt securities measured at fair value though the income statement*	Debt securities held-for-trading	Debt securities available-for-sale
Issuer rating by Fitch agency				
A (including from A- to AAA)	2,294,275	30,151,984	1,801,904	30,088,771
Total	**2,294,275**	**30,151,984**	**1,801,904**	**30,088,771**

Structure of the granted contingent liabilities from the credit risk point of view as at 31 December 2025:

PLN '000	31.12.2025			
	Liabilities due to institutional customers	Liabilities due to individual customers	Liabilities due to banks	Including receivables from assets held for sale
Contingent liabilities granted (Stage1)	**11,469,653**	**5,078,093**	**1,124,509**	**3,451,850**
by risk rating				
Risk rating 1-4-	9,076,934	-	1,124,475	-
Risk rating+5-6-	2,392,689	-	34	40,519
Risk rating +7 and greater	30	-	-	-
Contingent liabilities granted (Stage 2)	**916,221**	**111,053**	**-**	**1,786,254**
by risk rating				
Risk rating 1-4-	282,859	-	-	-
Risk rating+5-6-	585,782	-	-	-
Risk rating +7and greater	47,580	-	-	-
Contingent liabilities granted (Stage 3)	**3,803**	**5,495**	**-**	**5,568**
by risk rating				
Risk rating +7and greater	3,803	-	-	-

PLN '000	31.12.2025			
	Liabilities due to institutional customers	Liabilities due to individual customers	Liabilities due to banks	Including receivables from assets held for sale
Purchased or originated credit-impaired	**26,504**	**-**	**-**	**-**
by risk rating				
Risk rating 1-4-	870	-	-	-
Risk rating +7and greater	25,634	-	-	-
Total	**12,416,181**	**5,194,641**	**1,124,509**	**5,243,672**

Structure of the granted contingent liabilities from the credit risk point of view as at 31 December 2024:

PLN '000	31.12.2024		
	Liabilities due to institutional customers	Liabilities due to individual customers	Liabilities due to banks
Contingent liabilities granted (Stage1)	**13,196,783**	**3,538,682**	**1,339,807**
by risk rating			
Risk rating 1-4-	10,739,288	-	1,339,807
Risk rating+5-6-	2,457,495	-	-
Contingent liabilities granted (Stage 2)	**921,188**	**1,693,746**	**-**
by risk rating	**-**	**-**	**-**
Risk rating 1-4-	170,881	-	-
Risk rating+5-6-	724,178	-	-
Risk rating +7and greater	26,129	-	-
Contingent liabilities granted (Stage 3)	**1,820**	**6,111**	**-**
by risk rating	**-**	**-**	**-**
Risk rating +7and greater	1,820	6,111	-
Purchased or originated credit-impaired	**26,513**	**-**	**-**
by risk rating			
Risk rating +7and greater	26,513	-	-
Total	**14,146,304**	**5,238,539**	**1,339,807**

"Forbearance" practices

Forborne exposures are identified in the Group within credit risk management. Bank takes into account "forborne" exposures according to the reporting requirements under the EBA Technical Standards under ESMA Document 2012/853. In case of impaired or restructured exposures the Group applies EBA guidelines, EBA/GL/2018/06.

The Group considers "forborne" exposures, where the Group grants debtor experiencing or about to face financial difficulties preferential financing conditions (i.e., on non-market conditions), which would not have been considered in a different situation. Preferential financing conditions are considered situations in which for example the yield of the modified facility is lower than the contractual yield prior to the restructuring and/or the yield on the modified loan is below a market yield for the relevant tenor and credit risk.

The extent to which the financing conditions are changed is determined individually for each debtor in question. In particular, these activities include:

- receipt of assets;
- granting a new or restructured facility in partial or full satisfaction of a facility;
- modification of the terms of the existing facility, including rescheduling of future payments (e.g., extension of financing tenor), change of interest rate or methods of repayment, reduction of amount to be repaid (principal or accrued interest).

The process of assigning "forborne" status for exposures is closely related to the credit risk management process, including the impairment recognition process for exposures.

For institutional clients, similarly to retail exposures, the "forborne" status may refer to both the exposures: from the

impaired portfolio as well as from the portfolio without any impairment. As "forborne" without impairment are recognized by the Group exposures, where restructuring activities were applied, but change of financing conditions has not implied any deterioration of future payment streams. In such cases the change into “forborne" status is not evidence of exposure’s impairment.

For Retail exposures, the Group assumes, that exposures will remain in” forborne” status until they are entirely paid off.

Exposures with modified conditions according to forbearance rules (forborne exposures) are subject to regulatory and internal reporting.

Exposure values from customers, with particular emphasis on exposures in the "forborne" status:

PLN ‘000	31.12.2025	31.12.2024
Receivables without recognized impairment	**24,299,391**	**21,271,590**
Receivables without recognized impairment (Stage 1), including	**21,921,681**	**18,569,574**
non-financial sector entities	15,631,390	13,459,215
Institutional customers	10,190,891	8,878,518
Individual customers	5,440,499	4,580,697
Receivables without recognized impairment (Stage 2), including:	**2,377,710**	**2,702,016**
non-financial sector entities	2,208,206	2,702,001
Institutional customers, including:	1,532,807	1,282,206
„forborne”	497,113	848,416
Individual customers, including:	675,399	1,419,795
„forborne”	100	132
Receivables with recognized impairment (Stage 3), including:	**596,448**	**622,047**
non-financial sector entities	596,448	622,047
Institutional customers, including:	297,007	280,708
„forborne”	60,451	(347,897)
Individual customers, including:	299,441	341,339
„forborne”	14,456	20,848
Purchased or originated credit-impaired receivables	**18,127**	**19,320**
non-financial sector entities	18,127	19,320
Institutional customers, including:	1,121	875
„forborne”	-	875
Individual customers, including:	17,006	18,445
„forborne”	10,879	12,549
Total gross amount, including:	**24,913,966**	**21,912,957**
non-financial sector entities	18,454,171	16,802,583
Institutional customers, including:	12,021,826	10,442,307
„forborne”	557,564	501,394
Individual customers, including:	6,432,345	6,360,276
„forborne”	25,435	33,529
Provision for expected credit losses	**(523,214)**	**(545,711)**
On „forborne” receivables	(53,774)	(63,755)
Total net amounts due from customers, including:	**24,390,752**	**21,367,246**
„forborne” receivables	529,225	471,168

LIQUIDITY RISK

The processes and organization of liquidity risk management

Liquidity risk is defined as the risk that Bank will not be able to efficiently meet both expected and unexpected current and future cash flows and collateral needs without adversely affecting either daily operations or financial condition of the Bank. Risk may be exacerbated by the inability of the firm to access funding sources or monetize assets and the composition of liability funding and liquid assets.

The objective of liquidity risk management is to ensure that the Group can meet all commitments to customers when due and to secure the liquidity necessary to clear all money market transactions when due.

Liquidity risk management is based on:

- Applicable law, in particular on the Banking Law;

- Requirements of Polish regulatory institutions and especially resolutions of the Polish Financial Supervision Authority;
- Rules of prudent and stable risk management of the Group as well as general risk levels approved by the Supervisory Board of the Bank;

taking into account the best market practice.

The ultimate responsibility for ensuring that the Group operates under approved liquidity risk limits lies within the Management Board of the Bank, and ongoing market risk management is performed by the:

- Member of the Management Board responsible for Risk Management Sector;
- Assets and Liabilities Management Committee (ALCO);
- Head of the Market Risk unit;
- People delegated to risk management in the Group's entities.

Liquidity management

The objective of liquidity risk management is to ensure that the Bank and Group's entities have adequate access to liquidity in order to meet its financial obligations when due, including under extreme but probable stress conditions.

The Group analyses and manages liquidity risk in several time horizons while distinguishing current, short-, mid- and long-term liquidity, to which appropriate risk measurement methods and limits apply. The adopted measures and limits aim to limit excessive concentration in terms of the balance sheet structure and sources of financing.

Long-term liquidity risk management is the responsibility of ALCO and as such it is reflected in the Group's strategy. It is based on the monitoring of balance sheet structural ratios and on long-term regulatory liquidity measures and includes the analysis of liquidity gaps, the ability to acquire sufficient funding sources in the future as well as funding costs in the light of the overall business profitability.

Mid-term liquidity risk management, in the one-year time horizon, is the responsibility of ALCO and is based on the established on annual bases Funding and Liquidity Plan which defines the size of internal limits taking into account the business plans for changes in assets and liabilities that are being prepared by business units of the Group as part of the financial plans for the next budget year.

Short-term liquidity risk management, in the three-month time horizon, is the responsibility of the Financial Markets and Corporate Banking Sector and is performed based on short-term regulatory liquidity measures as well as internal limits. In addition, the Group analyses liquidity under stress scenarios, assuming the lack of liquidity gaps in all tenors up to three months as a necessary condition.

Intraday and current liquidity management is the responsibility of the Financial Markets and Corporate Banking Sector and comprises the management of the balances on the Group's nostro accounts and especially the mandatory reserve account with NBP while applying available money market products and central bank facilitates.

Liquidity management with accordance to "Risk management principals" in Group entities is a part of the entities, management board responsibilities. ALCO is the supervisor of the Group's entities' liquidity supervision.

In 2025 the Group did not implement any significant changes in liquidity risk management processes, procedures, systems and policies. The Group made changes to its liquidity risk management procedures and policies resulting from the completion of a review of the liquidity ratio calculation methodology, in particular with respect to determining the value of operational deposits.

Funding and Liquidity Plan

The Annual Funding and Liquidity Plan (Plan) is prepared for the Group by the Balance Sheet Management Supervision Department, the Financial Markets and Corporate Banking Sector, and the Market Risk Department. The Plan is subject to ALCO approval. The Plan should cover all significant funding and liquidity elements arising from business plans, particularly in the areas of deposits and customer loans, as defined in the annual budgets of individual business units, as well as significant changes in the regulatory environment and market conditions.

Liquidity risk management tools

The Group measures and manages liquidity risk by applying both external regulatory measures and additional internal liquidity measures.

The supervisory liquidity measures

The LCR and NSFR regulatory liquidity measures were at a safe level and amounted to:

	31.12.2025	31.12.2023	Change
LCR	194%	225%	-31p.p.
NSFR	194%	209%	-15p.p.

The table includes assets and liabilities held for sale

The reduction in the LCR and NSFR ratios is primarily due to a review of the liquidity ratio calculation methodology conducted in 2025, particularly with respect to determining the value of operating deposits.

The exclusion of retail operations will impact liquidity ratios; after excluding retail operations, the Bank will continue to maintain a safe buffer above regulatory minimums.

Internal liquidity risk management tools

In addition to the regulatory liquidity measures, the Bank's Group applies a range of liquidity risk management tools including:

- Analysis of liquidity gaps resulting from stress tests;
- Stress scenarios;
- Liquidity ratios;
- Market Triggers;
- Significant Funding Sources;
- Contingency Funding Plan.

Stress scenarios

Stress tests are intended to quantify the potential impact of an event on the Group's balance sheet and cumulative gap over a twelve-month period, and to ascertain what incremental funding may be required under any of the defined scenarios. The scenarios are proposed by the Bank's Financial Markets and Corporate Banking Sector and Market Risk and approved by ALCO.

The Group conducts stress tests monthly. The scenarios assume material changes in the underlying funding parameters, i.e.:

- Concentration event;
- Highly Stressed Market Disruption ("S2") – serious disruptions of financial markets;
- Local market event.

Contingency Funding Plan

Financial Markets and Corporate Banking Sector is responsible for the preparation and annual update of the Contingency Funding Plan, which defines the Bank's action plan in case of a contingency, specifically in cases assumed in liquidity stress scenarios and described in the annual Funding and Liquidity Plan. The Contingency Funding Plan is approved by ALCO.

The Contingency Funding Plan defines:

- Circumstances / symptoms of contingency events;
- Responsibilities for executing the action plan;
- Sources of liquidity, and in particular the principles of maintenance of a liquid assets portfolio to be used in the case of a liquidity contingency;
- Rules for assets disposal and balance sheet restructuring;
- Procedures for restoring customer confidence.

The levels of the cumulative liquidity gap in stress conditions and the level of liquid assets as at 31 December 2025 and 31 December 2024.

The cumulative liquidity gap as at 31 December 2025 in real terms:

PLN'000	Up to 1 month	More than 1 to 3 months	More than 3 months to 1 year	More than 1 year to 2 years	More than 2 years
Assets	37,604,782	528,099	8,781,667	-	32,034,562
Liabilities	11,752,944	6,037,586	21,077	-	61,137,503

PLN'000	Up to 1 month	More than 1 to 3 months	More than 3 months to 1 year	More than 1 year to 2 years	More than 2 years
Balance-sheet gap in the period	**25,851,838**	**(5,509,487)**	**8,760,590**	**-**	**(29,102,941)**
Conditional derivative transactions – inflows	42,116,517	16,263,134	31,613,061	9,027,013	11,642,399
Conditional derivative transactions – outflows	42,095,795	15,927,364	31,681,354	9,227,635	12,052,067
Off-balance-sheet gap in the period	**20,722**	**335,770**	**(68,293)**	**(200,622)**	**(409,668)**
Potential utilization of credit lines granted	711,105	474,070	(1,185,175)	-	-
Cumulative gap	**25,161,455**	**19,513,668**	**29,391,140**	**29,190,518**	**(322,091)**

The cumulative liquidity gap as at 31 December 2024 in real terms:

PLN'000	Up to 1 month	More than 1 to 3 months	More than 3 months to 1 year	More than 1 year to 2 years	More than 2 years
Assets	33,623,315	357,977	5,468,641	-	34,030,614
Liabilities	10,605,653	5,458,492	2,873	-	57,413,529
Balance-sheet gap in the period	**23,017,662**	**(5,100,515)**	**5,465,768**	**-**	**(23,382,915)**
Conditional derivative transactions – inflows	39,521,673	19,483,837	22,995,643	38,830,563	16,891,761
Conditional derivative transactions – outflows	39,393,024	19,161,150	22,726,200	38,800,173	17,102,669
Off-balance-sheet gap in the period	**128,649**	**322,687**	**269,443**	**30,390**	**(210,908)**
Potential utilization of credit lines granted	857,032	571,354	(1,428,386)	-	-
Cumulative gap	**22,289,279**	**16,940,097**	**24,103,694**	**24,134,084**	**540,261**

Liquid assets and the cumulative liquidity gap up to 1 year:

PLN'000	31.12.2025	31.12.2024	Change
Liquid assets, including:	**41,528,137**	**37,402,857**	**4,125,280**
nostro account in NBP and stable part of cash	9,081,878	5,512,182	3,569,696
debt securities held-for-trading	2,294,275	1,801,904	492,371
debt financial assets measured at fair value through other comprehensive income	30,151,984	30,088,771	63,213
Cumulative liquidity gap up to 1 year	**29,391,140**	**24,103,694**	**5,287,446**
Coverage of the gap with liquid assets	**Positive gap**	**Positive gap**	-

Financial liabilities of the Group, by contractual maturity, are presented below. The amounts presented do not include the impact of the effective rate on the interest payable.

As at 31 December 2025

PLN'000	Note	Total	Up to 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	More than 5 years
Amounts due to banks	**29**	**3,904,516**	**2,827,841**	**-**	**20,000**	**1,056,675**	**-**
Financial liabilities held-for-trading							
Short positions in financial assets	19	8,880	8,880	-	-	-	-
Amounts due to customers, including:	30	**60,582,125**	**52,936,238**	**5,516,462**	**1,975,163**	**104,130**	**50,132**
Deposits from financial sector entities	30	6,013,709	5,983,019	29,583	1,107	-	-
Deposits from non-financial sector entities	30	54,213,692	46,826,449	5,484,379	1,902,864	-	-
Other liabilities	30	354,724	126,770	2,500	71,192	104,130	50,132
Financial liabilities held-for-trading							

PLN'000	Note	Total	Up to 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	More than 5 years
Derivative financial instruments (settled on a net basis)	19	3,120,040	19,489	72,923	232,580	1,934,506	860,542
Hedging derivatives	37	**359,930**	-	-	-	**118,683**	**241,247**
Unused credit lines liabilities	40	**14,547,861**	**11,511,784**	-	**47,550**	**1,992,911**	**995,616**
Guarantee lines	40	**4,027,732**	**4,027,732**	-	-	-	-
		86,551,084	**71,331,964**	**5,589,385**	**2,275,293**	**5,206,905**	**2,147,537**
Derivatives settled on a gross basis							
Inflows		93,623,778	42,646,366	16,743,128	28,093,646	5,903,872	236,766
Outflows		93,083,837	42,618,162	16,384,120	27,936,771	5,907,922	236,862
		539,941	**28,204**	**359,008**	**156,875**	**(4,050)**	**(96)**

As at 31 December 2024

PLN'000	Note	Total	Up to 1 month	1 to 3 months	3 months to 1 year	1 to 5 years	More than 5 years
Amounts due to banks	**29**	**4,435,832**	**3,367,582**	-	-	**1,068,250**	-
Financial liabilities held-for-trading							
Short positions in financial assets	19	156,708	156,708	-	-	-	-
Amounts due to customers, including:	30	**53,985,048**	**47,644,928**	**4,312,590**	**2,026,078**	**1,452**	-
Deposits from financial sector entities	30	3,998,037	3,948,364	46,770	2,903	-	-
Deposits from non-financial sector entities	30	49,439,211	43,152,169	4,264,175	2,021,415	1,452	-
Other liabilities	30	547,800	544,395	1,645	1,760	-	-
Financial liabilities held-for-trading							
Derivative financial instruments (settled on a net basis)	19	2,816,672	45,236	23,071	182,725	1,584,532	981,108
Hedging derivatives		**72,737**	-	-	-	**40,183**	**32,554**
Unused credit lines liabilities	40	**16,261,305**	**12,495,483**	**526,122**	**358,380**	**1,654,508**	**1,226,812**
Guarantee lines	40	**4,057,549**	**4,057,549**	-	-	-	-
		81,785,851	**67,767,486**	**4,861,783**	**2,567,183**	**4,348,925**	**2,240,474**
Derivatives settled on a gross basis							
Inflows		117,463,044	39,295,616	21,051,859	18,528,429	38,293,800	293,340
Outflows		116,312,386	39,254,227	20,488,092	18,249,279	38,028,247	292,541
		1,150,658	**41,389**	**563,767**	**279,150**	**265,553**	**799**

** Data as of December 31, 2024, has changed due to a presentation change in 2025. Additional information presented in Note 2 in the "Comparative Data" section.*

MARKET RISK

Market risk is the risk of loss arising from changes in the value of Bank's assets and liabilities resulting from changes in market variables, such as interest rates, exchange rates or credit spreads. Losses can also result from the presence of Basis Risks.
The objective of market risk management is to ensure that the extent of risk accepted within the Group corresponds to the level acceptable to the shareholders and banking supervision authorities and to ensure that all exposures to market risk are properly reflected in the calculated risk measures communicated to relevant people and bodies responsible for the management of the Group. The adopted market risk measures and limits aim to prevent excessive concentration of exposure to a single risk factor or a group of related risk factors, as well as to determine the overall maximum level of risk taken in the trading or banking book. Market risk management in the Group is based on:

- Requirements of Polish regulatory institutions and especially resolutions of the Polish Financial Supervision Authority;
- Rules of prudent and stable risk management of the Bank as well as general risk levels approved by the Supervisory Board of the Bank;

taking into account best market practice.

The ultimate responsibility for ensuring that the Group operates under approved market risk exposure limits lies within the Management Board of the Bank, and ongoing market risk management is performed by the:

- Member of the Management Board responsible for Risk Management Sector;
- Assets and Liabilities Management Committee (ALCO);
- Head of the Market Risk unit;
- Heads of risk-taking business units;
- People delegated to risk management in Group entities.

Market risk management

Scope of risk

Market risk management applies to all portfolios generating income exposed to the negative impact of market factors including interest rates, foreign exchange rates, equity prices, commodity prices and the parameters of their volatility. Two types of portfolios have been defined for the purpose of market risk management: trading portfolios and bank portfolios.

The trading portfolios include transactions in financial instruments (balance-sheet and off-balance-sheet instruments) expected to generate income owing to a change in market parameters over a short period. The trading portfolios include balance-sheet items such as debt securities held-for-trading, i.e., debt securities acquired to be further traded and meeting pre-defined liquidity criteria, as well as all derivative instrument positions broken down into portfolios acquired purely for trading and transactions executed in order to provide an economic hedge of bank portfolio positions. The trading portfolios are valued directly at market prices or using market pricing-based valuation models. The trading portfolio operations are performed by the Bank's Financial Markets and Corporate Banking Sector in respect of interest rate risk portfolios and FX risk portfolios. The trading portfolio also includes options, manly foreign exchange options and interest rate and optional structures being a reflection of economic nature and risk resulting from products offered to customers of the Group. In this area, the Group concludes transactions in a way which ensures concurrent (at each time and immediate) conclusion of an opposite transaction with the same parameters and, in consequence, the Option portfolio does not generate open exposition of market risk. The only item related to the conclusion of option transactions which is reflected in market risk measurement, and in particular in foreign exchange risk, is the premium paid/received in a foreign currency.

The bank portfolios include all other balance sheet and off-balance sheet positions not assigned to any of the trading portfolios. The transactions are executed to make a profit over the entire contracted transaction period. The Group's and Corporate Banking Sector takes over the interest rate risk positions held in the bank portfolios of all other organizational units of the Group. The mechanism of transferring the interest rate risk positions is based on the transfer price system.

Measurement of the market risk of the non-trading portfolios

The Group typically uses the following methods for measuring the risk of the bank portfolios:

- Net interest income measures, i.e., measures of changes in expected future profitability over a specified time horizon resulting from changes in interest rates or credit spreads. These include interest income and expenses, e.g., interest rate exposure (IRE) – the potential increase/decrease in interest income as a result of changes in interest rates by +/- 100 basis points;
- Economic value measures, i.e., measures of changes in the net present value of interest rate-sensitive instruments over their remaining life, resulting from changes in interest rates in the case of IRRBB or changes in credit spreads in the case of CSRBB, e.g., EVE – economic value of equity, a special form of EV measure that assumes the exclusion of equity from cash flows; and EVS – a measure of the potential change in the economic value of a banking portfolio as a result of a specified change in interest rates;
- Stress testing;
- DV01 – generally defined as the change in the value of a position resulting from a 1 basis point change in interest rates. For reporting purposes, DV01 is assumed to represent a 1 basis point increase in interest rates; CR01 – the change in the position's value resulting from a 1 basis point change in the (required) credit margin; • SOT_NII - indicator denoting a decrease in the annual net interest income relative to Tier 1 capital (t, resulting from a sudden and unexpected change in the level of interest rates, specified in any of the two shock scenarios used for supervisory purposes, referred to in Article 1(2) of Commission Delegated Regulation (EU) 2024/856 of 1 December 2023.
- SOT_EVE - indicator denoting a decrease in the economic value of capital relative to Tier 1 capital, resulting from a sudden and unexpected change in the level of interest rates, specified in any of the six shock scenarios used for supervisory purposes, referred to in Article 1(1) of Commission Delegated Regulation (EU) 2024/856 of 1 December 2023.

Interest rate gap analysis uses the schedule of maturities or revaluations of balance-sheet positions and of derivative

instruments used in hedge accounting or qualified as economic hedge for the purpose of establishing the differences between positions whose maturity or interest rate revaluation fall within a given time range.

The general rule in the interest rate gap analysis is that of classifying transactions to respective bank portfolio position revaluation bands by the contracted or assumed transaction interest rate revaluation dates.

It is assumed that:

- transactions with a fixed interest rate (such as term deposits, interbank deposits, portfolio of debt securities available-for-sale with a fixed interest rate, granted loans both repaid in full at maturity and repaid in installments) are classified into appropriate revaluation bands in accordance with their maturity dates;
- transactions with a floating interest rate, updated at a regular frequency (primarily, loans granted with interest set based on a specific market/base rate such as, e.g., WIBOR 1M) are classified into appropriate revaluation bands in accordance with the nearest interest rate revaluation date;
- transactions with an administrated floating interest rate (i.e., any changes in the interest rate and its revaluation date are reserved to sole decision of the Group) or undefined maturity or interest rate revaluation date are classified into appropriate revaluation bands in accordance with historically observed or expert assessed shifts in the moment and scale of change in the interest rate of given positions in relation to change in the market interest rates (model of minimizing product margin variability). This group of transactions / balance sheet positions includes among others: current accounts, card loans and overdraft facilities. Additionally, early loan repayments are taken into account based on analysis of actual repayments made by customers before the due date and product interest rate revaluation profiles are set on that basis. This pertains particularly to installment loans;
- transactions insensitive to changes of interest rates, including cash, fixed assets, equity, other assets/liabilities, are classified into the longest revaluation band;
- transactions executed directly by the Financial Markets and Corporate Banking Sector for the purpose of management of interest rate risk and liquidity risk (Financial Markets and Corporate Banking Sector own portfolio) are always classified into appropriate revaluation bands in accordance with the contracted dates.

The table below presents projections of the net interest income sensitivity for the Group as at 31 December 2025 and 31 December 2024, in the +/-100 bp and +/-200 bp scenarios. The statement is presented separately for the main currencies, i.e., PLN, USD and EUR, which jointly account for over 90% of the Group's balance sheet, and for all currencies in total.

Projections of the net interest income sensitivity to interest rates for the Group

PLN'000	31.12.2025				31.12.2024			
	+200 bp	**+100 bp**	**-100 bp**	**-200 bp**	**+200 bp**	**+100 bp**	**-100 bp**	**-200 bp**
PLN	149,466	75,994	(85,718)	(172,877)	271,499	136,160	(136,570)	(273,960)
USD	(14,406)	(7,203)	7,203	14,767	58,237	29,529	(29,529)	(59,878)
EUR	34,936	17,288	(17,288)	(35,296)	23,377	11,483	(11,483)	(22,146)
Total for all currencies	**166,766**	**84,386,**	**(93,722)**	**(189,538)**	**351,473**	**177,097**	**(177,583)**	**(354,344)**

The table above includes assets and liabilities included in disposal groups classified as held for sale.

The reduction in the net interest income as of December 31, 2025, compared to December 31, 2024, results from implementing by the Group in 2025 changes in the balance sheet structure, ensuring a reduction in the SOT NII ratio below the regulatory threshold.

The exclusion of retail operations will contribute to a decreased sensitivity of net interest income.

Stress tests measure the potential impact of significant changes in the level or shape of interest rate curves on positions opened in the banking book.

The Group runs stress tests of predefined interest rate movement scenarios, which represent combinations of market factor movements defined as large moves and stress moves occurring both in Poland and abroad. Values of the assumed market factor movements are regularly assessed and are adjusted as appropriate to changes in the market conditions of the Group's operation. Stress tests also include changes in the value of capital as a result of movements in interest rates for individual currencies in scenarios compliant with the CRR requirements.

Activities relating to securities available-for-sale are the responsibility of the Assets and Liabilities Management Department within the Professional Markets Division. Three basic goals of activities in the portfolio of securities available-for-sale have been defined as follows:

- management of the liquidity;
- hedging against the risk transferred to the Financial Markets and Corporate Banking Sector from other organizational units of the Bank or the Group's entities;

- opening of own interest rate risk positions on the Group's books by the Financial Markets and Corporate Banking Sector.

In order to avoid excessive fluctuations in the Group's capital funds, caused by the revaluation of assets held-for-sale, the maximum limits of DV01 (Dollar Value of 1 basis point), which determines the potential change in the value of risk positions on a given interest rate curve at a specific nodal point (which brings together all the cash flows in a given time horizon), caused by a shift in the market interest rate by 1 basis point upwards, are established for this kind of portfolio. The limits also concern the open positions in derivatives (i.e., interest rate swap transactions), carried out to hedge the fair value of the portfolio.

Hedge accounting program

In addition to the general rules limiting market risk, in particular, interest rate risk, the Group has defined rules for the application of fair value hedge accounting. The main risk, which is hedged under hedge accounting, is the risk of changes in interest rates resulting from holding portfolio of securities measured at fair value through other comprehensive income with fixed interest rates. At the end of each month, when the hedging relation happens, the Group shall evaluate the effectiveness of the hedging instrument used by analyzing the changes in the fair value of the hedged and hedging instrument in respect of the risk being hedged.

The hedged item was part of a portfolio of securities measured at fair value through other comprehensive income at a fixed interest rate, denominated in PLN. In all cases, the hedging instrument was the interest rate swap (IRS), which converts the fixed interest rate on a variable. Gains and losses arising from revaluation at fair value of the hedging instrument and changes in the fair value of the hedged items are reflected - in part resulting from the hedged risk - in profit and loss items "Net income from hedge accounting".

The table below presents the risk measured with DV01 for the portfolio of securities available-for-sale, including the economic collateral, broken down by currency:

PLN '000	31.12.2025			Total in the period 01.01.2025 – 31.12.2025		
	Total	Securities	IRS	Average	Maximum	Minimum
PLN	(4,505)	(7,087)	2,582	(4,407)	(3,538)	(5,308)
USD	(280)	(280)	-	(353)	(257)	(449)
EUR	(234)	(234)	-	(194)	(41)	(280)

PLN '000	31.12.2024			Total in the period 01.01.2024 – 31.12.2024		
	Total	Securities	IRS	Average	Maximum	Minimum
PLN	(3,578)	(6,958)	3,380	(2,429)	(1,140)	(3,852)
USD	(369)	(369)	-	(153)	-	(420)
EUR	(185)	(185)	-	(238)	(165)	(365)

The Group's activities involving investments in debt securities available-for-sale were also one of the main factors influencing changes in the level of the risk of mismatch in revaluation periods as expressed by the IRE measure.

Measurement of the market risk of the trading portfolios

The following methods are applicable in measurement of the risk of the trading portfolios:

- Factor Sensitivity;
- Value at Risk (VaR); and
- Stress testing.

Factor Sensitivity measures the change in the value of positions in an underlying instrument in the case of a specific change in a market risk factor (e.g., change of the interest rate by 1 basis point at a given point on the interest rate curve, change of the currency exchange rate or share price by 1%).

In the case of interest rates, the applicable sensitivity measure is DV01.

In the case of exchange rate (FX) risk, the Factor Sensitivity value is equal to the value of the FX position in a given currency.

In the case of positions held in equities, the Factor Sensitivity value is equal to the net value of the positions held in the respective instruments (shares, indices, participation units).

Value at Risk (VaR) is the integrated measure of the market risk of trading portfolios which combines the impact of positions in respective risk factors and accounts for the effect of correlation between the fluctuations of different factors.

VaR is applied for the purpose of measuring the potential decrease in the value of a position or portfolio under normal market conditions, at a specific confidence level and within a specific time period. In the case of positions opened in the Group's trading portfolio, VaR is calculated at a 99% confidence level and a one-day holding period.

DV01 as well as VaR for the trading portfolio are calculated net of the economic hedge of the portfolio of securities available-for-sale, i.e., net of derivative instruments intended to hedge the fair value of the portfolio. The exposures to the risk of such transactions are mitigated through the application of relevant risk measurement methods and by the bank portfolio risk limits.

Each day, the Group runs stress tests on the assumption that the risk factors change by more than expected in the Value at Risk scenario and ignoring the historical correlations of these factors.

The Group keeps records of exposures of the bank portfolios to market risk in over twenty currencies both for currency positions and exposures to interest rates risk. These exposures are significant only for a few currencies. For a large group of currencies, the exposures are the consequence of a gap between transactions executed on the customer's orders and closing transactions with other wholesale market counterparties. Significant exposures to market risk are opened for PLN, currencies of well-developed markets (predominantly USD and EUR with a lesser focus on GBP, CHF and JPY) and Central European currencies.

The values of significant exposures to the interest rate risk of the trading portfolios risk in terms of DV01 in 2025 are presented in the table below:

PLN'000	31.12.2025	31.12.2024	In the period 1.01.2025 – 31.12.2025		
			Average	Maximum	Minimum
PLN	79	653	305	806	(758)
EUR	160	(259)	26	263	(483)
USD	(7)	39	(4)	48	(62)

Average exposures to the interest rate risk in the local currency in 2025 were higher compared to the average level from the previous year (PLN 141 thousand) and amounted to PLN 305 thousand. Average exposure to the interest rate risk in EUR was lower than in 2024 (average DV01 amounted to PLN 26 thousand, compared to PLN (45) thousand in the previous year). Average exposure in USD was lower than in 2024 (average DV01 amounted to PLN (4) thousand, compared to PLN (26) thousand in 2024). The maximum exposure in PLN of the biggest exposures accepted by the Treasury Division was PLN 806 thousand compared to PLN 730 thousand in 2024 and the position in EUR amounted to PLN 263 thousand compared to PLN 508 thousand in the previous year.

The Financial Markets and Corporate Banking Sector, which trades in financial instruments within the Group, continued the strategy of very active management of exposures to FX risk and interest rate risk by adjusting the volume and direction of such exposures depending on changing market conditions, which is reflected in the range of volatility of these exposures (the minimum and the maximum values in the table above).

The table below presents the levels of risk measured by VaR (net of economic hedges of the portfolio of securities available-for-sale) broken down by FX risk and interest rate risk position in 2025:

PLN'000	31.12.2025	31.12.2023	In the period 1.01.2025– 31.12.2025		
			Average	Maximum	Minimum
Currency risk	537	237	610	2,586	73
Interest rate risk	14,422	17,179	17,638	26,606	8,475
Spread risk	3,077	7,494	4,205	7,731	2,258
Total risk	**15,579**	**20,859**	**18,953**	**27,753**	**10,210**

The main risk factor was the interest rate risk, followed by the spread risk, where the credit spread risk determines the impact on the valuation of the instrument / portfolio resulting from changes in the market perception of the credit quality of certain instruments, such as "cross currency swap", "asset swap" or a portfolio of securities denominated in a foreign currency.
The overall average level of the market risk of the trading portfolios was 16% higher in 2025 than the average level in 2024, and amounted to PLN 18,953 thousand, mainly as a result of spread risk and interest rates volatility. The maximum level of price risk remained at a similar level (27,753 thousand PLN in 2025, and 28,316 thousand PLN in 2024).

Equity instruments risk

The Bank's Group is active in capital market instruments through the Brokerage Department of Bank Handlowy (DMBH). In accordance with its core scope of activity, DMBH is authorized to accept pricing risk of the trading portfolio of shares, or rights to shares, traded or likely to be traded on the Warsaw Stock Exchange ("WSE"), or BondSpot, WIG20 index futures and Indexed Participation Units, as well as shares of companies dual-listed on the WSE which are traded on international stock exchanges. The pricing risk of DMBH's portfolios of instruments is managed by means of volume limits applicable

to specific types of financial instruments and concentration warning thresholds applicable to instruments of specific issuers. Moreover, DMBH uses warning thresholds of potential loss under stress scenarios and the cumulative realized loss on the trading portfolio.

The equity instruments measured at fair value through profit and loss that are not actively traded by the Group include, for example, shares of Visa Inc, (the valuation method of which is presented in note 38).

The Group's FX exposure

The table below presents the Group's FX exposure by main currencies:

31.12.2025

PLN'000	Balance-sheet transactions		Contingent derivative transactions*		Net position
	Assets	Liabilities	Assets	Liabilities	
EUR	8,639,915	10,310,050	34,388,224	32,641,722	76,367
USD	3,315,970	6,162,839	18,133,485	15,307,109	(20,492)
GBP	52,544	617,686	598,961	34,967	(1,148)
CHF	26,647	327,514	299,684	2,184	(3,366)
Other currencies	255,044	213,256	1,512,327	1,555,894	(1,780)
	12,290,120	**17,631,344**	**54,932,682**	**49,541,876**	**49,582**

** at present value which is the sum of discounted future cash flows*

31.12.2024

PLN'000	Balance-sheet transactions		Contingent derivative transactions*		Net position
	Assets	Liabilities	Assets	Liabilities	
EUR	9,200,104	10,540,123	42,021,904	40,675,770	6,115
USD	8,084,739	7,253,740	20,633,407	21,489,359	(24,953)
GBP	23,007	466,786	495,617	52,491	(653)
CHF	34,475	327,864	298,726	7,041	(1,704)
Other currencies	187,334	186,607	2,183,931	2,173,278	11,380
	17,529,659	**18,775,120**	**65,633,585**	**64,397,939**	**(9,815)**

** at present value which is the sum of discounted future cash flows*

OPERATIONAL RISK

Strategic goals and assumptions of the operational risk management system

The objective of operational risk management is to ensure a permanent and effective approach to the identification, measurement/assessment, mitigation, control, monitoring and reporting of these risks, as well as the effective reduction of the level of exposure to operational risk, and as a consequence, to reduce the number and scale of operational risk events (policy of low tolerance for operational risk losses).

Operational risk management is also aimed at the full integration of this risk management processes into business decision- making processes (i.e., business strategy is supported by an operational risk assessment, and the business is assessed on the basis of pre-determined indicators of control and operational risk).

While organizing operational risk management process, the Group takes into account business strategy, Group's risk profile, macroeconomic environment, available resources of capital and liquidity and regulatory requirements (in particular Recommendation M) that constitute a framework for the preparation of operational risk control and management system in the Group.

The Management Board and subsidiary Management Boards are responsible for the development, implementation and operation of proper operational risk management system through the introduction of appropriate internal regulations, ensures consistency between operational risk management system and Group's Strategy, as well as its proper functioning within the organization through an analysis of information that allow to assess whether the system is adequate for operational risk profile. If needed, operational risk management system is reinforced through implementation of crucial improvements.

Operational risk management system in the Group is built in a way that ensures risk management at every stage, i.e.: identification, assessment/measurement, mitigation, control, monitoring and reporting.

The implementation of the strategy by the Management Board shall be assessed by the Supervisory Board, assisted by Audit Committee and Risk and Capital Management Committee based on synthetic reports submitted by the Management Board with frequency correlated with the committees' meetings, determining the scale and types of operational risk that the Bank is exposed to, methods of operational risk management, probability of risk's occurrence, assessment of potential negative impact of operational risk management methods, as well as results of operational risk profile and operational risk appetite monitoring. If necessary, after evaluation, the Supervisory Board may request revision of the entire or partial internal control system.

Operational risk definition

Operational Risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. This definition of operational risk includes legal risk - which is the risk of loss (including litigation costs, settlements and penalties) resulting from instable legal environment as well as wrongly defined contractual obligations in any aspect of the bank's business - but excludes strategic and reputation risks. This definition of operational risk includes also conduct risk as a risk related to the Bank's operations, that employees of the Bank or persons associated with the Bank, but not its employees – intentionally or negligently – cause damage to customers or the integrity of financial markets, with an effect on the Bank. As part of this risk, we also recognize ICT risk (Information, Communication and Technology). The Bank also recognizes the impact of Operational Risk on the reputation risk associated with the Bank's business activities.

The operational risk was considered significant for 2025. Additionally, the Compliance Risk, which is included in the Operational Risk for the purposes of the ICAAP process, has also been considered material risk.

Rules of operational risk identification

Each Group's Business Unit identifies all significant operational risks related to its processes. This includes identification by the Group's Management of significant risks associated with all processes, products, human factors, systems and compliance with applicable laws, regulatory administrative actions, the Group's internal regulations and the Group's strategy, also taking into consideration risk associated with dependence on other entities in the Group.

Group's organizational units and the Independent Control and Operational Risk Department use in the operational risk identification processes, regular analysis of information generated using the tools of operational risk management.

Operational Risk Profile

Operational Risk Profile – scale and structure of exposure to operational risk, defining the level of exposure to operational risk, expressed in selected structural measures (e.g., types of operational risk events, types of business lines, significant processes) and scale measures (e.g., assessed potential loss). The Group defines its operational risk profile based on operational loss data and based on information gathered through utilized operational risk management tools.

Measurement and assessment

In the process of risk estimation Group applies differentiated methods of risk measurement and assessment. Risk assessment is the determination of the probability of occurrence and scale of potential future operational losses. Group applies quantitative and quantitative methods for the purpose of risk assessment (e.g. appetite for risk, capital requirements, the target risk profile, key risk indicators, data loss and operational risk events, issues and corrective actions, the process of self-assessment, concentration risk areas and increasing the risk level, scenario analysis, stress tests, changes in processes and products, information from internal and external reviews and audits, information reported to the Commissions and Committees). Risk assessment analyses involve internal and external threats. Proper operational risk assessment enables adequate determination of risk profile and adequate risk management.

Assessed capital requirement for operational risk covers all risk categories included by the Group in operational risk definition.

Risk tolerance framework, risk control and mitigation

The Group sets tolerance levels for each operational risk category and business areas within a determined risk appetite. Excess of the established level of tolerance thresholds requires undertaking corrective actions in line with the decision of the Risk and Capital Management Committee.

Risk and Capital Management Committee or Management Boards of subsidiaries can decide on the following treatment of the identified risks by:

- accepting (conscious avoidance of activities, aiming at mitigation of probability and results of an event, including ensuring of funds for covering of potential losses);

- mitigation (mainly by adequate definition of processes, products, systems, procedures and implementation of control mechanisms);
- transfer (movement of part or whole risk related to a particular threat to the external party, in particular by outsourcing of activity to an external services provider or by insurance);
- avoidance of activities, leading to risk exposure.

In key aspects, processes of risk identification, self-assessment, measurement, monitoring and reporting are unified and generally accepted in all organizational units of the Group. Risk mitigation processes are determined for each entity and may be different for individual units.

Control is a process designed to mitigate cause(s), reduce the probability of an event occurring and/or minimize the severity of an effect. Risk mitigation measures include also risk transfer mechanisms (outsourcing, insurance). Risk mitigation measures include internal controls as well as risk transfer mechanisms, i.e., transfer of part or whole risk related to a given threat to an external entity, in particular by outsourcing or insurance. The Group regularly assesses and monitors the proper functioning of risk transfer mechanisms.

Monitoring and reporting

The Risk and Capital Management Committee, Operational Risk, Control and Compliance Committee, New Products Committee and commissions supporting the Committees are accountable for ongoing monitoring of operational risk. Quality and effectiveness of operational risk management processes (including the self-assessment process) in the respective organizational units of the Capital Group are subject to inspections and assessment carried out by the internal audit.

Within the consolidated oversight operational risk data of Group and subsidiaries is presented to Commissions and Committees, supporting the Management and Supervisory Board in the operational risk management process.

The Supervisory Board supervises and assesses the adequacy and effectiveness of operational risk management. The Supervisory Board is supported by Committees of Supervisory Board - Audit Committee, Risk and Capital Committee and Remuneration and Nomination Committee.

Based on synthetic operational risk reports, presented periodically by the Management Board at least twice a year, prepared based on data resulting from operational risk monitoring, covering scale and types of operational risk the Group is exposed at, probability of its occurrence, dimension of its possible negative impact, operational risk management principles and the operational risk profile, and risk concentration areas, Supervisory Board, supported by the Audit Committee and Risk and Capital Committee, monitors the effectiveness of internal control and risk management and the Supervisory Board shall review the implementation by the Management of the risk management strategy (including operational risk management).

Assumptions of internal control of operational risk

Internal control system and risk management system, functioning in the Group, are organized at three independent levels.

Within the Management Board, one of its members – Risk Management Sector Head - supervises Independent Control and Operational Risk Department and is responsible for providing the Management Board and the Supervisory Board with complex information on the risk.

The Management Board is supported by Risk and Capital Management Committee, Operational Risk, Control and Compliance Committee, New Products Committee, GCB and ICG Investment and Insurance Commission and Ethics and Disciplinary Commission.

Each Business Unit must establish an appropriate system of controls that are commensurate with the level of risk (incl. operational risk), including proper documentation of the control procedures and appropriate staff training. Each Business Unit must evaluate the risks that are unacceptable or outside of the Business Unit's risk appetite/tolerance and determine the appropriate actions for their mitigation or transfer.

Settings of control standards, coordination of the management, as well as monitoring of operational risk for key risk categories are supported by specialized organizational units.

Independent Control and Operational Risk Department - ICOR (internal control system second line of defense) is responsible for operational risk management supervision within the Bank, in particular for setting and enforcing standards and tools of the operational risk management, self-assessment process, management of the operational risk indicators monitoring process, monitors, prevents and reports operational losses, performs corrective action plans' monitoring. Additionally, the Department is responsible for maintaining operational risk management-supporting systems, calculation of regulatory and assessment of economic capital requirement for operational risk, management and regulatory reporting regarding operational risk, operational risk market disclosures, recommending changes in the processes and operations of the Bank to adjust control functions to the acceptable risk exposure level. The Department conducts also reviews within the organizational units of the Bank regarding the increased operational risk areas, and

recommends changes in the procedures, processes and banking operations in order to mitigate the operational risk level. In the scope of internal control system Independent Control and Operational Risk Department is responsible for Control Function Matrix coordination and vertical monitoring

The Audit Department (IA-Internal Audit) is responsible for independent assessment of the effectiveness of operational risk management processes and assessment of adequacy and effectiveness of operational risk management system, as well as for its regular reviews. Results of internal and external audits are considered in the management information system, the process of decision-making regarding risk management and management of the Group.

ESG Risk

ESG risk is a risk of losses arising from any negative financial impact on the Bank stemming from the current or prospective impacts of environmental, social and governance factors on its counterparties or invested assets. The ESG risk subcategories encompass Environmental (including climate), Social, and Governance risks.

ESG risk is considered cross-cutting, meaning that it may manifest through or amplify primary risk categories (i.e. Credit risk, Market risk, Strategic risk, etc.). As part of the 2025 risk materiality assessment process, ESG risk materiality was assessed across three-time horizons: short-term (less than 3 years), medium-term (3-5 years), and long-term (over 5 years). In the short term (i.e. ICAAP horizon), the following was concluded:

- Climate risk materiality for Strategic, Credit, Reputational, and Compliance risks,
- Environmental risk materiality for Compliance risk,
- Non-materiality of Social and Governance risks.

The main objective of ESG risk management is to effectively integrate these risk factors into existing risk management processes, all to ensure the effectiveness of the Group's risk profile in the short, medium and long term. Due to the cross-cutting nature of ESG risks and the dynamic development of regulatory expectations and good practices, the Group has developed a dedicated document "ESG Risk Management Framework in the Capital Group of Bank Handlowy w Warszawie S.A.", which is one of the elements of the Group's risk management strategy. This document:

- describes the key elements of the organizational structure and processes used by the Group to identify, measure, monitor, control and report ESG risk,
- clarifies the roles and responsibilities in relation to ESG risk management of the Group's Management Board, as well as employees across the three Lines of Defense.

ESG risk management practices are successively developed as part of policies and procedures for managing individual risk categories.

In the risk assessment process, the Group uses a combination of methods of measuring or estimating risk, tailored to the risk category, including:

- determining KRI indicators as part of the risk appetite covering priority portfolios, as well as risk types with a material impact of ESG risk drivers,
- monitoring credit exposure to transactions with elevated environmental and social risk,
- using industry climate and environmental heatmaps at the portfolio and client levels to identify and measure these risks,
- conducting stress tests for material ESG risks identified as part of the risk materiality assessment,
- conducting a quantitative analysis of the impact of climate threats on the Bank's business continuity as part of the risk materiality assessment process,
- conducting a quantitative climate risk assessment for key market risk indicators/limits as part of the risk materiality assessment process,
- analyzing portfolio alignment with emission reduction pathways stemming from the regulatory goals of the Paris Agreement and regional climate policies.

Monitoring the correctness and ensuring the effectiveness of ESG risk management and ensuring appropriate consideration of ESG risk in the Group's risk profile and risk appetite are the tasks of the Risk and Capital Management Committee of the Group's Management Board. A package of ESG risk analysis reports is prepared periodically and submitted to the Group's Management Board, including the Risk and Capital Management Committee, and the Supervisory Board, including the Risk and Capital Committee.

ESG risk did not have a material direct impact on individual areas of estimates made as of 31 December 2025, including the determination of the expected credit loss recognized in these financial statements, nor on the Group's continuity of business in the period of 12 months before the date of approval of this statement.

Detailed information on ESG risk management in the Group can be found in the Information on the capital adequacy of the Capital Group of Bank Handlowy w Warszawie S.A. as of 31 December 2025.

EQUITY MANAGEMENT

According to the Banking Act, banks in Poland are obliged to maintain equity at a level adequate for their specific business risks. The capital level presented below is considered sufficient for conducting business activity. The capital level is regularly monitored by using the capital adequacy ratio.

The Bank determines a policy of future dividend payment to the shareholders as part of the capital management process. The dividend policy depends on a number of factors including the Bank's profits, the Bank's expectations concerning future financial results, the level of capital requirements, as well as regulatory and legal issues.

Capital adequacy

The capital ratio was calculated in accordance with the principles set out in 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 and amending Regulation (EU) No 648/2012, as amended (the "CRR")..

Financial data necessary to calculate the Group's capital adequacy ratio is presented in the table below:

PLN'000	31.12.2025	31.12.2024
I Own Funds	**7,325,932**	**7,543,042**
Common Equity Tier 1 Capital	**7,325,932**	**7,543,042**
II Total capital requirements, including:	**2,641,161**	**2,687,736**
credit risk capital requirements	2,075,287	1,751,377
counterparty risk capital requirements	78,697	101,817
credit valuation correction capital requirements	10,026	8,688
excess concentration and large exposures risk capital requirements	-	-
total market risk capital requirements	115,403	113,887
operational risk capital requirements	361,748	711,967
Common Equity Tier 1 Capital ratio (%)	**22.2%**	**22.5%**
Total Capital ratio (%)	**22.2%**	**22.5%**

Own funds and the total capital ratio as of December 31, 2024, were retrospectively recalculated to include the profit for 2024 after its approval by the General Meeting of Shareholders.

On 25 November 2025, the Polish Financial Supervision Authority announced that in the supervisory assessment process, the Bank's sensitivity to the possible materialization of stress scenarios affecting the level of own funds and risk exposure was assessed as low and it did not set an additional capital charge (P2G) for the Bank to absorb potential losses resulting from the occurrence of stress conditions.

The Group's capital ratios remain above the minimum requirements under the CRR, the Act on Macroprudential Supervision.

The Group is a resolution entity that is part of a global systemically important institution in accordance with the definition contained in CRR and according to Art. 92a CRR must satisfy the following requirements for own funds and eligible liabilities:

a) a risk-based ratio of 18%, representing the own funds and eligible liabilities of the institution expressed as a percentage of the total risk exposure amount (TLAC TREA);

b) a non-risk-based ratio of 6,75%, representing the own funds and eligible liabilities of the institution expressed as a percentage of the total exposure measure (TLAC TEM).

In accordance with the CRR regulations, the amount of the required TLAC TREA for the Bank plus the combined buffer requirement for the Bank as of 31 December 2025 is 21.74%, while TLAC TREA of the Bank on a consolidated level was 25.39%. The TLAC TEM ratio as of December 31, 2025, is 9.51%

The TLAC TREA and TLAC TEM ratios as of December 31, 2025, remain above the minimum requirements resulting from the CRR regulation, taking into account the combined buffer requirement.

Eligible liabilities counting towards meeting the TLAC requirement include a loan granted by Citibank Europe PLC, Dublin, pursuant to an agreement entered on 6 June 2024.

01 January 2025 came into force the main changes resulting from Regulation CRR3 (i.e. Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor and the

minimum capital threshold (CRR3). Values as of the end of December 2025 reflect regulatory changes applicable to that date. Pursuant to Commission Delegated Regulation (EU) 2025/1496 of 12 June 2025, changes to market risk requirements will apply from 1 January 2027.

5. Segment reporting

A segment is a separable component of the Group engaged in business activities, generating income and expenses (including intergroup transactions), whose operating results are regularly reviewed by the Management Board of the parent entity as the chief operating decision-maker of the Group in order to allocate resources and assess its performance.

The Group is managed at the level of two main business segments – the Institutional Bank and Consumer Bank. The valuation of a segment's assets and liabilities as well as calculation of financial results comply with the Group's accounting policies applied in the preparation of the financial statements, including intergroup transactions between segments.

The allocation of the Group's assets, liabilities, revenues and expenses to segments was made on the basis of internal information prepared for management purposes. Transfer of funds between the Group's segments is based on market prices. Transfer prices are calculated using the same rules for both segments and any difference results only from maturity and the currency structure of assets and liabilities. The basis for assessment of segment performance is gross profit or loss.

The Group conducts its operations solely within the territory of Poland.

Institutional Bank

Within the Institutional Bank segment, the Group offers products and renders services to business entities, local government units and the public sector. Apart from traditional banking services, including credit and deposit activities, the segment provides services in the area of cash management, trade financing, leases, brokerage, custody services in respect of securities and offers treasury products on financial and commodity markets. In addition, the segment offers investment banking services on local and international capital markets, including advisory services, obtaining and underwriting financing via public and non-public issues of financial instruments. The activities of the segment also include proprietary transactions in the equity, debt and derivative instruments markets.

A common characteristic among institutional banking clients is their need for advanced financial products and financial services advice. In this area, the Group coordinates investment banking, treasury, and cash management products and prepares loan offers for various forms of financing.

Consumer Bank

Within the Consumer Bank segment, the Group provides products and financial services to individuals as well as to micro-enterprises and individual entrepreneurs within the framework of CitiBusiness offer. Apart from keeping bank accounts and providing credit and deposit offers, the Group offers cash loans, mortgage loans, credit cards, provides asset management services, and acts as an agent in the sale of investment and insurance products.

Income statement of the Group by business segment

For the period	2025			2024		
PLN'000	Institutional Bank	Consumer Bank	Total	Institutional Bank	Consumer Bank	Total
Net interest income	2,022,500	975,382	2,997,882	2,109,654	1,107,313	3,216,967
Internal interest income, including:	(635,414)	635,414	-	(680,780)	680,780	-
Internal income		635,414	635,414	-	680,780	680,780
Internal expenses	(635,414)		(635,414)	(680,780)	-	(680,780)
Net fee and commission income	455,014	142,037	597,051	426,773	144,587	571,360
Dividend income	3,561	9,011	12,572	2,786	8,722	11,508
Net income on financial instruments and revaluation	364,918	32,305	397,223	564,252	33,625	597,877
Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income	173,621	-	173,621	50,652	-	50,652
Net gain/(loss) on equity and other instruments measured at fair value through income statement	5,206	5,754	10,960	19,807	11,710	31,517

For the period	2025			2024		
PLN'000	Institutional Bank	Consumer Bank	Total	Institutional Bank	Consumer Bank	Total
Net gain/(loss) on hedge accounting	1,817	-	1,817	8,874	-	8,874
Net other operating income	(8,325)	(18,223)	(26,548)	9,318	(44,568)	(35,250)
General administrative expenses	(676,779)	(832,767)	(1,509,546)	(669,033)	(759,009)	(1,428,042)
Depreciation and amortization	(34,216)	(13,861)	(48,077)	(29,025)	(90,313)	(119,338)
Net impairment allowances on non-financial assets	-	-	-	-	(432,512)	(432,512)
Profit on sale of other assets	545	(608)	(63)	885	(300)	585
Net impairment loss on financial assets and provisions for off-balance-sheet commitments	(25,925)	4,194	(21,731)	(18,898)	35,455	16,557
Operating income	**2,281,937**	**303,224**	**2,585,161**	**2,476,045**	**14,710**	**2,490,755**
Tax on some financial institutions	(123,809)	(49,122)	(172,931)	(120,761)	(54,489)	(175,250)
Revaluation of assets and liabilities to be sold to fair value less costs to sell	-	(470,135)	(470,135)	-	-	-
Profit before tax from continuing and discontinued activity	**2,158,128**	**(216,033)**	**1,942,095**	**2,355,284**	**(39,779)**	**2,315,505**
Income tax expense			(275,751)			(555,048)
Net profit from continuing and discontinued activity			**1,666,344**			**1,760,457**

As at	31.12.2025			31.12.2024		
PLN'000	Institutional Bank	Consumer Bank	Total	Institutional Bank	Consumer Bank	Total
Total assets	**72,638,160**	**6,210,850**	**78,849,010**	**65,975,771**	**6,502,332**	**72,478,103**
Total liabilities and shareholder equity, including:	**55,677,278**	**23,171,732**	**78,849,010**	**49,237,874**	**23,240,229**	**72,478,103**
Liabilities	46,683,995	22,122,707	68,806,702	40,912,716	21,696,856	62,609,572

The net profit of the Bank's Retail Business differs from the net profit from discontinued operations due to the fact, that the sales transaction scope disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations" is not always aligned with the scope of the Retail Business. For the purposes of management assessment, the net profit of the Retail Business is determined by taking into account the results on capital allocated in the Retail Segment. The amount is not included in the calculation of the total amount of discontinued operations (Note 4: "Assets and liabilities classified as held for sale and profit from discontinued operations").

6. Net interest income

Accounting policy:

For all financial instruments, interest income and interest expense are recognized through the profit or loss account using the effective interest rate method.

The effective interest rate method calculates the amortized cost of a financial asset or a financial liability and allocates interest income or interest expense to appropriate periods. The effective interest rate is a rate that discounts the estimated futures inflows or payments in the expected period until the maturity of the financial instrument to the gross carrying value of a financial asset or the amortized cost for a financial liability. When calculating the effective interest rate, the Bank takes into account all the terms and conditions of a financial instrument agreement (e.g., prepayments, call options, etc.) but excludes potential future losses in connection with non-recoverable loans. The calculation covers all the commissions payable to and receivable from the parties to the agreement, integral components of the effective interest rate, transactional costs and any other premiums and discounts. As a result, commissions that are an integral part of the effective interest rate less direct costs of obtaining the financial instrument are recognized as components of interest income.

The effective interest rate applies for the gross carrying amount of financial assets, except for impaired financial assets.

In the case of financial assets for which impairment losses were recognized, interest income is measured using the interest rate that was used to discount the future cash flows to estimate such impairment losses and are calculated on the amount of exposure reduced by expected credit losses.

Financial information:

PLN'000	For the period	2025	2024
Interest income from:		**3,438,830**	**3,447,363**
Financial assets measured at amortized cost		**1,569,357**	**1,593,651**
Balances with Central Bank and current accounts with other banks		155,947	189,224
Amounts due from banks		378,300	481,359
Amounts due from customers, in respect of:		1,035,110	923,068
financial sector entities		371,787	304,012
non-financial sector entities, including:		663,323	619,056
Financial assets measured at fair value through comprehensive income		**1,869,473**	**1,853,712**
Debt investment financial assets measured at fair value through comprehensive income		1,869,473	1,853,712
Similar income from:		**303,304**	**278,236**
Debt securities held-for-trading		136,830	87,101
Liabilities with negative interest rate		96	7
Derivatives in hedge accounting		166,378	191,128
Effect of excess liquidity to be transferred as part of transaction settlement		(635,414)	(680,780)
		3,106,720	**3,044,819**
Interest expense and similar charges for:			
Financial liabilities measured at amortized cost		**(860,071)**	**(702,300)**
Balances with the Central Bank		(4)	(4)
Amounts due to banks		(56,305)	(106,311)
Amounts due to customers		(763,724)	(587,319)
Amounts due to financial sector entities		(139,010)	(437,192)
Amounts due to non-financial sector entities		(624,714)	(150,127)
Loans and advances acquired		(36,476)	(5,131)
Lease liabilities		(3,562)	(3,535)
Derivatives in hedge accounting		**(141,899)**	**(136,742)**
		(1,001,970)	**(839,042)**
Net interest income		**2,104,750**	**2,205,777**

The table above does not include the net income from discontinued activity in the amount of PLN 893,133 thousand for 2025 and in the amount of PLN 1,011,190 thousand for 2024. Information on discontinued operations disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations". In particular, Note 3 explains the methodology for calculating income from excess liquidity attributed to discontinued operations (included in interest income from discontinued operations in the amount of PLN 893,133 thousand for 2025 and 1,011,190 for 2024), which at the same time reduce the result from continuing operations, which is included in the table above in the line "Effect of excess liquidity to be transferred as part of the transaction settlement".

The impact on value of financial assets, whose cash flows resulting from the contract were modified, however were not discontinued recognition, as at 31 December 2025 amounted to PLN (1,759) thousand and net modification gain in 2025 amounted to PLN 1,521 thousand (PLN (3,454) thousand and PLN (4,015) thousand as at 31 December 2024, respectively).

7. Net fee and commission income

Accounting policy:

Commission and fee income is generated when the Bank renders financial services to its customers. The Bank classifies its commission into the following categories:

- commissions that are an integral part of the effective interest rate,
- commissions for brokerage activities, including commissions for the execution of orders to buy or sell financial instruments, offering financial instruments, maintaining cash accounts, holding and registering cash instruments and acting as market makers,
- commissions for services rendered,
- commissions for executing significant transactions.

Commissions that are an integral part of the effective interest rate are recognized in the income statement adjusted by the calculation of the effective interest rate and are shown in interest income.

In the case of loans and borrowings with undetermined installment payment dates, e.g., overdrafts or credit cards, commissions and fees are recognized using the straight-line method until the expiry date of a credit limit. Such commissions and fees are recognized as commission income.

For other commissions, the Bank performs the principles of IFRS 15. In particular if the Group transfers control of service over time and, therefore, satisfies a performance obligation and the customer simultaneously receives and consumes the benefits provided by the Bank's performance as the Bank performs, then fees are recognized over time in proportion to the completion of the service in fee income, In other cases, the fees are recognized at a point in time when services have been completed and are presented in fee income. There are no situations of withholding services which would affect the manner of revenue recognition described above in connection with meeting the obligation to provide services. The majority of commission income is settled on a one-off basis, except situation where the commission is charged in advance for a period of service exceeding one month. Such situation arises in respect of guarantees or loans for which no repayment schedule is agreed. In the area of commission income, the remuneration received is in principle non-refundable.

The Group considers the terms of the contract to determine the transaction price. The transaction price is the amount of consideration (fixed, variable or both) to which Bank expects to be entitled in exchange for transferring promised services to a customer, excluding amounts collected on behalf of third parties.

The Bank renders intermediary services for insurance products. Income for the distribution of insurance products not directly relating to the occurrence of financial assets is recognized in the income statement when the service has been provided or renewal of the insurance policy has taken place, except for the part of remuneration for services provided after the sale, which is amortized over the life of the facility using the straight-line method.

In the case of products directly attributable to financial assets, where income is received up front for a period longer than one month, to establish the way of showing income on distributing this insurance, a model of relative fair value is used as a result of which income from the sale of an insurance product is divided into the following components:

- income on account of services provided as an insurance agent, and
- income recognized in the Income Statement as an effective interest rate component, adjusted by the estimated amounts of potential future returns in case of early termination of insurance products based on the share of the fair value of each of these parts in the total of their fair values.

The income described above takes into account the estimation of future returns on customers renouncing their insurance in given conditions.

Costs directly attributable to the acquisition of a cash loan are amortized over the life of the product as an effective interest rate component and are part of the interest income.

If the Bank incurs costs directly associated with the sale of an insurance product, such costs are accounted for in accordance with the principle of matching revenues and expenses. Costs not directly associated with the sale of insurance products are recognized when incurred.

Financial information:

PLN'000	For the period	2025	2024
Fee and commission income			
Credit activities (other than income covered by the calculation of the effective interest rate process)		42,516	41,384
Servicing bank accounts		82,613	85,356
Payment and credit cards		12,207	12,726
Payment services		110,827	112,876
Custody services		150,832	127,327
Brokerage operations		44,695	27,745
Clients' cash on account management services		21,033	23,962
Financial liabilities granted		42,391	34,919
Other		2,903	3,808
		510,017	**470,103**
Fee and commission expense			
Payment and credit cards		(1,397)	(1,326)
Brokerage operations		(13,323)	(13,181)
Fees paid to the National Depository for Securities (KDPW)		(39,024)	(34,148)

PLN'000	For the period	2025	2024
Broker's fees		(4,273)	(3,896)
Other		(21,142)	(16,593)
		(79,159)	**(69,144)**
Fee and commission income		**430,858**	**400,959**

The table above does not include the net income from discontinued activity in the amount of PLN 166,192 thousand *for* 2025 and in the amount of PLN 170,401 thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

8. Dividend income

***Accounting policy*:**

Dividends resulting from equity investments are recognized in profit and loss when the entity's right to receive payment is established. There is a possibility that the entity will obtain economic benefits connected with the dividend and the dividend will be set credibly.

***Financial information*:**

PLN'000	For the period	2025	2024
Equity and other instruments at fair value through the income statement		11,203	10,598
Securities held-for-trading		1,369	910
Total dividend income		**12,572**	**11,508**

9. Net income on trading financial instruments and revaluation

***Accounting policy*:**

This item covers net income on trading financial instruments measured in fair value through profit or loss (as described in note 2.1 Financial assets and liabilities – classification and measurement) and net income on revaluation.

***Financial information*:**

PLN'000	For the period	2025	2024
Net income on financial instruments measured at fair value through profit and loss from:			
Debt instruments		69,435	(9,363)
Equity instruments		3,824	(3,692)
Derivative instruments, including:		(158,078)	111,112
Interest rate derivatives		(157,990)	102,894
Equity		(89)	8,154
Commodities		1	64
		(84,819)	**98,057**
Net income on FX operations			
Operations on FX derivative instruments		209,019	554,793
FX gains and losses (revaluation)		240,740	(88,630)
		449,759	**466,163**
Net income on trading financial instruments and revaluation		**364,940**	**564,220**

The table above does not include the net income from discontinued activity in the amount of PLN 32,281 thousand *for* 2025 and in the amount of PLN 33,657 thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

The net income on trading financial instruments and revaluation for 2025 contains movement in (net) adjustment of the valuation of derivatives reflecting the counterparty credit risk and own credit risk in the amount of PLN 1,010 thousand (in 2024: PLN (1,859) thousand).

Net income from debt instruments includes the net results on trading in government securities, corporate debt securities, EBI (European Investment Bank) securities and money market instruments held-for-trading.

Net income from equity instruments includes net income from shares in other entities.

Income from derivative instruments includes net income due to transactions in interest rate swaps, options, futures and other derivatives.

Net profit on foreign exchange includes profit and losses on valuation of assets and liabilities denominated in foreign currency and foreign currency derivatives such as forward, CIRS and option contracts and also contains a margin realized on spot and forward currency transactions.

10. Net gain/(loss) on hedge accounting

Accounting policy:
Additional information regarding the Bank's hedge accounting including accounting policy disclosed in Note 37.

Financial information:

PLN'000	For the period	2025	2024
Fair value hedge accounting			
Net gain on hedged transaction valuation		334,757	(145,533)
Net gain on hedging transaction valuation		(332,940)	154,407
Hedge accounting income		**1,817**	**8,874**

11. Net other operating income and expense

Financial information:

Other operating income and expenses comprise income and expenses that are not directly related to banking activities. They include the proceeds from and costs of selling or disposing of tangible fixed assets and assets held for disposal, income related to services for related parties, compensation, penalties and fines.

PLN'000	For the period	2025	2024
Other operating income			
Income from provision of services for related parties outside the Group		8,696	8,832
Income from office rental		791	3,147
Other		8,785	9,270
		18,272	**21,249**
Other operating expenses			
Amicable procedure and vindication expenses		(65)	(247)
Net provision for litigation		(14,250)	(21,607)
Other**		(16,317)	(15,256)
		(30,632)	**(37,110)**
Net other operating income and expense		**(12,360)**	**(15,861)**

**The item includes the (net) costs of provisions for litigation proceedings including those related to TSUE judgements*
***The item "Other" includes i.a. operating losses and donation costs*

The table above does not include the net income from discontinued activity in the amount of PLN (14,223) thousand *for* 2025 and in the amount of PLN (19,389) thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations*"*.

12. General administrative expenses

Accounting policy:

General administrative expenses are recognized in the period they apply to.

Financial information:

PLN'000	For the period	2025	2024
Staff expenses			
Remuneration costs, including:		(332,580)	(309,772)
Provisions for retirement allowances		(26,625)	(24,719)
Bonuses and rewards		(51,172)	(56,845)
Social insurance costs		(54,822)	(52,200)
		(438,574)	**(418,817)**
Administrative expenses			
Telecommunication fees and hardware purchases		(83,636)	(90,493)
Costs of external services, including advisory, audit, consulting services		(47,638)	(41,650)
Building maintenance and rent costs		(43,967)	(56,463)
Advertising and marketing costs		(4,874)	(4,775)
Cash management service, KIR service and other transactional costs		(33,209)	(34,487)
Costs of external services related to the distribution of banking products		(4,969)	(4,706)
Postal services, office supplies and printmaking costs		(876)	(886)
Banking and capital supervision costs		(7,622)	(7,916)
Costs paid to Bank Guarantee Fund		(81,235)	(76,872)
Other expenses		5,040	(3,481)
		(302,986)	**(321,729)**
Total general administrative expenses		**(741,560)**	**(740,546)**

*Item "Other costs" includes VAT deduction for purchases related to taxable or mixed sales.

The table above does not include the net income from discontinued activity in the amount of PLN (767,949) thousand *for* 2025 and in the amount of PLN (687,496) thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations*".*

In the building maintenance and rent cost position, there are lease payments for short-term leases and low-value assets, variable lease payments, non-lease components and maintenance costs related to real estate owned or leased by the Group.

Staff expenses include the following employee benefits for current and former members of the Management Board – the Group's parent company:

PLN'000	For the period	2025	2024
Short-term employee benefits		17,144	16,887
Long-term employee benefits		61	227
Capital assets		9,997	9,964
		27,202	**27,078**

13. Depreciation expense

Accounting policy:

Depreciation expenses are recognized on a straight-line basis according to depreciation rates described in note 23 for tangible fixed assets and note 24 for intangible assets.

Financial information:

PLN'000	For the period	2025	2024
Depreciation of property and equipment		(38,239)	(47,336)
Amortization of intangible assets		(4,358)	(3,531)
Depreciation expense, total		**(42,597)**	**(50,867)**

The table above does not include the net income from discontinued activity in the amount of PLN (5,480) thousand *for*

2025 and in the amount of PLN (68,471) thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

14. Provisions for expected credit losses on financial assets and provisions for contingent liabilities

***Accounting policy*:**

Provisions for expected credit losses and provisions for contingent commitments are presented in this position. Impairment policy is described in detail in note 3 in Credit risk part.

***Financial information*:**

PLN'000	For the period	2025	2024
Provision for expected credit losses on amounts due from banks			
Provision creation		(7,795)	(2,162)
Provision release		3,655	2,524
		(4,140)	**362**
Provision for expected credit losses on amounts due from customers			
Provision creation and reversals		**(34,171)**	**2,898**
Provision creation		(200,994)	(212,010)
Provision release		179,330	227,447
Other		(12,507)	(12,539)
Recoveries from debt sold		**9,965**	**11,998**
		(24,206)	**14,896**
Provision for expected credit losses on debt investment financial assets measured at fair value through other comprehensive income			
Provision creation		(4,316)	(6,847)
Provision release		3,813	6,458
		(503)	**(389)**
Provision for expected credit losses on financial assets		**(28,849)**	**14,869**
Created provisions for granted financial and guarantee commitments		(24,726)	(31,546)
Release of provisions for granted financial and guarantee commitments		31,844	33,234
Provision for expected credit losses for contingent liabilities		**7,118**	**1,688**
Provision for expected credit losses on financial assets and provisions for contingent liabilities		**(21,731)**	**16,557**

The table above includes the net income from discontinued activity in the amount of PLN 4,194 thousand *for* 2025 and in the amount of PLN 35,455 thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

In 2025 the Group sold a portfolio of retail non-performing credit exposures with a net carrying amount of PLN 7.5 million, achieving a positive result on sales of PLN 10 million.

15. Income tax expense

***Accounting policy*:**

Income tax consists of current tax and deferred tax. Income tax is recognized in the income statement, except for taxes related to amounts that are allocated to other comprehensive income.

***Financial information*:**

Recognized in the income statement

PLN'000	For the period	2025	2024
Current tax			
Current year CIT		(555,952)	(485,100)
Adjustments for prior years		(1,449)	9,502
		(557,401)	**(475,598)**
Deferred tax			
Origination and reversal of temporary differences		281,650	(79,450)
		281,650	**(79,450)**
Total income tax expense in income statement		**(275,751)**	**(555,048)**

Reconciliation of effective tax rate

PLN'000	For the period	2025	2024
Profit before tax		1,942,095	2,315,505
Income tax at the domestic corporate tax rate of 19%		(368,998)	(439,946)
Impairment provision not constituting deductible expenses		(5,682)	(4,171)
Deductible income not recognized in the income statement		(4,513)	(4,599)
Non-taxable income		2,320	2,123
Tax on some financial institutions		(32,857)	(33,297)
Bank Guarantee Fund		(20,040)	(17,072)
Tax rates change since 2026		114,159	-
Other permanent differences, including other non-deductible expenses		39,860	(58,086)
Depreciation and amortization		*40,862*	-
Total tax expenses		**(275,751)**	**(555,048)**
Effective tax rate		**14.20%**	**23.97%**

**In 2025 the Bank received an individual tax interpretation confirming interpretation confirming the possibility of including in tax-deductible costs the depreciation of fixed assets and intangible assets of the Retail Banking Segment covered by a write-off in 2024 resulting from the impairment test of the income-generating unit, which were not recognized in the deferred tax asset as at the date of the write-off.*

The table above does not include the net income from discontinued activity in the amount of PLN 119,920 thousand *for* 2025 and in the amount of PLN (12,814) thousand *for* 2024. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations*".*

EQUALIZATION TAX – Pillar 2 of the BEPS 2.0 reform

Pillar 2 of the BEPS 2.0 reform introduces the general framework for a 15% global minimum tax, approved by the OECD. For European Union member states, the first step in implementing the new rules was the adoption of Council Directive 2022/2523 of 14 December 2022 on ensuring a global minimum level of taxation for international groups of enterprises and large domestic groups in the European Union (hereinafter referred to as the "Directive"). In the case of Poland, where the Group operates, the Act of November 6, 2024, on equalization taxation of constituent entities of international and domestic groups (Journal of Laws of 2024, item 1685 – hereinafter referred to as the "Act"), implementing the provisions of the Directive, was published on November 19, 2024. Pursuant to the Act, Polish legal regulations imposing obligations on obligated entities entered into force on January 1, 2025 (for all three equalization taxes, i.e., the global equalization tax, the domestic equalization tax, and the equalization tax on undertaxed profits), with the possibility of voluntary application of these regulations from January 1, 2024, in the case of the global and domestic equalization taxes.

During the review of the Group's effective tax rate ("ETR") in Poland for 2025 for the purposes of the domestic equalization tax ("QDMTT") under the Act, after calculations based on the Group's assumptions, the calculated ETR was above 15%. As a result, the Group will not pay QDMTT for 2025.
Additionally, at the Citi Group level, it was determined that the Polish entities within the Citi Group should be considered taxpayers of the undertaxed profits tax ("UTPR") for 2025. The Citi Group has presented preliminary estimates of the UTPR attributable to the BHW Group. These preliminary estimates indicate that the potential UTPR tax liability will be immaterial.

The obligation to file a QDMTT and UTPR return will be fulfilled within the statutory deadline of 21 months after the end of 2025, due to the fact that 2025 is the first tax year for the Group in which it is subject to equalization tax obligations. Final calculations of the QDMTT and UTPR tax liability will be performed for the purpose of filing the aforementioned

returns.

Deferred tax recognized directly in equity

Deferred tax recognized directly in equity as of 31 December 2025 is related to financial assets measured at fair value through other comprehensive income and valuation of defined benefit plan and amounted to PLN 63,796 thousand (31 December 2024: PLN 20,617 thousand).

16. Earnings per share

Accounting policy:

In 2025 due to implementation of the incentive programs referred to in Note 34, the Bank purchased a total of 150,019 treasury shares at the same time issuing a total of 102,139 treasury shares free of charge to eligible employees of the Bank. Based on information regarding the purchase and issuance of treasury shares in the 12-month period ended 31 December 2025, the weighted average number of shares was calculated at the level 130,274,482.

In 2024 due to implementation of the incentive programs referred to in Note 34, the Bank purchased a total of 335,901 treasury shares at the same time issuing a total of 116,994 treasury shares free of charge to eligible employees of the Bank. Based on information regarding the purchase and issuance of treasury shares in the 12-month period ended 31 December 2025, the weighted average number of shares was calculated at the level 130,581,136.

PLN'000	31.12.2025	31.12.2024
Weighted average number of ordinary shares outstanding, used for calculation of basic earnings per share	130,274,482	130,581,136
Net profit for the reporting period	1,635,660	1,760,457
Net earnings per share	**12.56**	**13.48**

The Bank does not have any ordinary shares that may have a dilution impact or any other dilutive instruments.

17. Changes in other comprehensive income

Deferred income tax and reclassification included in other comprehensive income concern the valuation of financial assets measured at fair value recognized in the revaluation reserve and valuation of the defined benefit program recognized in other reserves.

PLN'000	Gross amount	Deferred income tax	Net amount
As at 1 January 2025	**(108,508)**	**20,617**	**(87,891)**
Remeasurement of financial assets measured at fair value through other comprehensive income (net)	565,642	(124,820)	440,822
(Profit) or loss reclassification to income statement after derecognition of financial assets measured at fair value through other comprehensive income (net)	(173,621)	38,313	(135,308)
Total comprehensive income connected with financial assets measured at fair value through other comprehensive income	**283,513**	**(65,890)**	**217,623**
Net actuarial profits/(losses) on defined benefit program valuation	(11,021)	2,094	(8,927)
As at 31 December 2025	**272,492**	**(63,796)**	**208,696**

PLN'000	Gross amount	Deferred income tax	Net amount
As at 1 January 2024	**139,871**	**(26,575)**	**113,296**
Remeasurement of financial assets measured at fair value through other comprehensive income (net)	(187,958)	35,712	(152,246)
(Profit) or loss reclassification to income statement after derecognition of financial assets measured at fair value through other comprehensive income (net)	(50,652)	9,624	(41,028)
Total comprehensive income connected with financial assets measured at fair value through other comprehensive income	**(98,739)**	**18,761**	**(79,978)**
Net actuarial profits/(losses) on defined benefit program	(9,769)	1,856	(7,913)

PLN'000	Gross amount	Deferred income tax	Net amount
valuation			
As at 31 December 2024	**(108,508)**	**20,617**	**(87,891)**

18. Cash and cash equivalents

PLN'000	31.12.2025	31.12.2024
Cash in hand	503,360	486,315
Current balances with Central Bank	8,883,789	5,296,169
Deposits in Central Bank	6,162	-
Current accounts in other banks	28,588	11,877
Total gross value	**9,421,899**	5,794,361
Provision for expected credit losses	(12)	(16)
Total net value	**9,421,887**	**5,794,345**

The table above includes assets held for sale m the amount of 216,403 at the day of December 31, 2025. Additional information presented in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations"

On the current account in the National Bank of Poland (NBP), the Bank maintains an obligatory reserve which may be used only under the condition that the sum of the average monthly balance on the current account in NBP is not lower than the declared balance.

The declared balance of obligatory reserve amounted as of 31 December 2025 to PLN 2,342,834 thousand (31 December 2024: PLN 2,098,239 thousand).

19. Amounts due from banks

Accounting policy:

Classification and measurement of Amounts due from banks are described in note 2.1 "Financial assets and liabilities – classification and measurement".

Financial information:

PLN'000	31.12.2025	31.12.2024
Current accounts	211,796	5,258
Deposits	419,467	235,635
Receivables due to purchased securities with a repurchase agreement	7,581,815	8,217,515
Deposits pledged as collateral of derivative instruments and stock market transactions	25,946	324,170
Other receivables	11,495	5,853
Total gross amount	**8,250,519**	**8,788,431**
Impairment provision	(4,461)	(651)
Total net amount due from banks	**8,246,058**	**8,787,780**

Changes in gross amounts due from banks that contributed to movements in provision for expected credit losses amounts are as follows:

PLN'000	Stage 1	Stage 2	Stage 3	Total
Loss allowance - amounts due from banks				
Loss allowance as at 1 January 2025	**(168)**	**(483)**	**-**	**(651)**
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
(Creation)/Releases in the period though the income statement	(4,612)	483	-	**(4,129)**

PLN'000	Stage 1	Stage 2	Stage 3	Total
Foreign exchange and other movements	319	-	-	**319**
Loss allowance as at 31 December 2024	**(4,461)**	**-**	**-**	**(4,461)**

PLN'000	Stage 1	Stage 2	Stage 3	Total
Loss allowance - amounts due from banks				
Loss allowance as at 1 January 2024	**(364)**	**(541)**	**-**	**(905)**
Transfer to Stage 1	(69)	69	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
(Creation)/Releases in the period though the income statement	258	(11)	-	247
Foreign exchange and other movements	7	-	-	7
Loss allowance as at 31 December 2024	**(168)**	**(483)**	**-**	**(651)**

The change in closing balance of impairment recognized on **loans and advances** to customers consisted of:

PLN'000	Stage 1	Stage 2	Stage 3	Total
Gross amounts due from banks measured at amortized cost				
Gross amounts due from banks as at 1 January 2025	**8,780,083**	**8,348**	**-**	**8,788,431**
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Receivables increase / repayment	(520,630)	(8,300)	-	(528,930)
Other movements	(8,944)	(38)	-	(8,982)
Gross amounts due from banks as at 31 December 2025	**8,250,509**	**10**	**-**	**8,250,519**

PLN'000	Stage 1	Stage 2	Stage 3	Total
Gross amounts due from banks measured at amortized cost				
Gross amounts due from banks as at 1 January 2024	**15,337,047**	**35,410**	**-**	**15,372,457**
Transfer to Stage 1	20,030	(20,030)	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Receivables increase / repayment	(6,574,128)	(7,000)	-	(6,581,128)
Other movements	(2,866)	(32)	-	(2,898)
Gross amounts due from banks as at 31 December 2024	**8,780,083**	**8,348**	**-**	**8,788,431**

20. Financial assets and liabilities held-for-trading

Accounting policy:

Classification and measurement of financial assets and liabilities held-for-trading are described in note 2.1.

***Financial information*:**

Financial assets held-for-trading

Derivative instruments, excluding hedging instruments, and selected debt securities are classified as held-for-trading and presented in the consolidated financial statement as "Financial assets held-for-trading".

PLN'000	31.12.2025	31.12.2024
Debt securities held-for-trading		
Bonds and notes issued by:		
Central Banks		
Banks and other financial entities*	259,761	963,254
Central governments	2,034,514	838,650
	2,294,275	**1,801,904**
Including:		
Listed on active market	2,294,275	1,801,904
Equity instruments held-for-trading	**35,272**	**10,555**
Including:		
Listed on active market	35,272	10,555
Derivative financial instruments	**2,497,556**	**2,623,860**
Financial assets held-for-trading, total	**4,827,103**	**4,436,319**

**As at 31 December 2024, some of the securities (bonds) issued by banks in the amount of PLN 259,761 thousand are covered by Government guarantees (31 December 2024: PLN 956,638 thousand).*

The table above includes the assets held for sale in the amount of PLN 3,731 thousand *(embedded derivatives) for 2025*. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations*".*

Financial liabilities held-for-trading

PLN'000	31.12.2025	31.12.2024
Liabilities related to short sale of securities	8,880	156,708
Derivatives	2,681,219	2,599,197
Financial liabilities held-for-trading, total	**2,690,099**	**2,755,905**

As at 31 December 2025 and 31 December 2024, the Group did not hold any financial assets and liabilities designated at fair value through profit or loss at initial recognition.

Derivative financial instruments as at 31 December 2025

PLN'000	Nominal amount with remaining life of				Total	Fair value	
	less than 3 months	between 3 months and 1 year	between 1 year and 5 years	more than 5 years		Assets	Liabilities
Interest rate instruments	**8,716,614**	**36,393,216**	**84,846,131**	**23,526,467**	**153,482,428**	**1,384,056**	**2,006,245**
FRA	730,000	1,940,000			2,670,000	0	27
Interest rate swaps (IRS)	6,663,657	27,686,269	80,793,173	23,526,467	138,669,566	1,383,284	2,004,736
Interest rate options			16,460		16,460	52	52
Futures*	1,322,957	6,766,947	4,036,498		12,126,402	720	1,430
Currency instruments	**59,394,692**	**28,094,987**	**6,325,172**	**236,766**	**94,051,617**	**1,113,101**	**674,855**
FX forward	18,676,566	6,622,071	215,557		25,514,194	372,994	26,860
FX swap	27,778,401	9,346,869	1,783,609		38,908,879	534,201	448,318
Currency-interest rate swaps (CIRS)**	10,020,389	11,467,932	4,326,006	236,766	26,051,093	201,791	195,558

PLN'000	Nominal amount with remaining life of				Total	Fair value	
	less than 3 months	between 3 months and 1 year	between 1 year and 5 years	more than 5 years		Assets	Liabilities
Foreign exchange options	2,919,336	658,115			3,577,451	4,115	4,119
Securities transactions	**784,744**	**8,893**	**-**	**-**	**793,637**	**399**	**119**
Futures*	32,351	8,893			41,244	-	-
Securities purchased/sold pending delivery	752,393	-	-	-	752,393	399	119
Total derivative instruments	**68,896,050**	**64,497,096**	**91,171,303**	**23,763,233**	**248,327,682**	**2,497,556**	**2,681,219**

*Exchange-traded products
** Foreign exchange interest rate swaps with capital exchange
The table above includes the assets held for sale in the amount of PLN 3,731 thousand *(embedded derivatives) at the day of December 31, 2025*. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

Derivative financial instruments as at 31 December 2024

PLN'000	Nominal amount with remaining life of				Total	Fair value	
	less than 3 months	between 3 months and 1 year	between 1 year and 5 years	more than 5 years		Assets	Liabilities
Interest rate instruments	**32,557,968**	**42,871,630**	**82,384,391**	**29,605,070**	**187,419,059**	**608,997**	**1,299,743**
FRA	13,700,000	4,340,000	-	-	18,040,000	1,522	4,010
Interest rate swaps (IRS)	3,772,194	15,866,977	76,402,711	29,605,070	125,646,952	572,375	1,295,620
Interest rate options	-	**1,110,980**	20,845	-	1,131,825	106	113
Futures*	15,085,774	21,553,673	5,960,835	-	42,600,282	34,994	-
Currency instruments	**60,391,684**	**18,570,602**	**38,722,067**	**293,340**	**117,977,693**	**1,997,438**	**1,282,595**
FX forward	13,260,201	5,282,716	3,896,464	-	22,439,381	226,064	27,337
FX swap	37,482,704	8,846,021	10,056,172	-	56,384,897	1,328,477	608,259
Currency-interest rate swaps (CIRS)**	6,244,481	3,382,507	24,762,464	293,340	34,682,792	407,606	611,689
Foreign exchange options	3,404,298	1,059,358	6,967	-	4,470,623	35,291	35,310
Securities transactions	**455,977**	**9,090**	**-**	**-**	**465,067**	**1,328**	**761**
Futures*	6,851	9,090	-	-	**15,941**	-	-
Securities purchased/sold pending delivery	449,126	-	-	-	449,126	1,328	761
Commodity transactions	**21,843**	**-**	**-**	**-**	**21,843**	**16,097**	**16,098**
Swaps	21,843	-	-	-	21,843	16,097	16,098
Total derivative instruments	**93,427,472**	**61,451,322**	**121,106,458**	**29,898,410**	**305,883,662**	**2,623,860**	**2,599,197**

*Exchange-traded products
** Foreign exchange interest rate swaps with capital exchange

21. Debt investment financial assets measured at fair value through other comprehensive income

Accounting policy:

The policy for classification and measurement of debt investment financial assets measured at fair value through other comprehensive income is described in note 2.1 "Financial assets and liabilities – classification and measurement".

Financial information:

PLN'000	31.12.2025	31.12.2024
Bonds and notes issued by:		
Central Banks	-	999,202
Banks*, including:	9,028,162	13,889,991
Covered bonds in fair value hedge accounting	1,904,233	3,225,777

PLN'000	31.12.2025	31.12.2024
Other financial sector entities	1,756,978	1,843,248
Covered bonds in fair value hedge accounting	537,652	505,371
Central governments, including:	19,366,844	13,356,330
Covered bonds in fair value hedge accounting	2,427,315	2,836,707
Debt securities measured at fair value through other comprehensive income, total	**30,151,984**	**30,088,771**
Including:		
Listed on active market instruments	30,151,984	29,089,569
Unlisted instruments on the active market	-	999,202

**As at 31 December 2025, the securities (bonds) issued by banks in the amount of PLN 9,028,162 thousand are covered by Government guarantees (31 December 2024: PLN 13,889,991 thousand).*

For debt investment financial assets measured at fair value through other comprehensive income, the cumulated value of impairment as at 31 December 2025 amounts to PLN 9,023 thousand (as at 31 December 2024: 8,520 thousand).

The movement in debt investment financial assets measured at fair value through other comprehensive income is as follows:

PLN'000	2025	2024
As at 1 January	**30,088,771**	**29,560,292**
Increases (due to):		
Purchases	395,281,306	548,803,054
Revaluation	752,057	-
Foreign exchange differences		44,170
Depreciation of discount, premium and interest	1,557,056	1,717,000
Decreases (due to):		
Sale	(397,356,505)	(549,653,949)
Revaluation		(362,750)
Foreign exchange differences	(136,418)	-
Depreciation of premium	(34,283)	(19,046)
As at 31 December	**30,151,984**	**30,088,771**

22. Equity and other instruments measured at fair value through the income statement

Accounting policy:

Shares in entities other than dependent entities are classified as financial assets measured at fair value through the income statement. Their classification and measurement are described in note 2.1 "Financial assets and liabilities – classification and measurement".

Financial information:

PLN'000	31.12.2025	31.12.2024
Stocks and shares in other entities	179,374	161,999
Impairment	4,534	10,949
Equity and other instruments measured at fair value through income statement, total	**183,908**	**172,948**
Including:		
Listed on active market instruments	45,632	38,117
Unlisted on active market instruments	138,276	134,831

The movement in equity and other instruments measured at fair value through income statement is as follows:

PLN'000	2025	2024
As at 1 January	**172,948**	**141,495**
Action conversion - transfer to Level I	2,597	2,548

PLN'000	2025	2024
Change in valuation	8,363	28,905
As at 31 December	**183,908**	**172,948**

23. Amounts due from customers

Accounting policy:

Classification and measurement of amounts due from customers are described in note 2.1 "Financial assets and liabilities – classification and measurement".

Financial information:

PLN'000	31.12.2025	31.12.2024
Amounts due from financial sector entities		
Loans, placements and advances	3,576,712	2,190,586
Debt financial assets unlisted	1,002,149	1,002,896
Receivables due to purchased securities with a repurchase agreement	10,880	303,408
Guarantee funds and deposits pledged as collateral	1,870,054	1,613,484
Total gross amount	**6,459,795**	**5,110,374**
Provision for expected credit losses	(10,854)	(2,623)
Total net amount	**6,448,941**	**5,107,751**
Amounts due from non-financial sector entities		
Loans and advances	15,288,312	13,920,199
Purchased receivables	-	2,840,285
Realized guarantees	3,118,387	30,533
Other receivables	30,467	11,566
Total gross amount	**18,454,098**	**16,802,583**
Provision for expected credit losses	(512,287)	(543,088)
Total net amount	**17,941,811**	**16,259,495**
Total net amounts due from customers	**24,390,752**	**21,367,246**

The table above includes the assets held for sale in the amount of PLN 6,168,098 thousand for 2025. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

In amounts due from customers presented on the line Unlisted debt financial assets are securitization assets covered by the Bank. The Group acts as investor in transactions involving senior tranches. The assets purchased by the Bank are not traded on the market. The Bank intends to maintain investments until the maturity date. The main risk of securitization transactions is credit risk. The Bank's maximum exposure to loss from involvement in these entities is equal to their carrying gross value, as at 31 December 2025 in the of amount PLN thousand (31 December 2024: PLN 1,002,896thousand). The carrying value of assets relating to Bank participation in unconsolidated structured entities as at 31 December 2025 in the amount of PLN thousand (31 December 2024: PLN 1,002,403 thousand).

Movement in **provision for expected credit losses** - amounts due from customers presents as follows:

2025

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Loss allowance - amounts due from institutional customers					
Provision for expected credit losses as at 1 January 2025	**(27,095)**	**(36,629)**	**(159,501)**	**166**	**(223,059)**

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Transfer to Stage 1	(1,030)	1,028	2	-	-
Transfer to Stage 2	1,080	(1,080)	-	-	-
Transfer to Stage 3	-	735	(735)	-	-
Transfer to purchased or originated credit-impaired assets	-	55	-	(55)	-
(Creation)/Releases in the period though the income statement	(923)	(12,878)	(10,468)	188	(24,081)
Decrease in provisions due to write-offs	-	-	410	-	410
Decrease in write-downs in connection with the sale of receivables	-	-	-	-	-
Changes in accrued interest in Stage 3 other than written off and sale of receivables	-	1	(6,259)	-	(6,258)
Decrease in provisions due to derecognition from the balance sheet as a result of significant change	-	-	-	(273)	(273)
Foreign exchange and other movements	2,406	510	5,455	(26)	8,345
Provision for expected credit losses as at 31 December 2025	**(25,562)**	**(48,258)**	**(171,096)**	**-**	**(244,916)**

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Loss allowance - amounts due from individual customers					
Provision for expected credit losses as at 1 January 2025	**(14,900)**	**(42,578)**	**(265,668)**	**567**	**(322,579)**
Transfer to Stage 1	(11,123)	10,176	947	-	-
Transfer to Stage 2	2,112	(4,979)	2,867	-	-
Transfer to Stage 3	517	8,585	(9,102)	-	-
Transfer to purchased or originated credit-impaired assets	-	-	9,080	(9,080)	-
(Creation)/Releases in the period though the income statement	10,577	(4,655)	(16,458)	(1,118)	(11,654)
Changes due to the update of the estimation method (net)	(1,190)	2,754	-	-	1,564
Decrease in write-downs due to write-offs	-	-	7,300	-	7,300
Decrease in write-downs in connection with the sale of receivables	-	-	68,344	3,180	71,524
Changes in accrued interest in Stage 3 other than written off and sale of receivables	-	-	(23,975)	(3,055)	(27,030)
Decrease in impairment losses due to de-balance sheet as a result of a material change	-	-	-	9,080	9,080
Foreign exchange and other movements	-	-	(6,430)	-	(6,430)
Provision for expected credit losses as at 31 December 2025	**(14,007)**	**(30,697)**	**(233,095)**	**(426)**	**(278,225)**

2024

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Loss allowance - amounts due from institutional customers					
Provision for expected credit losses as at 1 January 2024	**(20,582)**	**(29,898)**	**(260,474)**	**646**	**(310,308)**
Transfer to Stage 1	(738)	738	-	-	-
Transfer to Stage 2	2,006	(2,006)	-	-	-
Transfer to Stage 3	-	6	(6)	-	-
Transfer to purchased or originated credit-impaired assets	-	-	-	-	-
(Creation)/Releases in the period though the income statement	(4,953)	(9,072)	(1,988)	(42)	(16,055)
Decrease in provisions due to write-offs	-	-	99,698	-	99,698
Decrease in write-downs in connection with the sale of receivables	-	-	307	-	307
Changes in accrued interest in Stage 3 other than written off and sale of receivables	10	(1)	(3,990)	-	(3,981)
Decrease in provisions due to derecognition from the balance sheet as a result of significant change	-	-	-	(1,107)	(1,107)
Foreign exchange and other movements	(2,838)	3,604	6,879	669	8,314
Provision for expected credit losses as at 31 December 2024	**(27,095)**	**(36,629)**	**(159,574)**	**166**	**(223,132)**

Effect of minor modification on provision for expected credit losses is insignificant

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Loss allowance - amounts due from individual customers					
Provision for expected credit losses as at 1 January 2024	**(31,893)**	**(69,853)**	**(324,962)**	**(176)**	**(426,884)**
Transfer to Stage 1	(18,287)	17,101	1,186	-	-
Transfer to Stage 2	5,175	(8,077)	2,902	-	-
Transfer to Stage 3	1,088	17,514	(18,602)	-	-
Transfer to purchased or originated credit-impaired assets	-	-	13,295	(13,295)	-
(Creation)/Releases in the period though the income statement	29,017	733	(12,800)	2,003	18,953
Decrease in write-downs due to write-offs	-	-	15,326	-	15,326
Decrease in write-downs in connection with the sale of receivables	-	-	90,214	2,141	92,355
Changes in accrued interest in Stage 3 other than written off and sale of receivables	-	4	(28,894)	(3,400)	(32,290)
Decrease in impairment losses due to de-balance sheet as a result of a material change	-	-	-	13,295	13,295
Foreign exchange and other movements	-	-	(3,333)	(1)	(3,334)
Provision for expected credit losses as at 31 December 2024	**(14,900)**	**(42,578)**	**(265,668)**	**567**	**(322,579)**

Effect of minor modification on provision for expected credit losses is insignificant

The closing balance of impairment recognized on **loans and advances** to customers consisted of:

PLN'000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Gross amounts due from customers measured at amortized cost					
Gross amounts due from customers as at 1 January 2025	**18,569,574**	**2,702,016**	**622,047**	**19,320**	**21,912,957**
Transfer to Stage 1	1,127,516	(1,124,964)	(2,552)	-	-
Transfer to Stage 2	(945,892)	953,328	(7,436)	-	-
Transfer to Stage 3	(24,097)	(73,329)	97,430	(4)	-
Transfer to purchased or originated credit-impaired assets	(915)	(3,911)	(4,613)	9,439	-
Receivables increase / repayment*	3,319,006	(55,186)	(43,358)	(5,427)	3,215,035
Receivables written-off	-	-	(377)	-	(377)
Disposed receivables	-	-	(67,894)	(5,457)	(73,351)
Other movements	(123,511)	(20,244)	3,201	256	(140,298)
Gross amounts due from customers as at 31 December 2025	**21,921,681**	**2,377,710**	**596,448**	**18,127**	**24,913,966**

PLN'000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Gross amounts due from customers measured at amortized cost					
Gross amounts due from customers as at 1 January 2024	**17,683,704**	**2,286,856**	**793,881**	**27,205**	**20,791,646**
Transfer to Stage 1	1,009,326	(1,004,302)	(5,024)	-	-
Transfer to Stage 2	(1,001,989)	1,008,256	(6,267)	-	-
Transfer to Stage 3	(43,093)	(51,613)	94,706	-	-
Transfer to purchased or originated credit-impaired assets	(162)	(924)	(13,759)	14,845	-
Receivables increase / repayment*	1,073,713	464,437	(54,653)	(9,814)	1,473,683
Receivables written-off	-	-	(109,719)	-	(109,719)
Disposed receivables	-	-	(95,579)	(1,429)	(97,008)
Other movements	(151,925)	(694)	18,461	(11,487)	(145,645)
Gross amounts due from customers as at 31 December 2024	**18,569,574**	**2,702,016**	**622,047**	**19,320**	**21,912,957**

For gross amounts due from customers and provisions for expected credit losses which changed Stages during the period, transfers are presented as the change between the Stage as of 1 January 2025 or at the moment of initial recognition and as of 31 December 2025.

24. Tangible fixed assets

***Accounting policy*:**

Tangible fixed assets are stated at historical cost minus accumulated depreciation or amortization and impairment losses. The historical cost of an item of property and equipment includes any directly attributable costs of purchasing and bringing the asset into use.

Subsequent expenditure relating to an item of property and equipment is added to the carrying amount of the asset or recognized as a separate asset (where appropriate) only when it is probable that future economic benefits will flow to the

Group and the cost of the asset can be measured reliably. Any other expenditure, e.g., repairs and maintenance, is recognized as an expense when incurred.

Depreciation and amortization are calculated using the straight-line method over the expected useful life of an asset on the basis of rates that are approved in the depreciation and amortization plan for 2025.

Illustrative annual depreciation and amortization rates applied by the Group are presented in the table below:	
Buildings and structures	1.5%-4.5%
Motor vehicles	14.0%-34.0%
Computers	25.0%
Office equipment	20.0%
Other tangible fixed assets	7.0%-34.0%
Leasehold improvements – compliant with lease agreement period	

At each balance sheet date, the residual values of non-current assets and their useful lives are reviewed, and the depreciation and amortization schedule are adjusted where appropriate.

Assets with original cost below PLN 3,500 are fully depreciated on a one-off basis when brought into use. The total cost of other tangible fixed assets depreciated on a one-off basis is not material to the financial statements.

Assets in the course of construction are stated at the total of costs directly attributable to construction, assembly or improvement in progress less impairment provision.

The carrying amounts are reviewed at each balance sheet date to determine whether there is any evidence of impairment. If so, the asset's recoverable amount is estimated.

The recoverable amount in the case of assets other than financial assets is higher fair valueless selling costs and value in use. For value in use calculation, the estimation of future cash flows is discounted to their present value using the discount rate before taxation, which represents present market expectations regarding money value and specific risk regarding an asset. For assets that are not generating independent cash flows, the recoverable amount is estimated for the cash-generating unit, the asset owner (see Note 25).

Revaluation impairment allowances are recognized if the book value of an asset or cash-generating unit exceeds the recoverable amount. Revaluation impairment allowances are recognized in profit or loss.

The revaluation provision for impairment is reversed if the estimations for the recoverable amount have changed.

The revaluation write-off for impairment can be reversed only to the level by which the book value of the asset does not exceed the depreciation decreased book value that would be estimated if the impairment write-off was not recognized.

Tangible fixed assets from the date of initial application of IFRS 16 include the assets of the right of use of the assets. Details are presented in note 43.

***Financial information*:**

Movements of tangible fixed assets in 2025

PLN'000	Land and buildings	Vehicles	Other	Under construction	Total
Gross amount					
As at 1 January 2025	**762,800**	**45,833**	**252,927**	**8,279**	**1,069,839**
Increases:					
Purchases	299	25,237	8,370	9,908	43,814
Other increases*	5,268	-	-	-	5,268
Decreases:					
Disposals	(57,822)	(20,418)	(8,751)	-	(86,991)
Liquidation	-	(26)	(29,677)	-	(29,703)
Classification as non-current assets held for sale	(107,874)	(13,557)	(26,859)	-	(148,290)
Other decreases*	(628)	(86)	(60)	(1,402)	(2,176)
Transfers	9,455	-	2,664	(12,119)	-
As at 31 December 2025	**611,498**	**36,983**	**198,614**	**4,666**	**851,761**
Depreciation					
As at 1 January 2025	**344,667**	**6,806**	**183,411**	**-**	**534,884**
Increases:					

PLN'000	Land and buildings	Vehicles	Other	Under construction	Total
Amortization charge for the period	15,979	5,445	16,815	-	38,239
Other increases	-	-	-	-	-
Decreases:					
Disposals	(41,179)	(6,451)	(8,404)	-	(56,034)
Liquidation	-	(26)	(29,622)	-	(29,648)
Classification as non-current assets held for sale	(69,668)	1,020	(18,515)	-	(87,163)
Other decreases	(329)	(17)	(21)	-	(367)
As at 31 December 2025	**249,470**	**6,777**	**143,664**	**-**	**399,911**
Impairment write-offs	**5,059**	**-**	**8,765**	**-**	**13,824**
As at 1 January 2025	-	-	-	-	-
Increases	(1,205)	-	(7,749)	-	(8,954)
As at 31 December 2025	**3,854**	**-**	**1,016**	**-**	**4,870**
Carrying amount					
As at 1 January 2025	413,074	39,027	60,751	8,279	521,131
As at 31 December 2025	**358,174**	**30,206**	**53,934**	**4,666**	**446,980**

**Other increases/ decreases include for example restoration of a liquidated asset to inventory, donations, settlements of fixed assts under construction, new and terminated lease agreements.*

Movements of tangible fixed assets in 2024

PLN'000	Land and buildings	Vehicles	Other	Under construction	Total
Gross amount					
As at 1 January 2024	**653,665**	**39,745**	**228,802**	**98,324**	**1,020,536**
Increases:					
Purchases	687	16,425	9,667	49,479	76,258
Other increases*	24,103	-	143	-	24,246
Decreases:					
Disposals	-	(10,048)	-	-	(10,048)
Liquidation	(604)	-	(20,931)	-	(21,535)
Other decreases*	(6,145)	(289)	-	(13,184)	(19,618)
Transfers	91,094	-	35,246	(126,340)	-
As at 31 December 2024	**762,800**	**45,833**	**252,927**	**8,279**	**1,069,839**
Depreciation					
As at 1 January 2024	**321,202**	**5,586**	**185,345**	**-**	**512,133**
Increases:					
Amortization charge for the period	27,745	3,929	18,596	-	50,270
Other increases					
Decreases:					
Disposals	-	(2,672)	-	-	(2,672)
Liquidation	(540)	-	(20,530)	-	(21,070)
Classification as non-current assets held for sale					
Other decreases	(3,740)	(37)	-	-	(3,777)
As at 31 December 2024	**344,667**	**6,806**	**183,411**	**-**	**534,884**
Impairment write-offs					
As at 1 January 2024	-	-	-	-	-
Increases	5,059	-	8,765	-	13,824

PLN'000	Land and buildings	Vehicles	Other	Under construction	Total
As at 31 December 2024	**5,059**	**-**	**8,765**	**-**	**13,824**
Carrying amount					
As at 1 January 2024	332,463	34,159	43,457	98,324	508,403
As at 31 December 2024	**413,074**	**39,027**	**60,751**	**8,279**	**521,131**

**Other increases/ decreases include for example restoration of a liquidated asset to inventory, donations, settlements of fixed assts under construction, new and terminated lease agreements.*

As at 31 December 2025, as well as at 31 December 2024, the Group had no significant contractual obligations for future purchases of tangible fixed assets.

25. Intangible assets

***Accounting policy*:**

Intangible assets are stated at historical cost minus accumulated depreciation or amortization and impairment losses. The historical cost of an item of intangibles includes any directly attributable costs of purchasing and bringing the asset into use.

Subsequent expenditure relating to an item of intangibles is added to the carrying amount of the asset or recognized as a separate asset (where appropriate) only when it is probable that future economic benefits will flow to the Group and the cost of the asset can be measured reliably. Any other expenditure, e.g., repairs and maintenance, is recognized as an expense when incurred.

Depreciation and amortization are calculated using the straight-line method over the expected useful life of an asset on the basis of rates that are approved in the depreciation and amortization plan for 2025.

Illustrative annual depreciation and amortization rates applied by the Group are presented in the table below:	
Computer software and licenses (except for the main operating systems, which are depreciated at the rate of 10% and 20%)	34.0%
Other intangible fixed assets	20.0%

At each balance sheet date, the residual values of non-current assets and their useful lives are reviewed and the depreciation and amortization schedule are adjusted where appropriate.

Intangible assets are tested for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. The carrying amount of an item of property and equipment or intangible asset is written down to its recoverable amount if the carrying amount exceeds the recoverable amount.

The recoverable amount is higher fair value less selling costs and value in use. For value in use calculation, the estimation of future cash flows is discounted to their present value using the discount rate before taxation, which represents present market expectations regarding money value and specific risk regarding an asset. For assets that are not generating independent cash flows, the recoverable amount is estimated for the cash-generating unit, the asset owner (see Note 25).

Revaluation impairment allowances are recognized if the book value of an asset or of the cash-generating unit exceeds the recoverable amount. Revaluation impairment allowances are recognized in profit or loss.

The revaluation provision for impairment, excluding goodwill, is reversed if the estimations for the recoverable amount have changed.

The revaluation write-off for impairment for other assets can be reversed only to the level by which the book value of the asset does not exceed the depreciation decreased book value that would be estimated if the impairment write-off was not recognized.

***Financial information*:**

Movements of intangible assets in 2025

PLN'000	Goodwill	Software	Prepayments	Total
Gross amount				
As at 1 January 2025	**1,245,976**	**954,771**	**32,069**	**2,232,816**
Increases:				

PLN'000	Goodwill	Software	Prepayments	Total
Purchases	-	49	20,908	20,957
Decreases:				
Liquidation	-	(14,562)	(951)	(15,513)
Other decreases	-	(1,387)	(9,510)	(10,897)
Transfers	-	16,081	(16,081)	-
As at 31 December 2025	**1,245,976**	**954,952**	**26,435**	**2,227,363**
Depreciation				
As at 1 January 2025	**-**	**726,547**	**-**	**726,547**
Increases:				
Amortization charge for the period	-	4,547	-	**4,547**
Decreases:				
Liquidation	-	(14,562)	-	(14,562)
Other decreases	**-**	**716,532**	**-**	**716,532**
Transfers				
As at 31 December 2025				
	394,771	**216,105**	**22,518**	**633,394**
Impairment write-offs	-	1,387	4,818	6,205
As at 1 January 2025	-	(1,387)	(5,769)	(7,156)
Increases	-	9,966	(9,966)	-
As at 31 December 2025	**394,771**	**226,071**	**11,601**	**632,443**
Carrying amount				
As at 1 January 2025	851,205	12,119	9,551	872,875
As at 31 December 2025	**851,205**	**12,349**	**14,834**	**878,388**

Movements of intangible assets in 2024

PLN'000	Goodwill	Software	Prepayments	Total
Gross amount				
As at 1 January 2024	**1,245,976**	**856,932**	**54,592**	**2,157,500**
Increases:				
Purchases	-	342	95,021	95,363
Decreases:				
Other decreases	-	-	(20,047)	(20,047)
Transfers	-	97,497	(97,497)	-
As at 31 December 2024	**1,245,976**	**954,771**	**32,069**	**2,232,816**
Depreciation				
As at 1 January 2024	**-**	**657,479**	**-**	**657,479**
Increases:				
Amortization charge for the period	-	69,068	-	**69,068**
As at 31 December 2024	**-**	**726,547**	**-**	**726,547**
Impairment write-offs				
As at 1 January 2024	**214,707**	**-**	**-**	**214,707**
Increases	180,064	216,105	22,518	418,687
As at 31 December 2024	**394,771**	**216,105**	**22,518**	**633,394**
Carrying amount				
As at 1 January 2024	1,031,269	199,453	54,592	1,285,314
As at 31 December 2024	**851,205**	**12,119**	**9,551**	**872,875**

As at 31 December 2025, as well as at 31 December 2024, the Group had no significant contractual obligations for future

purchases of intangible assets. Intangible assets in the amount of PLN 878,288 thousand as at 31 December 2025 (as at 31 December 2024: PLN 872,875 thousand) include goodwill in the amount of PLN 851,205 thousand (as at 31 December 2024: PLN 851,205 thousand)

In the consolidated financial statements of the Group, goodwill represents the difference between the cost of the acquisition and the fair value of the Group's interest in identifiable assets, liabilities and contingent liabilities acquired at the business combination date. Goodwill included PLN 1,243,645 thousand proceed from merger from 28 February 2001 between Bank Handlowy w Warszawie S.A and Citibank (Poland) S.A, and PLN 2,331 thousand proceed from acquisition of organized part of the banking enterprise ABN Amro Bank (Poland) S.A, which happened on 1 March 2005.

Goodwill is stated at cost minus any accumulated impairment losses. Goodwill is allocated to cash-generating units and is not amortized but is tested annually for impairment independently of objective evidence of impairment.

Goodwill is disclosed at acquisition cost less total impairment losses to date. Goodwill is not amortized but is tested annually for impairment independently of objective evidence of impairment. The Group has identified two cash-generating units (the Retail Banking Segment and the Institutional Banking Segment) to which goodwill has been allocated.

As a result of a test performed, as of June 30, 2025, the Bank's Management Board has fully written off the goodwill attributable to the Retail Banking Segment.

The revaluation write-off for impairment for goodwill cannot be reversed.

The allocation of goodwill to cash-generating units is presented in the table below.

Book value of goodwill allocated to unit

PLN'000	31.12.2025	31.12.2024
Corporate Bank	851,206	851,206
Consumer Bank	-	-
	851,206	**851,206**

26. Impairment test for cash-generating units

Impairment testing is performed by comparing the carrying amount of an asset with its recoverable amount. Due to the fact that some property, plant and equipment, intangible assets and goodwill do not generate cash flow independently, for the purposes of the impairment test, they are assigned to the so-called cash generating units (CGUs).

A cash-generating unit is defined by International Accounting Standard 36 Impairment of assets (IAS 36), as the smallest identifiable set of assets that generates cash inflows that are largely independent of cash inflows from other assets or other sets of assets.

The Bank has identified two cash-generating units: the Institutional Banking Sector and the Retail Banking Sector, and their recoverable amount was determined on the basis of such a division.

The recoverable number of cash-generating units is determined on the basis of their value in use estimated on the basis of the financial plan. The plan is based on rational assumptions about future facts that reflect management assessment of future economic conditions and expected results of the Bank. The plan is periodically updated and approved by the Bank's Supervisory Board. The board accepted a 3-year time period for the process of financial planning.

IAS 36 requires that impairment testing be performed at least annually, unless there is evidence of impairment. The Group performs impairment testing of cash-generating units at the end of the reporting period. In the test performed as at December 31, 2025, the valuation used discount rates (from the range 9.1% - 12.0%) estimated using a beta coefficient for the banking sector, a risk premium and risk-free rate. Extrapolation of cash flows, which exceeds the period covered by the financial plan, has been based on growth rates reflecting the long-term NBP inflation target that amounted to 2.5% as at 31 December 2025

27. Deferred income tax assets and liabilities

Accounting policy:

A deferred tax provision and asset are calculated using the carrying value method by computing temporary differences between the carrying value of assets and liabilities in the statement of financial position and the tax base of assets and liabilities. In the statement of financial position, the Group discloses the deferred tax asset net of deferred tax provisions after compensation, when there is a legal title to set such compensation and when the provision and asset refer to the same taxpayer.

Deferred tax assets are recognized only to the extent that it is probable that a tax benefit will be realized in the future.

Financial information:

PLN'000	31.12.2025	31.12.2024
Deferred income tax asset	1,311,333	842,941
Deferred income tax liability	(1,033,929)	(762,775)
Deferred income tax net asset	**277,404**	**80,166**

The table above includes deferred income tax assets held for sale in the amount of 57,016 at the day of December 31, 2025. Additional information disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

Due to the entry into force of the Act of November 6, 2025, amending the Corporate Income Tax Act and the Act on Tax on Certain Financial Institutions, which provides for an increase in the corporate income tax rate for banks, the Bank has revalued its net deferred tax asset to reflect the increased tax rates.

In connection with paragraph 47 of IAS 12, deferred tax assets and deferred tax liabilities are measured using the tax rates expected to apply when the asset is realized or the liability is reversed, based on the tax rates (and tax regulations) that were legally or substantively in effect at the end of the reporting period.

As a result of the revaluation of the net asset taking into account the increase in the tax rate from 19% to the rate applicable at the expected time of realization of temporary differences (respectively: 30% in 2026, 26% in 2027 and 23% in subsequent years), the positive impact on the net financial result for 2025 amounted to PLN 114 million (of which PLN 51 million concerns the reduction of the net loss related to the transaction of sale of the retail business).

Positive and negative taxable and deductible temporary differences are presented below:

Deferred tax assets are attributable to the following:

PLN'000	31.12.2025	31.12.2024
Interest accrued and other expense	32,878	23,990
Revaluation impairment provision	74,394	66,432
Unrealized premium from securities	9,418	3,716
Negative valuation of derivative financial instruments	837,241	547,897
Negative valuation of securities held-for-trading	2,575	28,773
Income collected in advance	16,563	15,868
Commissions	3,695	3,146
Debt and equity securities measured at fair value through other comprehensive income	(13,163)	40,532
Staff expenses and other costs due to pay	100,985	73,585
Leasing IFRS16	41,631	34,698
Assets and liabilities classified as held for sale	140,100	-
Amortization of Consumer Segment	60,506	-
Other	4,510	4,304
Deferred tax asset	**1,311,333**	**842,941**

Deferred tax liability is attributable to the following:

PLN'000	31.12.2025	31.12.2024
Interest accrued (income)	40,816	20,668
Positive valuation of derivative financial instruments	669,499	537,289
Unrealized securities discount	120,486	106,013
Income to receive	8,382	5,137
Positive valuation of securities held-for-trading	2,517	23,965
Debt and equity securities measured at fair value through other comprehensive income	100,900	(7,044)
Investment relief	3,548	5,997
Valuations of shares	33,180	26,462
Leasing IFRS16	41,158	33,119

PLN'000	31.12.2025	31.12.2024
Other	13,443	11,169
Deferred tax liability	**1,033,929**	**762,775**
Net deferred income tax asset	**277,404**	**80,166**

Movement in temporary differences during the year 2025

The movement in temporary differences relating to deferred tax asset:

PLN'000	As at 1 January 2025	Adjustments recognized in income	Adjustments recognized in equity	As at 31 December 2025
Interest accrued and other expense	23,990	8,888	-	32,878
Revaluation impairment provision	66,432	7,962	-	74,394
Unrealized premium from securities	3,716	5,702	-	9,418
Negative valuation of derivative financial instruments	547,897	289,344	-	837,241
Negative valuation of securities held-for-trading	28,773	(26,198)	-	2,575
Income collected in advance	15,868	695	-	16,563
Commissions	3,146	549	-	3,695
Debt and equity securities measured at fair value through other comprehensive income	40,532	(33,079)	(20,616)	(13,163)
Staff expenses and other costs due to pay	73,585	27,400	-	100,985
Assets and liabilities classified as held for sale	34,698	6,933	-	41,631
Amortization of Consumer Segment	-	140,100	-	140,100
Leasing IFRS16	-	60,506	-	60,506
Other	4,304	206	-	4,510
	842,941	**489,008**	**(20,616)**	**1,311,333**

The movement in temporary differences relating to the deferred tax provision:

PLN'000	As at 1 January 2025	Adjustments recognized in income	Adjustments recognized in equity	As at 31 December 2025
Interest accrued (income)	20,668	20,148	-	40,816
Positive valuation of derivative financial instruments	537,289	132,210	-	669,499
Unrealized securities discount	106,013	14,473	-	120,486
Income to receive	5,137	3,245	-	8,382
Positive valuation of securities held-for-trading	23,965	(21,448)	-	2,517
Debt and equity securities measured at fair value through other comprehensive income	(7,044)	44,148	63,796	100,900
Investment relief	5,997	(2,449)	-	3,548
Valuations of shares	26,462	6,718	-	33,180
Leasing IFRS16	33,119	8,039	-	41,158
Other	11,169	2,274	-	13,443
	762,775	**207,358**	**63,796**	**1,033,929**
Change in net deferred income tax assets	**80,166**	**281,650**	**(84,412)**	**277,404**

Movement in temporary differences during the year 2024

The movement in temporary differences relating to deferred tax assets:

PLN'000	As at 1 January 2024	Adjustments recognized in income	Adjustments recognized in equity	As at 31 December 2024
Interest accrued and other expense	54,550	(30,560)	-	23,990
Revaluation impairment provision	84,236	(17,804)	-	66,432
Unrealized premium from securities	16,394	(12,678)	-	3,716

PLN'000	As at 1 January 2024	Adjustments recognized in income	Adjustments recognized in equity	As at 31 December 2024
Negative valuation of derivative financial instruments	770,046	(222,149)	-	547,897
Negative valuation of securities held-for-trading	2,421	26,352	-	28,773
Income collected in advance	16,794	(926)	-	15,868
Commissions	3,498	(352)	-	3,146
Debt and equity securities measured at fair value through other comprehensive income	3,421	16,494	20,617	40,532
Staff expenses and other costs due to pay	67,370	6,215	-	73,585
Leasing IFRS16	31,194	3,504	-	34,698
Other	8,351	(4,047)	-	4,304
	1,058,275	**(235,951)**	**20,617**	**842,941**

The movement in temporary differences relating to the deferred tax provision:

PLN'000	As at 1 January 2024	Adjustments recognized in income	Adjustments recognized in equity	As at 31 December 2024
Interest accrued (income)	65,824	(45,156)	-	20,668
Positive valuation of derivative financial instruments	729,710	(192,421)	-	537,289
Unrealized securities discount	48,965	57,048	-	106,013
Income to receive	4,920	217	-	5,137
Positive valuation of securities held-for-trading	1,226	22,739	-	23,965
Debt and equity securities measured at fair value through other comprehensive income	26,575	(7,044)	(26,575)	(7,044)
Investment relief	7,158	(1,161)	-	5,997
Valuations of shares	22,126	4,336	-	26,462
Leasing IFRS16	29,707	3,412	-	33,119
Other	9,639	1,530	-	11,169
	945,850	**(156,500)**	**(26,575)**	**762,775**
Change in net deferred income tax assets	**112,425**	**(79,451)**	**47,192**	**80,166**

28. Other assets

PLN'000	31.12.2025	31.12.2024
Interbank settlements	131,607	35,132
Interdepartmental settlements	8,843	-
Settlements related to brokerage activity	147,277	114,269
Income to receive	39,681	52,427
Staff loans out of the Social Fund	4,233	11,711
Sundry debtors	45,075	78,434
Prepayments	7,997	8,291
Other assets, total	**384,713**	**300,264**
Including financial assets*	337,035	239,546

** Financial assets include all the positions "Other assets", except the positions "Income to receive" and "Prepayments".*

The table above does not include the assets held for sale in the amount of PLN 58,636 thousand at the day of December 31, 2025. Additional information disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

29. Amounts due to banks

Accounting policy:

Classification and measurement of amounts due to banks are described in note 2.1 "Financial assets and liabilities – classification and measurement".

Financial information:

PLN'000	31.12.2025	31.12.2024
Current accounts	1,964,349	1,871,173
Term deposits	696,503	714,223
Credits and loans received	1,060,443	1,073,387
Other liabilities, including:	183,212	777,034
margin deposits	182,553	775,767
Total amounts due to banks	**3,904,507**	**4,435,817**

Received credit and loans changes are presented in the table below:

PLN'000	01.01.-31.12.2025	01.01.-31.12.2024
As the beginning of period	**1,073,387**	**-**
Increases (due to):	24,538	-
received credits and loans	-	1,066,750
received credit and loans interest	41,250	5,137
currency differences	(16,712)	1,500
Decreases (due to):	(37,482)	-
repayment of interest on loans and credits received	(37,482)	-
As at the end of period	**1,060,443**	**1,073,387**

30. Amounts due to customers

Accounting policy:

Classification and measurement of amounts due to customers are described in note 2.1 "Financial assets and liabilities – classification and measurement".

Financial information:

PLN'000	31.12.2025	31.12.2024
Deposits from financial sector entities		
Current accounts	3,356,648	1,748,848
Term deposits	2,657,059	2,249,188
	6,013,707	**3,998,036**
Deposits from non-financial sector entities		
Current accounts, including:	33,656,849	34,350,246
institutional customers	18,764,512	20,334,301
individual customers	11,695,551	11,385,244
public sector units	3,196,786	2,630,701
Term deposits, including:	20,556,829	15,088,950
institutional customers	10,025,054	5,793,514
individual customers	8,877,509	8,694,430
public sector units	1,654,266	601,006
	54,213,678	**49,439,196**
Total deposits	**60,227,385**	**53,437,232**

PLN'000	31.12.2025	31.12.2024
Other liabilities		
Other liabilities, including:	354,724	547,800
cash collaterals	238,743	446,647
margin deposits	81,088	53,863
Total other liabilities	**354,724**	**547,800**
Total amounts due to customers	**60,582,109**	**53,985,032**

The table above includes the assets held for sale in the amount of PLN 22,152,903 thousand at the day of December 31, 2025. Additional information disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

31. Provisions

Accounting policy:

A provision is recognized in the statement of financial position when the Group has a present legal or constructive obligation as a result of a past event, and also if it is probable that the discharge of this obligation will result in an outflow of economic benefits, and the provision amount can be reliably estimated.

Financial information:

PLN'000	31.12.2025	31.12.2024
Litigation	48,037	53,046
Granted financial and guarantee liabilities*	17,392	33,256
Other	12,241	34,690
Provisions, total	**77,670**	**120,992**

The movement in provisions is as follows:

PLN'000	2025	2024
As at 1 January	**120,529**	**111,689**
Provisions for:		
Litigation	52,583	47,028
Granted financial and guarantee commitments	33,256	34,960
Other	34,690	29,701
Increases:		
Charges to provisions in the period:	51,207	62,471
Litigation	24,167	16,296
Granted financial and guarantee commitments	22,840	31,546
Other	4,200	14,629
Decreases:		
Release of provisions in the period	(39,384)	(46,363)
Litigation	(8,619)	(5,446)
Granted financial and guarantee commitments	(25,044)	(33,234)
Other	(5,721)	(7,683)
Provisions used in the period, including:	(23,514)	(6,789)
Litigation	(17,409)	(4,832)
Other	(6,105)	(1,957)
Other, including:	(370)	(16)
Granted financial and guarantee commitments	(370)	(16)
Decreases in provisions due to IFRS 5	(31,292)	-
As at 31 December	**77,670**	**120,992**

**Additional information concerning provisions for granted financial and guarantee commitments are presented in note 40.*
***The „Other" item includes portfolio provisions related to TSUE judgements, which has been described in note 40.*
The table above does not include the provisions held for sale in the amount of PLN 23,289 thousand for 2025. Information on

discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

32. Other liabilities

Accounting policy:

The Bank records accruals and prepayments of expenses primarily in relation to the Bank's overhead expenses in reporting periods to which they relate. Accruals and prepayments are presented as 'Other liabilities' in the statement of financial position.

Within the range of liabilities to provision of providing services on time, the Bank uses a method of income on the time proportion in the time of providing services. According to the bank, this method reflects the procedure of providing services.

Within the area of methods, input data and assumptions adopted to estimate variable remuneration, the Bank uses approach most likely values in accordance with the remuneration received for achievement of the objectives, whereas within the range of remuneration reimbursements in insurance mediation, statistical methods are used, and provision is presented as accrual. The Bank addresses all issues, setting the level of income subject to identified variables (remuneration under specified objectives, expected reimbursements, all discounts).

For the remuneration for mediation in distribution of insurance products, in particular with the insurance connected with the Bank's credit product, the model of relative fair value is used. According to this model, using the fair value of the credit product and the sales services of the insurance product, the Bank separates remuneration being part of interest income and remuneration for provided services connected with the distribution and operation of these products.

Lease liabilities are measured in accordance with note 42.

Provisions due to employee benefits, including provision for retirement payments that are part of a defined benefit plan, are described in detail in note 45.

Financial information:

PLN'000	31.12.2025	31.12.2024
Staff benefits	11,177	20,835
Interbank settlements	265,806	198,432
Inter-branch settlements	-	2,543
Settlements related to brokerage activity	165,430	90,953
Liabilities due to leasing assets	84,174	121,165
Sundry creditors	101,101	159,403
Accruals:	322,362	385,015
Provision for employee payments	117,463	116,001
Provision for employee retirement	86,686	113,117
IT services and bank operations support	55,498	68,619
Consultancy services and business support	7,530	8,591
Other	55,185	78,687
Deferred income	34,622	38,318
Settlements with Tax Office and National Insurance (ZUS)	55,570	122,812
Other liabilities, total	**1,040,242**	**1,139,476**
Including financial liabilities*	627,688	593,331

**Financial liabilities include all the positions "Other liabilities", except the positions "Settlements with Tax Office and National Insurance (ZUS)" and "Deferred income".*
***The dividend payable to shareholders paid on July 14, 2025, was included in operating activities as 'Other adjustments' in the 2025 Statement of Cash Flows.*
The table above does not include the other liabilities from discontinued activity in the amount of PLN 118,302 thousand at the day of December 31, 2025. Information on discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

33. Financial assets and liabilities by contractual maturity

As at 31 December 2025

PLN'000	Note	Total	Up to 1 month	Between 1 and 3 months	Between 3 months and 1 year	Between 1 and 5 years	More than 5 years
Cash and cash equivalents	17	**9,421,899**	**9,421,899**	**-**	**-**	**-**	**-**
Amounts due from banks (gross)	18	**8,250,519**	**108,362**	**-**	**7,723,821**	**-**	**418,336**
Financial assets held-for-trading							
Debt securities held-for-trading	19	2,294,275	11,270	3,082	48,338	1,694,431	537,154
Financial assets measured at fair value through other comprehensive income							
Debt financial assets measured at fair value through other comprehensive income	20	30,151,984	1	-	119,312	25,358,871	4,673,800
Amounts due from customers (gross)							
Amounts due from financial sector entities	22	6,459,795	2,151,389	37,331	231,124	4,039,951	-
Amounts due from non-financial sector entities	22	18,454,171	6,498,679	1,565,954	2,791,149	5,100,069	2,498,320
Amounts due to banks	29	**4,096,957**	**3,020,282**	**-**	**20,000**	**1,056,675**	**-**
Amounts due to customers							
Amounts due to financial sector entities	30	5,833,664	5,802,974	29,583	1,107	-	-
Amounts due to non-financial sector entities	30	54,555,995	46,940,798	5,486,879	1,974,056	104,130	50,132

The table above does not include the other liabilities from discontinued activity in the amount of PLN 6,168,098 thousand at the day of December 31, 2025. Information on discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

As at 31 December 2024

PLN'000	Note	Total	Up to 1 month	Between 1 and 3 months	Between 3 months and 1 year	Between 1 and 5 years	More than 5 years
Cash and cash equivalents	17	**5,794,361**	**5,794,361**	**-**	**-**	**-**	**-**
Amounts due from banks (gross)	18	**8,788,431**	**2,207,277**	**1,909,437**	**4,437,500**	**-**	**234,217**
Financial assets held-for-trading							
Debt securities held-for-trading	19	1,801,904	15,711	3,551	130,147	603,542	1,048,953
Financial assets measured at fair value through other comprehensive income							
Debt financial assets measured at fair value through other comprehensive income	20	30,088,771	3,044,865	44,569	3,725,093	14,102,723	9,171,521
Amounts due from customers (gross)							
Amounts due from financial sector entities	22	5,110,374	2,034,675	75,699	700,000	2,300,000	-
Amounts due from non-financial sector entities	22	16,802,583	7,108,999	1,503,255	1,804,731	3,803,684	2,581,914
Amounts due to banks	29	**4,435,817**	**3,367,567**	**-**	**-**	**1,068,250**	**-**
Amounts due to customers							
Amounts due to financial sector entities	30	4,033,464	3,983,791	46,770	2,903	-	-
Amounts due to non-financial sector entities	30	49,951,568	43,661,121	4,265,820	2,023,175	1,452	-

34. Capital and reserves

Capital and reserves are accounted in nominal values except for Reserve for revaluation of financial assets measured at fair value through other comprehensive income that which include deferred taxation effect.

Share capital

Series/ issue	Type of shares	Type of preference	Type of limitation	Number of shares	Par value of series/issue [PLN'000]	Method of issue payment	Date of registration	Eligibility for dividends (from date)
A	bearer	none	-	65,000,000	260,000	paid in	27.03.97	01.01.97
B	bearer	none	-	1,120,000	4,480	paid in	27.10.98	01.01.97
B	bearer	none	-	1,557,500	6,230	paid in	25.06.99	01.01.97
B	bearer	none	-	2,240,000	8,960	paid in	16.11.99	01.01.97
B	bearer	none	-	17,648,500	70,594	paid in	24.05.02	01.01.97
B	bearer	none	-	5,434,000	21,736	paid in	16.06.03	01.01.97
C	bearer	none	-	37,659,600	150,638	transfer of Citibank (Poland) assets to the Bank	28.02.01	01.01.00
				130,659,600	**522,638**			

The par value of 1 share amounts to PLN 4.00

As at 31 December 2025, the Parent entity's share capital amounted to PLN 522,638,400 divided into 130,659,600 common bearer shares with a nominal value of PLN 4 each, which has not changed since 31 December 2024.

The Parent entity has not issued preferred shares.

Both in 2025 and 2024, there was no increase in the share capital by shares issuance.

Principal shareholders

During 2025 and the period from the publication of the previous annual consolidated financial statement for 2024 until the day of the publication of this annual consolidated financial statement for 2025, the structure of major shareholdings of the Bank changed.

The following table presents the shareholders who, as at 31 December 2025, held at least 5% of the total number of votes at the General Meeting or at least 5% of the Parent entity's share capital:

	Number of shares	% Shares	Number of votes at GM	% votes at GM
Citibank Europe PLC, Ireland	97,994,700	75.00	97,994,700	75.00
Other shareholders	32,664,900	25.00	32,664,900	25.00
	130,659,600	**100.00**	**130,659,600**	**100.00**

Supplementary capital

As at 31 December 2025, supplementary capital was PLN 3,001,262 thousand (31 December 2024: PLN 3,001,260 thousand). Supplementary capital is designated for offsetting financial losses or for other purposes including payment of dividends to the shareholders. The General Shareholders' Meeting of the Bank decides on the utilization of supplementary capital, but a portion of its balance amounting to one third of the total share capital may be used exclusively for offsetting losses shown in the financial statements.

The supplementary capital includes the amount of PLN 2,485,534 thousand constituting the excess of the fair value of the issued shares over their nominal value in connection with the business combination of the Bank and Citibank (Poland) S.A., which took place on 28 February 2001.

Issue, redemption and repayment of debt and equity securities

On February 14, 2025, the Bank received a decision of the Polish Financial Supervision Authority dated February 13, 2025, in which the PFSA granted the Bank permission to buy-back own shares in 2025 for the purpose of offering them by the Bank to eligible employees under the incentive program. Under the above permission issued for the period until

December 16, 2025, the Bank may acquire a maximum of 477,450 own shares, and the price of the own shares purchased by the Bank may not exceed PLN 16,667,000 in total.

In the period from January 1, 2025 to December 31, 2025, the Bank acquired a total of 150,019 own shares with a nominal value of PLN 4 per share, representing 0.1148167% of the Bank's share capital and entitling to 150,019 votes at the General Meeting of the Bank, which constitutes 0.1148167% of the total number of votes at the General Meeting of the Bank, for a total price of PLN 16,666,927.

Since the beginning of the share buyback, i.e. from January 2024, to the date of this report, the Bank has acquired a total of 485,920 own shares with a nominal value of PLN 4 per share, representing 0.3718977% of the Bank's share capital and entitling to 485,920 votes at the Bank's General Meeting, which constitutes 0.3718977% of the total number of votes at the Bank's General Meeting. During the period in which the Bank owned its own shares, the Bank did not exercise the voting rights attached to these shares.

On 22 July 2024, the Bank issued (i.e. initiated the transfer of), against no consideration, a total of 102,139 treasury shares previously purchased by the Bank. The shares issued represent a total of 0. 0781718% of the share capital of the Bank and entitle to 0.0781718% of the total number of votes at the General Meeting of Shareholders of the Bank, thus completing the process of issuing own shares in 2025.

As of the end of December 2025, the Bank retained a total of 266,787 treasury shares, representing 0.2041848% of the Bank's share capital and entitled to 0,2041848% of the total number of votes at the General Meeting of Shareholders of the Bank, thus completing the process of issuing own shares in 2025.

On March 2, 2026, the Bank received the decision of the Polish Financial Supervision Authority dated February 27, 2026, in which the Authority granted the Bank permission to commence the purchase of its own shares for the purpose of offering them to eligible employees under the incentive program. Under this permission, issued for the period until February 27, 2027, the Bank may purchase a maximum of 285,000 of its own shares, and the total price of the purchased shares may not exceed PLN 30,000,000.

Revaluation reserve

PLN'000	31.12.2025	31.12.2024
Revaluation of financial assets measured at fair value through other comprehensive income	240,646	(64,868)

The revaluation reserve is not distributed. As at the day of derecognition of all or part of the financial assets measured at fair value through other comprehensive income from the statement of financial position, retained earnings that were previously presented in the other comprehensive and accumulated income in "Revaluation reserve" are reclassified to the income statement.

Other reserves

PLN'000	31.12.2025	31.12.2024
Reserve capital	3,430,349	3,461,965
General risk reserve	540,200	540,200
Capital from the valuation of the equity awards program	64,305	55,352
	642,732	
Net actuarial losses on defined benefit program valuation	(31,951)	(23,025)
Foreign currency translation adjustment	4,489	4,535
Other reserves, total	**4,650,124**	**4,039,027**

Information regarding the distribution of the net income for 2025 is presented below in the "Dividends paid (declared) section.

Reserve capital

Reserve capital is created from the annual distribution of profits or from other sources, independently of the supplementary capital.

Reserve capital is designated for offsetting financial position losses or for other purposes, including payment of dividends to shareholders. The General Shareholders' Meeting of the Bank makes decisions on utilization of reserve capital.

General risk reserve

The general risk reserve is recorded out of net profit against unidentified risk arising from banking activities. The General Shareholders' Meeting of the Bank makes decisions on utilization of the general risk reserve subject to applicable

regulations.

Dividends

Dividends are recognized as liabilities on the date at which the General Meeting of the Bank has approved the appropriation of earnings.

Dividends paid (or declared)

On June 27, 2025, the Annual General Meeting of the Bank adopted a resolution on distribution of net profit for 2024. Pursuant to the resolution the net profit for 2024 in the amount of PLN 1,791,978,477.05was distributed as follows:

- Dividend: PLN 1,342,776,931.65, i.e. PLN 10.29 per share,
- Reserve capital: PLN 449,201,545.40

Dividend day was set for July 7, 2024, and the dividend payment date for July 14, 2024.

The dividend amount per share was calculated by dividing the dividend amount for shareholders by the total number of the Bank's shares, reduced by the number of treasury shares held by the Bank on the dividend date. Consequently, 130,493,385 shares participated in the dividend distribution.

The dividend accounted for 75% of the net profit for 2024, and the payment of funds in this amount was in line with the individual recommendation of the Polish Financial Supervision Authority regarding fulfilling by the Bank of requirements for dividend payment from net profit generated in 2024.

On 22 August 2025, The Bank was advised by the Polish Financial Supervision Authority that the PFSA did not have any objections to the potential payout by the Bank of the dividend (advance dividend) from the 2019 profit in the amount of PLN 449,201, 545.40.

An interim dividend in the amount of PLN 448,551,276.72 was paid from part of the reserve capital created by the Annual General Meeting of the Bank in Resolution No. 26/2025 of the Annual General Meeting of the Bank of June 27, 2025, to be allocated for the payment of dividends, including interim dividends ("Dividend Capital"), with the funds for the interim dividend payment coming from part of the Bank's profit generated in 2019. 130,392,813 shares participated in the interim dividend payment. The interim dividend per share was PLN 3.44 gross. The date for determining the eligibility for the interim dividend is set for October 21, 2025, and the date for payment of the interim dividend is set for October 28, 2025.

On February 27, 2026, the Bank received a letter from the Polish Financial Supervision Authority regarding an individual dividend recommendation for the Bank. The PFSA confirmed that the Bank meets the requirements for a dividend payment of up to 75% of the 2025 profit, with the maximum payment amount not exceeding the annual profit less the profit generated in 2025, which has already been included in the Bank's own funds. At the same time, the PFSA recommends that the Bank mitigate the risks inherent in its operations by refraining from taking other actions, particularly those outside the scope of current business and operational activities, that may result in a reduction of its own funds without prior consultation with the supervisory authority, including potential dividend payments from retained earnings from previous years and share buybacks or redemptions.

35. Repurchase and reverse repurchase agreements

The Group enters into purchase and sale transactions under agreements to resell and repurchase the same financial assets, so-called sell-buy-back and buy-sell-back respectively, as well as repo and reverse repo transactions in securities. Securities sold under repurchase agreements continue to be shown as the Group's assets. If the acquirer has the right to sell or pledge the assets, such assets are presented in a separate in the statement of financial positions line. At the same time liabilities arising from the repurchase promise are recognized. In the case of securities purchased under agreements to resell, securities are presented in the statement of financial position as loans. Any differences between sale/purchase prices and repurchase/resale prices are recognized respectively as interest income and expense using the effective interest rate method. In the case of sale of the securities previously purchased in the reverse repo transaction, the Group recognizes liabilities due to the short sale of securities. These liabilities are evaluated at fair value.

Repurchase agreements

Repurchase agreements are commonly used as a tool for short-term financing of interest-bearing assets, depending on the prevailing interest rates.

In repo transactions, all gains and losses on the assets held are on the Group's side.

Assets sold under repo transactions could not be traded by the Group further.

As at 31 December 2025 the Group had no repo liabilities

In 2025, the total interest expense on repurchase agreements was PLN 6,879 thousand (in 2024: PLN 26,558 thousand).

Reverse repurchase agreements

Reverse repurchase agreements are entered into as a facility to provide funding to customers.

As at 31 December 2025, assets purchased subject to agreements to resell were as follows:

PLN'000	Carrying amount of receivable*	Fair value of assets held as collateral	Resale date	Resale price
Amounts due from banks	814	814	Up to 1 month	814
	7,581,001	7,587,401	Up to year	7,718,551
Amounts due from other financial sector entities	10,880	10,888	Up to 1 month	10,886
	7,592,695	**7,599,103**		**7,730,251**

**Including interest*

As at 31 December 2024, assets purchased subject to agreements to resell were as follows:

PLN'000	Carrying amount of receivable*	Fair value of assets held as collateral	Resale date	Resale price
Amounts due from banks	1,840,962	1,894,830	Up to 1 month	1,843,107
	1,914,286	2,160,656	Up to 3 months	1,924,318
	4,462,267	4,464,007	Up to year	4,579,296
Amounts due from other financial sector entities	303,408	301,011	Up to 1 month	303,565
	8,520,923	**8,820,504**		**8,650,286**

**Including interest*

As at 31 December 2025 and 31 December 2024, the Group held the option to pledge or sell the assets acquired through reverse repo.

In 2025, the total interest income on reverse repurchase agreements was PLN 7,997 thousand (in 2024: PLN 468,741 thousand).

As at 31 December 2025, the liabilities due to short sale of securities purchased in reverse repo transactions amounted to PLN 8,880 thousand (as at 31 December 2024: PLN 156,708 thousand).

36. Offsetting of financial assets and financial liabilities

Financial assets and financial liabilities are offset and presented in the consolidated statement of financial position on a net basis when there is a legally enforceable right to offset, and their settlement is intended to take place on a net basis or to realize the asset and settle the liability simultaneously.

In the consolidated statement of financial position, the Group offsets financial assets and financial liabilities resulting from derivative contracts, settled by a central counterparty (CCP) - KDPW_CCP S.A.

The Group changed its approach to offsetting derivative instruments which is presented in Note 2.

The disclosure below additionally presents financial assets and financial liabilities resulting from forward and derivative transactions under master agreements, which constitute market standards developed under the International Swaps and Derivatives Association (ISDA), the Polish Bank Association and other master agreements, , under which, in certain breaches of the contracts' provisions, the contract may be legally terminated and settled in the net amount of receivables and liabilities.

The table below presents the fair values of derivatives (from the trading portfolio and designated as hedging instruments) as well as executable collateral for framework deals enabling lawful compensation in defined situations.

PLN'000	31.12.2025		31.12.2024	
	Financial assets	Financial liabilities	Financial assets	Financial liabilities
Receivables/liabilities arising from purchased/sold securities with a repurchase agreement received/granted	7,592,695	-	8,520,923	-
The effect of offsetting	-	-	-	-

PLN'000	31.12.2025		31.12.2024	
	Financial assets	Financial liabilities	Financial assets	Financial liabilities
The value of receivables and liabilities presented in the statement of financial position	**7,592,695**	**-**	**8,520,923**	**-**
Fair value of derivatives	3,907,542	4,154,616	4,818,938	4,153,965
The effect of offsetting*	(1,409,986)	(1,114,720)	(2,140,938)	(1,482,031)
Valuation of derivatives (net) presented in the statement of financial position	**2,497,556**	**3,039,896**	2,678,000	2,671,934
Value of collateral received/placed	(201,640)	(1,013,102)	(754,135)	(960,760)
Assets and liabilities subject to offsetting under the master agreement	**2,295,916**	**2,026,794**	**1,923,865**	**1,711,174**
Maximum amount of potential offset	(1,978,628)	(1,978,628)	(1,659,912)	(1,659,912)
Assets and liabilities subject to offsetting under the master agreement considering the maximum amount of potential offset	**317,288**	**48,166**	**263,953**	**51,262**

**Offsetting effect relates only to derivative instruments presented in the statement of financial position. Offsetting additionally impacts Amounts due to customers, deposit margin.*

37. Hedge accounting

Accounting policy:

The Group hedges against the risk of change in the fair value of fixed interest rate debt securities measured at fair value through other comprehensive income. The hedged risk results from changes in interest rates. In respect of hedge accounting the Group applies IAS 39.

IRS, denominated in the same currency as the hedged items, is the hedging instrument swapping the fixed interest rate for a variable interest rate.

The gain or loss on the hedged item attributable to the hedged risk is recognized in the result on hedge accounting in the income statement. The remainder of the change in the fair value valuation of debt securities available for sale is recognized in other comprehensive income. Interest income on debt securities is recognized in net interest income.

Changes in the fair value of derivative instruments designated and qualifying as fair value hedges are recognized in the result on hedge accounting in the income statement. Interest income and interest expenses related to the interest measurement component of derivatives concluded as hedging instruments under fair value hedges are presented in the interest result in the position interest income/expense on derivatives in hedge accounting.

Financial information:

As at 31 December 2025 and as at 31 December 2024, the Group had an active hedging relationship. Details are presented below.

As at 31 December 2025:

PLN'000	Notional value	Balance value		Listing in the statement of financial position	Change in fair value used to take hold of hedge ineffectiveness
		Assets	Liabilities		
Hedge accounting of fair value					
Interest rate risk					
IRS Transactions	4,848,500	-	358,677	Hedging derivatives	(332,939)

Details of the hedged items are presented in the table below.

PLN'000	Balance value		Cumulative amount of hedging fair value in balance value of hedged item corrections	Listing in the statement of financial position	Change in fair value used to take hold of hedge ineffectiveness
	Assets	Liabilities			
Hedge accounting of fair value					
Interest rate risk					

Treasury bonds	2,427,315	-	161,184	Debt investment securities measured at fair value through other	197,940
Bonds of financial institution	2,441,885	-	130,541	Debt investment securities measured at fair value through other	136,817

Cumulated amounts of adjustments related to fair value hedges included in the statement of financial position for all hedged items, with respect for which adjustments for gains and losses on fair value hedging have ceased, amounted to PLN (73,078) thousand as at 31 December 2025.

Information regarding hedge effectiveness is presented below.

PLN'000	Hedging ineffectiveness of income statement	Listing in the income statement
Hedge accounting of fair value	1,817	Hedge accounting result

As at 31 December 2024:

PLN'000	Notional value	Balance value		Listing in the statement of financial position	Change in fair value used to take hold of hedge ineffectiveness
		Assets	Liabilities		
Hedge accounting of fair value					
Interest rate risk					
IRS Transactions	7,024,500	54,615	72,737	Debt investment securities measured at fair value through other comprehensive income	154,407

Details of the hedged items are presented in the table below.

PLN'000	Balance value		Cumulative amount of hedging fair value in balance value of hedged item corrections	Listing in the statement of financial position	Change in fair value used to take hold of hedge ineffectiveness
	Assets	Liabilities			
Hedge accounting of fair value					
Interest rate risk					
Treasury bonds	2,836,707	–	(24,366)	Debt investment securities measured at fair value through other comprehensive income	(38,107)
Bank bonds	3,731,148	-	(8,546)	Debt investment securities measured at fair value through other comprehensive income	(107,426)

Cumulated amounts of adjustments related to fair value hedges included in the statement of financial position for all hedged items, with respect for which adjustments for gains and losses on fair value hedging have ceased, amounted to PLN (108,981) thousand as at 31 December 2024.

Information regarding hedge effectiveness is presented below.

	Hedge ineffectiveness recognized in income statement	Listing in the statement of financial position
Hedge accounting of fair value		
Interest rate risk	8,874	Hedge accounting result

38. Fair value information

Fair value of financial assets and liabilities

Fair value is a price that would be received for selling an asset or paid for transferring the liability in a transaction carried out in the conditions between market participants at the measurement date.

The summary below provides a statement of financial position (by category) and fair value information for each category of financial assets and liabilities.

As at 31 December 2025

PLN'000	Note	Held-for-trading	Loans, advances and other receivables	Measured at fair value through other comprehensive income	Other financial assets/liabilities	Total carrying value	Fair value*	Fair value disclosure**
Financial assets								
Amounts due from banks measured at amortized cost	18	-	8,246,058	-	-	8,246,058		8,250,663
Financial assets held-for-trading measured at fair value	19	4,827,103	-		-	4,827,103	4,827,103	
Debt investment financial assets measured at fair value through other comprehensive income	20	-	-	30,151,984	-	30,151,984	30,151,984	
Equity and other instruments measured at fair value through income statement	21	-	-	-	183,908	183,908	183,908	
Amounts due from customers measured at amortized cost	22	-	24,390,752	-	-	24,390,752		24,730,158
Amounts due from institutional customers						-		338,851
Amounts due from individual customers						-		555
		4,827,103	**32,636,810**	**30,151,984**	**183,908**	**67,799,805**	**35,162,995**	**32,980,821**
Financial liabilities								
Amounts due to banks	29				4,096,957	4,096,957		4,096,985
Financial liabilities held-for-trading	19	2,690,099				2,690,099	2,690,099	-
Amounts due to customers	30				60,389,659	60,389,659		60,363,722
		2,690,099	**-**	**-**	**64,486,616**	**67,176,715**	**2,690,099**	**64,460,707**

**Fair value of assets and liabilities that are recognized and measured in the statement of financial position at fair value.*
***Fair value of assets and liabilities that are not recognized and measured in the statement of financial position at fair value, but for which fair value is additionally disclosed in accordance with the requirements of IFRS 13.*
The table above includes assets and liabilities that are not recognized and measured in the statement of financial position at fair value. Additional information disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

As at 31 December 2024

PLN'000	Note	Held-for-trading	Loans, advances and other receivables	Measured at fair value through other comprehensive income	Other financial assets/liabilities	Total carrying value	Fair value*	Fair value disclosure**
Financial assets								
Amounts due from banks measured at amortized cost	18	-	8,787,780	-	-	8,787,780	n/a	8,787,781
Financial assets held-for-trading measured at fair value	19	4,436,319	-	-	-	4,436,319	4,436,319	n/a
Debt investment financial assets measured at fair value through other comprehensive income	20	-	-	30,088,771	-	30,088,771	30,088,771	n/a
Equity and other instruments measured at fair value through income statement	21	-	-	-	172,948	172,948	172,948	n/a
Amounts due from customers measured at amortized cost	22	-	21,367,246	-	-	21,367,246	n/a	21,381,622
Amounts due from institutional customers		-	15,329,548	-	-	15,329,548	n/a	15,321,332
Amounts due from individual customers		-	6,037,698	-	-	6,037,698	n/a	6,060,290
		4,436,319	**30,155,026**	**30,088,771**	**172,948**	**64,853,064**	**34,698,038**	**30,169,403**
Financial liabilities								
Amounts due to banks	29	-	-	-	4,435,817	4,435,817	n/a	4,435,873
Financial liabilities held-for-trading	19	2,755,905	-	-	-	2,755,905	2,755,905	n/a
Amounts due to customers	30	-	-	-	53,985,032	53,985,032	n/a	53,963,225
		2,755,905	**-**	**-**	**58,420,849**	**61,176,754**	**2,755,905**	**58,399,098**

**Fair value of assets and liabilities that are recognized and measured in the statement of financial position at fair value.*
***Fair value of assets and liabilities that are not recognized and measured in the statement of financial position at fair value, but for which fair value is additionally disclosed in accordance with the requirements of IFRS 13.*

Depending on the method of determining fair value, individual financial assets or liabilities are classified into the following categories:

- Level I: financial assets/liabilities valued directly on the basis of prices from an active market where the regular quotations and turnover are available.

  The active market includes stock and brokerage quotes and quotes in systems as pricing services, such as Reuters and Bloomberg, which represent the actual market transactions concluded on market conditions. Level I mainly include securities held-for-trading or available-for-sale.
- Level II: financial assets/liabilities valued on the basis of models based on input data from the active market and presented in Reuters and Bloomberg systems; depending on financial instruments, the following specific valuation techniques are used:
  - listed market prices for a given instrument or listed market prices for an alternative instrument;
  - fair value of interest rate swaps and forward foreign exchange contracts is calculated as the current value of future cash flows based on the market yield curves and current NBP fixing exchange rate in case of foreign currency instruments;
  - other techniques, such as yield curves based on alternative prices for a given financial instrument.

- Level III: financial assets/liabilities valued on the basis of valuation techniques using relevant parameters not market based.

The tables below present carrying amounts of financial instruments presented in the consolidated statement of financial position measured at fair value, arranged according to the above categories:

As at 31 December 2025

PLN'000	Note	Level I	Level II	Level III	Total
Financial assets					
Financial assets held-for-trading	19	2,330,267	2,496,836	-	4,827,103
derivatives		720	2,496,836		2,497,556
debt securities		2,294,275			2,294,275
equity instruments		35,272			35,272
Hedging derivatives	37	-	-	-	-
Debt investment financial assets measured at fair value through other comprehensive income	20	30,151,984	-	-	30,151,984
Equity and other instruments measured at fair value through income statement	21	45,632	-	138,276	183,908
Financial liabilities					
Financial liabilities held-for-trading	18	10,310	2,679,789	-	2,690,099
short sale of securities		8,880		-	8,880
derivatives		1,430	2,679,789	-	2,681,219
Hedging derivatives			358,677	-	358,677

The table above includes assets held for sale in the amount of PLN 3,731 thousand (embedded derivatives) at the day of December 31, 2025. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

As at 31 December 2024

PLN'000	Note	Level I	Level II	Level III	Total
Financial assets					
Financial assets held-for-trading	19	1,847,453	2,588,866	-	4,436,319
derivatives		34,994	2,588,866	-	2,623,860
debt securities		1,801,904	-	-	1,801,904
equity instruments		10,555	-	-	10,555
Hedging derivatives	37	-	54,140	-	54,140
Debt investment financial assets measured at fair value through other comprehensive income	20	29,089,569	999,202	-	30,088,771
Equity and other instruments measured at fair value through income statement	21	38,117	-	134,831	172,948
Financial liabilities		-	-	-	-
Financial liabilities held-for-trading	18	156,708	2,599,197	-	2,755,905
short sale of securities		156,708	-	-	156,708
derivatives		-	2,599,197	-	2,599,197
Hedging derivatives		-	72,737	-	72,737

As a result of the conversion carried out in 2025, the Bank acquired 100 series "A" preference shares of VISA Inc. worth PLN 7,243 thousand and at the same time, the conversion ratio of C shares to A shares changed, resulting in a reduction in the valuation of C shares as of the conversion date to PLN 4,646 thousand. The positive result on the operation amounted to PLN 2,597 thousand and was recognized as the result on equity and other investments measured at fair value through profit or loss.

As at 31 December 2025, the amount of financial assets classified to level III includes the value of the share in Visa Inc. in the amount of PLN 4,534 thousand (privileged series C) and also the value of other minority shareholding in the amount of PLN 133,742 thousand (as at 31 December 2024: PLN 10,949 thousand and PLN 123,882 thousand, respectively).

The sensitivity analysis for equity instruments classified to Level III is presented in the table below:

PLN'000	Fair value	Scenario	Fair value in the positive scenario	Fair value in the negative scenario
Equity and other instruments measured at fair value through income statement	138,276	Change of the key parameter (cost of capital by - 10% / + 10% or conversion rate by + 10% / - 10%)	157,068	123,585

The method of estimating the fair value of series C Visa Inc preference shares takes into account the value of Visa Inc. shares and corrections resulting from disputes (current or potential) to which Visa or the Bank would be a party. Minority shareholdings in structured companies are measured at fair value taking into account, inter alia, the expected discounted dividends using an assumed cost of capital and the history of profit distribution in the particular companies. Changes in the valuation are taken to the Income statement and presented in the Net gain/(loss) on equity and other instruments measured at fair value through income statement.

Changes in financial assets and liabilities measured at a fair value that was defined by using relevant parameters that are not market-based are presented below:

PLN'000	01.01.-31.12.2025 Equity and other investments measured at fair value through income statement	01.01.-31.12.2024 Equity and other investments measured at fair value through income statement
As at 1 January	**134,831**	**121,756**
Conversion of shares - transfer to Level I	(4,646)	(8,346)
Revaluation	8,091	21,421
As at 31 December	**138,276**	**134,831**

Revaluation is recognized in the Net gain/(loss) on equity and other instruments measured at fair value through income statement.

In 2025 the Group has not made any changes in classification criteria of financial instruments (presented in the consolidated statement of financial position at fair value) to each category reflecting the fair value (level I, level II, level III).

In the same period the Group has not made any changes in financial assets classification that could result from assets' purpose or usage change.

Fair value measurement

In the case of short-term financial assets and liabilities, it is assumed that their carrying amount is practically equal to their fair value. In the case of other instruments, the following methods and assumptions have been adopted.

Amounts due from customers and banks

The carrying amount of loans is presented at amortized costless impairment. The fair value of loans and advances is calculated as the discounted value of expected future principal payments and takes into account fluctuations in market interest rates as well as changes in margins during the financial period. Changes in margins on loans are based on concluded transactions. It is assumed that loans and advances will be paid on the contractual date. In the case of loans for which repayment dates are not fixed (e.g., overdrafts), the fair value is the repayment that would be required if the amount were due on the balance sheet date.

The methods of valuation mentioned above are classified to the third level of the fair value financial hierarchy: assets valued on the basis of valuation techniques using relevant parameters not market based.

Amounts due to banks and customers

In the case of on-demand deposits, as well as deposits without a pre-determined maturity date, the fair value is the amount that would be paid out if demanded on the balance date. The fair value of fixed maturity deposits is estimated on the basis of cash flows discounted with current interest rates taking into account current margins in a similar way as adopted for the valuation of loans.

For overnight placements, the fair value is equal to their carrying amount. For fixed interest rate placements, the fair value is assessed on the basis of discounted cash flows using current money market interest rates for receivables with similar credit risk, time to maturity, and currency.

As described above, the models used to determine the fair value of assets and liabilities to banks and customers,

recognized in the consolidated statement of financial position at amortized cost, involve valuation techniques based on non-market parameters. Therefore, the Group classifies the valuation of financial instruments for the purpose of disclosure to the third level of the fair value hierarchy. For all other financial instruments not at fair value, the Group believes that the fair value generally approximates the carrying value.

39. Derecognition of financial assets

The net gain/(loss) on derecognition of financial assets in Group relates to the gain on debt investment financial assets measured at fair value through other comprehensive income.

PLN '000	01.01.-31.12.2025	01.01.-31.12.2024
Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income		
Polish treasury bonds	48,393	30,176
Securities of international financial institutions	6,010	18,064
Others	119,218	2,412
	173,621	**50,652**

Due to specific activity of the Group, changes in debt investment financial assets measured at fair value through other comprehensive income are presented in operating activities in the statement of cash-flows.

40. Contingent liabilities and litigation proceedings

Information on pending proceedings

No proceedings regarding receivables or liabilities of the Group conducted in 2025 in court, public administration authorities or an arbitration authority is of significant value. In Group's opinion no proceedings conducted before in court, public administration authority or an arbitration authority, pose a threat to the Group's financial liquidity, individually or in total.

In the case of legal proceedings involving the risk of cash outflow, the appropriate reserves are created.

In accordance with applicable regulations, the Group recognizes impairment losses for receivables subject to legal proceedings.

The value of provisions for disputes as at 31 December 2025 and 31 December 2024 is presented in the table below:

PLN '000	31.12.2025	31.12.2024
Provisions for disputes, including:		
provisions for option cases on derivative instruments	17,506	16,718
provisions for individual cases related with TSUE:	21,694	25,446
Other	8,837	10,882
Provisions for disputes	**48,037**	**53,046**

The table above does not include the liabilities held for sale. The value of provisions for litigation relating to discontinued operations was amounted to PLN 3,585 thousand at the day of December 31, 2025.

The above values do not include portfolio provision created in connection with the CJEU judgments presented in Note 31 under "Other".

In 2025 the Group did not make any significant settlement resulting from court's final judgment.

- On 27 May 2019 the Bank received a statement of claim submitted by Rigall Arteria Management spółka z ograniczoną odpowiedzialnością sp. k. for the payment of PLN 386,139,809 along with statutory interest for delay from the date of filing the claim to the payment date and the amount of PLN 50,017,463.89 including statutory interest for delay from the date of filing the claim to the date of payment. The statement of claim refers to the agency agreement, which covered intermediary services for the Bank's products and services, primarily in the segment of consumer banking, and was terminated in 2014. The Court has referred the matter to mediation proceedings, which have not resulted in a mutual agreement, so the case is pending before the court of first instance.

  On 10 February 2020 the Bank received a statement of claim submitted by Rotsa Sales Direct sp. z o.o. for the payment of PLN 419,712,468 along with statutory interest for delay from the date of filing the claim to the payment

date and the amount of PLN 33,047,245 including statutory interest for delay from the date of filing the claim to the date of payment. The statement of claim refers to the agency agreement, which covered intermediary services for the Bank's products and services, primarily in the segment of consumer banking, and was terminated in 2014. The court referred the matter to mediation proceedings, so the case is pending before the court of first instance.

In the Bank's opinion, the number of claims filed by the companies is not justified. The Bank's position is confirmed by final and binding decisions of the companies' previous legal actions against the Bank, confirmed by Supreme Court judgments, favorable to the Bank, the judgment of the Court of Justice of the European Union of October 13, 2022, issued in case number C-64/21 in connection with preliminary questions from the Supreme Court, and the judgment of the District Court in Warsaw of December 16, 2025, issued in the case brought by Rigall Arteria Management.

The proceedings described in this section were excluded from the transaction of transferring the Bank's retail business to VeloBank S.A. pursuant to the agreement on the demerger by separating the Bank's retail business to VeloBank S.A. entered into on May 27, 2025, by the Bank with VeloBank S.A., Promontoria Holding 418 B.V., and Citibank Europe Plc.

As at 31 December 2024, the Bank was among others a party to 10 court proceedings associated with derivative transactions. Among these, 8 proceedings have not been terminated with a legally binding conclusion, and 2 have been terminated with a legally binding conclusion and cassation proceedings took place. In 6 proceedings the Bank acted as a defendant and in 4 as a plaintiff. The claims and allegations in the individual cases against the Bank are based on various legal bases. The subject of the dispute refers mainly to the validity of the derivative transactions and clients' liabilities demanded by the Bank with respect to those derivative transactions, as well as potential claims regarding potential invalidation of such demands by court decisions. Clients try to prevent the Bank from seeking claims resulting from derivative transactions; they dispute their liabilities towards the Bank, question the validity of the agreements and, in some cases, demand payment from the Bank.

The proceedings described in this section do not cover the Bank's retail activities and are not subject to transfer to VeloBank S.A.

- The Bank was a party to proceedings initiated by the President of the Office of Competition and Consumer Protection (UOKiK) against the Visa and Europay payment system operators and banks - issuers of Visa cards and Europay/Eurocard/Mastercard cards. The Bank was one of the addressees of the President of UOKiK's decision in the case. The proceedings have concerned alleged practices limiting competition on the payment cards market in Poland consisting in the fixing of interchange fees for transactions made with Visa and Europay/Eurocard/Mastercard cards, as well as limiting access to the market for operators who do not belong to the unions of card issuers, against whom the proceedings were initiated. The President of UOKiK's decision was the subject of legal analyses in appeal proceedings. On April 22, 2010, the Appeal Court overturned the verdict of the Court of Competition and Consumer Protection (SOKiK) and referred the case back to the court of first instance. On 21 November 2013 SOKiK gave a judgment, under which a penalty imposed on the Bank was modified and set in the amount of PLN 1,775,720. On October 6, 2015, the Appeal Court modified the verdict of the Competition and Consumer Protection Court and denied all appeals from the decision of the President of the Competition and Consumer Protection Office, including the changes of amounts of the fines that were imposed upon banks. As a result, the fine in the amount of 10,228,470 PLN that was originally imposed upon the Bank has been reinstated. As the Bank submitted extraordinary appeal on the 25 October 2017 the Supreme Court has overturned the Appeal Court's verdict, and the case has been returned to the Appeal Court for a second review. The appeals proceedings have begun again. In the first quarter of 2018, the Bank received the reimbursed. By the judgment of November 23, 2020, the Appeal Court set aside the judgment of November 21, 2013, and remitted the case to the court of first instance for reconsideration.

  The proceedings described in this section were excluded from the transaction of transferring the Bank's retail business to VeloBank S.A. based on the agreement on the division by separating the Bank's retail business to VeloBank S.A. concluded on May 27, 2025 by the Bank with VeloBank S.A., Promontoria Holding 418 B.V. and Citibank Europe Plc

- The Bank is carefully following the changes of the legal environment arising out of the courts' case law regarding mortgage loans indexed to foreign currencies. On 15 June 2023, the Court of Justice of the European Union (CJEU) in case C 520/21 essentially duplicated the opinion of the Advocate General from February 16, 2023, and ruled that only the consumer may demand additional benefits resulting from the cancellation of the Swiss franc loan agreement. The Bank may only demand the return of the loan capital together with statutory interest for delay without the possibility of demanding remuneration from the customer (consumer) for non-contractual use of capital. It has been held that Directive 93/13 does not directly govern the consequences of the invalidity of a contract concluded between a seller or supplier and a consumer after the unfair terms have been removed. It is for the Member States to determine the consequences of such a finding and the measures which they adopt in that regard must comply with EU law and, in particular, with the objectives of that directive. It will be for the national courts to assess, in the light of all the circumstances of the dispute, whether the acceptance of such consumer claims is

compatible with the principle of proportionality. When estimating the risk resulting from court litigations regarding indexation clauses in mortgage loan agreements, Bank Handlowy w Warszawie S.A. continuously did not factor in receivables under its claims against borrowers for the payment of amounts equivalent to a fee for using the loan capital, therefore, the Bank does not have to revise its assumptions following the Advocate General's and CJEU's opinion.

As at 31 December 2025, the Bank had receivables under CHF-indexed retail mortgage loans at the gross carrying amount of PLN 16 million. The Bank maintained a collective provision in the amount of PLN 21.7 million (compared to PLN 22.8 million as at 31 December 2024). Estimation of the provision assumes the expected level of probability of settlement or litigation resolution and an estimate of the Bank's loss should a dispute be settled in court. This value, as well as provisions for individual litigation cases, is included in the consolidated financial statement under Provisions.

As at 31 December 2025, the Bank was sued in 78 cases relating to a CHF-indexed loan for a total amount of approximately PLN 34.9 million. 59 cases were legally lost, and the Bank decided to file two cassation appeals (one appeal was rejected on formal grounds, as to the second the Supreme Court refused to accept the cassation appeals for consideration). Most of the cases are in the first instance.

The proceedings described in this section were excluded from the transaction of transferring the Bank's retail business to VeloBank S.A. pursuant to the agreement on the demerger by separating the Bank's retail business to VeloBank S.A. concluded on May 27, 2025 by the Bank with VeloBank S.A., Promontoria Holding 418 B.V. and Citibank Europe Plc.

- On 22 June 2021, the President of the Office of Competition and Consumer Protection initiated explanatory proceedings to initially determine whether the Bank's actions taken after consumers reported unauthorized payment transactions may justify the initiation of proceedings regarding practices violating the collective interests of consumers or proceedings regarding to recognize the provisions of the standard contract as prohibited. On 8 February 2024, the President of the Office of Competition and Consumer Protection initiated proceedings (decision delivered on 13 February 2024) regarding practices violating the collective interests of consumers regarding unauthorized payment transactions. The charges brought are:
  - failure to refund the amount of an unauthorized payment transaction to the customer within the D+1 deadline despite the lack of premises for such refusal,
  - misleading consumers as to the Bank's obligations and the distribution of the burden of proving the authorization of a payment transaction.

  The proceedings are the result of the explanatory proceedings of the President of the Office of Competition and Consumer Protection initiated in June 2021. At this stage of the proceedings, the amount of potential penalty cannot be estimated reliably.

- As of 31 December 2025, the Bank was the defendant in a total of 317 court cases concerning claims arising from the free credit sanction related to consumer loans offered by the Bank. The total value of the dispute in these cases as of the above date was PLN 7.2 million. The Bank noted the preliminary questions submitted by Polish courts in cases concerning Polish financial market entities, which concern issues related to the free credit sanction, and is closely following the course of proceedings in which these questions are to be resolved. The Bank closely monitors court decisions in cases involving sanctions for free loans. Currently, the majority of court decisions in the Bank's cases are favorable to the Bank.

  The proceedings described in this section were excluded from the transaction of transferring the Bank's retail business to VeloBank S.A. pursuant to the agreement on the demerger by separating the Bank's retail business to VeloBank S.A. concluded on May 27, 2025 by the Bank with VeloBank S.A., Promontoria Holding 418 B.V. and Citibank Europe Plc.

Commitments due to granted and received financial and guarantee liabilities

The amount of financial and guarantee commitments granted and received, by product category, is as follows:

PLN '000	State as at 31.12.2025	31.12.2024
Contingent liabilities and guarantees granted		
Letters of credit	159,738	245,189
Guarantees granted	4,004,978	4,035,116
Credit lines granted	14,547,861	16,261,305
Other financial liabilities	-	160,607
Underwriting other issuers' securities issues	22,754	22,433
	18,735,331	**20,724,650**

PLN '000	State as at 31.12.2025	31.12.2024

PLN '000	31.12.2025	31.12.2024
Letters of credit		
Import letters of credit issued	159,738	245,189
	159,738	**245,189**

The table above includes liabilities held for sale in the amount of PLN 5,235,160 thousand at the day of December 31, 2025. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

Guarantees issued include credit principal repayment guarantees, other repayment guarantees, advance repayment guarantees, performance guarantees, tender guarantees, and bill of exchange guarantees.

The provisions for expected credit losses for contingent liabilities and guarantees granted by the Group are established. As at 31 December 2025 the number of provisions of granted contingent liabilities and guarantees was PLN 25,767 thousand (31 December 2024: 33,256 thousand).

Movement in provision for expected credit losses – contingent liabilities and guarantees granted presented as follows:

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Provision for expected credit losses - contingent liabilities and guarantees granted					
Provision for expected credit losses as at 1 January 2025	**15,823**	**12,538**	**3,629**	**1,266**	**33,256**
Transfer to Stage 1	2,392	(2,009)	(383)	-	-
Transfer to Stage 2	(542)	1,110	(568)	-	-
Transfer to Stage 3	(12)	(600)	612	-	-
Transfer to purchased or originated credit-impaired assets	-	(8)	-	8	-
(Creation) / Releases in the period though the income statement	(4,906)	(3,803)	327	1,264	(7,118)
Foreign exchange and other movements	(302)	(62)	8	(15)	(371)
Provision for expected credit losses as at 31 December 2025	**12,453**	**7,166**	**3,625**	**2,523**	**25,767**

PLN '000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Provision for expected credit losses - contingent liabilities and guarantees granted					
Provision for expected credit losses as at 1 January 2024	**12,512**	**18,057**	**3,686**	**705**	**34,960**
Transfer to Stage 1	3,799	(3,515)	(284)	-	-
Transfer to Stage 2	(702)	1,049	(347)	-	-
Transfer to Stage 3	(33)	(1,024)	1,057	-	-
Transfer to purchased or originated credit-impaired assets	-	-	-	-	-
(Creation) / Releases in the period though the income statement	(485)	(1,290)	(659)	746	(1,688)
Foreign exchange and other movements	732	(739)	176	(185)	(16)
Provision for expected credit losses as at 31 December 2024	**15,823**	**12,538**	**3,629**	**1,266**	**33,256**

Movements in contingent liabilities granted that contribute to movements in provision for expected credit losses presented as follows:

PLN'000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Gross amount of contingent liabilities granted					
Gross amount of contingent liabilities granted as at 1 January 2025	**18,075,272**	**2,614,934**	**7,931**	**26,513**	**20,724,650**
Transfer to Stage 1	1,869,218	(1,868,214)	(1,004)	-	-
Transfer to Stage 2	(822,529)	824,389	(1,860)	-	-
Transfer to Stage 3	(538)	(20,726)	21,264	-	-
(Creation)/Releases in the period though the income statement	-	(1,836)	-	1,836	
Foreign exchange and other movements	(1,078,767)	(506,649)	(16,819)	(1,562)	(1,603,797)
Other changes	(370,401)	(14,624)	(216)	(281)	(385,522)
Net amount of contingent liabilities granted as at 31 December 2025	**17,672,255**	**1,027,274**	**9,298**	**26,504**	**18,735,331**

PLN'000	Stage 1	Stage 2	Stage 3	Purchased or originated credit-impaired assets	Total
Gross amount of contingent liabilities granted					
Gross amount of contingent liabilities granted as at 1 January 2024	**14,798,876**	**2,517,837**	**7,868**	**17,721**	**17,342,302**
Transfer to Stage 1	342,481	(342,465)	(16)	-	-
Transfer to Stage 2	(614,155)	614,198	(43)	-	-
Transfer to Stage 3	(7)	(104)	111	-	-
Transfer to purchased or originated credit-impaired assets	-	-	-	-	,
(Creation)/Releases in the period though the income statement	645,797	(197,926)	24	8,257	456,152
Foreign exchange and other movements	2,902,280	23,394	-13	535	2,926,196
Net amount of contingent liabilities granted as at 31 December 2024	**18,075,272**	**2,614,934**	**7,931**	**26,513**	**20,724,650**

PLN'000	31.12.2024	31.12.2024
Financial and guarantees liabilities received		
Guarantees	14,881,119	12,910,800
	14,881,119	**12,910,800**

The table above includes liabilities held for sale in the amount of PLN 5,235,160 thousand at the day of December 31, 2025. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

41. Assets pledged as collateral

Details of the carrying amounts of assets pledged as collateral are as follows:

PLN'000	31.12.2025	31.12.2024
Assets pledged		
Debt investment financial assets measured at fair value through other comprehensive income, including:	49,130	322,449
Assets pledged as collateral	*49,130*	*200,309*
Amounts due from banks		
Settlements related to operations in derivative instruments and stock market trading	25,946	324,170

PLN'000	31.12.2025	31.12.2024
Amounts due from customers		,
Stock market trading guarantee funds and settlements	1,870,054	1,613,484
	1,896,000	**2,260,103**

As at 31 December 2025, debt securities that serve as collateral for the settlement of derivative instruments in the Euroclear clearing house in the amount of PLN 49,130 thousand (31 December 2024 accordingly: PLN 122,140 thousand and PLN 200,309 thousand).

In the statement of financial positions, the Bank presents separately non-cash assets pledged as collateral for liabilities, where the acquirer has the right to sell or pledged the collateral.

Other assets disclosed above secure settlement of derivatives transactions and stock market transactions. The terms and conditions of the transactions executed to date are standard and typical for such dealings.

Restricted assets, apart from the instruments presented in this note, also include the value of the obligatory reserve that the Group is required to maintain in its current account with the NBP. More information on the required reserve is provided in Note 18 Cash and cash equivalents.

42. Leases

Accounting policy:

At the commencement date, the Group as a lessee measures the lease liability at the present value (discounted) of the lease payments that are not paid at that date. The right-of-use assets are measured at cost.

Right of use of assets due to perpetual usufruct of land are presented as tangible fixed assets in the statement of financial position, while lease liabilities are presented in other liabilities.

In the profit and loss account, the depreciation of the right to use assets is included in the depreciation tangible fixed and intangible assets, interest costs on lease liabilities - in interest costs, and the costs of short-term contracts, leasing low-value assets and leasing variables - in general administrative expenses.

In the statement of cash flows, interest flows are recognized in cash flows from operating activities, while the equity component is included in cash flows from financing activities.

Leases where the Group is the lessee

Financial information:

The Group leases office space and has the right of perpetual usufruct of land:

	2025			2024		
PLN'000	Rights to perpetual usufruct	Real estate and other	Total	Rights to perpetual usufruct	Real estate and other	Total
ROU - Opening	**75,563**	**37,290**	**112,853**	**76,667**	**28,601**	**105,268**
ROU - Added	-	127	127	-	21,688	21,688
ROU – held for sale	-	(32,108)	(32,108)	-	-	-
ROU - Amortization	(1,104)	(2,120)	(3,224)	(1,104)	(12,999)	(14,103)
ROU - Closing	**74,459**	**3,189**	**77,648**	**75,563**	**37,290**	**112,853**
Liability Balance as at reporting date	**80,936**	**3,239**	**84,175**	**81,141**	**40,024**	**121,165**

	2025			2024		
PLN'000	Rights to perpetual usufruct	Real estate and other	Total	Rights to perpetual usufruct	Real estate and other	Total
Lease Cost	**4,494**	**2,292**	**6,786**	**4,512**	**2,573**	**7,085**
- Depreciation of right-of-use Assets	1,104	2,120	3,224	1,104	2,446	3,550
- Interest on Lease Liabilities	3,390	172	3,562	3,408	127	3,535
Reporting Exceptions Cost Short-term Leases	-	1,051	1,051	-	320	320
Reporting Exceptions Cost Low-value Leases	-	2,302	2,302	-	2,256	2,256

PLN'000	2025			2024		
	Rights to perpetual usufruct	Real estate and other	Total	Rights to perpetual usufruct	Real estate and other	Total
Variable Lease Cost	303	12,847	13,149	-	,	0
Result on lease modification	-	6	6	-	(87)	(87)
Total Lease Cost	**4,797**	**18,498**	**23,295**	**4,512**	**22,297**	**26,809**

The table above does not include the cost of discontinued activity in the amount of PLN 8,872 thousand at the day of December 31, 2025. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

PLN'000	2025			2024		
	Rights to perpetual usufruct	Real estate and other	Total	Rights to perpetual usufruct	Real estate and other	Total
Cash Flows - Total	**3,595**	**2,265**	**5,860**	**3,595**	**13,590**	**17,185**
Cash Flows - Interest	3,390	172	3,562	3,408	918	4,326
Cash Flows - Principle Repayment	205	2,093	2,298	187	12,672	12,859
Weighted-average Remaining Lease Term (in years)	**67,7**	**3,5**	**3,2**	**68,7**	**4,2**	**62,1**
Weighted-average Incremental Borrowing Rate	**4,3%**	**2,9%**	**4,2%**	**4,3%**	**2,6%**	**4,1%**
Total Lease Cost	**3,595**	**2,265**	**5,860**	**3,595**	**13,590**	**17,185**

43. Transactions with key management personnel

PLN'000	31.12.2025		31.12.2024	
	Members of the Management Board	Members of the Supervisory Board	Members of the Management Board	Members of the Supervisory Board
Loans granted	**3,377**	**51**	**3,537**	**56**
Deposits				
Current accounts	12,964	3,895	11,062	8,810
Term deposits	556	29,227	1,074	26,730
	13,520	**33,122**	**12,136**	**35,540**

As at 31 December 2025 and 31 December 2024, no guarantees were granted to members of the Management Board or the Supervisory Board.

All transactions of the Group with members of the Management Board and the Supervisory Board are concluded on market terms and conditions.

Staff expenses for current and former members of the Management Board are presented in note 11.

In 2025, the total amount of remuneration paid to the Bank's Supervisory Board was PLN 1,570 thousand (2024: PLN 1,437 thousand). In 2025 and 2024, the Members of the Bank's Supervisory Board did not receive any salaries or any fringe benefits from Subsidiaries.

In 2025 there were changes in the composition of the Bank's Management Board and the Bank's Supervisory Board, as listed below.

Changes in the composition of the Bank's Management Board

On April 9, 2025, Katarzyna Majewska resigned from the role of Vice President of the Management Board effective January 31, 2025, due to the intention to take on new challenges outside the Bank's structures.

On May 29, 2025, the Supervisory Board of the Bank decided to appoint Mr. Tomasz Dziurzyński to the Management Board of Bank Handlowy w Warszawie S.A. with the position of the Member of the Management Board as of 30 November 2024 for a four-year term of office. As part of the internal division of powers in the Management Board, Mr. Tomasz Dziurzyński will be a Member of the Bank's Management Board responsible for operations and technology.

On August 21, 2025, Mr. Ivan Vrhel resigned from the role of Member of the Management Board effective November 30,

2025.

On November 3, 2025, the Supervisory Board of the Bank decided to appoint Mr. Sebastian Perczak to the Management Board of Bank Handlowy w Warszawie S.A. with the position of the Member of the Management Board responsible for transaction banking and custody services as of December 1, 2025. The appointment took place due to the resignation of Mr. Ivan Vrhel as of November 30, 2025.

Changes in the composition of the Bank's Supervisory Board

In 2025 the composition of the Bank's Management Board has not been changed.

Among all employment contracts between the Bank and the members of the Management Board of the Bank, there is no contract that provides for financial compensation in the case of termination with prior notice or for reasons specified in Article 53 of the Labor Code.

A separate non-competition agreement conducted with the Bank applies to each member of the Bank's Management Board. According to its provisions, in case of termination of employment in the Bank, in the period of 12 months (in case of one member of the Management Board – of 6 months) from the date of employment termination, the member of the Management Board is obligated to refrain from competitive activities against the Bank. Due to limitations mentioned above, the Bank will be obliged to pay the compensation to the member of the Management Board.

44. Related parties

The Bank is a member of Citigroup Inc., which is the ultimate controlling party. The parent entity of the Bank is Citibank Europe PLC based in Ireland.

Within its normal course of business activities, the Group enters into transactions with related entities, in particular with entities of Citigroup Inc.

The transactions with related entities result from current activity of the Group, and mainly include deposits, guarantees and derivatives transactions.

Apart from the transactions described in this section, in the presented period neither the Bank nor the Bank's subsidiaries conducted any transactions with related entities, which would be individually or jointly significant. No transaction with related entities was concluded on terms other than market terms.

Transactions with Citigroup Inc. entities

The receivables and liabilities toward Citigroup Inc. entities are as follows:

PLN'000	31.12.2025	31.12.2024
Receivables, including:	7,791,730	7,304,663
Liabilities, including*:	2,623,925	3,197,334
Deposits	1,091,727	2,096,072
Credits and loans received**	1,060,443	1,073,387
Balance-sheet valuation of derivative transactions:		
Assets held-for-trading	618,584	1,595,239
Liabilities held-for-trading	605,645	942,136
Contingent liabilities granted	248,245	269,064
Contingent liabilities received	131,871	220,724
Contingent transactions in derivative instruments (nominal value), including:	66,728,140	119,673,376
Interest rate instruments	12,855,786	44,035,640
Interest rate swaps (IRS)	721,154	869,446
Interest rate options	8,230	565,912
Futures contracts	12,126,402	42,600,282
Currency instruments	53,371,076	75,382,595
FX forward/spot	702,859	711,140
Currency – interest rate swaps (CIRS)	22,557,778	30,706,330
FX swap	28,272,672	41,688,289
Foreign exchange options	1,837,767	2,276,836
Securities transactions	501,278	244,219
Securities purchased pending delivery	59,674	60,961
Securities sold pending delivery	441,604	183,258
Commodity transactions	-	10,922
Swaps	-	10,922

PLN'000	31.12.2025	31.12.2024

*On 31 December 2025 the Bank's liabilities from the parent company and its branches amounted to PLN 1,623 million and off-balance liabilities amounted PLN 102 thousand (31 December 2024: PLN 1,589 thousand and PLN 124 thousand).
**To draw funds from subordinated loan under the Framework Loan Facility Agreement, concluded by the Bank and Parent Entity.

PLN'000	2025	2024
Interest and commission income*	351,032	255,328
Interest and commission expense*	57,338	53,708
General administrative expenses	196,641	192,201
Other operating income	8,696	8,832

*Including interest and commission income in amount of PLN 17,342thousand (2024: PLN 16,296 thousand) and interest and commission expense in amount of PLN thousand (2024: PL 7,452 thousand) refer to the parent company

The Group incurs costs and receives income on derivative transactions with Citigroup Inc. entities to hedge the Bank's position in market risk. These derivative transactions are opposite (back-to-back) to derivative transactions with other Group clients or close the proprietary position of the Group. The net carrying amount of financial derivative transactions with related entities as at 31 December 2025 amounted to PLN 12,939 thousand (as at 31 December 2024: PLN 653,103 thousand).

Furthermore, the Group incurs costs and receives income from agreements concluded between Citigroup Inc. entities and the Group for the mutual provision of services.

The costs arising and accrued (including VAT, reflected in the Group's costs) under concluded agreements in 2025 and 2024 mainly related to the cost of services provided to the Group for the maintenance of the banking IT systems and advisory support and are included in general administrative expenses; income was mainly related to the provision of data processing services by the Group to such entities and is presented in other operating income.

In 2025, the capitalization of investments regarding functionality modification of Retail Banking IT systems did not take place. In 2024, total payments for Citigroup Inc. entities amounted to PLN 88,744 thousand. Information on transactions with key management personnel is presented in note 43.

Citibank Europe PLC is absorbing interest rate exposures associated with the transferred assets and liabilities from the date of the Bank entering into an agreement to sell consumer banking business (described in Note 3) through to completion. Additionally, the Bank may incur certain migration costs from various Citigroup affiliates related to the transaction. Amounts will be billed at market rates by Citigroup, which will be due and payable to various Citigroup affiliates. Citigroup affiliates may assume certain costs related to these arrangements.

At the end of 2025, there are no outstanding balances between Citigroup affiliates and the Bank related to these arrangements related to the transaction.

No guarantees have been given to or received by the Bank related to the transaction with related parties.

45. Employee benefits

Employee benefits are divided into the following categories:

- short-term benefits, which include salaries, awards, social insurance contributions, paid leave and benefits in kind (such as medical care, company cars and other free or subsidized benefits).

  Depending on their individual grade, employees may receive an award from the incentive fund, a discretionary annual bonus under the internal employee compensation regulations. The costs of short-term benefits are expensed in the income statement in the period to which they relate. At the end of a given reporting period, if there is a balance payable which equals the expected undiscounted value of short-term benefits for that period, the Group will record it as an accrued expense presented under Other liabilities in the statement of financial position.

- Long-term employee benefits

  Under its compensation scheme, the Group guarantees its employees retirement and pension allowances, constituting defined benefit plans. Their amount depends on years worked in the Bank, falling directly before gaining rights to payment. For the future payments of retirement and pension allowances there is a reserve made, shown in liabilities in "Other liabilities" in the statement of financial position and in "Activities costs and general and administrative expenses" of the profit and loss account in part resulting from costs of current employment and time. Part of the provision resulting from a change of actuarial assumptions (economics and demographic) taken to

valuation is shown in other total income.

- Employee Pension Plan

  The Group conducts for its employees the Employee Pension Plan ("PPE", "Plan"), registered by the Supervisory Authority under numbers ZM RPPE 178/02/12/19 and 993/02/12/19. Collective agreement is based on records of payment of employee contributions to the investment fund by the employer. The Plan is conducted and managed by Goldman Sachs TFI S. A. (previously NN Investment Partners TFI S.A.).

  The Group's pension plan is a defined contribution program in accordance with IAS 19. The Group pays contributions for its staff to a separate organization and, after they are paid, has no other payment liabilities. Premiums are shown as employee benefit expenses in the period they concern.

  The basic contribution paid by the employer is defined as a percentage of the Plan member's salary. The basic contribution rate amounts to 7%. The additional contribution – voluntary, is paid by the employee – the Plan participant. The basic contribution is the income of the Program participant, from whom he is obliged to pay personal income tax (articles 12 and 13 of the Act on the income tax from individuals of 26 July 1991, Official Journal from 2019, item 1387 with amendments).

  Payments from the Plan are paid after the participant's or entitled person's motion and under conditions specified in the program.

  The Plan participant may quit the Plan. The employer stops charging and paying basic and additional contributions for the Plan participant, and the funds that have accumulated on the Plan participant's registers are left there till the time of payment, transfer payment, transfer or refund. In connection with the operation of the PPE in the Bank, the Bank has not implemented the Employee Capital Plan (PPK)

- other long-term employee benefits – jubilee and other long service awards and until 2021 - deferred cash awards granted to the Management Board and people, whose professional operating has a significant impact on the Bank's risk profile. Based on the agreement signed with trade unions in 2023, since 1 January 2025 instead of rewards in kind Bank introduced additional day offs subject to years of service – for every 5 years, starting from 5th anniversary. Starting with the annual bonus for 2022, the granting of bonuses in the form of a deferred cash bonus has been discontinued. Since then, the Bank has been granting deferred variable remuneration conditionally only in a financial instrument.

- employee equity benefits – in the form of existing shares in the capital of Bank Handlowy w Warszawie S.A. or phantom shares (including under the Transaction Reward) and also in the form of common stock under deferred stock award programs based on shares of Citigroup (capital accumulation plan – CAP). In 2025 there were no grants under Citi CAP. In first half of 2024, the Group converted a specific part of the awards settled in cash into awards settled in equity instruments of Bank Handlowy S.A., which resulted in a change of method of recognizing certain equity awards in accordance with IFRS 2 "Share-based payments". The conversion of awards involved the transfer of part of liabilities to employees previously included in the statement of financial position in the item Other liabilities to the equity item Other reserves. Awards are recognized as costs in the period of acquiring rights by the awarded employees in correspondence with equity. The value of the award is determined according to the fair value of the shares determined on the date of granting and is not subject to revaluation thereafter. Awards that have not been converted are treated as cash-settled programs. A provision is created for future payments is shown in the "consolidated statement of financial position" and "General administrative expenses" in the income statement. The costs of the program are determined on the basis of the Bank's shares price or Citigroup share price. According to IFRS, the fair value is measured at grant date and, subsequently, at each reporting date until the final settlement. Total expenses recorded in a given period are based on the fair value deferred shares at the reporting date times the part of the rights that were deemed acquired in that period. Detailed information concerning the employee equity benefits is presented further in this note.

Provisions/accruals for the above employee benefits are as follows:

PLN'000	31.12.2025	31.12.2024
Provision for remuneration	93,842	93,503
Previsions for unused leave	13,225	17,458
Provision for employee retirement and pension benefits	86,686	113,117
Provision for employee equity compensation	10,396	5,013
	204,149	**229,091**

The table above does not include provisions held for sale in the amount of PLN 55,688 thousand at the day of December 31, 2025. Information on the discontinued activity disclosed in Note 3 "Assets and liabilities classified as held for sale and profit from discontinued operations".

Change in provisions/accruals for employee retirement allowances and jubilee payments:

PLN'000	2025	2024
As at 1 January	**113 117**	**95 546**
Increases (due to):	23 480	20 186
Actuarial profit/loss on revaluation	11 020	9 769
Including those resulting from:		
Change of economic assumptions	176	(772)
Change of demographic assumptions	4 327	4 584
Experience adjustment	6 517	5 957
Remuneration cost	6 733	5 587
Interest cost	5 727	4 830
Decreases (due to):	(49 911)	(2 615)
Provisions utilization	(2 037)	(2 615)
Classified as held for sale	(8 024)	-
Limitation of benefits	(39 850)	-
As at 31 December	**86 686**	**113 117**

Analysis of sensitivity for significant actuarial assumptions

PLN'000	2025	2024
Central value	86,686	113,117
Decrease of growth salary to 1 p.p.	77,670	101,255
Increase of growth salary to 1 p.p.	97,022	127,014
Decrease of rotation by 10%	89,657	117,104
Increase of rotation by 10%	83,919	109,640
Decrease of discount rate by 0.5 p.p., including:	73,535	116,258
Falling to benefits paid within 1 year	6,840	9,321
Increase of discount rate by 0.5 p.p., including:	69,159	110,443
Falling to benefits paid within 1 year	6,840	9,321

More information about defined benefit programs in the Bank's financial report can be found in note 2.

In 2025, the Group's expenses in respect of premiums for the Employee Pension Plan amounted to PLN thousand (in 2024: PLN 31,122 thousand).

Employment in the Group*:

FTEs	2025	2024
Average employment during the year	3,062	3,038
Employment at the end of the year	3,045	3,050

**In 2025, the Bank changed the methodology for calculating average employment and employment at the end of the period. In previous periodic reports, both average employment and employment at the end of the period were calculated excluding employees absent due to illness, parenthood or unpaid leave. Currently, the Bank does not apply this exclusion. Comparative data has been changed accordingly.*

Description and principles of employee stock benefit schemes

Under the employee stock benefit program, the shares of Bank Handlowy w Warszawie S.A. and may be awarded in the form of Citigroup stock (the so-called Capital Accumulation Program, or CAP) are offered to selected employees. Bank has amended remuneration policies by introducing a possibility to payout financial instrument in form of existing shares in the capital of the Bank to employees whose professional activities have material impact on risk profile of the Bank (the "Identified Staff") and to employees without such status, indicated in above-mentioned policies. On November the 7th, 2022 the Management Board by way of resolution amended remuneration policies, and on November 14, 2022, Supervisory Board adopted them. On December the 16th, 2022 the Extraordinary General Assembly of Shareholders decided to implement motivation programs that are based on the existing shares in capital of the Bank. In case Bank will not be able to deliver to employees required number of real shares, adopted changes to policies enable Bank to payout a

part of remuneration as phantom share award or in case of the decision of the Bank, in form of phantom or real shares of the Bank. Remuneration policies allow for 1:1 conversion of phantom shares granted before the adoption of amendments, provided that an appropriate agreement is signed with employees concerned. On December 29, 2023, the Polish Financial Supervision Authority granted the Bank its permission to buy-back Bank's shares referred to in Article 77 and Article 78 section 1 of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of June 26, 2013 on prudential requirements for credit institutions and amending Regulation (EU) No. 648/2012. The buy-back of Bank's shares started in January 2024.

Within the framework of the CAP, eligible employees could receive so-called "deferred shares" of Citigroup which are granted at the NYSE average closing price as at the 5 days prior to the grant date. "Deferred shares" give the right to equivalents of dividends, but without voting rights, and must not be sold prior to their conversion into stocks. "Deferred shares" are converted into stocks after the end of a period that is determined in the Program Rules. As a general rule, the employee has a right to options revoked at the moment of employment termination in the Citigroup, provided the termination of separate contract for granted options. Deferred shares granted in previous years will be transferred partially in 25% every year for the next four years, starting from the first anniversary of the option to acquire. In 2024, there were no awards granted under this Program.

The employee share program is subject to internal controls in the Compensation and Benefits Unit.

As of 22 December 2017, the Bank implemented the employee remuneration Policy of Bank Handlowy w Warszawie S.A., replacing the prior policy for the remuneration of key persons in Bank Handlowy w Warszawie S.A. Since then, the aforementioned Policy has been subject to reviews and amendments. The last change was implemented by decision of the Bank's Supervisory Board on December 5, 2024.

According to the above-mentioned policy, the Management Board of the Bank and other managerial staff having a significant influence on the Bank's risk profile receive variable remuneration in relation to individual performance and the Bank's financial results.

Employees will acquire entitlements to the part of variable remuneration granted conditionally in 2024 to people covered by the Policy in tranches over the next 4 or 5 years for the Members of the Bank's Management Board. Payment is made after the end of the relevant Retention Period.

Under motivational program dedicated for employees not being Identified Staff, a portion of the variable remuneration granted conditionally will be paid out in tranches during 4 years after the grant date. In 2024, one employee was granted awards under this program.

Variable Remuneration in form of financial instruments – Phantom shares and/or real shares of the Bank	
Transaction as per IFRS	Transactions share-based payments settled in cash in accordance with IFRS 2
Financial instruments grant date	14 of January 2019 14 of January 2020 11 of January 2021 13 of January 2022 (in case employees excluding the members of the Management Board) 10 of February 2022 (in case of the members of the Management Board) 11 of January 2023 (in case employees excluding the members of the Management Board) 16 of February 2023 (in case of the members of the Management Board) 11 of January 2024 (in case employees excluding the members of the Management Board) 15 of February 2024 (in case of the members of the Management Board) 14 of January 2025
Number Shares granted Date of maturity	The number of shares was set on grant date • Financial instruments for the President of the Management Board financial instruments granted in 2019-2025 - at least 12, 24, 36, 48, 60, 72 months after grant date • Financial instruments granted in 2020-2021 for other employees Including Members of the Management Board) – at least 6, 18, 30, 42 months after grant date • Financial instruments for the Members of the Management Board financial instruments granted in

Variable Remuneration in form of financial instruments – Phantom shares and/or real shares of the Bank	
	2022-2025 - at least 12, 24, 36, 48, 60, 72 months after grant date • Financial instruments granted in 2022-2024 for other employees – at least 6, 18, 30, 42, 54 months after grant date
Vesting date	• Financial instruments for the President of the Management Board o in 2019 – 2025 – for short-term financial instruments at grant date, for long-term financial instruments at least 12, 24, 36, 48, 60 months after grant • Financial instruments for the members of the Management Board excluding the President of the Management Board o in 2020 –2021 – for short-term financial instruments at grant date, for long-term financial instruments at least 12, 24, 36 months after grant o in 2022-2025 - for short-term financial instruments at grant date, for long-term financial instruments at least 12, 24, 36, 48, 60 months after grant • Financial instruments granted for other employees o in 2020-2021 - at least 6, 12, 24 and 36 months after grant date o in 2022-2025 – for short-term financial instruments at grant date, for long-term financial instruments at least 12, 24, 36, 48 months after grant date
Terms and conditions for acquiring rights to the award	Satisfying the conditions on the Bank's results, individual performance of the employee and employment in the Bank in • 2019: o For the President of the Management Board in relation to the award from 2019-2024 • 2020: o For the President of the Management Board in relation to the award from 2020-2025 o For other employees in relation to the award from 2020-2023 • 2021: o For the President of the Management Board in relation to the award from 2021-2026 o For other employees in relation to the award from 2021-2024 • 2022: o For the members of the Management Board (including the President of the Management Board) in relation to the award from 2022-2027 o For other employees in relation to the award from 2022-2026 • 2023: o For the members of the Management Board (including the President of the Management Board) in relation to the award from 2023-2028 o For other employees in relation to the award from 2023-2027 • 2024: o For the members of the Management Board (including the President of the Management Board) Senior Management from 2024-2029 o For other employees from 2024-2028 • 2025: o For the members of the Management Board (including the President of the Management Board) Senior Management from 2025-2030 o For other employees from 2025-2029

Variable Remuneration in form of financial instruments – Phantom shares and/or real shares of the Bank	
Program settlement	In the case of the Bank's own shares, employees are presented with an offer to purchase the shares and if accepted, the transfer of the shares to brokerage accounts takes place immediately after the maturity date. In the case of phantom shares. At the settlement date the participants will get an amount of cash being the product held by a participant phantom shares and the arithmetic mean of the lowest and highest prices of shares of the Bank notified on WSE at the maturity date. Acquisition of rights to every tranche will be confirmed by a decision of the Supervisory Board of the Bank in relation to the member of the Management Board and by a decision of the Management Board in relation to other employees covered by the Policy. According to a decision of the above-mentioned Bank Management the amount of payment may be partially or fully reduced according to conditions given in the Policy. These terms and conditions relate to Bank's results, individual performance and employment status and will relate to the vesting period of each tranche.

Another component of Variable Remuneration granted until 2022 under the Policy is the Deferred Cash Award.

Variable Remuneration – Deferred Cash Award	
Transaction as per IFRS	Other long-term employee benefits in accordance with IAS 19
Grant date of the Deferred Cash Award	14 of January 2019 14 of January 2020 11 of January 2021 13 of January 2022 (in case employees excluding the Members of the Management Board) 10 of February 2022 (in case of the members of the Management Board)
Granted amount	The amount was settled on the Deferred Cash Award grant date
Date of maturity	• Deferred Cash Award for the President of the Management Board in 2018-2021 - at least 18, 30, 42, 54, 66 months after grant date • Deferred Cash Award granted in 2018-2021 for other employees – at least 18, 30, 42 months after grant date • Deferred Cash Award for the members of the Management Board (including the President of the Management Board) in 2022 - at least 12, 24, 36, 48, 60 months after grant date • Deferred Cash Award granted in 2022 for other employees – at least 12, 24, 36, 48 months after grant date
Vesting date	• Deferred Cash Award for the President of the Management Board in 2018-2021 - at least 12, 24, 36, 48, 60 months after grant date • Deferred Cash Award granted in 2020-2021 for other employees – at least 12, 24 and 36 months after grant date • Deferred Cash Award for the members of the Management Board (including the President of the Management Board) in 2022 - at least 12, 24, 36, 48, 60 months after grant date • Deferred Cash Award granted in 2022 for other employees – at least 12, 24, 36,48 months after grant date
Terms and conditions for acquiring rights to the award	Satisfying the conditions on the Bank's results, individual performance of the employee and employment in the Group • 2018: o For the President of the Management Board in relation to the award from 2018-2023 • 2019: o For the President of the Management Board in relation to the award from 2019-2024 • 2020:

Variable Remuneration – Deferred Cash Award	
	○ For the President of the Management Board in relation to the award from 2020-2025 ○ For other employees in relation to the award from 2020-2023 • 2021: ○ For the President of the Management Board in relation to the award from 2021-2026 ○ For other employees in relation to the award from 2021-2024 • 2022: ○ For the members of the Management Board (including the President of the Management Board) in relation to the award from 2022-2027 ○ For other employees in relation to the award from 2022-2026
Program settlement	At the settlement date the participants will get an amount of Deferred Cash Award increased by the amount of interest for the period of deferral and retention until the date of the pay-out. The amount of interest was set up in January 2018, 2019, 2020, 2021 and 2022 by the resolution of the Supervisory Board of the Bank in relation to the member of the Management Board and by a decision of the Management Board in relation to other employees covered by the Policy. Acquisition of rights to every tranche will be confirmed by a decision of the Supervisory Board of the Bank in relation to the members of the Management Board and by a decision of the Management Board in relation to other employees covered by the Policy. According to a decision of the above-mentioned Bank Management the amount of payment may be partially or fully reduced according to conditions given in the Policy. These terms and conditions relate to Bank's results, individual performance and employment status and will relate to the vesting period of each tranche.

Due to information shared by Citigroup on April 15 2021 concerning amendment to strategy towards Consumer Bank ("GCB"), the Management Board of the Bank adopted the policy enabling to grant the award in order to recognize the effort of employees, whose support in strategy implementation towards the part of the Bank Handlowy w Warszawie S.A. (consumer banking segment) is crucial – Transaction Award Policy.

In 2022 the Supervisory of the Bank Handlowy w Warszawie S.A. made a decision to amend the Transaction Award Policy by e.g., moving away from deferred cash award and introducing existing shares in capital of the Bank as new form of pay-out of the financial instruments. Awards for 2023 are granted based on new rules in 2023. Amended remuneration policies allow for 1:1 conversion of phantom shares granted before the adoption of amendments, provided that appropriate agreements are signed with employees concerned.

On July 31, 2025, the first acquisition of rights to the Transaction Award took place

Variable Remuneration in form of financial instruments – Phantom shares and/or real shares of the Bank – granted in years 2021-2022 under Transaction Award	
Transaction as per IFRS	Transactions share-based payments settled in cash in accordance with IFRS 2
Phantom Shares grant date	July 1, 2021, and December 3, 2021 July 1, 2022, and November 1, 2022 July 1, 2023 July 1, 2024
Number of Financial Instruments granted	The number of shares was set on grant date
Date of maturity	• For awards granted to Vice-President of Management Board responsible for the Retail area. in 2022– depending on the type of the award not sooner June 30, 2025, or the completion of Transaction if earlier and not sooner than 24, 36, 48, 60, 72 months after grant date. For awards granted to Vice-President of Management Board responsible for the Retail area in 2021 and other employees, who have material impact on risk profile of the Bank – depending on the type of

Variable Remuneration in form of financial instruments – Phantom shares and/or real shares of the Bank – granted in years 2021-2022 under Transaction Award	
Vesting date	the award, (June 30 2025 or after completion of Transaction if earlier and not sooner than 18, 30, 42, 54 months after grant • For awards granted to the Vice-President of the Management Board responsible for the Retail area in 2022– depending on the type of the award, and at least 12, 24, 36, 48, 60 months after grant • For awards granted to responsible for the Retail area in 2021 and other employees, who have material impact on risk profile of the Bank – depending on the award, immediately after satisfying criteria (including these related to Transaction) and not sooner than 12, 24, 36, 48 months after grant
Terms and conditions for acquiring rights to the award	The completion of Transaction until defined date and fulfillment of the criteria related to Bank's financial results, individual employees' performance and employment in the Group: For 2021 - 2021-2025 For 2022 o For the Vice-President of the Management Board responsible for the Retail area, in relation to the award from 2022-2027 o For other employees in relation to the award from 2022-2026 For 2023 – 2023-2027 For 2024 – 2024-2028
Program settlement	In the case of the Bank's own shares, employees are presented with an offer to purchase the shares and if the offer is accepted, the shares are transferred to brokerage accounts immediately after the maturity date. At the settlement date the participants will get an amount of cash being the product held by a participant phantom shares and the arithmetic means of the lowest and highest prices of shares of the Bank notified on WSE at the maturity date. Acquisition of rights to every tranche will be confirmed by a decision of the Supervisory Board of the Bank in relation to the Vice-President of the Management Board responsible for the Retail area and by a decision of the Management Board in relation to other employees covered by the Transaction Award Policy. According to a decision of the above-mentioned Bank Management the amount of payment may be partially or fully reduced according to conditions given in the Policy. These terms and conditions relate to Bank's results, individual performance and employment status and will relate to the vesting period of each tranche.

Another component of Variable Remuneration granted according to the Transaction Award Policy is the Deferred Cash Award granted in 2021.

Variable Remuneration – Deferred Cash Award	
Transaction as per IFRS	Other long-term employee benefits in accordance with IAS 19
Grant date of the Deferred Cash Award	July 1, 2021, and December, 3 2021
Granted amount	The amount was settled on the Deferred Cash Award grant date
Date of maturity	• depending on the type of the award, immediately after criteria fulfillment (including these related to Transaction) or not sooner than 6 months after completion of Transaction and not sooner than 18, 30, 42, 54 months after grant date
Vesting date	• depending on the award, immediately after satisfying the criteria (including these related to Transaction) or not sooner than 6 months after completion of Transaction and not sooner than 12, 24, 36, 48 months after grant date •
Terms and conditions for acquiring rights to the award	The completion of Transaction until defined date and fulfillment of the criteria related to Bank's financial results, individual employees' performance and employment in the Group: o 2021-2025
Program settlement	At the settlement date the participants will get an amount of Deferred Cash Award. Acquisition of rights to every tranche will be confirmed by a decision of the Management Board in relation to other employees covered by the Transaction Award Policy. According to a decision of the above-mentioned Bank Management the amount of payment may be partially or fully reduced according to conditions given in the Policy. These terms and conditions

Variable Remuneration – Deferred Cash Award	
	relate to Bank's results, individual performance and employment status and will relate to the vesting period of each tranche.

Assumptions of valuation of the employee equity benefit schemes

The fair value of particular awards and the assumptions used in their measurement is shown below:

CAP Program	Grant date	Exercise price/stock price at grant date [USD]	Number of eligible employees	Number of options/shares
1	10.02.2022	66.53	1	94
Phantom Shares Program	**Grant Date**	**Exercise price/stock price at grant date [PLN]**	**Number of eligible employees**	**Number of options/shares**
1	01.07.2021	47.85	2	3,099
2	13.01.2022	61.96	2	918
3	10.02.2022	65.86	5	9,008
	01.07.2022	61.56	8	45,653
Financial Instruments Program	**Grant Date**	**Exercise price/stock price at grant date [PLN]**	**Number of eligible employees**	**Number of options/shares**
1	14.01.2020	101.00	1	5,365
2	11.01.2021	101.00	1	12,915
3	01.07.2021	99.00-109.40	2	8,326
4	13.01.2022	92.30-113.60	15	14,353
5	10.02.2022	99.00-105.80	2	15,378
6	01.07.2022	100.40	1	3,808
7	01.11.2022	100.40	2	7,388
8	11.01.2023	100.40	27	71,036
9	16.02.2023	100.40	6	70,328
10	11.01.2024	100.40	27	88,973
11	15.02.2024	104.84	7	87,663
12	01.05.2024	112.40	1	939
13	14.01.2025	90.50	37	235,162

**Varies depending on the date of exercise*

The number and weighted-average price of shares (CAP Program) are presented below:

CAP Program		Phantom Shares Program / Financial Instruments Program
Vesting period (years)	25% after each additional year	From 2020: 40% on the grant date an 20% each for the next three years, 40 on the grant date and 12% each for th next 5 years, or 60% on the grant dat and 13.33% each for the next 3 years 60% on the grant date and 8% each fo the next 5 years. For a transactiona award, no earlier than June 30, 2025, c prior to the closing of the transactio within 4 consecutive years. From 2022*: 40% on the grant date an 15% each over the next four years, 40 on the grant date and 12% each over th next 5 years, or 60% on the grant dat and 10% each over the next 4 years, 60 on the grant date and 8% each over th next 5 years. For a transactional award no earlier than June 30, 2025, or prior t the closing of the transaction within th next 5 years.
Average expected duration of the instrument	Vesting date	Vesting date

CAP Program		Phantom Shares Program / Financial Instruments Program
Likelihood of premature termination of employment (annual turnover rate of awarded employees)	0,00%	8.45%
Weighted average fair value of one instrument as at the balance sheet date	71.12 (USD)	102.60/96.71 (PLN)

**From 2024, prizes are awarded in the form of financial instruments*

As of 31 December 2025, the value of the equity component resulting from the equity-settled program (Equity awards program) unpaid mounted to PLN 68,476 thousand and the costs recognized in this respect in 2025 amounted to PLN 58,472 thousand. On 31 December 2025, the book value of liabilities from the Phantom Share and CAP programs amounted to PLN 6,246 thousand (31 December 2024: PLN 5,013 thousand). The costs recognized in this respect in 2025 amounted to PLN 1,763 thousand (in 2024: PLN 199 thousand including the costs of CAP programs).

46. Benchmark reform

In recent years, we have observed efforts in developed foreign markets to introduce alternatives to existing benchmarks such as the IBOR (Interbank Offered Rate), which also includes the WIBOR index. In Poland, work has also begun on benchmark reform, including the introduction of a new interest rate benchmark that would ultimately replace the WIBOR benchmark.

In 2022, the National Working Group for Benchmark Reform (NGR) was established in Poland. The NGR includes representatives of the Minister of Finance, the National Bank of Poland, the Polish Financial Supervision Authority, the Bank Guarantee Fund, the Warsaw Stock Exchange, the National Depository for Securities, and BPW Benchmark, as well as commercial banks, cooperative banks, investment fund companies, insurance companies, and industry organizations representing financial market entities. The NGR's work is overseen and coordinated by a Steering Committee, which includes representatives from the Ministry of Finance, the Polish Financial Supervision Authority, GPW Benchmark, the Bank Guarantee Fund, BondSpot, and the Polish Bank Association.

The NGR's work is conducted based on a Road Map defining the timeline and scope of detailed actions necessary to implement the reform. According to the roadmap, the reform, which involves the introduction of a new interest rate benchmark to replace the WIBOR benchmark, is expected to be completed by the end of 2027. The ongoing reform also applies to the WIBID benchmark. As part of the ongoing work, the WIRON (Warsaw Interest Rate Overnight) benchmark was initially selected as an alternative to WIBOR. However, in 2024, following additional verification and public consultations, the NGR Steering Committee selected an index from the WIRF family, technically named WIRF- (based on deposits from unsecured credit institutions and financial institutions), as the target alternative index. The NGR Steering Committee chose the official name POLSTR (Polish Short-Term Rate). Detailed information on the NGR work and the NGR Steering Committee's decisions is published by the Polish Financial Supervision Authority on its official website under the "benchmarks" tab.

Since the first days of the reform, the Bank has actively participated in all NGR work. To prepare the Bank for the efficient and safe implementation of the new benchmark and the planned conversion, it has also been conducting a key internal project, in which all members of the Bank's Management Board, the Bank's senior management, and representatives of the Bank's organizational units relevant to the project's smooth implementation are actively involved.

47. Subsequent events

On February 27, 2026, the Bank received a letter from the Polish Financial Supervision Authority (KNF) regarding an individual dividend recommendation for the Bank. The KNF confirmed that the Bank meets the requirements for a dividend payment of up to 75% of the 2025 profit, with the maximum payout not exceeding the annual profit less the profit generated in 2025, which has already been included in the Bank's equity. At the same time, the KNF recommends that the Bank mitigate the risks inherent in its operations by refraining from taking other actions, particularly those outside the scope of current business and operational activities, that could result in a reduction of equity, without prior consultation with the supervisory authority. This includes potential dividend payments from retained earnings from previous years and share buybacks or repurchases.

On March 2, 2026, the Bank received the decision of the Polish Financial Supervision Authority dated February 27, 2026, in which the Authority granted the Bank permission to begin purchasing its own shares in 2026 for the purpose of offering them to eligible employees under the incentive program. Under this permission, issued for the period until February 27, 2027, the Bank may purchase a maximum of 285,000 own shares, and the total price of the repurchased shares may not exceed PLN 30,000,000. After December 31, 2025, no other material events occurred that were not included in these financial statements and that could significantly affect the Bank's results.

citi handlowy

2025
Report on activities

This document is a translation from the original Polish version. In case of any discrepancies between the Polish and English versions, the Polish version shall prevail.

In accordance with § 73 item 6 of the Ordinance of the Minister of Finance on current and periodical information provided by issuers of securities and the conditions for regarding information required by the law of non-member state as equivalent dated June 6, 2025 (Journal of Laws of 2025, item 755), report on activities of the Bank and the Group was prepared in the single report. The information in the report refer to the Group (including the Bank) or only to the Bank as specified in the individual chapters, tables or descriptions.

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I. Basic information about the Capital Group of Bank Handlowy w Warszawie S.A.

1. History of the Capital Group of Bank Handlowy w Warszawie S.A.

Founded in 1870, Bank Handlowy w Warszawie S.A. is the oldest commercial bank in Poland today and one of the oldest continuously operating banks in Europe. After 150 years in the market, Bank Handlowy has developed a strong brand. Since 2001, the Bank has been a part of Citigroup, a global financial institution, and has since operated in Poland under the brand name of Citi Handlowy.

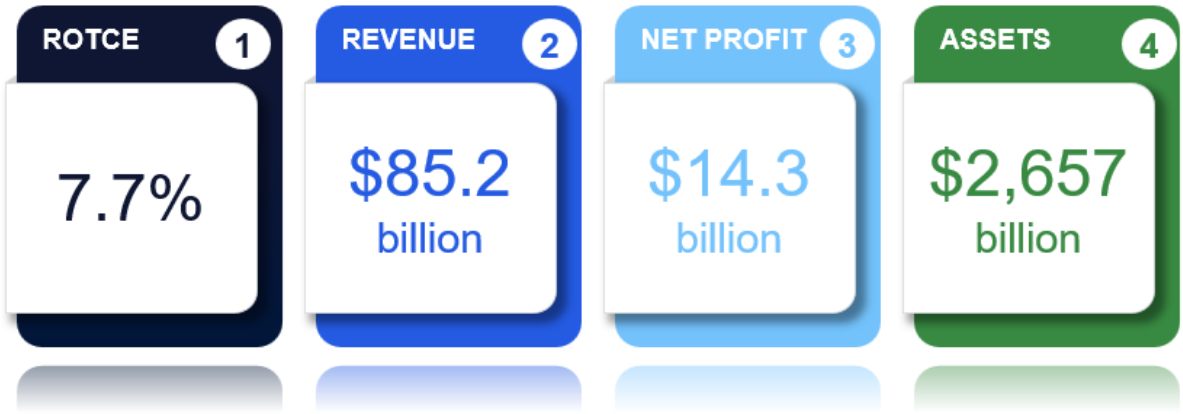
Today, under the brand name Citi Handlowy, Bank Handlowy w Warszawie SA offers a broad and modern range of products and services of corporate, investment and retail banking. Affiliation with Citi, the leading global financial institution, ensures that clients of Citi Handlowy have access to financial services in almost 100 countries. For more information, please visit https://www.citibank.pl/poland/homepage/english/history.htm

2. Ownership structure

The majority and strategic shareholder of the Bank is Citibank Europe Plc based in Dublin, Ireland – a company in the Citi group that brings together foreign investments.

Citi is leading global provider of a wide range of financial services and products for corporations, institutional investors, public administrations, and individuals in the United States. It is also a global leader in wealth management services ("Wealth Management"). Citi operates in nearly 160 countries and jurisdictions. Citi's vision is to be the premier banking partner for institutions with cross-border needs, a global leader in wealth management, and a respected personal bank in the United States. For more information, please visit website: https://www.citigroup.com/global/about-us

The Citi Capital Group in numbers for 2025 *(Citi financial data for 2025)*



Detailed information on the Bank's shareholding structure can be found in Chapter VIII Investor Information.

3. Business profile of Bank Handlowy w Warszawie S.A.

Bank Handlowy w Warszawie S.A. ('Bank','Citi Handlowy') is strategically focused on its defined target market.

In the institutional client segment, Citi Handlowy focuses on fostering its leading position among banks which provide services to international corporations and the largest local companies. Small and medium enterprises sector (SME) especially enterprises with international needs and aspirations, are another group of significant clients. In addition, the bank focuses on the acquisition of new clients (including so-called new economics participants – software producing companies) and active strengthening relations with the existing clients from selected industries. These elements are the key for further building the market advantage of the Capital Group of Bank Handlowy w Warszawie S.A.

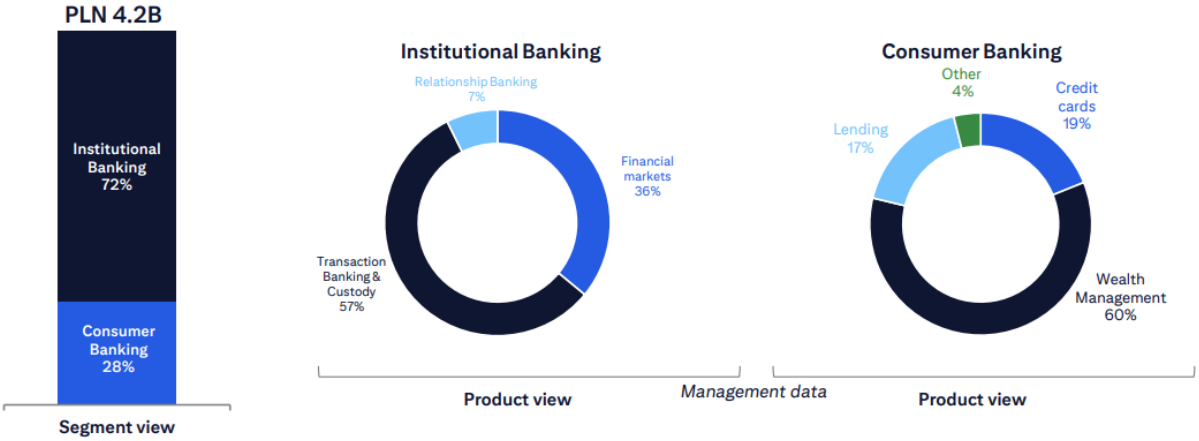
The Group's objective is to play the role of Strategic Partner to Polish enterprises, who actively supports the expansion of the Polish industry. This is tangibly reflected in the Bank's product offer with foreign exchange transactions and products associated with trade finance and secure trade transactions being its important and inextricable part. Furthermore, the Bank strives to maintain the status of one of the safest venue for keeping institutional clients' savings, which delivers many state-of-the art and useful solutions in operational accounts and day-to-day cash management.

The Bank's sound capital position and its landmark network of international connections, is also appreciated by consumer banking clients. The Bank uses its competitive edge in this regard to foster its leader position in net worth clients banking. Aim-driven, the Bank is constantly developing its offer for Citigold clients and a unique offer - Citigold Private Client, which was launched at the end of 2015 for the most affluent clients. In the retail segment, the Bank focuses on investment products and special rewards for clients who decide to use the Bank's online wealth management products. The Bank's geographic breadth thanks to its international connections, makes the offer for individual clients more attractive and a unique experience in global banking.

Moreover, Citi Handlowy is an undisputed industry leader in credit cards with access to products from Citi global product range, accepted worldwide and providing exceptional value to the client, such as, among other rewards, loyalty reward schemes.

The Brokerage Department of Bank Handlowy ("DMBH") is one of the most active actors in Poland's capital market among local members of a stock exchange and provides a wide range of brokerage services to both individual and institutional clients.

The structure of the Group's revenues in 2025 (the product view presents the management view).



4. Strategy 2025-2027 - development prospects for the Bank Handlowy w Warszawie S.A.

4.1 Bank's competitive position

The Bank is in the group of 10 largest banks in Poland in terms of balance sheet total and it holds a special strong competitive position in institutional client banking and, specifically in:

- providing services to global enterprises and Polish enterprises with international aspirations;
- foreign exchange products and trade finance products;
- securitization transactions;
- cash management;
- custody and brokerage services.

In consumer banking, the Bank retains its strong market position:

- on the credit card market ;
- in a complex Wealth Management offer for affluent clients (Citi Private Client - CPC, Citigold segments).

The group is characterized by above-average strong capital position, high liquidity and good-quality credit portfolio, which offers a convenient environment for the Group to take actions aimed at driving increases in key areas. Moreover, its global reach and unique offer for institutional clients running international business activity give the Bank a crucial competitive edge. The strong position of the Bank also results from its unique experience in handling even the most complex transactions and top-quality technology solutions, which ensure smooth and solid provision of services to demanding businesses.

4.2 Development prospects

In December 2024, the Bank adopted the new Strategy of Bank Handlowy w Warszawie S.A. for 2025 - 2027. Following the conclusion on 27 May 2025 of the agreement concerning the exit from Retail Banking, the Bank adopted new strategic directions for Institutional Banking for 2025–2027 – "The Global Business Bank." Exiting Retail Business will allow the Bank to focus on the dynamic development of its leading business area – Institutional Banking. As part of the new strategic directions, the Bank will strive to achieve the revised financial goals in 2027 (more ambitious compared to the corresponding goals presented in the Bank's Strategy of 5 December 2024). The table below presents the updated financial targets together with the status of their implementation in 2025.

Strategic directions for 2025-2027 - financial goals:

	Goal 2027	Realization (2025)
Return on equity (ROE)	~19%	19.7%
Return on assets (ROA)	~2,6%	2.1%
Cost/Income ratio (C/I)	<30%	37%
Dividend payout, subject to regulatory approval	75%-100%	100%*

*The Bank paid out PLN 1,3 billion (75%) of net income for 2024 and PLN 449 MM advance dividend from the undistributed profit for 2019

Leveraging the Bank's affiliation with the Citi Group, operating in nearly 100 countries worldwide, the Bank aims to become the number one choice for businesses with international needs and aspirations. In this regard, special attention will be paid to supporting foreign investors entering the Polish market, particularly within the emerging new trade corridors. The Bank can offer this group of clients a full range of trade finance solutions and a global online banking platform. The Bank is also able to deliver top-quality solutions that enable the integration of the systems of the client and the bank using open architecture and supporting transaction automation.

Another important area of the Bank's involvement will be initiatives that are in line with Poland's strategic priorities, such as energy transition and growing defense investments resulting from the geopolitical situation. The Bank can see significant growth opportunities in cooperation with international financial institutions, agencies of international organizations, and export support agencies, as well as domestic institutions interested in collaborating on obtaining financing (including through the issuance of debt instruments) and broadly defined supporting of increased investment in Poland's energy and defense sectors. Institutional clients involved in these areas will also be able to benefit from the Bank's extensive expertise and a range of hedging instruments, including against foreign exchange and interest rate risks.

The Bank will strive to strengthen its position in the foreign exchange area by utilizing a best-in-class FX platform, which provides access to global financial markets. The Bank also aims to maintain its leadership position in various areas, for example custody services.

The Bank also focuses on collaborating with new economy companies, such as fin-techs, payment operators, e-commerce companies, and IT companies (including those in the gaming industry). The Bank will offer clients in this sector solutions such as instant payments and high-volume transaction processing, while ensuring the highest level of security.

At the same time, the Bank will focus on supporting clients in transforming their business models towards sustainable development. Until 2027, the bank will lend PLN 2 billion for sustainable transformation of its clients, offering them a broad range of solutions and advisory services in this respect.

In the Consumer Banking segment, the Bank will focus on retaining its existing client base, ensuring the highest level of service until the completion of the sale transaction.

5. Major results and developments in 2025

5.1 Summary financial data of the Bank and the Group in 2025

In connection with separation of discontinued activity, the Group has made a transformation of the income statement for the period of the 2024 to reflect continuing and discontinued operations. The impact of this transformation on the comparative data of the consolidated income statement for 2024 is presented in Note 2 in the Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for of 2025.

In 2025 the Group recorded net profit amounting to PLN 1,666.3 million, which was lower by PLN 94.1 million (i.e. 5.3%) comparing to the profit for 2024 mainly due to lower net interest income resulting from the negative impact of interest rate cuts (by 175 basis points in the entire 2025) on interest income and higher interest expenses. The result was also influenced by the recorded net loss on discontinued operations in the amount of PLN 91.8 million compared to a loss of PLN 24.8 million in the same period last year. The result on discontinued operations is described in detail in Note 3 in the Consolidated Financial Statements of the Capital Group of Bank Handlowy w

Warszawie S.A. for 2025.

The stand-alone net profit of the Bank (distributable) for 2025 amounted to PLN 1,667.4 million and was lower by PLN 124.6 million (i.e. 7.0%) as compared to the net profit for 2024.

At the same time, in 2025, the Group maintained a strong and safe capital position, achieving a total capital ratio of 22.2% and TLAC TREA ratio of 25.4% as at the end of December 2025.

PLN million	Bank		Capital Group	
	2025	2024	2025	2024
Total assets	78,939.9	72,569.2	78,849.0	72,478.1
Equity	10,030.4	9,855.5	10,042.3	9,868.5
Amounts due from customers*	18,222.9	21,367.2	18,222.9	21,367.2
Deposits *	60,331.8	53,542.8	60,227.4	53,437.2
Net profit	1,667.4	1,792.0	1,666.3	1,760.5
Capital adequacy ratio	22.0%	22.2%	22.2%	22.5%

** Amounts due from and deposits of non-banking entities of the financial sector, entities of the non-financial sector, including the public sector.*

5.2 Key achievements in 2025

2025 was the year of implementing the growth strategy in the key areas for the Group, which is confirmed by the following achievements and events:

- **The Bank granted a total of PLN 6.7 billion in new financing for clients of Institutional Banking,** of which PLN 2.6 billion for Commercial Banking Clients, PLN 2.1 billion for Global Clients and PLN 2.0 billion for Corporate Clients – **an increase by 30% YoY**;
- **The volume of loans in Institutional Banking Segment (excluding reverse repo transactions) increased by 22% compared to 2024 and deposits volume in this segment increased by 19% YoY**;
- The Bank **organized five bond issues for an international financial institution in the total amount of PLN 2.35 billion** and participated in a **public issue for a client from the automotive sector – in the amount of PLN 600 million;**
- The Bank participated in the **IPO of Diagnostyka S.A. worth PLN 1.7 billion** and conducted **five Accelerated Share Sale transactions with a total value of PLN 8.8 billion** – DMBH acted as the Global Co-Coordinator or Joint Bookrunner in these transactions;
- **The Bank granted sustainable financing in the amount of PLN 448.3 million, which is 22% of the strategic goal set for 2025–2027, ultimately the Bank intends to acquire PLN 2 billion of green assets;**
- The Bank continued to develop electronic banking platforms, focusing on providing modern, secure and efficient solutions that improve the comfort and efficiency of customers' daily work - **as a result, a 6% YoY increase in transactions processed electronically was recorded**;
- The Bank's focus on automating processes and settlements in real time resulted in **increase in the volumes of Express Elixir instant payments by 13%** compared to 2024;
- **The value of assets under trade finance products** such as reverse factoring, trade credit, supplier financing and loans secured by export agency guarantees **reached a record high, with an increase of 29% YoY**.
- In the Consumer Banking area, the Group continued its **growth in the Wealth Management area,** as evidenced by an **increase in the number of affluent clients (Citigold Private Client) by 13% YoY and number of CitiGold Clients by 6% YoY**;
- **Deposits from individual customers increased by 2% YoY, while the number of savings accounts increased by 7% YoY,** which shows that the Bank has built an attractive offer for it's strategic group of clients;
- Increases were also observed in the area of investment products - **the total value of funds managed in investment products** purchased by individual clients through the Bank **was 21% higher** than the value at the end of the corresponding period in 2024;
- The observed **continuation of the trend of increased customer interest in cash loans resulted in an increase in sales of these products by 21% YoY**,
- The Bank also focused on improving customer experience, incl. digital tools such as CitiKantor. **In the Consumer Banking segment the number of FX transactions processed via CitiKantor increased by 5.5% YoY.**

6. Awards and honors

In 2025, Citi Handlowy was recognized for its business activities and ESG activities. The Bank received many prestigious awards and distinctions:

Citi Handlowy with II Main Prize in "The Best Annual Report 2024"

The Bank was awarded the II Main Prize in "The Best Annual Report 2024" competition, in the Banks and Financial Institutions category. The competition is regularly organized by the Institute of Accountancy and Taxes (Instytut Rachunkowości i Podatków). Citi Handlowy's report received 77.42 out of 100 possible points. Additionally, the jury of The Best Annual Report competition awarded the Bank a distinction for its financial report. The Institute of Accountancy and Taxes competition selects the best reports in terms of utility value for shareholders and investors. The jury appreciated the report on the Bank's activity, financial statements, and summary corporate governance report, as well as the Bank's contribution to developing good practices in financial reporting at public companies.

Citi named The Best Investment Bank for Debt Capital Markets in Poland in Euromoney Awards for Excellence 2025

The jury of the Euromoney competition appreciated our vast experience as an investment banking leader in Poland in the implementation of strategic transactions for clients on local and international debt markets. Citi provides clients with tailored financial, advisory and risk management solutions to effectively implement capital raising opportunities. Citi Handlowy's experience on the Polish market, combined with Citi's global network, allows us to support our clients in a unique way. The Euromoney Award for Excellence has been awarded for more than 30 years to institutions that have demonstrated a significant impact on the industry through innovation, effective strategies, and meaningful initiatives.

Diversity IN CHECK - Citi Handlowy among the leaders in diversity management

Citi Handlowy have once again been listed among employers most advanced in diversity management in Poland prepared by the Responsible Business Forum. The Forum is an expert organization, initiator and partner of key ESG projects in Poland. The process of assessing the maturity and qualifications of the organization was based on a study conducted together with the PBS Research Agency, prepared based on international standards and guidelines.

Citi Handlowy Brokerage Bureau awarded by the Warsaw Stock Exchange

Biuro Maklerskie Citi Handlowy has been listed among the winners of the 2024 Stock Exchange Year Summary and awarded for the highest market maker's share in turnover on the equity futures market.

Cashless for Equality

Citi in Poland is again at the top of the ranking of financial institutions that care about professional and social equality of LGBT+ employees. This was another edition of the Cashless.pl ranking, which recognizes the activities taken by Citi for LGBT+ employees and their partners, as well as the entire community in Poland.

Lambda Warszawa Association Certificate

As the first institution in Poland, Citi and Citi Handlowy have completed the certification process for creating a safe, equal and inclusive work environment for LGBTQIA+ people. The Lambda Warsaw certificate is a signal to people from the LGBTQIA+ community that the place where they work or plan to work is fully committed to their well-being.

Citi and Citi Handlowy awarded with the title of Future Leader in the category "Employer" of the Future Congress in Olsztyn

Citi Handlowy and Citi Solutions Center were awarded Future Leader award in the category "Employer" by Gazeta Olsztyńska. Citi has been doing business in Olsztyn for 25 years and, as one of the largest employers in the region, works for the development of the region. Citi and Citi Handlowy's investments in the professional development of employees, innovative support programs and commitment to creating a friendly and inspiring organizational culture make them a model for modern employers.

II. Poland's economy in 2025

1. Main macroeconomic trends

1.1 External environment

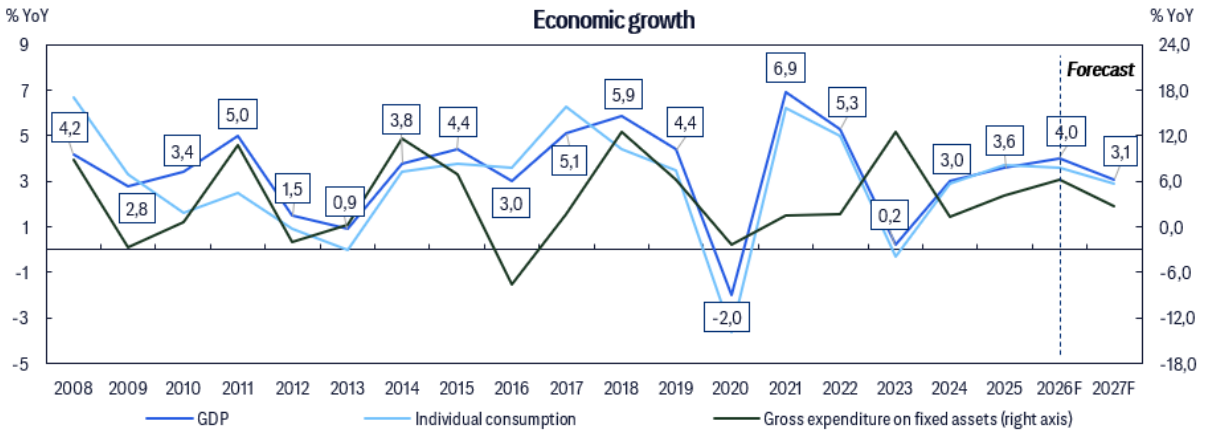
Despite global challenges, including trade tensions related to the U.S. administration's tariff policy and heightened geopolitical uncertainty, global economic growth in 2025 once again proved resilient and remained close to its long-term trend. Global GDP growth in 2025 most likely remained at the 2024 level, and amounted to 2.9% YoY.

In 2025, inflationary pressure was declining, which allowed major central banks to start easing monetary policy. The European Central Bank, in response to receding inflation and economic woes in the largest economies of the eurozone, ended the year with a deposit rate of 2% compared to 3% at the beginning of 2025. Due to the deteriorating situation in the labor market in the United States, the Federal Reserve also decided to cut interest rates; as a result, the federal funds rate stood at 3.50%–3.75% at the end of 2025.

In 2026, global economic growth is likely to be around 2.8%. In the euro area, growth is expected to slow slightly, however it should not deviate materially from the 2025 level. The Group expects the global monetary easing cycle to be brought to an end by most central banks. A source of uncertainty for global economic activity remains the tense geopolitical situation, which poses the risk of escalation of existing conflicts, the potential continuation of trade disputes, and a high level of global debt.

1.2 Gross Domestic Product („GDP")

Contribution to GDP growth (%) – forecast of January 31, 2025



Source: Chief Statistical Office, Citi Handlowy forecasts

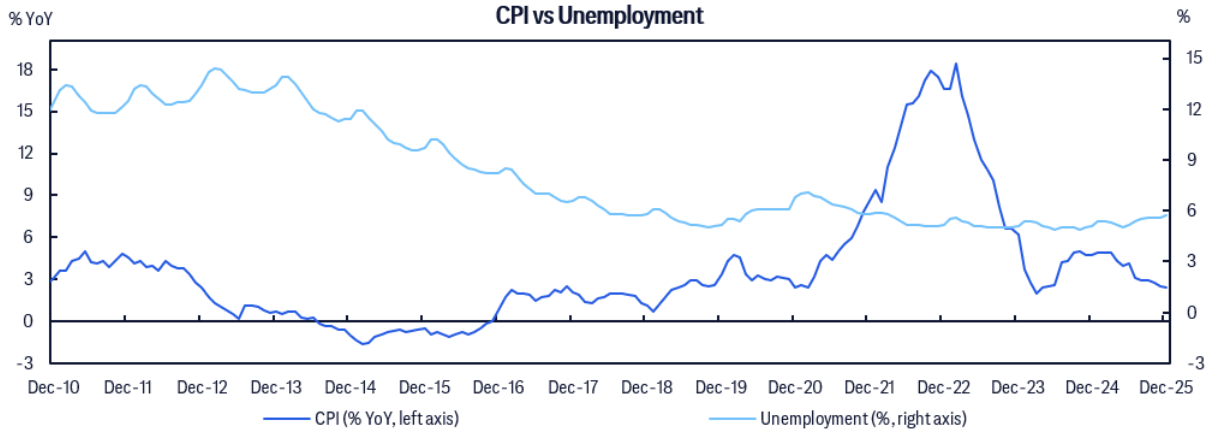
Gross Domestic Product rose 3.6% in 2025, as compared to 3.0% in 2024. The GDP data turned out to be slightly weaker than the forecasts made by us at the beginning of 2025, but at the same time were above expectations from the end of the year. Private consumption increased by 3.7% YoY vs. a 2.9% YoY increase in 2024, while fixed capital formation increased by 4.2% YoY vs. a 0.9% YoY decline a year earlier. Annual GDP data and other indicators of economic activity suggest that GDP growth in the fourth quarter of 2025 was trending toward 4.0% YoY. The unemployment rate at the end of 2025 rose to 5.7% compared to 5.4% toward the end of 2024. Employment in the enterprise sector declined by 0.8% YoY during 2025.

The year 2025 was characterized by a gradual cooling of the labor market. After a period of double-digit growth in 2024, average wages in the enterprise sector grew at a single-digit pace in 2025, increasing by 8.6% YoY in December, compared with 9.8% YoY at the end of 2024. Industrial output growth rose to 3.0% YoY from 0.3% YoY in 2024, and construction output increased by 0.7% YoY as compared to a decrease by 0.5% YoY in 2024.

Economic growth in 2026 in Poland will be boosted by a strong increase in investments as a result of the inflow of EU funds and the ongoing strong private consumption.

1.3 Inflation

CPI vs Unemployment



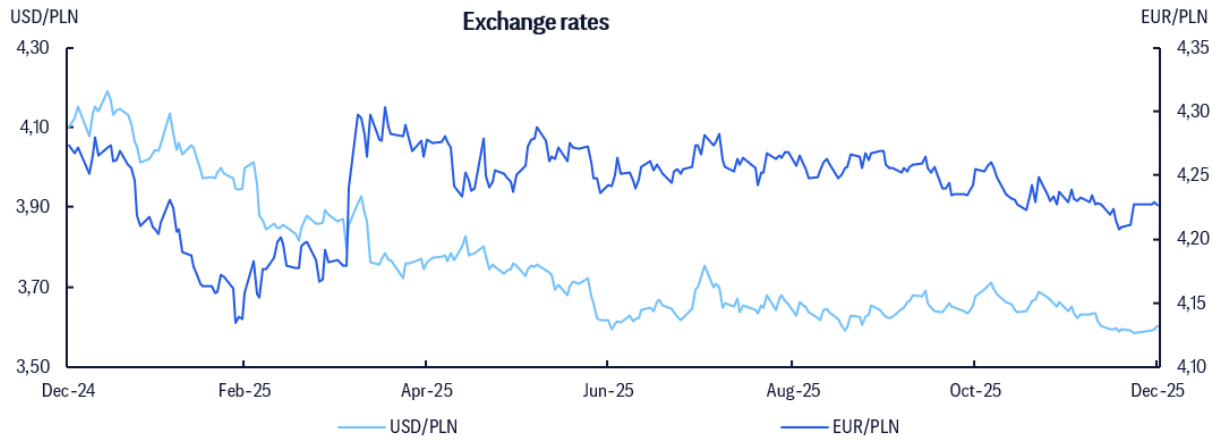
Source: NBP, Chief Statistical Office, Citi Handlowy

Price levels of consumer goods and services in 2025 rose on average by 3.6%, as compared with 3.7% in 2024. In 2025, a clear disinflationary trend was observed, and from the second half of the year inflation remained within the permissible deviation band around the National Bank of Poland's inflation target (2.5% ± 1pp). The year-average net inflation declined to 3.3% in 2025 from 4.3% in 2024. The Group's assumptions indicate that at the beginning of 2026 the inflation rate will be slightly below the inflation target (2.5%), supported, among other factors, by a strong złoty and a growing share of imports of goods from China. At the same time, the absence of increases in excise duties and the sugar tax will be conducive to a decline in inflation. On the other hand, changes in the geopolitical environment, significant increases in metal prices, and the materialization of the effects of earlier interest rate cuts may lead to a rebound in inflation in the second half of the year.

In May 2025, the Monetary Policy Council decided to make the first interest rate cut of 50 basis points after a break of more than six months. From July onwards, rates were reduced by 25 basis points at each policy-setting meeting. As a consequence, the reference rate was lowered by a total of 175 basis points and stood at 4.00% at the end of 2025.

2. Money and forex markets

2.1 Exchange rates



Source: NBP, Citi Handlowy

In 2025, the Polish zloty appreciated by about 13.9% versus the U.S. dollar and by about 1.1% to the euro (vs. the end of 2024). The year 2025 was the time of a strong złoty, which was attributable, among other factors, to the systematic disinflation process and the weakness of the U.S. dollar. The USD/PLN rate decreased from around 4.10 as at the end of December 2024 to around 3.60 as at the end of the year 2025 and the EUR/PLN rate decreased from around 4.27 to around 4.23 in the same period.

The money market rates declined significantly during 2025. The WIBOR 3M rate was 3.99% at the end of December 2025, compared to 5.84% at the end of December 2024. In 2025, the yield on 2-year T-bonds decreased to 3.77% from 5.10% as at the end of 2024. The yield on 10-year bonds decreased to 5.18% as at the end of 2025 as compared to 5.89% in December 2024.

3. Capital market

The year 2025 was marked by a clear improvement in sentiment across financial markets, supported by stabilizing inflation and the gradual easing of monetary policy. In such an environment, all the main indices on the WSE recorded high rates of return. These gains were driven largely by dominant demand from foreign investors, confirming the growing investment attractiveness of the Polish market.

In 2025, the broadest market index, WIG, gained 47.3% YoY. The index of the biggest companies, WIG20, showed comparable increase by 45.3% YoY. The WIG-div index (companies that pay out dividends) rose by 45.7% YoY – the same growth as in the case of the WIG30 index. Meanwhile, the mWIG40 index ended 2025 with a result 33.6% higher than at the end of 2024.

In terms of sectors, the following sub-indices showed the largest gains: The WIG-Górnictwo (WIG-Mining) gained 131.5% YoY, the WIG-Paliwa (WIG-Fuels) grew by 115.7% YoY and the WIG-Informatyka (WIG-Info) rose by 76.5% YoY. On the other hand, the greatest depreciation was recorded by WIG-Leki (WIG-Medicine), which lost 9.0% YoY. In addition, the WIG-Media index came under pressure, declining by 2.4% YoY.

Compared to Poland's market, the main U.S. indices recorded weaker growths. The S&P 500 gained +16.4% YoY and the Nasdaq Composite went up +20.4% YoY. The European indices EuroStoxx 50 and Stoxx 600 increased by +18.3% YoY and +16.7% YoY, respectively. On an annual basis, emerging markets outperformed developed markets. The MSCI Emerging Markets index gained +34,4% YoY., while MSCI World increased by +21,6% YoY.

Stock market indices, as at 31 December 2025

Index	2025 (1)	2024 (2)	Change (%) (1)/(2)	2023 (3)	Change (%) (2)/(3)
WIG	117,240.24	79,577,32	47.3%	78,459.91	1.4%
WIG-PL	122,274.86	83,145,56	47.1%	81,539.59	2.0%
WIG-div	2,496.12	1,712,82	45.7%	1,545.59	10.8%
WIG20	3,184.02	2,192,01	45.3%	2,342.99	(6.4%)
WIG20TR	7,038.61	4,615,99	52.5%	4,678.55	(1.3%)
WIG30	4,086.60	2,805,76	45.7%	2,907.55	(3.5%)
mWIG40	8,182.06	6,122,32	33.6%	5,785.21	5.8%
sWIG80	29,590.15	23,594,64	25.4%	22,904.49	3.0%
Sector sub-indices					
WIG-Banks	19,177.37	12,345.94	55.3%	11,062.01	11.6%
WIG- Construction	9,368.31	6,786.32	38.1%	7,628.56	(11.0%)
WIG-Chemicals	7,671.46	7,642.64	0.4%	10,434.67	(26.8%)
WIG-Energy	3,984.22	2,491.54	59.9%	2,806.75	(11.2%)
WIG-Games	17,623.29	14,000.06	25.9%	15,669.10	(10.7%)
WIG-Mining	8,851.11	3,822.78	131.5%	4,315.32	(11.4%)
WIG-IT	10,010.73	5,673.05	76.5%	4,616.29	22.9%
WIG-Medicines	2,852.26	3,134.33	(9.0%)	2,768.40	13.2%
WIG-Media	6,701.20	6,863.45	(2.4%)	8,328.80	(17.6%)
WIG-Automotive	8,034.67	7,946.26	1.1%	9,254.33	(14.1%)
WIG-Developers	5,606.96	4,148.98	35.1%	3,545.06	17.0%
WIG-Clothing	12,682.47	11,063.68	14.6%	8,962.90	23.4%
WIG-Oil & Gas	11,265.42	5,222.62	115.7%	6,697.89	(22.0%)
WIG-Food	2,936.56	2,692.89	9.1%	2,202.63	22.3%

Source: WSE, Dom Maklerski Banku Handlowego S.A.

2025 saw a low activity level in the IPO market. Over the last 12 months, stocks of only two companies went public on the main floor of the WSE (in 2024 - one company), and one company was moved from the New Connect market. The value of offerings was nearly PLN 1.97 billion in total. Simultaneously, the delisting of companies from the WSE also continued. In 2025, the shares of 15 companies were removed from the WSE main floor (against 11 in 2024). Consequently, at the end of December 2025, 399 companies were traded on the WSE (compared to 411 a year before), including 18 foreign ones. Total capitalization of companies listed on the main floor reached PLN 2,435.7 billion (+63.3% YoY), 46.1% of which was represented by domestic companies (PLN 1,122.9 billion in nominal terms).

Value of trading in shares and bonds, volume of trading in derivatives on WSE, as at 31 December 2025

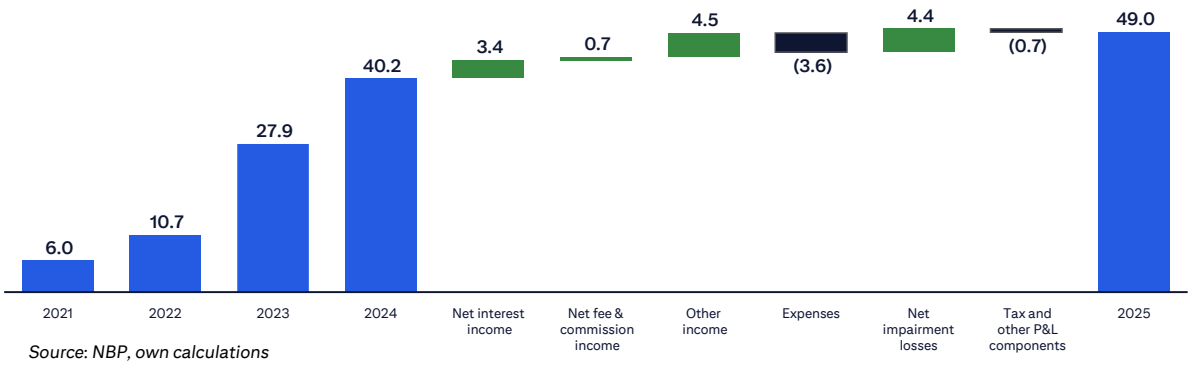
	2025 (1)	2024 (2)	Change (%) (1)/(2)	2023 (3)	Change (%) (2)/(3)
Shares (PLN million)*	983,801	689,516	42.7%	564,122	22.2%
Bonds (PLN million)	13,755	9,659	42.4%	8,071	19.7%
Futures ('000 contracts)	24,428	26,733	(8.6%)	28,835	(7.3%)
Options ('000 contracts)	404	423	(4.4%)	520	(18.7%)

**data including session and block transactions*

Source: WSE, Brokerage Department of Bank Handlowy,

4. Banking sector

Net profit of the banking sector (PLN billion)



Source: NBP, own calculations

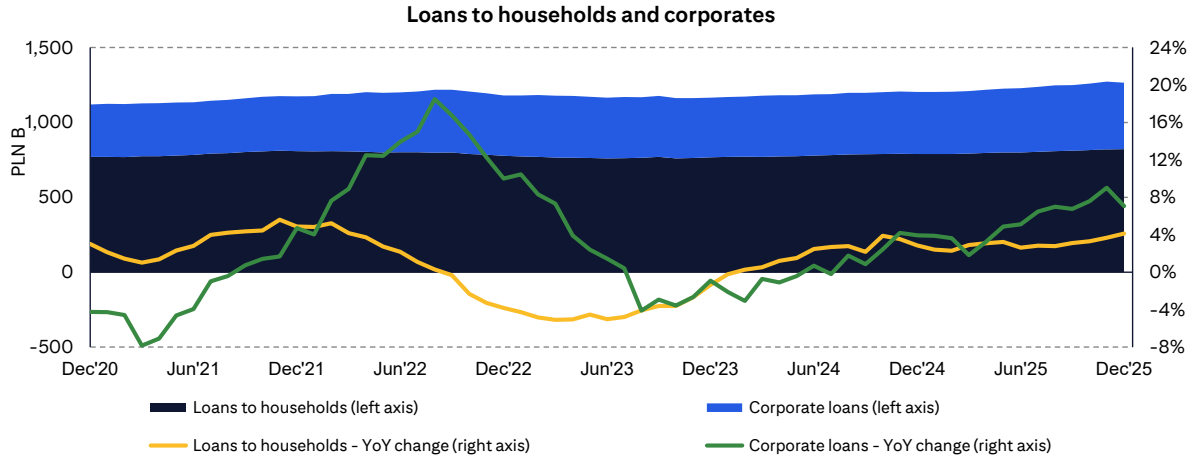
4.1 Financial results

According to data published by the Polish Financial Supervision Authority ("PFSA"), the banking sector generated a net profit of nearly PLN 49.0 billion in 2025, which is +22% YoY, PLN 8.7 billion more than in the previous year. This growth was driven by record revenues reaching PLN 139.4 billion (+7% YoY, PLN 8.6 billion), driven by improvements across all key income statement lines. Despite six interest rate cuts totaling 1.75 percentage points, net interest income increased by 3% YoY (PLN 3.4 billion), driven by both higher loan volumes and a reduction in interest expenses. Banks also posted higher net fee and commission income (+3% YoY, PLN 663 million), as well as a more than doubling of other income compared to 2024, totaling PLN 8.9 billion.

At the same time, the banking sector managed to maintain cost efficiency, measured by the cost-to-income ratio, at 39%. However, cost growth, which was half the rate of revenue growth in 2024, exceeded revenue growth in 2025. Administrative costs increased by a total of 8% YoY, rising PLN 3.5 billion to nearly PLN 49.0 billion, with this increase driven equally by higher employee costs and other costs, which also included contributions to the Bank Guarantee Fund (BFG): a contribution to the Bank Guarantee Fund of almost PLN 900 million, which had not been collected in recent years, and a contribution to the Resolution Fund of over PLN 1.8 billion (+16% YoY). Against this background, the 3% YoY increase in depreciation, to PLN 5.6 billion, seems relatively small.

The second factor that helped banks achieve such strong results was the relatively lower level of net impairment write-offs and provisions, including provisions for litigation and settlements related to foreign currency mortgage loans. The level of provisions in most banks has now approached the value of their entire portfolio, reducing the need for additional provisions. In total, credit risk costs reduced gross profit by PLN 16.2 billion, which is 21% (PLN 4 billion) less than in 2024.

The value of the bank levy paid by banks exceeded PLN 6 billion. Corporate income tax, in turn, exceeded PLN 14 billion, with this amount reduced due to the revaluation of deferred tax net assets related to the signing of a law introducing a higher tax rate from 2026.

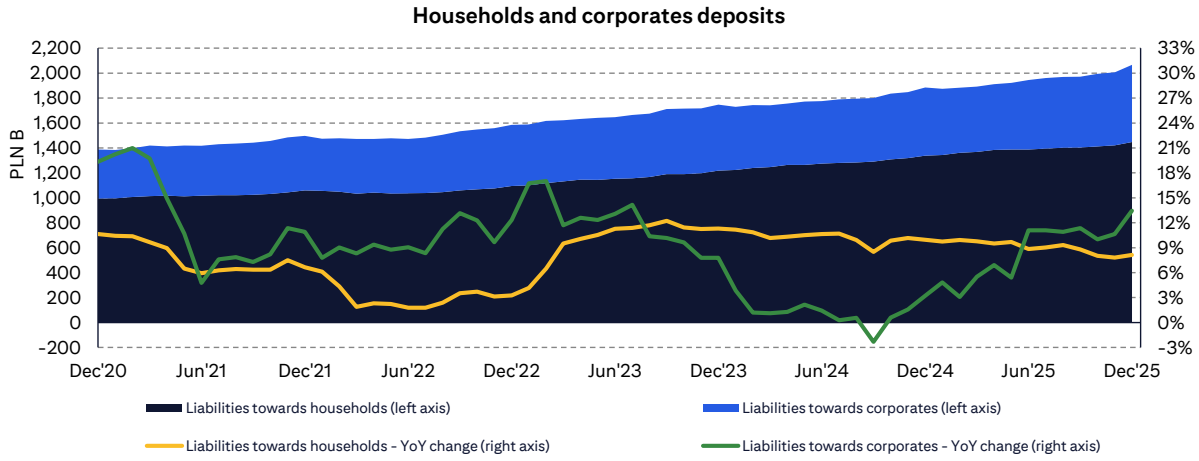


Source: NBP, own calculations

In 2025, the banking sector recorded further acceleration in the dynamics of growth of the volume of loans in the non-financial sector, amounting to +3.9% YoY at the end of December 2024, and as much as +5.3% YoY at the end of 2025 (an increase by PLN 71 billion). The improvement in growth was possible mainly thanks to higher growth rates in loans to non-financial enterprises (+7.1% YoY, PLN 29 billion at the end of 2025 to PLN 443 billion, compared to +4.0% YoY at the end of 2024) and also to households (+4.1% YoY, PLN 33 billion at the end of 2025 to nearly PLN 822 billion, compared to +2.9% YoY at the end of 2024). At the same time, while the segment of loans to households still showed a significant decline in the volume of loans in foreign currencies, and an improvement was recorded in the area of PLN loans, in the segment of loans to non-financial enterprises the growth rate remained positive regardless of currency denomination. By loan category, the highest growth among loans to non-financial companies was recorded in investment loans (+10.5% YoY, PLN 17 billion). Similarly, a high growth rate was also recorded in real estate loans (+9.0% YoY, PLN 5 billion). In contrast, current loans grew more slowly (+3.7% YoY, PLN 7 billion), also compared to the end of 2024. Similar trends became apparent in terms of the maturity structure, where the highest growth rate was seen in the group of loans with the longest maturity (above 5 years) amounting to +11.1% YoY, PLN 21 billion, followed by loans with maturities from 1 to 5 years (+9.8% YoY, PLN 11 billion), while the volume of loans with a maturity of up to 1 year grew by only 4.2% YoY (PLN 4 billion).

In the retail segment, the largest (by volume) group – mortgage loans – grew, as in the previous year, by only 3.5% YoY (PLN 17 billion), mainly due to the still sharply declining volume of foreign-currency mortgage loans (-30.4% YoY), as well as very high rates of prepayments on zloty-denominated loans. Much faster growth was observed in the segment of consumer loans, with a volume increase of 8.4% YoY (PLN 18 billion). However, negative dynamics occurred for the portfolio of current loans to sole proprietor firms and private farmers (by -2.8%, or PLN 1 billion, YoY), as well as in the category of investment loans (by -4.2%, or PLN 0.6 billion, YoY). In terms of time to maturity, the largest growth was in the segment of loans with time to maturity between 1 and 5 years (by +8.9%, or PLN 8 billion, YoY). Growth was much slower in percentage terms, but significantly higher in absolute value, for loans with maturities over 5 years (+4.0% YoY, PLN 26 billion), while loans with maturities of less than one year declined by 4.1% YoY (PLN 1.7 billion).

Loan portfolio quality data from the end of December 2025 indicate further improvement in customers' ability to service their debt, across almost every segment and loan category. The share of loans from non-financial customers, including the public sector, in stage 3 (with overdue payments of more than 90 days) fell from 4.7% at the end of 2024 to a historically low level of 4.2%. The largest improvement (-1.0 percentage points YoY) was recorded in the portfolio of consumer loans to households, for which the share of stage 3 was 5.4% at the end of December. The same indicator for mortgage loans fell to just 1.3%, primarily due to improvements in foreign currency loans, but also due to a positive trend in domestic currency loans. In line with this long-standing trend, the quality of the loan portfolio for small and medium-sized enterprises also improved (-0.7 percentage points YoY to 6.3%). Loans to large enterprises remained the only area where a deterioration in portfolio quality was recorded, measured by an increase in the share of stage 3 to 7.3% (+0.3 p.p. YoY).



Source: NBP, own calculations

In 2025, the rate of inflow of deposits from non-financial entities slightly decreased from +10.3% YoY (PLN 204 billion) at the end of 2024 to +9.3% YoY (PLN 205 billion) at the end of December 2025. By client segment, non-financial companies moved to the first place, with total deposit volumes increasing by 13.4% YoY (PLN 73 billion). This growth was driven to a similar extent by higher volumes of both term deposits (+16.0% YoY, PLN 27 billion) and current deposits (+13.6% YoY, PLN 48 billion). The entire portfolio reached PLN 619 billion.

At the same time, the household deposit portfolio approached PLN 1,448 billion, recording an increase of 8.1% YoY, i.e. PLN 109 billion. Within this client segment, a dominance of growth in current deposits (+9.8% YoY, PLN 92 billion) over term deposits (+4.2% YoY, PLN 17 billion) was evident.

The continuously higher dynamic of deposits than that of loans translated into further increase in liquidity in the banking sector. The loan-to-deposit ratio of non-financial clients fell by another 2.3 p.p. YoY, to 59%, i.e. close to the all-time low level.

5. Factors with an impact on the financial results of the Bank's Group in 2026

5.1 Trends in the Polish and global economy

In 2026, the macroeconomic environment is expected to remain burdened by an elevated level of uncertainty, with the geopolitical situation remaining the key risk factor over the coming quarters. An escalation of tensions in the Middle East, combined with the ongoing US military intervention in the region, has led to an increase in the prices of energy commodities, particularly oil and gas, and may result in increased volatility in their future prices. Higher commodity prices can lead to higher production costs and negatively impact the competitiveness of companies. Financial markets, during periods of conflict escalation, experience a shift away from risky assets towards safe-haven instruments, which may be reflected in at least a temporary weakening of emerging market currencies, including the Polish złoty. A further escalation of the armed conflict between Russia and Ukraine cannot be ruled out, which – especially in the case of emerging markets, including Poland – could contribute to currency depreciation. An additional risk factor is the potential for further tightening of U.S. trade policy. The introduction of new tariffs could lead to disruptions in global supply chains, a reduction in trade volumes, and a slowdown in global economic growth.

Although economic growth prospects in the euro area remain moderate, the expected gradual recovery in Germany – Poland's largest trading partner – may support an improvement in economic conditions in the Polish manufacturing sector, particularly in its export-oriented segments.

5.2 Legal and regulatory risks

Legal risk related to the portfolio of loans indexed to foreign currencies

The Bank is carefully following the changes of the legal environment arising out of the courts' case law regarding mortgage loans indexed to foreign currencies. On 15 June 2023, the Court of Justice of the European Union (CJEU) in case C 520/21 essentially ruled that only the consumer may demand additional benefits resulting from the cancellation of the Swiss franc loan agreement. The Bank may only demand the return of the loan capital together with statutory interest for delay without the possibility of demanding remuneration from the customer (consumer) for non-contractual use of capital. It has been held that Directive 93/13 does not directly govern the consequences of the invalidity of a contract concluded between a seller or supplier and a consumer after the unfair terms have been removed. It is for the Member States to determine the consequences of such a finding and the measures which they adopt in that regard must comply with EU law and, in particular, with the objectives of that directive. It will be for the national courts to assess, in the light of all the circumstances of the dispute, whether the acceptance of such consumer claims is compatible with the principle of proportionality. When estimating the risk resulting from court litigations regarding indexation clauses in mortgage loan agreements, Bank Handlowy w Warszawie S.A. did not factor in receivables under its claims against borrowers for the payment of amounts equivalent to a fee for using the loan capital, therefore, the Bank does not have to revise its assumptions following the CJEU's judgment.

As at 31 December 2025, the Bank had receivables under CHF-indexed retail mortgage loans at the gross carrying amount of PLN 16.0 million. The Bank maintained a collective provision in the amount of PLN 21.7 million (compared to PLN 22.8 million as at 31 December 2024). Estimation of the provision assumes the expected level of probability of settlement or litigation resolution and an estimate of the Bank's loss should a dispute be settled in court. This value, as well as provisions for individual litigation cases, is included in the consolidated financial statement under Provisions.

As at 31 December 2025, the Bank was sued in 80 cases relating to a CHF-indexed loan for a total amount of approximately PLN 34.9 million. 59 cases were legally lost, and the Bank decided to file two cassation appeals (one appeal was rejected on formal grounds, as to the second the Supreme Court refused to accept the cassation appeals for consideration). Most of the cases are in the first instance.

The court proceedings described in this section are excluded from the business transfer transaction of Retail Segment to VeloBank S.A. on the basis of the Agreement on the division by separation of the Bank's retail operations in favour of VeloBank S.A. concluded on May 27, 2025 by ValoBank S.A., Promotoria Holding 418 B.V. and Citibank Europe Plc.

Legal risk related to claims arising from the free credit sanction

As of 31 December 2025, the Bank was the defendant in a total of 317 court cases concerning claims arising from the free credit sanction related to consumer loans offered by the Bank. The total value of the dispute in these cases as of the above date was PLN 7.2 MM. The Bank noted the preliminary questions submitted by Polish courts in cases concerning Polish financial market entities, which concern issues related to the free credit sanction, and is closely following the course of proceedings in which these questions are to be resolved. The Bank closely monitors court decisions in cases concerning the free credit sanction. Currently, the rulings in the Bank's cases are overwhelmingly favorable to the Bank.

The court proceedings described in this section are included in the business transfer transaction of Retail Segment to VeloBank S.A. on the basis of the Agreement on the division by separation of the Bank's retail operations in favour of VeloBank S.A. concluded on May 27, 2025, by ValoBank S.A., Promotoria Holding 418 B.V. and Citibank Europe Plc.

The above factors may affect the financial performance of the Group in the future.

III. The organizational structure of the Capital Group of Bank Handlowy w Warszawie S.A.

The Capital Group of Bank Handlowy w Warszawie S.A. (the "Group") consists of a parent company and subsidiaries.

Group entities fully consolidated

Entity	Core business	Capital relationship	% of authorized capital held	Accounting method	Equity (PLN '000)
Bank Handlowy w Warszawie S.A.*	Banking	parent	-	-	10,030,353
Handlowy Financial Services Sp. z o. o. (previously Dom Maklerski Banku Handlowego S.A.)**	Investing activity	subsidiary	100.00%	full consolidation	72,284
Handlowy - Leasing Sp. z o.o.**	Leasing	subsidiary	100.00%***	full consolidation	16,269
Handlowy Investments S.A.**	Investing activity	subsidiary	100.00%	full consolidation	4,357
Handlowy-Inwestycje Sp. z o.o.**	Investing activity	subsidiary	100.00%	full consolidation	10,622

** Equity of Bank Handlowy w Warszawie S.A. as per the statement of the financial position of the Bank for 2025*
*** Pre-audit data*
****Including indirect share*

Changes in Group's structure

In the 2025 the structure of the Bank's Capital Group has not changed compared to the end of 2024.

IV. Selected financial data of the Capital Group of Bank Handlowy w Warszawie S.A.

1. Financial results of the Bank and the Group in 2025

This document presents financial data for both Bank and Group. As activities of the Bank account for the vast majority of operations of the Group (equity of the Bank account for 99.9% of the equity of the Group), both results and financial situation are discussed on the basis of consolidated data, except where it is expressly indicated that the data of the Bank are discussed.

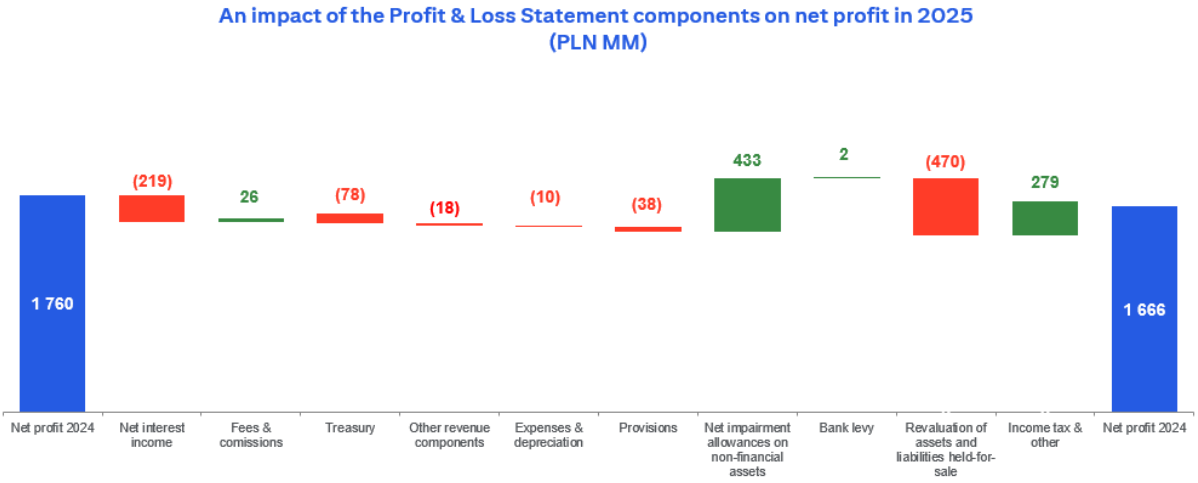
In connection with the agreement for the sale of the Retail Business to VeloBank S.A., the Bank reclassified the Retail Business as held for sale in accordance with IFRS 5. As a result, the income statement and statement of financial position under review relate to continuing operations, primarily the Institutional Banking segment. The financial result of the Retail Business is presented as the result from discontinued operations. Detailed information regarding the presentation of discontinued operations can be found in the Consolidated Financial Statements in the section "Assets and liabilities classified for sale and result from discontinued operations."

1.1. *Income statement*

Selected income statement items

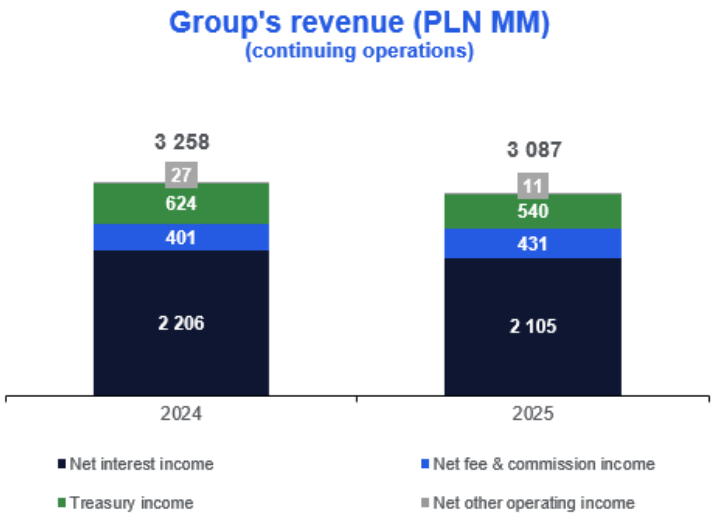
PLN '000	Bank		Capital Group			
					Change	
	2025	2024	2025	2024	PLN '000	%
CONTINUING OPERATIONS						
Net interest income	2,101,217	2,200,874	2,104,750	2,205,777	(101,027)	(4.6%)
Net fee and commission income	430,876	400,987	430,858	400,959	29,899	7.5%
Dividend income	15,221	45,970	12,572	11,508	1,064	9.2%
Net income on trading financial instruments and revaluation	364,982	564,100	364,940	564,220	(199,280)	(35.3%)
Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income	173,621	50,652	173,621	50,652	122,969	242.8%
Net gain/(loss) on equity and other instruments measured at fair value through income statement	10,960	31,517	10,960	31,517	(20,557)	(65.2%)
Net gain on hedge accounting	1,817	8,874	1,817	8,874	(7,057)	(79.5%)
Net other operating income	(12,241)	(15,764)	(12,360)	(15,861)	3,501	(22.1%)
Total income	**3,086,453**	**3,287,210**	**3,087,158**	**3,257,646**	**(170,488)**	**(5.2%)**
Overheads and general administrative expenses and depreciation, including	(782,740)	(790,017)	(784,157)	(791,413)	7,256	(0.9%)
Overheads and general administrative expenses	(740,143)	(739,150)	(741,560)	(740,546)	(1,014)	0.1%
Depreciation/amortization of tangible and intangible fixed assets	(42,597)	(50,867)	(42,597)	(50,867)	8,270	(16.3%)
Profit/loss on sale of other assets	545	885	545	885	(340)	(38.4%)
Net impairment on financial assets and provisions for off–balance sheet commitments	(25,926)	(18,933)	(25,925)	(18,898)	(7,027)	37.2%
Operating profit	**2,278,332**	**2,479,145**	**2,277,621**	**2,448,220**	**(170,599)**	**(7,0%)**
Tax on some financial institutions	(123,810)	(120,761)	(123,810)	(120,761)	(3,049)	2.5%
Profit before tax from continuing operations	**2,154,522**	**2,358,384**	**2,153,811**	**2,327,459**	**(173,648)**	**(7.5%)**
Income tax expense	(395,333)	(541,637)	(395,670)	(542,234)	146,564	(27.0%)
Net profit from continuing operations	**1,759,189**	**1,816,747**	**1,758,141**	**1,785,225**	**(27,084)**	**(1.5%)**
Net profit from discontinued operations	**(91,797)**	**(24,768)**	**(91,797)**	**(24,768)**	**(67,029)**	**270.6%**
Net profit from continuing and discontinued operations	**1,667,392**	**1,791,979**	**1,666,344**	**1,760,457**	**(94,113)**	**(5.3%)**

The impact of individual items of the income statement on net profit is shown on the graph below:



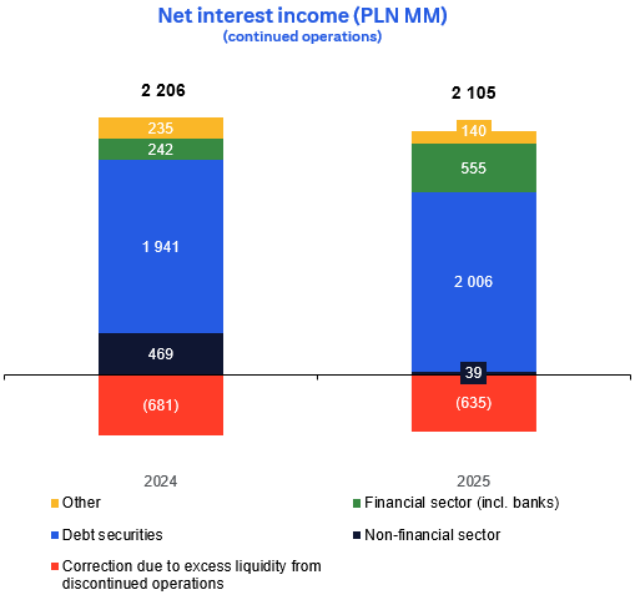
Revenue

In 2025, revenues from continuing operations amounted to PLN 3,087.2 million as compared to PLN 3,257.6 million in 2024, i.e. decreased by PLN 170.5 million, i.e. 5.2% mainly due to lower net interest income resulting from continued cycle of interest rate cuts in Poland.



The operating result generated by the Group in 2025 was influenced in particular by:

- **Net interest income from continuing operations** accounted for 68% of the Group's total revenues from continuing operations in 2025. It amounted to PLN 2,104.8 million in comparison to PLN 2,205.8 million in 2024, which means a decrease by PLN 101.0 million (which is 4.6% YoY) due to lower asset profitability due to the NBP reference rate cuts by 175 basis points throughout 2025. As a result, the Bank's interest margin decreased from 4.39% in 2024 to 3.75% in 2025.

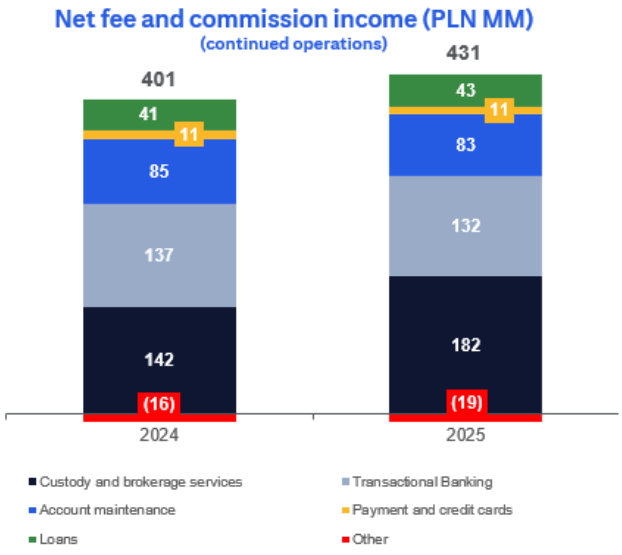


Interest income amounted to PLN 3,106.7 million in 2025 and increased by PLN 61.9 million, i.e. 2.0% as compared to 2024. The largest nominal increase by PLN 112.0 million (i.e. 12.1%) as compared to 2024 was recorded by interest income from amounts due from customers, which amounted to PLN 1,035.1 million at the end of 2025 due to higher loan volumes which increased by 22% YoY (excluding reverse-repo transactions and collateral deposits).

The largest share in interest income in 2025 was interest income on debt investment financial assets measured at fair value through other comprehensive income (share of 60%) which amounted to PLN 1,869.5 million (i.e. increased by 15.8 million or 0.9% YoY) due to due to the higher average volume of investment debt instruments.

In turn, the Group's interest expenses from continuing operations in 2025 were higher by PLN 162.9 million or 19.4% as compared to 2024 and amounted to PLN 1,002.0 million. This increase was driven by higher interest expenses from customers (i.e. increase by 179.6 million or 30.6% YoY) due to the higher volume of deposits from Institutional Banking segment clients by 18% YoY.

Net fee and commission income from continuing operations in the amount of PLN 430.9 million compared to PLN 401.0 million in 2024 - an increase by PLN 29.9 million (i.e. 7.5% YoY) due to higher revenues from capital markets activities, as a result of which the highest nominal increase was recorded in revenues from custody activities by PLN 23.5 million, i.e. at 18.5% YoY) and revenues from brokerage activities by PLN 17.0 MM, i.e. 61.1% YoY). The above increases were the result of increased customer activity. Additionally, the Bank participated in key transactions that took place on the WSE – the Diagnostyka IPO and 5 Accelerated Share Sale transactions that took place in 2025. At the same time, income from financial liabilities granted increased by PLN 7.5 million, i.e. 21.4% YoY) mainly due to the higher average value of the trade service transaction portfolio by 36% YoY. On the other hand, the Bank observed a decrease in clients' cash on account management services revenues by PLN 2.9 million, i.e. 12.2% YoY), a decrease in revenues from maintaining bank accounts by PLN 2.7 million, i.e. 3.2% YoY, and from payment orders by PLN 2.0 million, i.e. 1.8% YoY.



Fee and commission expenses from continuing operations in 2025 amounted to PLN 79.2 million, up by PLN 10.0 million (i.e. 14.5% YoY). This increase mainly concerned the area of custody activity.

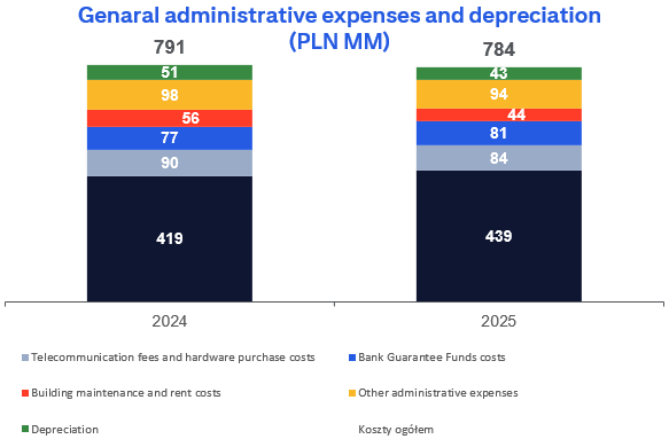
- **Other operating income (i.e. non-interest and non-commission income) from continuing operations** amounting to PLN 551.6 million in comparison to PLN 650.9 million in 2024 which means a decrease by PLN 99.4 million, i.e. 15.3% YoY) mainly due to the decrease in the result on trading financial instruments and revaluation by PLN 199.3 million, i.e. 35.3% YoY which was largely offset by a higher result on debt investment financial assets measured at fair value through other comprehensive income by PLN 123.0 million, i.e. 242.8% YoY.

Expenses

General expenses & depreciation

PLN '000	Bank		Capital Group			
					Change	
	2025	2024	2025	2024	PLN '000	%
Personnel costs	***(437,889)***	***(418,084)***	***(438,574)***	***(418,817)***	***(19,757)***	***4.7%***
General administrative expenses, including:	***(302,254)***	***(321,066)***	***(302,986)***	***(321,729)***	***18,743***	***(5.8%)***
Telecommunication fees and IT hardware	*(83,618)*	*(90,428)*	*(83,636)*	*(90,493)*	*6,857*	*(7.6%)*
Bank Guarantee Funds costs	*(81,235)*	*(76,872)*	*(81,235)*	*(76,872)*	*(4,363)*	*5.7%*
Building maintenance and rent	*(43,967)*	*(56,463)*	*(43,967)*	*(56,463)*	*12,496*	*(22.1%)*
Total overheads	***(740,143)***	***(739,150)***	***(741,560)***	***(740,546)***	***(1,014)***	***0.1%***
Depreciation	*(42,597)*	*(50,867)*	*(42,597)*	*(50,867)*	*8,270*	*(16.3%)*
Total general expenses & depreciation	***(782,740)***	***(790,017)***	***(784,157)***	***(791,413)***	***7,256***	***(0.9%)***

General administrative and depreciation expenses from continuing operations amounted to of PLN 784.2 million in 2025, i.e. slight decrease in expenses by PLN 7.3 million (i.e. 0.9% YoY). This decrease is mainly due to a decrease in general and administrative expenses (a decrease of PLN 18.7 million, or 5.8% YoY), which were mainly influenced by lower building maintenance expenses (a decrease of PLN 12.5 million, or 22.1% YoY), lower telecommunication fees and IT hardware expenses (drop by PLN 6.9 million or 7.6% YoY) and lower depreciation (a decrease of PLN 8.3 million, or 16.3% YoY). These expenses decreases were partially offset by higher staff costs (an increase of PLN 24.6 million, or 6.0% YoY), caused by higher remuneration costs due to wage pressure.



Employment of the Group*

FTEs	2025	2024
Average employment during the year	3,062	3,038
Employment at the end of the year	3,045	3,050
Headcount	**2025**	**2024**
Average employment during the year	3,157	3,122
Employment at the end of the year	3,149	3,143

In 2025 average employment in the Group amounted to 3,062 FTEs, thus being by 0.8% higher than in 2024. The number of FTEs at the end of the period amounted to 3,045 i.e. almost the same as at the end of 2024 (slight increased by 0,2% as compared with the same period of 2024.

As of December 31, 2025 employment in the Group (headcount) amounted to 3 149 employees, of which 1,520 in Consumer Banking, 768 in Institutional Banking and 861 in support units.

Provision for expected credit losses on financial assets and provisions for off–balance sheet commitments

Net impairment and provisions

PLN '000	Bank		Capital Group		Change	
	2025	2024	2025	2024	PLN '000	%
Provision for expected credit losses on receivables, including	(28,346)	15,258	(28,346)	15,258	(43,604)	(285.8%)
Provision for expected credit losses on financial assets – Stage 1	3,842	24,437	3,842	24,437	(20,595)	(84.3%)
Provision for expected credit losses on financial assets – Stage 2	(14,297)	(8,350)	(14,297)	(8,350)	(5,947)	71.2%
Provision for expected credit losses on financial assets – Stage 3	(16,961)	(2,790)	(16,961)	(2,790)	(14,171)	507.9%
Provision for expected credit losses - assets granted with impairment	(930)	1,961	(930)	1,961	(2,891)	(147.4%)
Provision for expected credit losses for granted off-balance sheet commitments	7,118	1,688	7 118	1,688	5,430	321.7%
Provision for expected credit losses on equity investments	(1)	(35)	-	-	-	-
Provision for expected credit losses on debt investment financial assets measured at fair value through other comprehensive income	(503)	(389)	(503)	(389)	(114)	29.3%
Provision for expected credit losses	**(21,732)**	**16,522**	**(21,731)**	**16,557**	**(38,288)**	**(231.3%)**

Provision for expected credit losses on financial assets and provisions for off-balance sheet commitments amounted to PLN 21.7 million (negative impact on P&L) versus PLN 16.6 million (positive impact on P&L) in 2024 (up by PLN 38 million YoY) mainly due to lower cost of risk in discontinued operations in 2024 (reversal of the management adjustment). At the same time, provision for expected credit losses in continuing operations increased due to a higher loan volume (22% increase YoY).

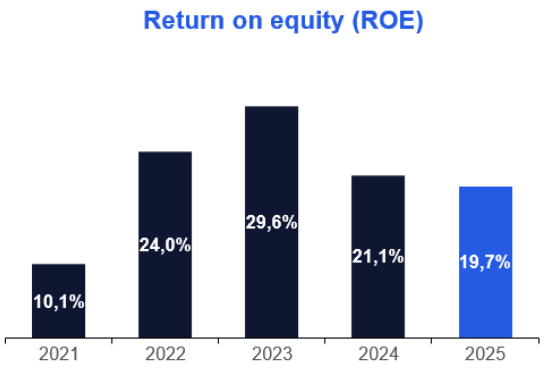
Ratio analysis

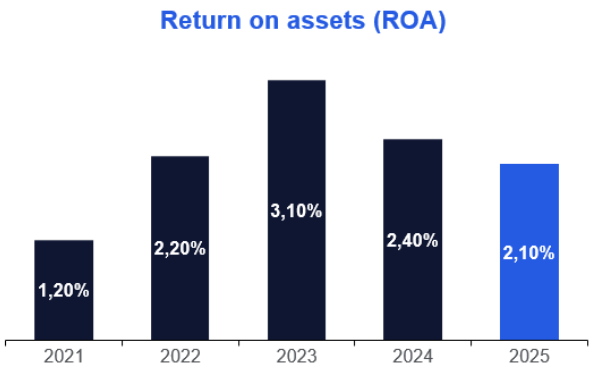
The Group's efficiency ratios

	2025	2024
Return on equity (ROE)*	19,7%	21,1%
Return on assets (ROA)**	2,1%	2,4%
Net interest margin (NIM)***	3,7%	4,4%
Margin on interest-bearing assets	4,0%	4,7%
Earnings per share in PLN	12,79	13,48
Cost/income****	37%	35%
Loans/Deposits	41%	40%
Loans/Total assets	31%	29%
Net interest income to total revenue	72%	72%
Net fee and commission income to total revenue	14%	13%

** Net profit to average equity (excluding net profit for the current year) calculated on a quarterly basis;*
*** Net profit to average total assets calculated on a quarterly basis;*
**** Net interest income to average total assets calculated on a quarterly basis;*
***** Overheads, general administrative expenses, depreciation and amortization to operating income.*

In 2025, the Group's returns on equity and assets remained at levels of respectively 19.7% and 2.1% which means a decrease compared to the previous year due to the lower net profit. In turn, in the area of cost-effectiveness, the cost/income ratio was 37% (up by 2 p.p.) due to higher operating expenses.





1.2 Consolidated statement of financial position

As of December 31, 2025, the total assets of the Group amounted to PLN 78.8 billion and increased by PLN 6.4 million or 8.8% as compared to the end of 2024. Simultaneously, total liabilities amounted to PLN 68.8 billion, up by PLN 6.2 billion (or 9.9%) as compared to the end of 2024.

The loan-to-deposit ratio increased to 41% at the end of December 2025 (up by 1 percentage point compared to the end of December 2024).

Consolidated statement of financial position

PLN '000	Bank		Capital Group			
	As at		As at		Change	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024	PLN'000	%
ASSETS						
Cash and cash equivalents	9,205,484	5,794,345	9,205,484	5,794,345	3,411,139	58.9%
Amounts due from banks	8,245,819	8,787,780	8,245,819	8,787,780	(541,961)	(6.2%)
Financial assets held for trading	4,823,372	4,436,319	4,823,372	4,436,319	387,053	8.7%
Assets pledged as collateral	-	-	-	-	-	-
Hedging derivatives	-	54,140	-	54,140	(54,140)	(100.0%)
Debt financial assets measured at fair value through other comprehensive income	30,151,984	30,088,771	30,151,984	30,088,771	63,213	0.2%
Assets pledged as collateral	49,130	*200,309*	49,130	*200,309*	*(151,179)*	*(75.5%)*
Equity investments valued at equity method	91,020	91,299	-	-	-	-
Equity and other instruments measured at fair value through income statement	183,908	172,948	183,908	172,948	10,960	6.3%
Amounts due from customers	18,222,892	21,367,246	18,222,892	21,367,246	(3,144,354)	(14.7%)
Tangible fixed assets	446,980	521,131	446,980	521,131	(74,151)	(14.2%)
Intangible assets	878,388	872,875	878,388	872,875	5,513	0.6%
Current income tax receivables	-	-	-	-	-	-
Deferred income tax asset	221,661	82,273	221,703	82,284	139,419	169.4%
Other assets	384,670	300,066	384,713	300,264	84,449	28.1%
Non-current assets held-for-sale and assets in disposal groups held-for-sale	6,083,766	-	6,083,766	-	6,083,766	-
Total assets	**78,939,944**	**72,569,193**	**78,849,009**	**72,478,103**	**6,370,906**	**8.8%**
LIABILITIES						

PLN '000	Bank		Capital Group			
	As at		As at		Change	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024	PLN'000	%
Liabilities due to banks	3,904,294	4,435,817	3,904,294	4,435,817	(531,523)	(12.0%)
Financial liabilities held for trading	2,690,099	2,755,905	2,690,099	2,755,905	(65,806)	(2.4%)
Hedging derivatives	358,677	72,737	358,677	72,737	285,940	393.1%
Amounts due to customers	38,533,807	54,090,588	38,429,419	53,985,032	(15,555,613)	(28.8%)
Provisions	77,176	120,529	77,670	120,992	(43,322)	(35.8%)
Current income tax liabilities	11,770	99,568	11,807	99,600	(87,793)	(88.1%)
Deferred tax provision	-	-	-	13	(13)	(100.0%)
Other liabilities	1,039,274	1,138,566	1,040,242	1,139,476	(99,234)	(8.7%)
Liabilities in disposal groups held-for-sale	22,294,494	-	22,294,494	-	22,294,494	-
Total liabilities	**68,909,591**	**62,713,710**	**68,806,702**	**62,609,572**	**6,197,130**	**9.9%**
EQUITY						
Share capital	522,638	522,638	522,638	522,638	-	-
Supplementary capital	2,944,585	2,944,585	3,001,262	3,001,260	2	0.0%
Own shares	(27,311)	(20,577)	(27,311)	(20,577)	(6,734)	32.7%
Revaluation reserve	240,646	(64,868)	240,646	(64,868)	305,514	(471.0%)
Other reserves	4,682,403	4,039,644	4,650,124	4,039,027	611,097	15.1%
Retained earnings	1,667,392	2,434,061	1,654,948	2,391,051	(736,103)	(30.8%)
Total equity	**10,030,353**	**9,855,483**	**10,042,307**	**9,868,531**	**173,776**	**1.8%**
Total liabilities and equity	**78,939,944**	**72,569,193**	**78,849,009**	**72,478,103**	**6,370,906**	**8.8%**

1.2.1 Assets

The largest share in the Group's asset structure at the end of 2025 was held by **investment debt financial assets**. Their share in total assets amounted to 38.2%. In 2025, the Bank reduced its exposure to money market bills in favor of Polish Treasury bonds.

Debt securities portfolio of the Bank

PLN '000	As at		Change	
	31.12.2025	31.12.2024	PLN '000	%
Treasury bonds, including:	21,401,358	14,194,980	7,206,378	50.8%
covered bonds in fair value hedge accounting	2,427,315	2,83, 707	(409,392)	(14.4%)
Bank bonds, including:	9,287,923	14,846,629	(5,558,706)	(37.4%)
covered bonds in fair value hedge accounting	1,904,233	3,225,777	(1,321,544)	(41.0%)
Bonds issued by financial entities	1,756,978	1,849,864	(92,886)	(5.0%)
covered bonds in fair value hedge	537,652	505,371	32,281	6.4%
NBP bills	-	999,202	(999,202)	(100.0%)
Total	**32,446,259**	**31,890,675**	**555,584**	**1.7%**

In turn, the second largest share in the structure of the Group's assets at the end of 2025 was **amounts due from customers**, their share in total assets was 23.1%. The value of amounts due from customers at the end of 2025 amounted to PLN 18.2 billion and was lower by PLN 3.1 billion (i.e. 14.7%) compared to the end of 2024 due to the transfer of amounts due from individual customers to the item Non-current assets held-for-sale and assets in disposal groups held-for sale.

Net amounts due from customers (including assets held for sale) amounted to PLN 24.4 billion at the end of 2025, i.e. up by PLN 3.0 billion or 14.2% as compared to 2024.

The value of amounts due from customers in the Institutional Banking segment, representing the sum of amounts due from both financial sector and non-financial sector entities (i.e. excluding individual clients), amounted to PLN 18.2 billion, up by PLN 2.9 billion (i.e. 19.0%) as compared to the end of 2024 (excluding reverse repo transactions and collateral deposits this increase amounted to PLN 3.2 billion or 21.9% YoY). This increase

concerned both financial sector clients – mainly short-term loans – and the non-financial sector – including primarily global and corporate clients.

The volume of amounts due from clients granted to individual customers slightly increased by PLN 116.4 million (i.e. 1.9%) compared to the end of 2024 and amounted to PLN 6.2 billion mainly as a result of increase in the balance of cash loans (up by PLN 170.4 million, i.e. 10.7% YoY) and the balance of mortgage loans by (up by PLN 72.6 million, i.e. 3.1% YoY) and). The above increase was offset by a decrease in unsecured receivables due to lower credit card balances (down by PLN 130.6 million, i.e. 6.3% YoY).

Net amounts due from clients (including assets held for sale)

PLN '000	Bank		Capital Group			
	As at		As at		Change	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024	PLN '000	%
Receivables from financial sector entities	**6,448,941**	**5,107,751**	**6,448,941**	**5,107,751**	**1,341,190**	**26.3%**
loans	6,438,061	4,804,343	6,438,061	4,804,343	1,633,718	34.0%
Reverse repo	10,880	303,408	10,880	303,408	(292,528)	(96.4%)
Receivables from non-financial sector entities, including:	**17,941,811**	**16,259,495**	**17,941,811**	**16,259,495**	**1,682,316**	**10.3%**
Corporate clients*	11,787,690	10,221,799	11,787,690	10,221,799	1,565,891	15.3%
Individuals, including:	6,154,121	6,037,696	6,154,121	6,037,696	116,425	1.9%
Unsecured loans	3,734,904	3,691,071	3,734,904	3,691,071	43,833	1.2%
Mortgage loans	2,419,217	2,346,625	2,419,217	2,346,625	72,592	3.1%
Total net receivables from clients	**24,390,752**	**21,367,246**	**24,390,752**	**21,367,246**	**3,023,506**	**14.2%**

**Corporate clients include enterprises, public sector, state-owned and private companies, co-operatives, individual enterprises, non-commercial institutions acting for the benefit of households*

Loans to customers per portfolio with not recognized credit losses vs. portfolio with recognized credit losses (including assets held for sale)

PLN'000	As at		hange	C
	31 Dec 2025	31 Dec 2024	PLN'000	%
Loans without recognized impairment (Stage 1), including:	**21,921,681**	**18,569,574**	**3,352,107**	**18.1%**
financial institutions	6,290,291	5,110,359	1,179,932	23.1%
non-financial sector entities	15,631,390	13,459,215	2,172,175	16.1%
institutional clients*	10,190,891	8,878,518	1,312,373	14.8%
individual customers	5,440,499	4,580,697	859,802	18.8%
Loans without recognized impairment (Stage 2), including:	**2,377,710**	**2,702,016**	**(324,306)**	**(12.0%)**
financial institutions	169,504	15	169,489	1,129,926.7%
non-financial sector entities	2,208,206	2,702,001	(493,795)	(18.3%)
institutional clients*	1,532,807	1,282,206	250,601	19.5%
individual customers	675,399	1,419,795	(744,396)	(52.4%)
Loans with recognized impairment (Stage 3), including:	**596,448**	**622,047**	**(25,599)**	**(4.1%)**
financial institutions	-	-	-	-
non-financial sector entities	596,448	622,047	(25,599)	(4.1%)
institutional clients*	297,007	280,708	16,299	5.8%
individual customers	299,441	341,339	(41,898)	(12.3%)
Purchased or originated credit-impaired loans, including:	**18,127**	**19,320**	**(1,193)**	**(6.2%)**
financial sector entities	-	-	-	-
non-financial sector entities	18,127	19,320	(1,193)	(6.2%)
institutional clients*	1,121	875	246	28.1%
individual customers	17,006	18,445	(1,439)	(7.8%)
Total gross loans to customers, including:	**24,913,966**	**21,912,957**	**3,001,009**	**13.7%**
financial institutions	6,459,795	5,110,374	1,349,421	26.4%
non-financial sector entities	18,454,171	16,802,583	1,651,588	9.8%
institutional clients*	12,021,826	10,442,307	1,579,519	15.1%

PLN'000	As at		Change	
	31 Dec 2025	31 Dec 2024	PLN'000	%
individual customers	6,432,345	6,360,276	72,069	1.1%
Impairment, including:	**(523,214)**	**(545,711)**	**22,497**	**(4.1%)**
Total net amounts due from customers	**24,390,752**	**21,367,246**	**3,023,506**	**14.2%**
Impairment provisions coverage ratio	**65.9%**	**66.2%**		
institutional clients*	59.7%	58.9%		
individual customers	73.8%	73.7%		
Non-performing loans ratio (NPL)	**2.5%**	**2.9%**		
Non-performing loans ratio (NPL) – institutional clients	**2.5%**	**2.7%**		

** Institutional clients include enterprises, the public sector, state-owned and private companies, co-operatives, individual enterprises, non-commercial institutions acting for the benefit of households.*

Gross loans to customers of the Group (including assets held for sale)

PLN'000	As at		Change	
	31 Dec 2025	31 Dec 2024	PLN'000	%
Loans in PLN	20,980,856	18,143,952	2,836,904	15.6%
Loans in foreign currency	3,933,110	3,769,005	164,105	4.4%
Total	**24,913,966**	**21,912,957**	**3,001,009**	**13.7%**

1.2.2 Liabilities

As at the end of 2025 total liabilities amounted to PLN 68.8 billion, up by PLN 6.2 billion (or 9.9%) as compared to the end of 2024. The largest nominal increase was recorded in liabilities in disposal groups held-for-sale (an increase of PLN 22.3 billion) due to the separation of discontinued operations.

In 2025 **amounts due to customers** were the dominant source of financing of the Group's activity (they accounted for 48.7% of the Group's liabilities and equity) and amounted to PLN 38.4 billion at the end of December 2025, which means a decrease by PLN 15.6 billion (i.e. 28.8% YoY).

Taking into account liabilities held for sale, current account funds continued to dominate amounts due to customers in 2025, accounting for 61.1% of the total. Their balance increased slightly by PLN 914.4 million, or 2.5%, compared to the end of the previous year. Meanwhile, the balance of time deposits increased by PLN 5.9 billion, or 33.9% YoY.

The deposit volumes in the Institutional Banking segment as of the end of 2025 amounted to PLN 39.7 billion, up by PLN 6.3 billion (i.e. 18.9%) compared to the end of 2024. The above decrease concerned mainly time deposits of Corporate Clients and public sector.

The deposit volumes in the Consumer Banking segment amounted to PLN 20.6 billion and increased by PLN 493.4 million (i.e. 2.5%) compared to the end of December 2024 as a consequence of the higher balance of time deposits and current account funds.

Amounts due to customers (including liabilities in disposal groups held-for-sale)

PLN '000	Bank		Capital Group			
	As at		As at		Change	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024	PLN '000	%
Deposits of financial sector entities	**6,118,095**	**4,103,592**	**6,013,707**	**3,998,036**	**2,015,671**	**50.4%**
Deposits of non-financial sector entities, including	**54,213,678**	**49,439,196**	**54,213,678**	**49,439,196**	**4,774,482**	**9.7%**
Non-financial sector entities	28,501,621	25,789,871	28,501,621	25,789,871	2,711,750	10.5%
Non-commercial institutions	287,945	337,944	287,945	337,944	(49,999)	(14.8%)
Individuals	20,573,060	20,079,674	20,573,060	20,079,674	493,386	2.5%
Public sector entities	4,851,052	3,231,707	4,851,052	3,231,707	1,619,345	50.1%
Other liabilities	**354,724**	**547,800**	**354,724**	**547,800**	**(193,076)**	**(35.2%)**
Total liabilities towards customers	**60,686,497**	**54,090,588**	**60,582,109**	**53,985,032**	**6,597,077**	**12.2%**
Deposits of financial and non-financial sector entities, including:						
Liabilities in PLN	44,608,149	37,210,932	44,503,761	37,105,376	7,398,385	19.9%
Liabilities in foreign currency	15,723,624	16,331,856	15,723,624	16,331,856	(608,232)	(3.7%)
Total deposits of financial and non-financial sector entities	**60,331,773**	**53,542,788**	**60,227,385**	**53,437,232**	**6,790,153**	**12.7%**

1.2.3 Source and use of funds

PLN '000	Bank		Capital Group	
	31.12.2025	31.12.2024	31.12.2025	31.12.2024
Source of funds				
Funds of banks	3,904,294	4,435,817	3,904,294	4,435,817
Funds of customers	38,533,807	54,090,588	38,429,419	53,985,032
Own funds with net income	10,030 354	9,855,483	10,042,307	9,868,531
Other funds	26,471,489	4,187,305	26,472,989	4,188,723
Total source of funds	**78,939,944**	**72,569,193**	**78,849,009**	**72,478,103**
Use of funds				
Receivables from banks	8,245,819	8,787,780	8,245,819	8,787,780
Receivables from customers	18,222,892	21,367,246	18,222,892	21,367,246
Securities, shares and other financial assets	35,250,284	34,843,477	35,159,264	34,752,178
Other uses of funds	17,220,949	7,570,689	17,221,034	7,570,899
Total use of funds	**78,939,944**	**72,569,192**	**78,849,009**	**72,478,103**

1.2.4 Equity and the capital adequacy ratio

As compared to 2024, total equity increased slightly by PLN 173.8 million (i.e. 1.8%) mainly due to the increase in other reserves and revaluation reserve (mainly due to the higher valuation of debt and investment instruments.

The capital is fully sufficient to ensure financial security of the institution and client deposits and to support the future growth of the Group.

Group's equity*

PLN '000	As at		Change	
	31.12.2025	31.12.2024	PLN '000	%
Share capital	522,638	522,638	-	-
Supplementary capital	3,001,262	3,001,260	2	0.0%
Own shares	(27,311)	(20,577)	(6,734)	32.7%
Revaluation reserve	240,646	(64,868)	305,514	(471.0%)
Other reserves	4,650,124	4,039,027	611,097	15.1%
Retained earnings	1,654,948	2,391,051	(736,103)	(30.8%)
Total equity	**10,042,307**	**9,868,531**	**173,776**	**1.8%**

** Equity net of net profit /(loss)*

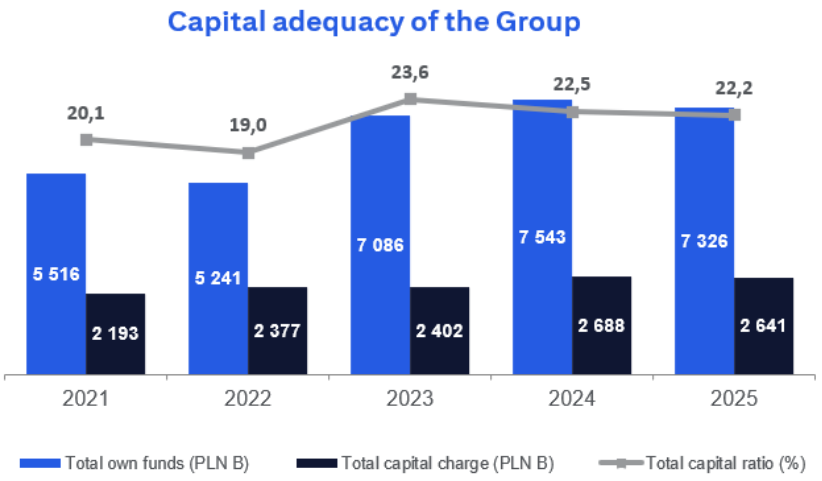
The following table shows the financial data used for calculation of the capital adequacy ratio on the basis of the consolidated financial statements of the Bank and the Group.

Capital adequacy ratio*

PLN'000	31.12.2025	31.12.2024**
I Common Equity Tier 1 Capital	**7,325,932**	**7,543,042**
II Total capital requirements, including:	**2,641,161**	**2,687,736**
credit risk capital requirements	2,075,287	1,751,377
counterparty risk capital requirements	78,697	101,817
Credit valuation correction capital requirements	10,026	8,688
excess concentration and large exposures risks capital requirements	-	-
total market risk capital requirements	115,403	113,887
operational risk capital requirements	361,748	711,967
Common Equity Tier 1 Capital ratio	**22.2%**	**22.5%**
Total Capital Ratio*	**22.2%**	**22.5%**

**Capital Adequacy Ratio was calculated according to the rules stated in the Regulation no 575/2013 of the European Parliament and of the Council (EU) of 26 June 2013 on prudential requirements for credit institutions and investment firms amending Regulation (EU) no 648/2012. Data as at respective reporting dates includes profits included in own funds, taking into account the applicable EBA guidelines.*

***In connection with the above, the capital ratio presented in the table considers the position of the European Banking Authority (EBA) regarding the inclusion of audited financial data and retrospective adjustments (Q&A 2018_4085 and 2018_3969).*



The Group as a resolution entity that is part of a global systemically important institution outside EU (Citigroup) in accordance with the definition contained in Art. 4 (136) of the CRR, shall meet the following requirements for own funds and eligible liabilities in accordance with Art. 92a CRR:

a) a risk-based ratio of 18%, representing the own funds and eligible liabilities of the institution expressed as a percentage of the total risk exposure amount (TLAC TREA);
b) a non-risk-based ratio of 6,75 %, representing the own funds and eligible liabilities of the institution expressed as a percentage of the total exposure measure (TLAC TEM).

In accordance with the CRR regulations, after increasing by the combined buffer requirement, the required minimum level of TLAC TREA for the Bank as at 31 December 2025 is 21.74% while Bank's TLAC TREA ratio at the consolidated level at the end of December 2024 amounted to 25.39%.

The level of the required Capital ratios encompasses:

- The basic requirement for capital ratios resulting from the CRR Regulation: 8% at the own funds level, 6% at the Tier I level and TLAC TREA at the level of 18%
- The combined buffer requirement - 3.74% on consolidated basis, which consists of:
  - The capital conservation buffer – 2.50%
  - The other systemically important institution's buffer – 0.25%
  - Countercyclical capital buffer – 0.99%
  - Systemic risk buffer – 0.00% (due to the regulation of the Minister of Finance of March 18 on the solution of the systemic risk buffer in order to limit the impact of the coronavirus on the domestic banking sector).

As at 31 December 2025, the capital adequacy ratio of the Group amounted to 22.19% and TLAC TERA ratio amounted to 25.39% and this value enables the Group to develop its lending activities.

The decrease in the total capital ratio in 2025 compared to 2024 was influenced by an increase risk-weighted exposure to credit risk and lower own funds partially offset by lower operational risk.

The increase in the level of TLAC TREA measures is due to the above-described factors affecting the level of funds and total risk exposure as well as the use of a subordinated loan in the amount of PLN 250 EUR.

On 6 June 2024, Bank concluded a subordinated loan agreement with Citibank Europe PLC with the registered office in Dublin. On 19 November 2024, in accordance with the information presented in current announcement No. 37/2024 of 19 November 2024, the Management Board of the Bank decided to use EUR 250 million of the subordinated loan from the total amount granted in the framework subordinated loan agreement. The amount of the loan used as at December 31, 2025 is approximately PLN 1.057 million. The loan is classified as eligible liabilities, credited towards meeting the TLAC and MREL requirements.

01 January 2025 came into force the main changes resulting from Regulation CRR3 (i.e. Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor) which has impact on Group capital adequacy.

These changes of law are intended to make standard methods of calculating requirements more sensitive and to increase the comparability of capital requirements between institutions using different calculation methods (including by using the output floor for credit risk in advanced methods or implement one common method for operational risk). The CRR3 regulations are being implemented in stages, with the largest scope of changes coming into force on 1 January 2025. In some situations, a transitional period has been established for the implementation of the target principles.

The change of methods for calculating the capital requirement for market risk will come into force on 1 January 2027.

The banking sector is still waiting for the finalization of legislative changes, including the adoption of regulatory technical standards for selected articles of the CRR regulation and the adoption of guidelines which may have a potential impact on the selected rules interpretation.

2. Interest rates

The table below presents weighted average effective interest rates of receivables and payables by the respective business segments of the Group:

As at 31 December 2025

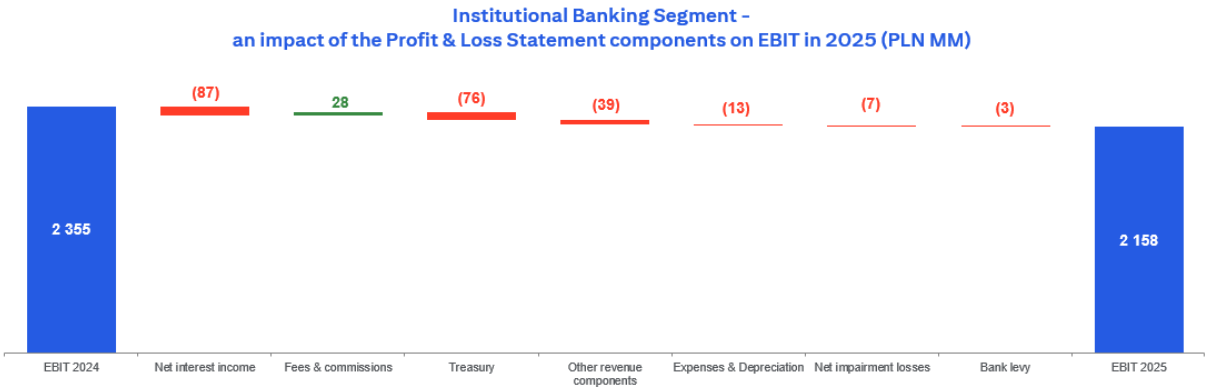
in %	Institutional Bank			Consumer Bank		
	PLN	EUR	USD	PLN	EUR	USD
ASSETS						
Receivables from banks and customers						
- fixed term	5.62	3.64	5.81	8.12	-	-
Debt securities	5.13	2.46	4.86	-	-	-
LIABILITIES						
Liabilities towards banks and customers						
- fixed term	3.44	2.34	3.05	3.89	0.84	1.03

As at 31 December 2024

in %	Institutional Bank			Consumer Bank		
	PLN	EUR	USD	PLN	EUR	USD
ASSETS						
Receivables from banks and customers						
- fixed term	7.77	4.42	6.48	8.08	-	-
Debt securities	5.96	3.89	4.48	-	-	-
LIABILITIES						
Liabilities towards banks and customers						
- fixed term	4.39	0.26	3.62	4.68	0.85	1.49

3. Institutional Banking Segment

3.1 Summary of segment's results



In 2025, the pre-tax profit of the Institutional Banking segment decreased by PLN 197.2 million, i.e. 8.4%. The following factors affected the pre-tax profit of the Institutional Banking segment in 2025 as compared to the previous year:

- **Net interest income** of PLN 2,022.5 million compared to PLN 2,109.7 million in 2024 - a decrease of PLN 87.2 million or 4.1% YoY, due to lower asset profitability as a result of NBP reference rate cuts by 175 basis points throughout 2025;
- **Net fee & commission income** of PLN 455.0 million compared to PLN 426.8 million in 2024, i.e. up by PLN 28.2 million, i.e. 6.6% YoY) resulting from the increased activity of the Bank's clients, thanks to which the largest nominal increases were recorded in revenues from activities related to capital markets (custody and brokerage activities);
- **decrease in other operating income** (i.e. non-interest and non-commission income) amounting to PLN 540.8 million at the end of 2025 compared to PLN 655.7 million in 2024 (i.e. decrease by PLN 114.9 million, i.e. 17.5% YoY), mainly due to a lower result on trading financial instruments and revaluation by PLN 199.3 million, i.e. 35.3% YoY which was partially offset by higher result on investment debt financial assets measured at fair value through other comprehensive income by PLN 123.0 million, i.e. 242.8% YoY);
- **General and administrative expenses and depreciation** in the amount of PLN 711.0 million compared to PLN 698.1 million in 2024 - an increase of PLN 12.9 million or 1.9% YoY caused by higher staff expenses due to wage pressure, which was partially offset by lower general and administrative costs, which were influenced, among others, by lower costs of building maintenance;
- **Provision for expected credit losses on financial assets and provisions for off-balance sheet commitments** amounted to PLN 25.9 million (negative impact on the P&L) compared to PLN 18.9 million (negative impact on P&L) in 2024, due mainly due to the growing loan portfolio.

3.2 Institutional Bank

In the area of institutional banking, the Group provides comprehensive financial services to the largest Polish companies and strategic companies with a large potential of growth, and also to the largest financial institutions and to companies from the public sector.

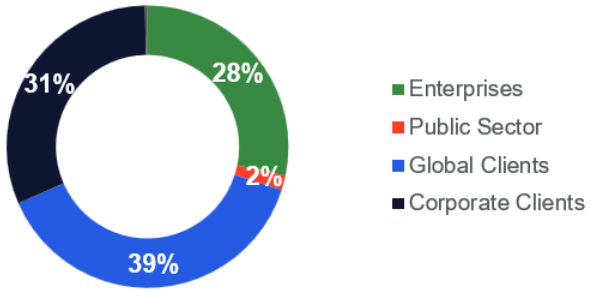
A shared characteristic of the institutional banking clients is that they need advanced financing products and advice relating to financial services. In this area, the Group ensures a coordinated offer of investment banking, treasury and cash management products and prepares loan proposals that cover differentiated forms of financing. The innovativeness and competitiveness of offered modern financing structures is achieved by combining the knowledge and experience of the Group and thanks to cooperation within the global structure of Citigroup.

As at the end of 2025, the number of institutional clients (which include strategic clients, global clients and commercial bank clients) stood at slightly below 5,600, i.e. increase by 3% as compared to the end of 2024 level.

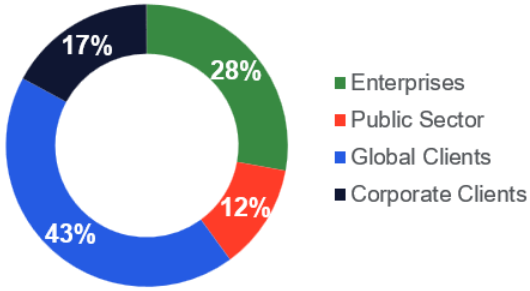
In terms of client's acquisition in the Commercial Bank segment the Bank attracted 271 new clients in 2025, including 34 Large Companies, 19 Small and Medium-Sized Companies, 99 International Clients of Commercial Banking Segment, 15 Digital and 104 Public Sector Entities. In the strategic and global client segments, the Bank established 28 new client relationships.

Clients assets:

Structure of the Institutional Bank assets as of 31.12.2025



Structure of the Institutional Bank liabilities as of 31.12.2025



Key transactions and achievements in Institutional Banking in 2025:

Credit activity	<u>Granting new financing or increasing or extending existing ones in the amount of PLN 6.7 B</u> • PLN 2.6 billion for Commercial Banking Clients, among others, among others, for one of the largest groups in Poland operating in the recycling and secondary raw materials sector, for a client providing modern solutions in the field of metal processing and automation of production processes; for one the biggest European footwear industry companies; for a leader in the outsourcing sector in Poland offering comprehensive facility management services that cover a wide range of activities from cleaning through property management to advanced technical services, for leading medical centers conducting coordinated, specialized diagnosis and treatment of patients, for a client operating online portals, for a client operating software-related businesses, for the largest drug distributor and one of the leading pharmaceutical wholesalers in Poland; for a Polish broadcaster of free-to-air and subscription television channels; for a Polish manufacturer specializing in the production of electric traction units and locomotives as well as modernization of diesel locomotives; for a Polish company focused on design, production, and distribution of clothes; for a client offering functional food additives such as spices, sauces, and marinades; for a leader in the frozen fruit and vegetable market in Poland; for leading Polish rolling stock manufacturer and for a recognized European producer of top-quality coke; • PLN 2.1 billion for Global Clients, among others, among others, for a client offering a comprehensive and innovative range of mobile services; for a client operating in the brewing industry; for an American energy and defense corporation; for a client operating in the lifting equipment industry; for a direct recycling program operator for one of the largest mobile networks in Poland; for a company offering short and long-term rentals, contract rentals through peer-to-peer services and used car sales; for a client offering leasing and rental of new and used cars; for an international group offering a wide range of car financing products; for a world-leading technology pioneer in electronics, mobile communications, and household appliances; for a client offering diversified leasing and loan solutions; • PLN 2.0 billion for Corporate Clients, among others, for a client from the fuel and energy industry; for a public sector client; for one of the largest e-commerce platforms in Poland offering the ability to buy and sell goods; and for one of the leaders in the factoring industry in Poland, providing a wide range of financial services, including factoring, debt collection, and receivables insurance.
Transactional Banking	<u>Increasing shares in banking services and transaction banking</u> • Winning 38 mandates for comprehensive banking services or extending the Bank's cooperation with its clients; • Signing new agreements or increasing the amounts of existing agreements regarding supplier financing, letters of credit, promises, factoring and bank guarantees for a total amount of PLN 2.6 billion.

3.3 Treasury Activity

In 2025, the Sales Division within the Financial Markets and Corporate Banking Sector successfully continued its mission of building long-term client relationships by delivering comprehensive support in navigating global financial markets. The team consistently executed its strategy while adapting to a dynamic market environment. Key initiatives included:

- organizing economic meetings to promote the exchange of knowledge and experience with leading market analysts;
- enhancing functionalities of transaction systems, which improved client ergonomics and operational efficiency;
- intensifying efforts to digitalize sales processes, which resulted in more efficient and faster client service;
- gradually providing clients with access to the new Citi Velocity FX trading platform.

The Investor Services Department and the Structured Finance Department in the Financial Markets and Corporate Banking Sector was active in the primary market for debt securities by arranging five issues for the European Investment Bank (EIB) in the total amount of PLN 2.35 billion for general purposes related to the EIB's activities (including those intended for the implementation of sustainability goals) and by participating in a public issue for a client from the automotive sector - in the amount of PLN 600 million.

3.4 Transactional banking

In 2025, the Bank implemented its strategy, under which the key drivers of development and growth included, among other things, an attractive offering of trade services and trade finance, aimed at enabling clients to strengthen their competitiveness in international markets, as well as the ongoing modernization of platforms supporting payment solutions.

In the area of trade services and trade finance, the Bank exceeded its assumed business volume growth targets for 2025, confirming strong client interest in the Bank's solutions supporting global business and their effectiveness in a period marked by high volatility in international trade and challenging geopolitical conditions.

The Bank continued to execute its planned initiatives to modernize its *back-end* systems to ensure full market compatibility (including migration to the ISO 20022 standard) and consistency across the Citi group. Standardization and a high level of automation are designed to ensure the seamless handling of growing transaction volumes. In 2025, the Bank implemented initiatives aimed at simplifying processes and standardizing services in order to provide clients with fast and secure settlements and modern tools facilitating bank account management.

At the same time, work continued consistently toward the full digitalization of the client onboarding process.

Current account

Implementation of CitiDirect® Digital Onboarding

In 2025, Citi Handlowy successfully implemented the first phase of the CitiDirect Digital Onboarding solution, in line with its strategic objectives of process digitalization. This innovative solution automated key back-end processes related to:

- onboarding (opening and introduction) of new clients;
- applications for additional accounts for existing clients.

CitiDirect Digital Onboarding, launched in January 2025, became the primary process for onboarding new clients. Over the course of the year, as many as 86% of new clients were submitted for onboarding via this digital channel, confirming its effectiveness and broad use.

Digital Signer Management (DSM) Module

A new solution introduced as part of the digitalization of bank account management processes was the Digital Signer Management (DSM) module. DSM enables clients to independently manage authorized persons in a fully digital mode, significantly simplifying and accelerating existing processes while materially enhancing the security of management of funds in their accounts.

In its initial phase, launched in March 2025, DSM was available in English, which meant it was used primarily by global clients. The Polish-language version was made available in the fourth quarter of 2025. At present, 38% of clients in the target group actively use the DSM service. Moreover, 7.5% of clients using DSM submitted requests via this module in 2025, confirming growing trust in digital solutions.

	Increase in the number of electronically signed documents Digitalization processes are directly reflected in a significant increase in the volume of documents signed using a qualified electronic signature. In 2025, as many as 62% of all documents were signed in this manner. This represents a notable increase of 8 percentage points compared to 2024, when documents signed with a qualified electronic signature accounted for 56% of the total. This trend demonstrates that clients are increasingly willing to use modern tools and capabilities offered by the Bank, valuing the convenience and security they offer.
Electronic Banking	In 2025, Citi Handlowy continued to develop its electronic banking platforms, focusing on delivering modern, secure, and efficient solutions that enhance the comfort and effectiveness of clients' day-to-day operations. The Bank implemented, among other things, an optimized transaction authorization process, which significantly shortens order processing times and minimizes the risk of operational errors, while providing a more intuitive working environment. The system was also enhanced with new tools supporting payment management, such as a quick copy function for recurring payments and the ability to add own comments to transactions, which makes tracking and improving internal communication within organizations easier. The Bank also provided more precise information on transaction processing status, enabling even better control over cash flows. Security remained a top priority; therefore, the Bank continued to promote modern sign-in methods, such as the Mobile Token combined with biometric authentication. To help clients fully leverage the platform's capabilities, the Bank regularly organized training sessions and collected feedback, which is essential for the system's ongoing improvement. The year 2025 also marked a period of strategic changes aimed at unifying and simplifying the offering on the global level. The Bank successfully migrated clients that use CitiConnect API services to the latest, more secure interface versions. At the same time, as part of its global strategy, the Bank standardized the formats and channels for delivering bank statements by retiring older local solutions to ensure access to more stable technologies and a consistent experience across all markets. Citi Handlowy also completed the migration process for clients that use discontinued payment methods under the CitiConnect for Files service, which simplified the offering and improved data quality in transactions transmitted via this channel. In 2025, the Bank processed over 38.4 million transactions via electronic channels, which represents an increase by 6% vs. the prior year period.
Payment processing	In the payments area, the Bank continued in 2025 to execute its strategy focused on modernizing *back-end* systems and developing solutions expected by clients from the "new economy," which resulted in a significant increase in processed payment volumes. In the area of domestic transactions, the Bank recorded a 13% increase in Express Elixir payment volumes compared to the prior year. This upward trend confirms the Bank's strategic focus on process automation and real-time settlements, which are critical for entities operating under the *Banking as a Service (BaaS)* model and for clients executing urgent consumer payouts. The Bank also actively strengthened its suite of payment solutions dedicated to *Digital Natives* clients, which translated into a sharp 26% year-on-year increase in domestic payment volumes of clients from the "new economy" segment. While these clients use the full range of available solutions, they demonstrate a higher demand for domestic payments, underscoring the Bank's role as a local partner leveraging Citi's global expertise and geographic reach. Taking into account the constantly growing needs of clients regarding process automation, agility of transaction execution and the timely access to data with the right coverage and structure, the Bank continued to revamp the architecture of its systems. The investments made in the platforms are aimed at standardizing formats, increasing bandwidth and compatibility, also in terms of the ISO 20022 requirements. In line with the market timetable for ISO 20022 changes, Citi Handlowy completed the migration of the high-value payment system SORBNET to the new SORBNET3 platform.

	As part of its strategy of providing flexible and intelligent treasury and trade solutions, the Bank developed Citi Payment Insights, a tool allowing for tracking the status of payments or generating confirmations at the beneficiary's request. The Bank also actively offered Citi Payment Outlier Detection, which, thanks to advanced analytics and algorithms, provides real-time monitoring and control of the company's payments, identifying transactions that differ from standard trends. At the end of 2025, the Bank maintained a strong market position, achieving a high 35% market share in Direct Debit. Growth in cross-border payment volumes also continued, with a 5% YoY increase recorded both in total foreign payments and within the SEPA system.
Corporate cards	In 2025, the Bank maintained the number of activated cards at a level similar to that of 2024. In the debit card segment, stable transaction trends continued compared to the previous year, i.e. the same number of transactions year on year and a slight decline in transaction value (-2% YoY). In the credit card segment – with cards often used to cover business travel expenses – the trend observed in 2024 continued, with fewer corporate employees undertaking business trips due to cost optimization and the growing use of remote communication tools. This resulted in a decline in the number and value of cashless transactions by 3% YoY and 6% YoY, respectively. Throughout 2025, preparations were underway for the implementation of key initiatives aimed at improving efficiency and raising service standards in the corporate card area, as well as preparing the operating model for the new structure following the separation of Retail Banking. One important initiative is the simplification of the Credit Card offering. The current three card types will be replaced with a single card type, intended to streamline client processes while maintaining a broad insurance package. In addition, changes to the design of both credit and debit cards were announced, aimed at aligning them with Citi standards and enhancing security by placing sensitive data on the reverse side of the card.
Trade Finance and Service	Trade Finance In 2025, the Bank continued to offer a broad range of solutions supporting flexible financing of day-to-day operations as well as the foreign expansion of Polish companies. Thanks to an extensive offering tailored to the specifics of the local market and the synergies resulting from the Bank's membership in the global Citi network, clients gained access to comprehensive solutions addressing their growing needs and enabling the execution of ambitious business strategies. As at the end of 2025, the value of assets under trade finance products – such as reverse factoring, trade loans, supplier financing, and loans secured by export credit agency guarantees – reached a record level – representing an increase of 29% compared to the asset value as at the end of 2024. Trade Service In 2025, the average value of the trade service transaction portfolio increased by 36% compared to 2024. In 2025, the Bank handled 76% more export letters of credit in terms of volume (and 56% more in terms of value) than in the previous year. Clients appreciated the possibility of issuing guaranties electronically, which was reflected in the share of e-guaranties in the total guaranties issued, maintained at nearly 75%.

3.5 Custody and depositary services

The Bank runs its custody operations under Polish law and in accordance with international standards of custody services offered to investors and intermediaries active in international securities markets. The Bank can meet the requirements of the largest and most demanding institutional clients.

The Bank provides custody services for domestic and foreign institutional investors and services of a custodian bank for domestic pension and investment funds. For many years, Citi Handlowy has been a leader in the Polish market of depository banks.

As part of its statutory activities, under a license issued by the Polish Securities and Exchange Commission (at present, the Polish Financial Supervisory Authority (KNF)), the Bank maintains securities accounts, settles securities transactions, processes dividend and interest payments, provides valuations of asset portfolios, delivers individual reports and arranges representation at general meetings of shareholders of listed companies. The Bank keeps collective accounts for authorized foreign entities. In addition, the Bank provides services consisting in maintenance of registers of foreign securities, under which it acts as intermediary in settlements of transactions executed by domestic clients in foreign markets.

The Bank also provides services as operator of accounts kept in the name of a client at the KDPW S.A. (Polish central depository and clearing institution), under which the Bank passes client's orders to KDPW and vice versa, as well as settlement confirmations and statements to accounts opened at KDPW to the client of the Bank. This service is dedicated to foreign financial institutions, in particular depository and settlement ones (financial entities classified as *ICSD – International Central Securities Depository)* and covers the management of securities accounts and collective accounts of such entities.

The Bank maintained its leading position in the market of securities transaction settlements carried out for remote members of the Warsaw Stock Exchange. In addition, the Bank was still the active participant of settlements of transactions concluded by foreign institutional clients on the Treasury BondSpot Poland debt securities electronic platform, managed by BondSpot S.A.

As at 31 December 2024, the Bank maintained more than 16.9 thousand securities accounts (including collective accounts).

Simultaneously, the Bank acted as depositary of open-end pension fund Nationale - Nederlanden OFE, two voluntary pension funds: Nationale - Nederlanden DFE, Generali DFE, and the Employee Pension Fund Orange Polska.

The Bank was also the depository of investment funds managed by the following Investment Fund Companies: Santander TFI S.A., PKO TFI S.A., Quercus TFI S.A. [merged on November 28, 2025 with Templeton Asset Management (Poland) TFI S.A.], mTFI S.A. and Goldman Sachs TFI S.A.

The Bank continued servicing investment funds and pension funds operating under the Employee Capital Plans program: PKO Emerytura SFIO, Santander PPK SFIO, Nationale - Nederlanden DFE Nasze Jutro and Goldman Sachs Emerytura SFIO.

At the same time, the Bank continued its activities to help refine legal regulations applicable to the securities market. A representative of the Bank was the Chairman of the Steering Committee of the Council of Depository Banks at the Polish Bank Association ("Council") for the nine consecutive term of office. In the reporting period, the Council was involved in providing opinions on draft regulations affecting activities of domestic custodian banks and depositary activity. With the use of its own resources, experience and competences, employees of the Bank, in cooperation with the Polish Financial Supervision Authority, Ministry of Finance, KDPW, KDPW_CCP and the Warsaw Stock Exchange, participated in consultations about the implementation of new solutions in the Polish capital market, and in projects carried out by market working parties.

3.6 Brokerage Activity

The Group runs brokerage activities in the capital market via Brokerage Department of Bank Handlowy w Warszawie ("DMBH").

As at the end of 2025, DMBH was the market maker for 69 companies listed on the Warsaw Stock Exchange (of which 20 from the WIG20 index), i.e. 17.3% of the shares listed in its main equity market.

In 2025, DMBH was the intermediary in in-session transactions accounting for 4.9% of equity turnover in the secondary market. The value of the in-session transactions concluded via DMBH in the equity market on the WSE was PLN 45.7 billion and increased by 66.2% as compared to last year, with increase in turnovers on the WSE by 41.9%.

In 2025, DMBH was on a 9. position in the session trading on the WSE Main Market, and 3. as a local Exchange Member.

The number of investment accounts maintained by DMBH was 17.0 thousand as at the end of 2025 and increased by 11.8% compared to 2024. The change is a consequence of ongoing acquisition processes in DMBH, taking into account the synergy effect of distribution processes at the Bank.

In 2025, DMBH participated in the PLN 1.7 billion IPO of Diagnostyka S.A. and completed five Accelerated Share Sale transactions. Three of these involved Allegro.eu S.A., and another involved Santander Bank Polska S.A. DMBH acted as the Global Coordinator in these transactions. The fifth transaction involved an issue of shares in CCC S.A., also as part of an Accelerated Share Sale transaction, in which DMBH acted as Joint Bookrunner. The total value of all Accelerated Share Sale transactions exceeded PLN 8.8 billion.

Summary financial data as at 31 December 2025*

Company	Headquarter	% of authorized Capital/votes in GM held by the Bank	Balance sheet total	Equity	Net financial result for 2025
		%	PLN '000	PLN '000	PLN '000
Handlowy Financial Services Sp. z o.o.	Warsaw	100.00	72,974	72,284	1,333

**preliminary data*

Summary financial data as at 31 December 2024

Company	Headquarter	% of authorized Capital/votes in GM held by the Bank	Balance sheet total	Equity	Net financial result for 2024
		%	PLN '000	PLN '000	PLN '000
Handlowy Financial Services Sp. z o.o.	Warsaw	100.00	73,987	73,335	2,384

3.7 Leasing

The leasing products are still offered by the Bank's Group as part of the so-called "open architecture", which is a partnership cooperation with entities not being part of the Bank's Group.

Summary financial data as at 31 December 2025*

V.	Company	Headquarter	% of authorized Capital/votes in GM held by the Bank	Balance sheet total	Equity	Net financial profit/loss for 2025
			%	PLN '000	PLN '000	PLN '000
Handlowy-Leasing Sp. z o.o.		Warsaw	100.00**	16,981	16,269	136

**pre-audit data*
***Including indirect share*

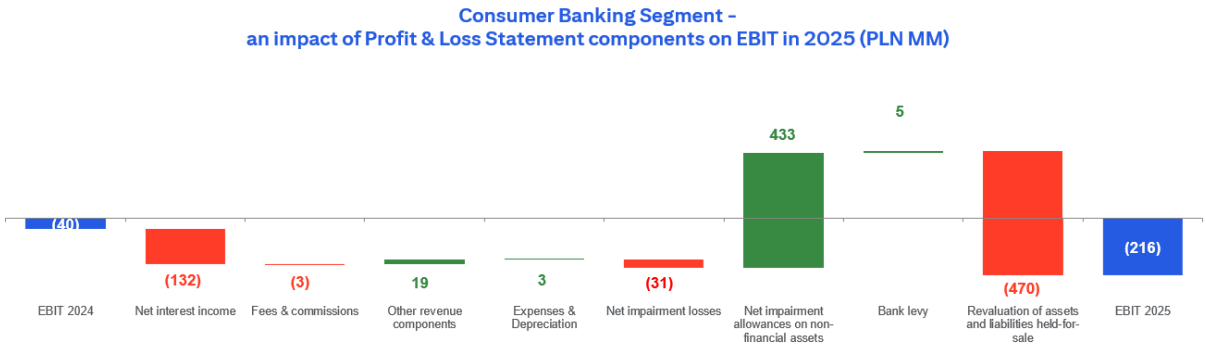
Summary financial data as at 31 December 2024

VI.	Company	Headquarter	% of authorized Capital/votes in GM held by the Bank	Balance sheet total	Equity	Net financial profit/loss for 2024
			%	PLN '000	PLN '000	PLN '000
Handlowy-Leasing Sp. z o.o.		Warsaw	100.00*	17,108	16,404	273

***Including indirect share*

1. Consumer Banking Segment

1.1 Summary of the segment's results



The following factors affected the pre-tax profit of the Consumer Bank segment in 2025:

- lower **interest income** by 12% YoY mainly caused by lower interest income as a consequence of lower interest rates compared to the previous year;
- **net fee and commission income** – lower by 2% caused, among others, by weaker credit card revenues (cash transactions, commissions, FX, ATM) as a result of a shrinking card portfolio. These declines are offset by higher (positive) commission revenue readings (investment funds, insurance), lower amortized acquisition costs (credit card), and loyalty program reward costs;
- lower net income on **financial instruments and revaluation** by PLN 4% YoY due to lower FX volume (strengthening of the PLN)
- **net other operating income** higher by 59% YoY mainly due to lower costs of retail products and lower costs related to CHF provisions;
- **an increase in operating expenses** by 10% YoY, mainly due to following: increase in remuneration expenses and employee benefits (salaries, provisions for annual bonuses, commissions, incentive and pension programs), increased costs: related to consulting services, customer acquisition (sales agencies, sales support), BFG fees, higher costs of software-related services;
- **a decrease in depreciation and amortization** by 85% YoY mainly due to lower depreciation related to impairment write-down of the asset value in 2024;
- **result on sales of the Consumer Banking Segment** – in 2025, the Bank's result will include the recognition of transaction costs related to the sale of the retail part;
- **result on sale of fixed assets** – result lower by 102% YoY, mainly due to the recognized loss on sale of fixed assets (refers to the sale of cars with residual value);
- **result on equity investment** – lower by 51% YoY due to change in share valuation holding by the Bank;

4.2 Selected business data

	2025	2024	Change PLN '000	Change %
Number of individual customers	560.8	564.5	(3.7)	(0.6%)
Number of current accounts	536.3	529.2	7.2	1.4%
Number of savings accounts	129.0	121.0	8.0	6.6%
Number of credit cards	447.4	461.8	(14.4)	(3.1%)
Number of debit cards	275.1	270.8	4.3	1.6%

4.3 Key business achievements

Bank accounts	Current accounts The total balance on the accounts amounted to PLN 8.8 billion as at the end of 2025, i.e. increased by almost 2% as compared to 2024. The stable balance level is a consequence of the attractive deposit offer and the growing number of clients. The number of personal accounts was 536,000 as at the end of 2025, i.e. increased by 1% as compared to 2024. Of that number, 289,000 were PLN accounts and 247,000 accounts in foreign currencies. Savings accounts and time deposits The number of savings accounts was 129,000 as at the end of 2025 and increased by 7% as compared to 2024, with a simultaneous their total balance of PLN 2.6 billion, i.e. up by 7% YoY. The increase in the balance on savings accounts is due to the great interest in the welcome offer for customers opening a Gold or CitiKonto account. The balance accumulated in time deposit accounts increased by 8% from PLN 6.5 billion at the end of 2024 to nearly PLN 6.9 billion at the end of December 2025. Changes in the offer In 2025, the Bank still provided the special offer for deposits up to PLN 20 thousand with an attractive interest rate from 4.0% up to 5.0% per annum for a 3-month term. In addition, the Bank offered attractive interest rates on term deposits as part of the offer for new Citigold Clients and Citigold Private Clients. In response to multiple cuts in market rates in PLN and foreign currencies in 2025, the Bank introduced changes to the interest rates on selected deposits in PLN, EUR, GBP and USD for individual clients. The standard interest rate on Savings and Super Savings Accounts in PLN also changed in 2025. The Bank's mix included numerous special offers with the possibility of obtaining promotional interest on the Savings Account in PLN. Clients who opened a CitiKonto account could obtain interest of up to 7.2% per annum, and Clients who opened a Gold Account up to 7% per annum on the Savings Account.
Credit Cards	As at the end of 2025, the number of credit cards was 447,400. The total debt on credit cards amounted to PLN 2.0 billion as at the end of 2025 and decreased by 7.0% from the end of 2024. The Bank's share on the credit card market, measured by the value of loans granted on credit cards, was 14.8% according to the data at the end of December 2025. In 2025, the acquisition of credit cards amounted to approximately 26,900 cards, which means a decrease by 25% as compared to 2024. In 2025, the high quality of the acquired cards was maintained, which translates into a high level of activation and usability in transactions by newly acquired clients. The Bank consistently diversifies its acquisition channels while continuously optimizing its sales processes.
Cash loans and installment products on credit card accounts	In 2025, the Bank observed a continued trend of increased customer interest in cash loans, mainly in high-value loans. As a result, at the end of 2025, the sales volume of unsecured loans (cash loans and loans on credit card) amounted to PLN 1.1 billion and was higher by 21% YoY. The balance of the above-mentioned cash loans amounted to PLN 1.8 at the end of 2025

	billion, which means an increase of 8% compared to the end of 2024.
Mortgage products	As at the end of 2025, the mortgage loan portfolio balance amounted to PLN 2.4 billion, i.e. up by 3% YoY despite the continued very high overpayments of credit balances. The increase in the secured loan portfolio balance was due to the implementation of marketing support for own sales and continued good relations with intermediaries. In 2025, sales of mortgage products amounted to PLN 503 million, i.e. increased by 2% compared to the sales results recorded in 2024.
Investment and insurance products	As at the end of 2025, the funds under management as part of investment products (including investment insurance products, without dual currency investments) acquired by retail clients via the Bank were 21% higher as compared to 2024. This increase is attributable mainly to the increase of assets and valuations of stocks and bonds listed on foreign markets, which have the largest share in the asset portfolio, and to an increase in the valuation of investment units in investment funds. The asset portfolio for the local stock and bond market at the end of 2025 grew by 15%, and for investment funds – by 24% compared to the end of 2024. In 2025, the volume of foreign exchange (FX) transactions in the Consumer Banking segment decreased by 3% compared to 2024, while the number of foreign exchange transactions remained unchanged compared to 2024. As regards structured products, throughout 2025 the Bank successfully completed the offer of 12 subscriptions for structured bonds denominated in the Polish zloty and 4 subscriptions in the US dollar. As regards open-end investment funds, in 2025 the Bank added to the offer 2 new investment units in open-end investment funds in various currencies – PLN and USD. The Bank still offered insurance in a multi-channel distribution model – both at branches and in remote channels. In the case of Citigold branches, the products were offered under the model where clients are served by insurance specialists who provide their clients with expert support in the area of financial planning using insurance products.

4.4 Development of distribution channels

4.4.1 Branch network

In 2025, the retail branch network retained its established and stable structure. At the end of 2025, the bank's branch network still comprised 18 units. It comprised 9 Hub Gold branches, 8 Smart branches, and 1 Corporate Branch.

The present branch structure of the network is adapted to current market needs and customer operational requirements. The network structure ensures the effective implementation of established business goals and guarantees the maintenance of a high standard of customer service. The bank is actively continuing its modernization efforts, aimed at continuously improving the quality of services provided and maintaining the highest standards of space dedicated to banking services, which is crucial for maintaining competitiveness. The effectiveness of the adopted model is confirmed by the consistently high level of customer satisfaction with the services provided and the current efficiency of sales processes.

Number of branches (at the end of period)

	December 31, 2025	December 31, 2024	Change
Number of branches:	**18**	**18**	**-**
- HUB Gold	9	9	-
- Smart Branches	8	8	-
- Corporation Branches	1	1	-

4.4.2 Internet and telephone banking

Online banking

The online platform for retail clients is built in a responsive technology, i.e. it can adapt itself to the device used by a client. The design responds to customer expectations, and the extensive functionality means that customers increasingly choose to manage their products themselves via the Internet. One of the improvements is for credit card holders, which can manage their card limit, define transaction limits, convert transactions into installments. The clients can construct and update their investment profile coherent with the MiFID II regulation.

Electronic banking also includes a transaction module for investment funds and a Citi Kantor currency exchange module, enabling, among others, placing a conditional order and setting a currency alert.

The number of active users of Citibank Online, i.e. those who logged in to the online or mobile banking service via a browser or the Citi Mobile application at least once in every 90-day period, was **337,000** as at the end of 2025. The share of active Citibank Online users in the entire client portfolio of the Bank was 64% as at the end of 2025, which is a similar result compared to the end of 2024.

At the same time, as at the end of 2025, **digital users accounted for 92% of all transactionally active clients,** which means **an increase by 2 p.p.** compared to the end of 2023.

Mobile Banking

Responsive technology gives the client access to all functionalities in Citibank Online on any device they may use. The mobile application Citi Mobile also has a following features: free Push notifications, which keep the client updated of changes on the account or card, and login activation with the use of a fingerprint or face map, which makes access to the application even easier. The clients also use a simplified and intuitive navigation, a modernized layout and a mobile authorization service - Citi Mobile Token. The application also offers a currency exchange module, Citi Kantor, and a multi-currency service, Citibank Global Wallet, which permits automatic currency account alignment with the transaction currency without manually reassigning the card. The application presents offers of products and services tailored to the needs of customers and enables convenient recommendation of the Bank to friends. It also provides the possibility of updating contact details, including phone number and email address.

As at the end of the 2025, the **number of active users of mobile banking**, i.e. those who used mobile banking at least once in every 90-day period via the application or Citibank online in responsive technology, **amounted to 258,000**, i.e. decreased by 1% as compared to the end of 2024.

As at the end of 2025 **the share of active users of mobile banking in the retail client portfolio** of Citi Handlowy was **48%**, which is a similar result compared to the end of 2024.

At the same time, at the end of 2025, **mobile users accounted for 70%** of all active transactional customers, which is an **increase of 3 p.p.** compared to the end of 2024.

With the popularity of mobile applications, electronic payment methods gather momentum. One of the selected

payment methods that has been gaining the most popularity recently is BLIK. This service allows clients to make payments in online stores, stationary stores and service points, and to withdraw money from ATMs, as well as instant BLIK Phone Transfers between customers of different banks.

The number of transactions using the BLIK code made by the Bank's clients in 2025 **was over 3.3 million** , which means **an increase by 12%** compared to 2024. And **the number of BLIK transfers by phone was 1,8 million,** which is an **increase by 18%** compared to 2024.

Other payment methods have also enjoyed undiminished popularity, among others: **Apple Pay** and **Google Pay**. These are virtual wallets in clients' phones that give them independence and possibility to make payments anywhere in the world. In 2025, clients made a total of **over 25,8 million transactions using these payment methods, which represents a growth by 10% as compared to 2024 (including an increase by 11% YoY for Apple Pay and an increase by 9% YoY for Google Pay).**

Social media

In 2025, Citi Handlowy continued its activities in social media. The platforms on which the Bank has a presence represent an important channel of communication with customers. In 2025, Citi Handlowy conducted active communication in this form regarding products, special offers prepared for the Bank's clients, and educated them on the use of its solutions. Social media also served as one of the new client acquisition channels.

In 2025, the content published by the Bank in social media (Meta) reached 7.8 million unique users, which means an increase in unique reach by 8.3% compared to the previous year. In 2025, there were 225 publications (namely 6.6% more than in the previous period). The content was viewed 40.2 million times (-8.0% YoY).

Thanks to paid activities, users left 33,937 reactions (+172.4% YoY), 1,195 comments (-1.2% YoY) under all of the Bank's publications in 2025, and content was shared by them 529 times (+60.3% YoY), saved 407 times, and links were clicked 104,048 times (+28.8% YoY). The strong increase in user activity is due to the maintenance and development of additional publications targeted at user engagement.

2. Changes in IT technologies

In 2025, a strategic goal of the Bank in the area of IT technology was to continue increasing the competitiveness of the Bank by providing top quality products and services with the extensive use of innovative solutions, digitization and automation and concurrently with cost optimization. In accordance with prevailing market trends, the technology of the Bank is based, to a large extent, on centralized services and outsourcing. The services centralization processes enable the Bank to generate savings, improve quality, standardize processes and ensure a high level of control and information security. The Technology Division of the Bank focused its activities on the development and implementation of solutions which promote an electronic distribution the channels based on the most advanced online and mobile solutions. Projects supporting the automation and digitization of the Bank's internal processes as well as projects using AI were important.

IT processes of the Bank are executed in accordance with international standards, which was confirmed, in the first half of 2025, by the positive outcome of recertification audits of compliance with ISO 20000 (information technology – service management).

The most crucial modifications and improvements implemented in 2025 included:

- **in institutional banking:**
  - implementation of reporting within the Central Electronic System of Payment Information (CESOP);
  - implementation of solutions supporting digitization and automation of back-office processes. As a result of implementing the automation of subsequent back-office processes, the Bank expects increased reliability and efficiency in the area of automated processes;
  - completion of the implementation of solutions supporting the processing of foreign SWIFT payments in the new ISO 20022 format;
  - implementation of transaction settlements within the Sorbnet 3 system along with the modernization of the IT systems architecture;
  - adaptation of payment systems to changes in the SEPA payment settlement standard;
  - migration of SWIFT statement distribution to a modern technology platform;
  - introduction of the MarketData 2.0 solution, which automates the process of updating market rates through automatic connection to Reuters and Bloomberg, enabling data downloads to five of the Bank's systems;

- Introduction of the DSM solution, which allows institutional banking clients to independently initiate the process of updating data on individuals authorized to act on their account through Electronic Banking, regardless of the geographical location of the activity.

- **in consumer banking:**
  - adaptation of consumer banking systems to the new requirements of the GDPR;
  - implementation of new functionalities in the mobile application;
  - strengthening the security of debit card transactions.
- **in the scope of adaptation of systems of the Bank to ensure their compliance with regulatory requirements:**
  - adaptation of the Bank to the changed EMIR (Emir Refit) reporting requirements to ensure compliance with regulatory requirements;
  - adaptation of the Bank to the changed CRR3 reporting requirements in order to ensure the Bank's compliance with the regulatory requirements;
  - adaptation of the Bank to the requirements of the DORA regulation in order to ensure the Bank's compliance with the regulatory requirements;
  - introducing standards for managing tools based on artificial intelligence, compliant with the requirements of the AI Act.
- **in the area of information and communication technology infrastructure of the Bank and information security:**
  - implementation of the Zscaler solution improving the security of the Bank's infrastructure and systems;
  - continued implementation of improvements to increase the security of use of the CitiBank Online platform, including the implementation of additional authentication mechanisms at the server level to secure the systems against possible attacks and manipulation of data of defined customers of the client;
  - introducing a new version of the Data Leakage Prevention system, which consistently strengthens mechanisms protecting against data leaks;
  - adapting processes related to handling information security incidents to DORA requirements;
  - implementing a reporting framework for key indicators in line with the CRI (Cyber Risk Institute) standard.

Technology units proactively develop and improve their portfolios of services to fully meet both current and future business needs of the Bank. They deliver to their business partners optimal technology solutions used to build competitive advantage. Technology units actively support initiatives which enable a broader use of information technologies that automate processes at the Bank and increase the services digitization level.

Pending and not completed initiatives and modifications of systems which will affect the operations of the Bank in the near future are presented below:

- **in institutional banking:**
  - integration with the National e-Invoice System;
  - adapting the Bank's systems to support the new POLSTR reference index;
  - modernizing the architecture of IT systems for Elixir and Express Elixir payments,
  - implementation of solutions for robotization and automation of operating processes of the Bank;
  - expansion of the ICT environment for financial reporting – by automating current processes, this implementation will ensure greater cost efficiency and reliability of financial and supervisory reporting processes;
  - ongoing identification and elimination of safety gaps in used systems;
  - optimization of the technology services portfolio through the elimination and consolidation of obsolete IT architecture elements;

- introduction of a new CRM platform for institutional client advisors, enabling comprehensive access to client data and streamlining RMs' operational workdays;
- implementation of a new electronic banking platform for institutional clients of Commercial Banking, facilitating client access to all products.

- **in consumer banking:**
  - implementation of a number of solutions increasing the security of client transactions and eliminating fraud transactions;
  - ongoing identification and elimination of security gaps and IT risks in the systems used;
  - a new Argos brokerage platform for processing orders and stock exchange transactions, which will replace the currently used Promak system. The project will continue in 2026. Following its implementation in January 2026, the next stage will be the adaptation of the Argos system to WATS (Warsaw Automated Trading System), the new trading system of the Warsaw Stock Exchange.
- **in the area of information and communication technology infrastructure of the Bank and information security:**
  - implementation of additional new-generation security solutions in banking systems;
  - continued modernization of the architecture of network infrastructure of the Bank's main locations using SDN technology (software defined network) including the implementation of encryption between the Bank's main locations in Poland (MACSEC) and logical network segmentation;
  - preparation works before using AWS cloud and GCP services for data processing (in the first stage for data classified as internal);
  - migration of servers and systems to a shared colocation with the Warsaw Stock Exchange;
  - migration of the production computing center and IT infrastructure from the building at Goleszowska 6 to a new colocation;
  - implementation of AI-based services – M365 Copilot.

The Bank developed, implemented and has maintained a business continuity management system (BCMS), which is oriented to achieving results reflecting the core principles and values of the Bank in line with the Bank's strategy. The Bank designed business continuity plans and contingency plans for critical processes, which ensure continuity of processes during an emergency. The plans ensure an efficient and well-balanced continuity of critical services and products of the Bank in the required time. The plans are subject to periodic reviews and tests, and the test results are used to improve the plans and the entire BCMS. The Bank maintains the BCMS in line with the international ISO22301 standard – In the fourth quarter of 2025, another ISO22301 supervisory audit was completed with a positive result.

3. Equity investments

The investments of the Bank are divided between the portfolio of strategic companies and the portfolio of companies held for sale. In 2025, the Bank continued the investment policy it had decided to adopt earlier. Its objectives for the strategic companies portfolio were: to maximize profits in the long run, to increase market shares, to develop cooperation with the Bank and to expand the product range of the Bank; and for the portfolio of companies held for sale: to optimize the financial result of capital transactions and to minimize the risk in the areas arising from those transactions.

6.1 Strategic portfolio

Strategic portfolio includes entities which conduct their activities in the financial sector and through which the Bank enlarges its product offer, raises prestige and fosters its competitive position on the Polish financial services market.

Strategic portfolio also includes infrastructural companies which operate for the financial sector. The Bank holds non-controlling interest in such companies but they are of strategic importance for the Bank given their operations and collaboration with the Bank.

For its strategic investments in the so-called infrastructural companies, the Bank is going to retain its share and to participate proactively in decision making to determine strategic directions of their development to the extent of the options the Bank may pursue with the voting rights it holds. As its overriding goal when exercising corporate oversight over those companies, the Bank has chosen to support their growth insofar as the continuation of their current operations utilized by financial market participants, including the Bank, is not put in jeopardy.

Simultaneously, in order to ensure that the Bank's proposal is innovative and comprehensive and that it meets diverse product needs and expectations of clients, the Bank may consider an expansion of its strategic companies portfolio by those which will complement its own proposal and make it more attractive, while ensuring that all offered services are safe. To this end, the Bank may opt for an acquisition, create a new company or use a special purpose investment vehicle it already has in its portfolio.

6.2 Divestment portfolio

Companies held for sale are entities in which the Bank's involvement is not of strategic nature. They include both companies held by the Bank directly and indirectly as well as special purpose investment vehicles. Some of the companies held for sale are restructuring commitments taken over by the Bank as a result of debt-to-equity conversion.

Strategic assumptions of the Bank regarding companies held for sale provide for gradual reduction of the Group's exposure in these companies. It is assumed that the individual entities shall be sold at the most favorable moment, determined on the basis of market conditions. The held-for-sale portfolio covers investments without a pre-determined rate of return. The Bank does not plan any new investments that would be held for sale in the future. The portfolio of companies which are held for sale may be enlarged by adding new companies taken over in the course of debt-to-equity conversions or as a result of takeover/enforcement of a pledge established on shares during the lending process or other processes aimed at securing or enforcing receivables of the Bank, and by investments which the Bank may take over in the course of its operations. Investment resulting from restructuring activities will be sold in accordance with the restructuring plan created individually for each company.

Special purpose investment vehicles companies

As at 31 December 2025, the Group included two investment special purpose vehicles. Their activities were financed with reverse capital contributions of the shareholder and with their profits. As the Bank continues its strategy which assumes that its activities carried out via special purpose vehicles should be trimmed down, it is expected that its special purpose vehicles will be gradually sold or liquidated.

According to information available as the date of preparation of the (preliminary and unaudited) financial statements, the key financials of those companies as at 31 December 2025 were as follows:

Entity	Headquarter	Authorized capital/votes in GM held by the Bank	Balance sheet	Equity	Net financial profit/loss for 2025
		%	PLN '000	PLN '000	PLN '000
Handlowy-Inwestycje Sp. z o.o.	Warsaw	100.00	10,691	10,622	163
Handlowy Investments S.A.*	Luxemburg	100.00	4,386	4,357	163

* Financial data of Handlowy Investments S.A. originate from the financial statements prepared as at 28 February 2025 (pre-audit data), which is the entity's balance sheet date.

V. Significant risks related to the activities of the Capital Group of Bank Handlowy w Warszawie S.A.

1. Significant risks and threats related to the Group's operating environment

1.1 Regulatory and legal risks

In 2025 the financial and organizational situation of the Group was affected, among other things, by:

Legal acts / regulations	Effective date and summary of new requirements
Amendment to Recommendation G concerning interest rate risk management at banks (Resolution of the KNF No. 60/2024)	• Date: 31 December 2024 (deadline for adapting the activities), • The Polish Financial Supervision Authority (KNF) adopted an amendment to Recommendation G concerning interest rate risk management at banks (Resolution No. 60/2024 of 26 February 2024). The new Recommendation G replaces the Recommendation concerning interest rate risk management at banks issued in 2002. • The final shape of the new Recommendation G was influenced by both the regulations contained in national law and the recently developed package of EU regulations in the area of interest rate risk management. Recommendation G takes into account, in particular, the provisions of Guidelines on IRRBB and CSRBB, i.e. EBA Guidelines specifying criteria for the identification, evaluation, management and mitigation of the risks arising from potential changes in interest rates and of the assessment and monitoring of credit spread risk, of institutions' non-trading book activities (EBA/GL/2022/14). • The new Recommendation G is a set of good practices in managing interest rate risk at banks and maintaining the risk-sensitive variability of financial results and economic value measures within limits that do not threaten the bank's security. The recommendation takes into consideration current conditions for products generating interest rate risk and techniques to manage this risk.
UKNF's position on the application of the DORA by financial entities	• Date: 17 January 2025 • This position specifies, among others, the KNF's expectations as to compliance resulting from the implementation of the DORA requirements by 17/01/2025 and as to the compliance with the manner and mode of fulfilling disclosure and reporting obligations in accordance with the position, as regards: – the obligation to have a Legal Entity Identifier (LEI) – the first reporting obligations – reporting major ICT-related incidents and significant cyberthreats – keeping and providing a register of information on contracts with ICT third-party service providers. • In the position, the KNF again raises the fact of repealing the soft-law regulations, including recommendation D and the cloud communication.
Resolution no. 243/2024 of the Polish Financial Supervision Authority (KNF) of 15 July 2024 on the issuance of the WFD Recommendation on the Long-Term Financing Ratio (LTF).	• Effective date: 18 July 2024 (applicable from 2026) • The Recommendation describes the definition of the Long-Term Financing Ratio and refers to the application and level of the LTF requirement and the reporting of the LTF Ratio.
The ruling of the Court of Justice of the European Union of 11 September 2019 on the interpretation of Article 16.1 of the Directive of the European Parliament and of the Council 2008/48/EC of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC, concerning the	• Announcement date: 11 September 2019 • The position of the UOKiK (Office of Competition and Consumer Protection) clearly shows how the conclusions from the judgment should be taken into account in activities of lenders. • The expected response is a proportionate, i.e. in accordance with the so-called straight-line method, return of part of the commission on early repaid consumer loans.

settlement of cost of borrowing in the case of an earlier repayment.	• As revealed in an official communiqué published on the UOKiK's website, the majority of banks have promised to use practice in line with the UOKiK's expectations.
Judgment of the Court of Justice of the European Union of 3 October 2019 on the interpretation of Article 1(2), Article 4, Article 6(1) and Article 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts (OJ 1993 L 95, p. 29) concerning clauses in foreign currency indexed mortgage contracts	• Announcement date: 3 October 2019 • According to the CJEU ruling, if Polish courts find that indexation clauses in foreign currency indexed mortgage loan agreements are abusive: 1) courts may assume that the contract cannot continue to operate without such clauses because this would change the nature of the contract, 2) as a rule, the consequences of contract invalidation for the consumer must be assessed as at the moment the dispute arose (not as at the time the contract was made), 3) courts cannot freely supplement their terms based on equity principles (e.g. by introducing settlements based on NBP exchange rates into contracts), 4) courts cannot uphold the indexation even if the contract has to be invalidated and such invalidation is disadvantageous to the client if the client does not agree to maintain the indexation. • As a result of this judgment, a case law unfavorable for banks has developed, affirming the ability to invalidate mortgage loan contracts indexed to a foreign currency.
Regulation on operational resilience to digital threats ("DORA" – Digital Operational Resilience Act).	• DORA – The regulation will apply to entities such as: investment funds, payment and credit institutions, ASI managers, insurance companies, audit companies, ICT service providers (Information and communication technologies), crypto-asset service providers, securities depositories. The DORA Regulation aims at harmonizing the provisions regarding the digital resilience of the financial sector in the EU and at boosting the digital and operational resilience of the financial sector organizations. The regulation entered into force on January 17, 2025.
DIRECTIVE (EU) 2022/2464 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (CSRD) Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU as regards sustainability reporting standards (ESRS) Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025 amending Delegated Regulation (EU) 2023/2772 as regards the deferral of the date of application of disclosure requirements for certain undertakings Act of 29 September 1994 on accounting (consolidated text: Journal of Laws of 2023, item 120, as amended) – in the scope of CSRD implementation	• The CSRD Directive makes, among other things, changes to a bank's existing non-financial reporting by introducing sustainability reporting. Pursuant to the amended regulations, a bank is obliged to present in its activity reports the information necessary for recipients to understand the bank's impact on sustainability issues, as well as to present how the presented information affects the development, results and situation of the bank. The CSRD applies to a bank for financial years beginning on or after 1 January 2024. • The ESRS Regulation introduces standards as to the information that obliged entities should report as part of sustainability reporting together with a regulation postponing the dates of application of certain requirements.
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 ("EU Taxonomy")	• The EU Taxonomy is the foundation of the EU's sustainable finance framework and an important tool for ensuring market transparency. It helps direct investments towards the economic activities most needed for transformation, in line with the objectives of the European Green Deal. The Taxonomy is a

Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation (Text with EEA relevance) Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Delegated Regulation (EU) 2021/2178 as	classification system that defines criteria for economic activities that align with the net zero emissions by 2050 pathway and broader environmental goals beyond climate. To achieve the EU's 2030 climate and energy targets and the objectives of the European Green Deal, it is crucial to direct investments towards sustainable projects and activities. To achieve this, a common language and a clear definition of “sustainability” are needed. Therefore, the action plan for sustainable finance calls for the creation of a common classification system for sustainable economic activities, or “EU Taxonomy.” The EU Taxonomy allows financial and non-financial companies to use a shared definition of economic activities that can be considered environmentally sustainable. As such, it plays a vital role in helping the EU increase sustainable investment, while ensuring security for investors, protecting private investors from greenwashing, helping companies become more climate-friendly, and mitigating market fragmentation. The Taxonomy Regulation entered into force on 12 July 2020. It establishes the foundations of the EU taxonomy by defining four overarching conditions that an economic activity must meet to qualify as environmentally sustainable. Under the Taxonomy Regulation, the Commission had to develop an actual list of environmentally sustainable activities, defining technical screening criteria for each environmental objective through delegated and implementing acts.

regards specific public disclosures for those economic activities Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities	
Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets and amending Directive (EU) 2015/849	• The Regulation takes effect on 30 December 2024 and Regulation (EU) 847/2015 of the European Parliament and of the Council will cease to apply on the above effective date. The draft introduces: 1) amendments to the obligations of payment service providers to provide information on payers and payees accompanying transfers of funds, 2) obligations of crypto-asset service providers involved in the transfer of crypto-assets to provide information on the originators and beneficiaries accompanying transfers of crypto-assets; 3) obligations to implement internal policies, procedures and controls to ensure that restrictive measures are applied.
Regulation on Artificial Intelligence (AI Act)	• The regulation is to ensure that AI systems introduced in the EU market and used in the EU are safe and in compliance with the law in the area of fundamental rights and EU values. The regulation introduces comprehensive requirements for the so-called high-risk Artificial Intelligence systems, which include creditworthiness assessment systems for individuals, but also other systems that may be used in the banking system. The regulation defines prohibited AI practices – the AI systems using such practices will be prohibited, • The regulation was published in the Official Journal of the EU. The regulation comes into force 20 days after publication in the Official Journal and will become generally applicable 24 months after its entry into force, with the following exceptions: 1) Chapter I – General Provisions and Chapter II – Prohibited AI Practices will enter into force on 2 February 2025, 2) Section 4 of Chapter III on supervisory authorities, Chapter V on general purpose AI models, Chapter VII on governance at Union level and Chapter XII on penalties for infringements of the regulation (except Article 101) and Article 78 regarding confidentiality will come into force on 2 August 2025, 3) Article 6(1) regarding high-risk systems and the corresponding obligations described in the regulation will enter into force on 2 August 2027.
Regulation (EU) 2024/2987 of the European Parliament and of the Council of 27 November 2024 amending Regulations (EU) No 648/2012, (EU) No 575/2013 and (EU) 2017/1131 as regards measures to mitigate excessive exposures to third-country central counterparties and improve the efficiency of Union clearing markets (EMIR 3.0)	• Its effective date is 24 December 2024, • Requirements for financial and non-financial counterparties subject to the central clearing obligation, to clear at least some derivatives indicated in the legal act as being of systemic importance in active accounts at Union CCP (CCP – central counterparty), are one of the key changes introduced by EMIR 3.0, • The above requirement refers to the obligation of counterparties to have the so-called active account, which meets specific requirements, at a Union CCP, and to clear in that account a specific number of interest rate derivatives denominated in EUR and PLN deemed to be of substantial systemic importance. • The obligations introduced under EMIR 3.0 are also subject to additional regulation at the level of technical standards, such as regulatory technical standards specifying operational conditions,

	the representativeness obligation and reporting requirements related to the requirement to hold an active account (project described later in this document).
Regulation (EU) No 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements on credit risk, credit valuation adjustment risk, operational risk, market risk and the minimum capital threshold (CRR 3)	• CRR3 published in the Official Journal of the EU on June 19, 2024, entered into force on July 9, 2024, effective from January 1, 2025. • Regulations amending Regulation (EU) No 575/2013 implementing a reform of the prudential framework for institutions aimed at increasing the resilience of the EU banking sector - implementing the Basel III reform.
Recommendations of the National Working Group on Benchmark Reform (NGR) regarding new contracts for PLN products	• Deadline: end of 2027, • The purpose of this recommendation is to guide financial market entities on practices for using the POLSTR (Warsaw Interest Rate Overnight) interest rate benchmark or indices from the POLSTR Composite Index Family in financial contracts and financial instruments. The practices outlined in the recommendation are not mandatory and may be applied on a discretionary basis, taking into account the specific characteristics of the given financial market entity and the clients with whom the contracts are concluded.
Draft Act amending the Banking Law Act and certain other acts (implementation of CRD IV)	• Effective date: after 14 days from the date of publication in the Journal of Laws, with exceptions,, • Changes in the processes used for assessing the suitability of members of the Management Board, Supervisory Board and persons holding key functions at the Bank, as well as in the process of appointing members of the Management Board and the Chairman of the Supervisory Board (requirement to obtain prior consent from the Polish Financial Supervision Authority), • Disclosure obligations related to the acquisition and disposal of the Bank's shares or a planned merger or division or transfer of assets or liabilities of significant value, • Expanding the tasks of the risk management system to include environmental, social and corporate governance (ESG) risks in the short, medium and long term, • Strengthening the powers of the Polish Financial Supervision Authority.
The ruling of the Court of Justice of the European Union of 11 September 2019 on the interpretation of Article 16.1 of the Directive of the European Parliament and of the Council 2008/48/EC of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC, concerning the settlement of cost of borrowing in the case of an earlier repayment.	• Announcement date: 11 September 2019 • The position of the UOKiK (Office of Competition and Consumer Protection) clearly shows how the conclusions from the judgment should be taken into account in activities of lenders. • The expected response is a proportionate, i.e. in accordance with the so-called straight-line method, return of part of the commission on early repaid consumer loans. • As revealed in an official communiqué published on the UOKiK's website, the majority of banks have promised to use practice in line with the UOKiK's expectations.
Judgment of the Court of Justice of the European Union of 3 October 2019 on the interpretation of Article 1(2), Article 4, Article 6(1) and Article 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts (OJ 1993 L 95, p. 29) concerning clauses in foreign currency indexed mortgage contracts	• Announcement date: 3 October 2019 • According to the CJEU ruling, if Polish courts find that indexation clauses in foreign currency indexed mortgage loan agreements are abusive: a. courts may assume that the contract cannot continue to operate without such clauses because this would change the nature of the contract, b. as a rule, the consequences of contract invalidation for the consumer must be assessed as at the moment the dispute arose (not as at the time the contract was made), c. courts cannot freely supplement their terms based on equity principles (e.g. by introducing settlements based on NBP exchange rates into contracts), d. courts cannot uphold the indexation even if the contract has to be invalidated and such invalidation is

	disadvantageous to the client if the client does not agree to maintain the indexation. • As a result of this judgment, a case law unfavorable for banks may develop, affirming the ability to invalidate mortgage loan contracts indexed to a foreign currency.
Bill amending the Act on crisis management and certain other acts	• Implementation of solutions included in the CER directive, • The Bill assumes not only that the current level of protection of critical infrastructure will be maintained, but also that protection will be extended to include the protection of "critical infrastructure under construction" and the protection of critical infrastructure that is of key importance for local communities, • The designed solutions are aimed at strengthening the mechanisms for protecting critical infrastructure, taking into account that it is the core for providing services to the state and citizens. They also result from the analysis of the course of the war in Ukraine and the emerging sabotage and hybrid activities, • New criteria are planned to enable the identification of facilities, installations and devices as critical infrastructure, and thus the selection of critical infrastructure operators (the owner or holder of such infrastructure). Simultaneously to the criteria, the ministers in charge of government administration departments will be indicated who will be responsible for critical infrastructure in particular sectors, • A division will be made into critical infrastructure, the destruction or disruption of which will have an adverse impact, • In order to ensure an appropriate level of critical infrastructure protection, it is planned to introduce minimum standards in the areas of physical, technical, personal, ICT and legal security, as well as business continuity and recovery plans. • As part of the personal safeguards, it provides for, among others, a possibility for a critical entity to carry out background checks on employees or candidates who hold or might hold sensitive roles in the organizational structures of the critical entity or perform tasks for its benefit, and on persons who are or may be authorized to directly or remotely access its premises, information or control systems, including in connection with the security of the critical entity.
Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 with regard to regulatory technical standards on the obligation to make market data available to the public on a reasonable commercial basis	• The Delegated Regulation was published on 3 November 2025. It therefore entered into force on 24 November 2025.
Commission Delegated Regulation (EU) 2025/1003 of 24 January 2025 supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council as regards OTC derivatives identifying reference data to be used for the purposes of the transparency requirements laid down in Article 8a(2) and Articles 10 and 21	• This Delegated Regulation was published on 22 May 2025 and entered into force on 11 June 2025. • The main objective of this Delegated Regulation is to fulfil the Commission's obligation set out in the first subparagraph of Article 27(5) of MiFIR, namely to specify the identifying reference data to be used in respect of derivatives traded outside a regulated market for the purposes of meeting the transparency requirements laid down in Articles 8a(2), 10 and 21 of MiFIR. The Delegated Regulation introduces a distinction between interest rate derivatives and credit derivatives. As the issue of a daily maturity date arose only with the application of ISO 6166 (ISIN) to interest rate swaps traded outside a regulated market, the Delegated Regulation focuses primarily on this asset class (interest rates) and this type of instruments (swaps).
The Act of 14 April 2023 Amending the Goods and Services Tax Act and Certain Other Acts	• Effective date – 01 January 2024, • a new requirement for individual payment service providers participating in cross-border transactions to report certain cross-border transactions to the Head of the National Revenue

	Administration. Data collected at the national level are provided to the Central Electronic System of Payment Information (CESOP); payment service providers are obliged to keep electronic records, on a quarterly basis, of payment recipients and cross-border payments as regards the payment services provided. The obligation arises when the number of services provided by the service provider during a given quarter exceeds 25 cross-border payments to the same recipient.
The Act of 16 June 2023 Amending the Goods and Services Tax Act and Certain Other Acts (implementing the National System of e-Invoices, the so-called KSeF)	• KSeF, i.e. the National System of e-Invoices, is mandatory from February 1, 2026 for the largest taxpayers (with annual sales value exceeding PLN 200 million gross), the final deadline for the smallest entities is January 1, 2027. • The National System of e-Invoices (KSeF) is a system that enables the generation and sharing of structured invoices. The aim of KSeF is to centralize the process of registering invoices in business transactions by directing them to one central facility.
The act of 6 November 2024 on top-up taxation of component units of international and domestic groups	• The Act is an implementation of the EU Directive which introduces the concept of the so-called global minimum tax (Pillar 2), • Pillar 2 is, in simple terms, a set of rules that impose an obligation on large multinational enterprise groups to pay a top-up tax so that the group's effective tax rate in a given country is not lower than 15%, • The Act entered into force on 1 January 2025, with the possibility of using the so-called safe harbor until the end of 2026, which, when certain conditions are met, excludes the requirement to prepare a full calculation of the top-up tax.
Resolution of 29 October 2021 amending the Personal Income Tax Act, the Corporate Income Tax Act and certain other acts (amended by the Act of 26 May 2023)	• On 1 January 2025, an obligation came into effect to maintain accounting books only in electronic form and to send the JPK-CIT structure to the tax authorities on an annual basis. • The largest CIT taxpayers (with revenues exceeding the equivalent of EUR 50 million) and tax capital groups are the first to be required to submit JPK-CIT for 2025. • In December 2025, a draft bill was published that would change the JPK-CIT reporting deadline to the end of the seventh month after the end of the tax year.
The Act of 12 April 2024 Amending the Accounting Act and Certain Other Acts	• The Act implements the EU Directive and obliges large multinational companies to publicly disclose reports related to income tax paid in the countries in which they operate, • If the parent company in a group is based outside the EEA and certain thresholds are exceeded, the reporting obligation falls on its subsidiaries based in the EEA, • If the parent company publishes a report and meets certain requirements, subsidiaries will be exempt from this obligation, • The first report for 2025 will have to be published by the end of 2026.
The Act of 25 June 2025 Amending the Corporate Income Tax Act	• The Act repealed the obligation to prepare and publish information on tax strategy.
Act of 6 November 2025 amending the Corporate Income Tax Act and the Act on Tax on Certain Financial Institutions	• The Act introduced a higher corporate income tax rate, including for banks. It will be increased from 19% to 30% in 2026. In subsequent years, these rates will be 26% (in 2027) and 23% (from 2028), respectively. • In 2027, changes will come into effect reducing the corporate income tax rate for certain financial institutions (from 0.0366% to 0.0329% in 2027 and 0.0293% from 2028).
Draft Act on Credit Servicers and Credit Purchasers	• The act was passed by the Sejm on 20 December 2024. The Senate adopted it on 8 January 2025 without amendments. On 30 January it was signed by the President, • Regulation of credit management activities (supervision, register, permits, capital requirements, requirements regarding policies and internal procedures), • The Directive lays down the rules of national supervision over the above-mentioned entities (including but not limited to,

	supervision of individual categories of entities and establishment of a procedure for granting authorization to credit servicers), including in terms of cross-border trade in receivables, • Amendment to the Consumer Credit and Mortgage Credit Act with respect to mandatory information provided before the agreement is amended, • Amendments to the Banking Act consisting in, among others, adding a possibility to divide a bank being a joint-stock company by separation (*podział przez wyodrębnienie*) (apart from the already existing option of partial division (*podział przez wydzielenie*).
Financial data access and payments package (PSR/PSD3/FIDA) REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on payment services in the internal market (PSR) DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on payment services and electronic money services in the internal market (PSD3) Regulation of the European Parliament and of the Council on a Framework for Financial Data Access (FIDA)	• Date of entry into force of the PSR: the Regulation enters into force on the twentieth day following its publication in the Official Journal of the European Union. It applies 18 months after the date of entry into force of the Regulation, • Date of entry into force of PSD3: the Directive enters into force on the twentieth day following its publication in the Official Journal of the European Union and needs to be transposed into national law. • FIDA effective date: The Regulation is to enter into force on the twentieth day following its publication in the Official Journal, and is to be applied after twenty four months following the date of entry into force, with the proviso that data holders and data users must become members of financial data sharing schemes within eighteen months following the entry into force of the Regulation, • PSR – the establishment of uniform requirements for the provision of payment services and electronic money services in relation to the following matters: 1) transparency of the reporting conditions and requirements for payment services and electronic money services; 2) the rights and obligations of users of payment services and electronic money services and of payment service and electronic money service providers with regard to the provision of payment services and electronic money services. • PSD3 - the establishment of the provisions concerning: 1) the admission of payment institutions to an activity consisting of the provision of payment services and electronic money services within the Union; 2) supervisory powers and tools for the supervision of payment institutions. • FIDA - the extension of the "open banking" principle by allowing access to data to which access has not been granted yet under the PSD2 directive. This includes access to data on mortgage loans, loans, savings, non-payment accounts, and even access to data that constitute the basis for assessing a customer's creditworthiness, which is collected as part of a loan application or credit rating.
The Act of 4 June 2025 amending the Labor Code	• The Act came into force on 24 December 2025 and should serve as partial implementation of the Directive of the European Parliament and of the Council (EU) 2023/970 of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms, the purpose of which is to reduce the pay gap between men and women. The Act provides, among other things, that: 1) a person applying for employment receives information from the employer in paper or electronic form about the remuneration, its initial amount or its range – based on objective, neutral criteria, in particular in terms of gender, and about the relevant provisions of the collective bargaining agreement or remuneration regulations,

	2) the employer provides the above-mentioned information sufficiently in advance to ensure informed and transparent negotiations, i.e.: – in the job advertisement, – before the interview – if the employer did not announce the recruitment for the position or did not provide this information in the advertisement referred to above, – before entering into the employment relationship – if the employer did not announce a recruitment process for the position or did not provide this information in the above-mentioned advertisement or before the interview, 3) job advertisements and job titles should be gender neutral, and the recruitment process should be conducted in a non-discriminatory manner, 4) the employer will not be able to ask the candidate about remuneration under current or previous employment contracts.
Draft act amending the Labor Code	• Date of entry into force: 21 days after the date of announcement • It provides for significant changes in the scope of counteracting mobbing and discrimination, including: 1) adding of a definition of mobbing by association and by assumption, 2) introduction of a new definition of mobbing, among others, by recognizing as its primary characteristic the fact of persistent harassment of an employee while clarifying that incidental behaviors, even if they constitute a violation of the employee's personal rights, do not constitute mobbing, 3) imposition of an obligation on employers to counteract violations of the equal treatment principles and mobbing by applying preventive measures, detection and quick and proper response, as well as by implementing corrective actions and supporting people affected by unequal treatment. 4) employers will be able to be released from the responsibility for mobbing if they can demonstrate that they duly fulfilled their obligation referred to in point 3, and the questionable behaviors were displayed by a person who did not manage the employee or did not hold a position superior to the employee in the work establishment, 5) expansion of the catalogue of employer's obligations by adding counteracting violation of an employee's dignity and other personal rights, 6) specification of reparation for an employee who has suffered mobbing in the amount not lower than not lower than twelve times the minimum wage determined on the basis of separate provisions or compensation.
A package of AML regulations: Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing ("AML Regulation") Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010 and (EU) No 1095/2010 ("AMLA Regulation") Directive (EU) 2024/1640 of the	• The AML Regulation defines a common legal framework for anti-money laundering and combating financing of terrorism (AML/CFT) for the EU. It specifies, in particular, a catalogue of obliged entities (such that are required to comply with AML/CFT regulations), indicates the scope of procedures, policies and controls to be adopted by obliged entities, and describes the principles of application of financial security measures, such as client identification or verification. Obliged entities will be required to apply EU harmonized rules to identify a client and a beneficial owner and to verify their identity, obtain information about the purpose and nature of business relations, monitor clients' business relations and transactions, and verify whether a client or a beneficial owner are subject to financial sanctions. The AML Regulation also regulates the rules of applying simplified and enhanced due diligence measures, • The AML Regulation will come into effect on 10 July 2027. • The purpose of the AML Regulation is the establishment of the Authority for Anti-Money Laundering and Countering the

European Parliament and of the Council of 31 May 2024 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive(EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 ("AML Directive") and draft act amending the Act on Anti-Money Laundering and Combating the Financing of Terrorism	Financing of Terrorism ("AMLA"), as well as definition of its structure, role, tasks and competences. The AMLA will be based in Frankfurt am Main, Germany, and should begin operations mid-2025. • In principle, the AML Regulation will be effective from 1 July 2025, • The AML Directive establishes the provisions regarding, among others, the identification of risk of money laundering and terrorist financing at the level of the EU and Member States, establishment of central registers of beneficial owners, registers of bank accounts and electronic data search and access to information systems kept in these registers, as well as points of access to real estate information. The directive also sets out the obligations and tasks of financial intelligence units (FIUs) and bodies involved in supervising obliged entities, • According to the AML Directive, Member States have, in principles, 3 years to prepare provisions transposing this directive, with some exceptions.
The Act of 26 April 2024 on ensuring compliance with the requirements of accessibility of certain products and services by business entities	• Effective date: 28 June 2025, • It introduces a requirement for the accessibility of retail banking products and services to persons with technical difficulties or disabilities, as well as the comprehensibility and provision of information about them at the B2 language level.
Regulation of the European Parliament and of the Council amending Regulation (EU) No 910/2014 as regards establishing a framework for a European Digital Identity (eIDAS 2.0)	• Development of digital identity for citizens throughout the European Union, in particular through the introduction of the European Digital Identity Wallet (EUDI – EU Digital Identity Wallet) and new trust services. EUDI is intended to allow for the secure storage of various digital identity data, such as driving licenses, permits, health cards, diplomas, etc. In addition to identity management, the EUDI wallet is intended to offer a payment solution.
Regulation (EU) of the European Parliament and of the Council of 13 March 2024 amending Regulations (EU) No 260/2012 and (EU) 2021/1230 and Directives 98/26/EC and (EU) 2015/2366 as regards instant credit transfers in euro ("IPR")	• Obligation for payment service providers (in practice, banks) to offer instant credit transfers (24/7) in EUR. • Fee for an instant credit transfer in EUR (for non-eurozone countries) – in principle, according to the Regulation on equivalence of fees and charges (Regulation 2021/1230), that is, the same as their equivalent domestic fee in PLN, provided that it cannot be higher than the fee for a standard transfer in EUR (SEPA). • Obligation to provide a matching verification service (accompanying the instant credit transfer service) allowing the payer to verify whether the IBAN matches the name of the payee, and allowing the user to resign from such service. • Introduction of an obligation to check users of payment services, on an ongoing basis (at least daily), against the sanction lists. • The Regulation shall come into effect on 8 April 2024. • Pursuant to Article 5a(8) inserted in Regulation 260/2012, the adjustment deadlines for introducing instant credit transfers in EUR by payment service providers outside of the eurozone are as follows: 1) 9 January 2027 – adjustment deadline for offering the payment service of receiving instant credit transfers in euro as laid down in the inserted Article 5a 2) 9 July 2027 – adjustment deadline for offering the payment service of sending instant credit transfers in euro as laid down in the inserted Article 5a.
Draft act on consumer credit and amending the consumer rights act	• Implementation of the Directive of the European Parliament and of the Council (EU) 2023/2225 of 18 October 2023 on credit agreements for consumers and repealing Directive 2008/48/EC, and • Directive of the European Parliament and of the Council (EU) 2023/2673 of 22 November 2023 amending Directive 2011/83/EU as regards financial services contracts concluded at a distance and repealing Directive 2002/65/EC.

Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (CSDDD)	• CSDDD establishes companies' obligations as regards identifying, preventing and mitigating the adverse impacts of their operations on human rights and the environment. Its goal is to promote sustainable and responsible business conduct. It also provides for monitoring the effectiveness of the measures taken and communicating the implemented procedures. The regulation applies to big companies operating in the European Union, regardless of whether they are domiciled in or outside the EU.
Directive (EU) 2025/794 of the European Parliament and of the Council (so called "*stop-the-clock*" directive) amending Directives (EU) 2022/2464 (CSRD) and (EU) 2024/1760 (CSDDD) as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements.	• The Directive extends reporting deadlines for entities that are in the second and third reporting groups under the CSRD, • The Directive changes the deadline for transposition of the CSDDD from 26 July 2026 to 26 July 2027, and also postpones its application by 1 year for the first group of companies falling within the scope of the Directive (i.e. until 26 July 2028).
Draft Delegated Regulation of the European Commission of 11 July 2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of disclosure requirements for certain undertakings	• The European Commission has adopted targeted "quick-fix" amendments to the first set of European Sustainability Reporting Standards (ESRS). They will reduce burdens and increase certainty for companies that had to start ESG reporting for the 2024 financial year (commonly referred to as "first wave" companies). Under the current ESRS, undertakings reporting for the 2024 financial year can omit information on, among other things, the expected financial impact of certain sustainability risks. The quick-fix that applies from the 2025 financial year will allow them to omit the same information in the 2025 and 2026 financial years.
Draft Delegated Regulation of the European Commission of 4 July 2025 amending Commission Delegated Regulation (EU) 2021/2178 as regards simplifying the content and presentation of information to be disclosed in relation to environmentally sustainable activities and Commission Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplifying certain technical screening criteria for determining whether an economic activity causes no significant harm to environmental objectives	• The European Commission has adopted a set of measures aimed at simplifying the application of the EU taxonomy "quick-fix", i.e. the EU's classification system for sustainable economic activities and investments. These changes will reduce administrative burdens imposed on businesses while preserving the framework's core objectives. These changes were adopted in the form of a delegated act amending the delegated acts on taxonomy-related disclosures and the delegated acts on climate and environment. The simplification measures set out in this Delegated Act will apply from 1 January 2026 and cover the 2025 financial year. However, undertakings have an option to apply the measures from the 2026 financial year onwards if they find it more convenient.
Regulation (EU) 2025/914 of the European Parliament and of the Council of 7 May 2025 amending Regulation (EU) 2016/1011 as regards the scope of the rules for benchmarks, the use in the Union of benchmarks provided by an administrator located in a third country, and certain reporting requirements	• The Regulation was promulgated on 19 May 2025 and enters into force on the twentieth day following its publication, and applies from 1 January 2026, • Amendments to the Regulation streamline the existing assumptions regarding the application of a nearly identical regime of requirements for critical and significant benchmarks, as well as other benchmarks that are not included in the first two groups. The changes, among other things, largely reduce the scope of application of the Regulation to critical and significant benchmarks. Additionally, the provisions regarding significant benchmarks have been clarified. Additional regulations have been introduced regarding climate transition benchmarks and alignment with the Paris Agreement. The benchmark requirements for third-country administrators have also been amended accordingly. • Amendments to Article 28(2) (concerning contingency plans) and Article 29 in conjunction with Article 24a of the Regulation (e.g. actions required in the event of a declaration that a significant benchmark does not comply with the Regulation) and the

	aforementioned Article 29 in relation to the obligation to monitor the status of benchmark administrators' authorizations.
Regulation of 17 July 2025 amending Regulation of the Minister of Finance of 20 September 2024 on the submission of information to the Polish Financial Supervision Authority by investment firms, state-owned banks running brokerage activity, banks referred to in Article 70(2) of the Act on Trading in Financial Instruments, and custodian banks	• The amendment entered into force on 19 July 2025, • A significant change for the Bank is the extension of the deadline for investment firms to submit a quarterly report on sales activity to the Polish Financial Supervision Authority (KNF) from 20 days to one month (§ 1(4)(b) and (c) of the proposed Regulation). The current deadline overlaps with the obligation to prepare and submit three other reports to the KNF (MDF, PORTFOLIO, LIQUIDITY GAP), leading to excessive reporting obligations. Furthermore, a sales report requires data from external entities, which typically submit it only after the 15th day of a month.
Draft Regulation of the European Parliament and of the Council amending Regulation (EU) No 909/2014 with regard to a shorter settlement cycle in the Union	• The regulation entered into force on 12/09/2025 and is to apply from 11/10/2027. • The change concerns the execution of orders and settlement of transactions in transferable securities in the trading system - shortening the settlement date to one business day.
COMMISSION IMPLEMENTING REGULATION (EU) 2024/3117 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 supervisory reporting of institutions and repealing Commission Implementing Regulation (EU) 2021/451	• The Regulation will apply from 28 June 2025, • Establishment of a coherent reporting framework, including reporting requirements for own funds and own funds requirements (minimum capital threshold, credit and counterparty credit risk, credit valuation adjustments, market risk, operational risk, loss coverage for non-performing exposures and crypto-assets), reporting requirements for losses from real estate-secured loans, and reporting requirements on the leverage ratio.
Act of 24 June 2025 on an amendment to the Act on investment funds and alternative investment fund management.	• The Act entered into force on 29 July 2025. • The changes consist in the repeal of the provisions of point 10(1) of Article 72 and point 10(1) of Article 81c of the amended Act, i.e. provisions which imposed on the depositary an obligation to verify whether the investment fund's activities complied with the legal provisions governing the operation of investment funds or with the fund's Articles of Association. Since its introduction, this provision (due to the very broad scope of the verification to be carried out by the depositary) has given rise to controversy as regards the depositary's obligations, and its repeal reduces the legal risk of allegations being made against the depositary for the improper performance of its legal duties.
Regulation of the Minister of Finance and Economy of 28 October 2025 on information concerning the characteristics of portfolios of receivables sold by banks to other entities	• This Regulation specifies the detailed scope of data to be included in the information referred to in Article 139a(1) of the Act of 29 August 1997 – the Banking Law (hereinafter: the "information"), as well as the manner and deadlines for submitting the information to the Polish Financial Supervision Authority (KNF), • The Regulation entered into force on 19 November 2025, and its provisions apply for the first time to information submitted by banks for the first half of 2025.
Judgment of the Court of Justice of the European Union (CJEU) in Case C-280/24 (Malicník) of 5 June 2025	• The judgment is of significant importance for the method of calculating fees charged in connection with granting consumer credit, • The judgment concerns a contractual clause providing for an "administrative fee" without specifying which services it covers, • The CJEU ruled that such clauses must meet the transparency requirement, meaning that the consumer must clearly understand which specific services they are paying for. A statement showing only the name of the fee and its amount is insufficient. The bank must specify the services provided and justify their cost, • The judgment may lead to a significant limitation of lenders' freedom in shaping the content of credit agreements in relations

	with consumers (including with respect to the main obligations of the parties, such as commissions).

In addition, the Bank's activities in 2025 was affected by the following EBA Guidelines:

AML and Sanctions Risk:

- EBA Guidelines on information requirements in relation to transfers of funds and certain crypto-assets transfers under Regulation (EU) 2023/1113

Product and Customer Relationship Management:

- EBA Guidelines on the Use of Remote Customer Onboarding Solutions

Corporate Governance:

- EBA Guidelines on Improving Resolvability for Institutions and Resolution Authorities (EBA/GL/2022/01)
- EBA guidelines on benchmarking of diversity practices under CRD and IFD
- EBA Guidelines amending Guideline EBA/GL/2022/01 on Improving Resolvability for Institutions and Resolution Authorities to Introduce a New Section on Resolvability Testing
- EBA Guidelines on Transferability in the Context of the Resolvability Assessment for the Purposes of the Transfer Strategy
- EBA Guidelines on General Resolvability in Recovery and Resolution Planning
- EBA Guidelines on resubmission of historical data under the EBA reporting framework
- EBA, ESMA and EIOPA Guidelines on estimation of aggregated annual costs and losses caused by major ICT-related incidents under regulation (EU) 2022/2554 (DORA)
- Joint guidelines on templates for explanations and opinions and on a harmonized crypto-asset classification test under MiCAR (EBA, ESMA, EIOPA).
- European Banking Authority (EBA) Guidelines amending EBA/GL/2019/04 Guidelines on information and communication technology (ICT) and security risk management.

In 2026, the financial and organizational situation of the Group will be affected, among other things, by:

Legal acts / regulations	Effective date and summary of new requirements
EBA Guidelines on the management of ESG risks	• Date: 11 January 2026 • The guidelines concern management of the environmental, social and governance risks and set out the management rules to be implemented by institutions pursuant to Article 87a (1) and Article 74 of the CRD Directive (Directive 2013/36/EU of the European Parliament and of the Council on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms). • The EBA Guidelines refine the above provisions of the CRD as regards: a) the minimum standards and reference methodologies for the identification, measurement, management and monitoring of environmental, social and governance risks (ESG) b) qualitative and quantitative criteria for the assessment of the impact of ESG risks on the risk profile and solvency of institutions in the short, medium and long term, c) the content of plans to be prepared in accordance with Article 76(2) of the CRD by the management body.
Recommendations of the National Working Group for Benchmark Reform (NGR) on new agreements for PLN products	• Date: end of 2027 • These recommendations are to present to financial market entities the best practices relating to the use of the WIRON interest rate benchmark (Warsaw Interest Rate Overnight) or rates from the WIRON composite index family for determination of variable interest rates when concluding new agreements with customers for benchmark-based PLN products. The recommendations include recommended interest calculation guidelines. • The guidelines specified in the recommendations are not mandatory and may be applied voluntarily taking into account the specific characteristics of a financial market participant and of customers with whom agreements are made.
Regulation on Artificial Intelligence (AI Act)	• The regulation is to ensure that AI systems introduced in the EU market and used in the EU are safe and in compliance with the law in the area of fundamental rights and EU values. The

	regulation introduces comprehensive requirements for the so-called high-risk Artificial Intelligence systems, which include creditworthiness assessment systems for individuals, but also other systems that may be used in the banking system. The regulation defines prohibited AI practices – the AI systems using such practices will be prohibited, • The regulation was published in the Official Journal of the EU. The regulation comes into force 20 days after publication in the Official Journal and will become generally applicable 24 months after its entry into force, with the following exceptions: 1) Chapter I – General Provisions and Chapter II – Prohibited AI Practices will enter into force on February 2, 2025, 2) Section 4 of Chapter III on supervisory authorities, Chapter V on general purpose AI models, Chapter VII on governance at Union level and Chapter XII on penalties for infringements of the regulation (except Article 101) and Article 78 regarding confidentiality will come into force on August 2, 2025, 3) Article 6(1) regarding high-risk systems and the corresponding obligations described in the regulation will enter into force on August 2, 2027.
Draft act amending the Act on Public Offering and Terms of Introduction of Financial Instruments to an Organized Trading System and on Public Companies and the Act on Implementing Some EU Regulations Concerning Equal Treatment	• This regulation implements the Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures, • The objective of the directive is to facilitate the application of the principle of equal opportunities of women and men in leadership positions, by determining the requirements of the selection process of candidates for these roles, • The provisions refer to the underrepresented sex in corporate bodies.
Draft act amending certain acts with regard to provision of information to the European Single Access Point (ESAP).	• The draft has been submitted to the Sejm, planned date of entry into force: after 14 days from the date of announcement with exceptions (July 10, 2026, January 10, 2028, January 10, 2030), • The draft act transposes to the national law the ESAP Package (Regulation (EU) 2023/2859 establishing the ESAP, omnibus directive 2023/2864, omnibus regulation 2023/2869). The drafted act provides for amendment of a number of legal acts, including the Commercial Companies Code and banking law. • Furthermore, the draft provides for changes to the Act on Trading in Financial Instruments resulting from the amendment to the MiFID 2 directive.
Draft Act amending the Banking Law Act and certain other acts (implementation of CRD IV)	• Effective date: after 14 days from publication in the Journal of Laws, with certain exceptions, • Changes in the processes used for assessing the suitability of members of the Management Board, Supervisory Board and persons holding key functions at the Bank, as well as in the process of appointing members of the Management Board and the Chairman of the Supervisory Board (requirement to obtain prior consent from the Polish Financial Supervision Authority), • Disclosure obligations related to the acquisition and disposal of the Bank's shares or a planned merger or division or transfer of assets or liabilities of significant value, • Expanding the tasks of the risk management system to include environmental, social and corporate governance (ESG) risks in the short, medium and long term, • Strengthening the powers of the Polish Financial Supervision Authority.
Commission Delegated Regulation (EU) 2024/2795 of 24 July 2024 amending Regulation (EU) No 575/2013 of the European Parliament and of the Council	• It defers until 1 January 2027 the date of application in the EU of the CRR provisions relating to FRTB (regulations based on the principles adopted under Basel III).

with regard to the date of application of the own funds requirements for market risk	• The current deferral applies until 1 January 2026. Postponing the application of the FRTB provisions by a further year will give the Commission time to assess international developments and to carry out further work on the next steps for implementing FRTB in the EU, with a view to ensuring a level playing field for EU banks internationally.
The Act of 17 October 2025 amending the Act on the handling of complaints by financial market entities, on the Financial Ombudsman and on the Financial Education Fund;	• The Act will come into effect on 13 February 2026, • Amendments to the procedures and methods for submitting complaints and providing responses to complaints from customers who are natural persons.
Draft Act on Personal Investment Accounts (PIA)	• According to the draft Act, this legislation is due to come into force on 1 July 2026. • The draft Act provides for the creation of Personal Investment Accounts (PIAs) intended for natural persons, with a tax exemption up to a specified value of assets.
Draft Commission Delegated Regulation (EU) of 29 October 2025 supplementing Regulation (EU) No 648/2012 of the European Parliament and of the Council (EMIR) with regard to regulatory technical standards specifying operational conditions, the representativeness obligation, and reporting requirements related to the active account requirement	The Regulation sets out in detail: • The operational conditions for an active account, • The representativeness requirement (a minimum number of transactions in the "most relevant" sub-categories within each asset class), • Semi-annual reporting to the supervisory authority.
Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives	• The changes to reporting include the introduction of a materiality threshold and amendments to the reporting templates. The changes to the Technical Screening Criteria (TSC) of the EU Taxonomy include amendments to the "Do No Significant Harm" (DNSH) criteria in relation to the environmental objective of pollution prevention and control, • This Delegated Regulation will enter into force on 28 January 2026 and will apply retroactively from 1 January 2026, covering financial year 2025 for undertakings already subject to the EU Taxonomy framework. Undertakings may, however, opt to defer application by one year and apply the previous framework in financial year 2025 if this is more convenient, provided that the reporting rules are applied in full, • Reporting entities should include, in the contextual information of their sustainability report, a statement specifying which set of reporting standards was applied in preparing the CSRD report for the financial year 2025.
Draft act amending the Labor Code	• Effective date: 21 days after the date of publication, • It provides for significant changes in the scope of counteracting mobbing and discrimination, including: 1) the addition of definitions of 'discrimination by association' and 'discrimination by assumption', 2) the introduction of a new definition of mobbing, among others, by recognizing as its primary characteristic the fact of persistent harassment of an employee, while at the same time clarifying that incidental behaviors do not constitute mobbing, even if they amount to an infringement of the employee's personal rights, 3) imposition of an obligation on employers to counteract violations of the equal treatment principles and mobbing

	by applying preventive measures, detection and quick and proper response, as well as by implementing corrective actions and supporting people affected by unequal treatment, 4) employers will be able to be released from the responsibility for mobbing if they can demonstrate that they duly fulfilled their obligation referred to in point 3, and the questionable behaviors were displayed by a person who did not manage the employee or did not hold a position superior to the employee in the work establishment, 5) expansion of the catalogue of employer's obligations by adding counteracting violation of an employee's dignity and other personal rights, 6) determination of compensation for an employee who has been subjected to mobbing in an amount not lower than twelve times the statutory minimum wage, as determined under separate regulations, or damages.
Regulation (EU) 2024/886 of the European Parliament and of the Council of 13 March 2024 amending Regulations (EU) No 260/2012 and (EU) 2021/1230 and Directives 98/26/EC and (EU) 2015/2366 as regards instant credit transfers in euro ("IPR")	• Obligation for payment service providers (in practice, banks) to offer instant credit transfers (24/7) in EUR, • Fee for an instant credit transfer in EUR (for non-eurozone countries) – in principle, according to the Regulation on equivalence of fees and charges (Regulation 2021/1230), that is, the same as their equivalent domestic fee in PLN, provided that it cannot be higher than the fee for a standard transfer in EUR (SEPA). • Obligation to provide a matching verification service (accompanying the instant credit transfer service) allowing the payer to verify whether the IBAN matches the name of the payee, and allowing the user to resign from such service. • Introduction of an obligation to check users of payment services, on an ongoing basis (at least daily), against the sanction lists, • The Regulation shall come into effect on 8 April 2024. • Pursuant to Article 5a(8) inserted in Regulation 260/2012, the adjustment deadlines for introducing instant credit transfers in EUR by payment service providers outside of the eurozone are as follows: 1) 9 January 2027 – adjustment deadline for offering the payment service of receiving instant credit transfers in euro as laid down in the inserted Article 5a, 2) 9 July 2027 – adjustment deadline for offering the payment service of sending instant credit transfers in euro as laid down in the inserted Article 5a.
The Act of 16 June 2023 Amending the Goods and Services Tax Act and certain other acts (implementing the National System of e-Invoices, the so-called KSeF)	• Pursuant to the Act of 9 May 2024 amending the Act amending the Goods and Services Tax Act and certain other acts, the effective date for the mandatory KSeF (e-invoicing) system has been postponed to 1 February 2026, • In the first half of 2025, the Ministry of Finance published the latest version of the draft Act implementing mandatory invoicing in the KSeF system, • The National System of e-Invoices (KSeF) is a system that enables the generation and sharing of structured invoices. The aim of KSeF is to centralize the process of registering invoices in business transactions by directing them to one central facility.
Regulation of the European Parliament and of the Council amending Regulation (EU) No 910/2014 as regards establishing a framework for a European Digital Identity (eIDAS 2.0)	• Development of digital identity for citizens throughout the European Union, in particular through the introduction of the European Digital Identity Wallet (EUDI – EU Digital Identity Wallet) and new trust services. EUDI is intended to allow for the secure storage of various digital identity data, such as driving licenses, permits, health cards, diplomas, etc. In addition to identity management, the EUDI wallet is intended to offer a payment solution.

Regulation of the European Parliament and of the Council amending Regulations (EU) 2024/1689 and (EU) 2018/1139 as regards the simplification of the implementation of harmonized rules on artificial intelligence (Digital Law Omnibus on AI).	• The Digital Omnibus package is a European Commission legislative initiative aimed at simplifying, consolidating and updating the body of EU digital regulations (the so-called "digital rulebook"). The objective is to reduce administrative burdens, limit overlapping obligations, and increase the predictability of digital legislation. • Scope of the Commission's work – the following areas are envisaged: • Data-related regulations, including: 1) GDPR – the Commission is considering simplifying certain administrative obligations and incorporating cookie-related rules into the GDPR; 2) Data Governance Act – subject to review; 3) Free Flow of Non-Personal Data Regulation – also under analysis; 4) Open Data Directive – also with a view to consider potential amendments. 5) Electronic communications and privacy regulations, including the ePrivacy Directive, in the context of cookies and tracking technologies, 6) Artificial intelligence regulations, including the AI Act – the Commission wants to clarify rules on the use of AI in light of new technologies, 7) Digital identity frameworks, including the concept of the EU Business Wallet (a digital identity wallet for businesses in the EU) – intended to support identification and authentication in digital services, 8) Consolidation of data-related rules and data-sharing frameworks – the Commission plans to integrate these rules within a single legislative instrument. • The introduction of a single reporting point for breaches/incidents under the following acts: Directive 2022/2555 (NIS2), Regulation 2022/2554 (DORA), Regulation 910/2014 (eIDAS). Personal data breach notification forms under the GDPR are likely to be integrated into a common interface together with ICT incident notifications (DORA).
The draft Act of 23 January 2026 amending the Act on the national cybersecurity system and certain other acts.	• The draft Act relates to implementation of the Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (NIS 2 Directive) OJ EU L 333 of 27.12.2022, p. 80). • The new provisions provide, among other things, for: the extension of the list of entities covered by the national cybersecurity system to include new economic sectors; the procurement of equipment and modernization of infrastructure, as well as the establishment of cybersecurity incident response teams; the increased liability of persons managing enterprises and institutions covered by the national cybersecurity system; the introduction of an obligation to report network incidents.
Judgment of the Court of Justice of the European Union (CJEU) in Case C-280/24 (Malicník) of 5 June 2025	• The judgment is of significant importance for the method of calculating fees charged in connection with granting consumer credit, • The judgment concerns a contractual clause providing for an "administrative fee" without specifying which services it covers, • The CJEU ruled that such clauses must meet the transparency requirement, meaning that the consumer must clearly understand which specific services they are paying for. A statement showing only the name of the fee and its amount is insufficient. The bank must specify the services provided and justify their cost,

	• The judgment may lead to a significant limitation of lenders' freedom in shaping the content of credit agreements in relations with consumers (including with respect to the main obligations of the parties, such as commissions).
Regulation of the Minister of Finance and Economy of 28 October 2025 on information concerning the characteristics of portfolios of receivables sold by banks to other entities	• This Regulation specifies the detailed scope of data to be included in the information referred to in Article 139a(1) of the Act of 29 August 1997 – the Banking Law (hereinafter: the "information"), as well as the manner and deadlines for submitting the information to the Polish Financial Supervision Authority (KNF), • The Regulation entered into force on 19 November 2025, and its provisions apply for the first time to information submitted by banks for the first half of 2025.
Draft Act on the status of a close person in a relationship and cohabitation agreement; formerly: draft Act on registered partnerships, and draft Act – provisions Introducing the Act on the status of a close person in a relationship and cohabitation agreement, formerly: draft Act Introducing the Act on partnerships	• According to the drafts, the changes are to enter into force on 1 January 2027; however, the Acts require substantial adaptation work, which will take a considerable amount of time, • The draft Acts provide for the introduction of the institution of a "cohabitation agreement," the conclusion of which grants the parties the status of a "close person in a relationship," • The purpose of the draft Act is to introduce into Polish law a regulation under which individuals in informal relationships can, through a cohabitation agreement, obtain the status of a close person. The introducing provisions adapt over two hundred acts by extending regulations that apply to persons in a marital relationship to also cover persons who are parties to a cohabitation agreement.
Draft Act amending the Act on crisis management and certain other acts	• Implementation of solutions included in the CER directive, • The draft Act assumes not only that the current level of protection of critical infrastructure will be maintained, but also that protection will be extended to include the protection of "critical infrastructure under construction" and the protection of critical infrastructure that is of key importance for local communities, • The designed solutions are aimed at strengthening the mechanisms for protecting critical infrastructure, taking into account that it is the core for providing services to the state and citizens. They also result from the analysis of the course of the war in Ukraine and the emerging sabotage and hybrid activities, • New criteria are planned to enable the identification of facilities, installations and devices as critical infrastructure, and thus the selection of critical infrastructure operators (the owner or holder of such infrastructure). Simultaneously to the criteria, the ministers in charge of government administration departments will be indicated who will be responsible for critical infrastructure in particular sectors, • A division will be made into critical infrastructure, the destruction or disruption of which will have an adverse impact, • In order to ensure an appropriate level of critical infrastructure protection, it is planned to introduce minimum standards in the areas of physical, technical, personal, ICT and legal security, as well as business continuity and recovery plans, • As part of the personal safeguards, it provides for, among others, a possibility for a critical entity to carry out background checks on employees or candidates who hold or might hold sensitive roles in the organizational structures of the critical entity or perform tasks for its benefit, and on persons who are or may be authorized to directly or remotely access its premises, information or control systems, including in connection with the security of the critical entity.

In addition, the Bank's activities in 2026 may be affected by the following EBA Guidelines:

AML and Sanctions Risk

- EBA Guidelines on information requirements in relation to transfers of funds and certain crypto-assets transfers under Regulation (EU) 2023/1113
- EBA Guidelines on internal policies, procedures and controls to ensure the implementation of Union and national restrictive measures
- EBA Guidelines on internal policies, procedures and controls to ensure the implementation of Union and national restrictive measures under Regulation (EU) 2023/1113

Corporate Governance:

- EBA Guidelines amending Guideline EBA/GL/2022/01 on Improving Resolvability for Institutions and Resolution Authorities to Introduce a New Section on Resolvability Testing
- EBA Guidelines on Transferability in the Context of the Resolvability Assessment for the Purposes of the Transfer Strategy
- EBA Guidelines on General Resolvability in Recovery and Resolution Planning
- EBA Guidelines on resubmission of historical data under the EBA reporting framework
- EBA Guidelines on internal policies, procedures and controls to ensure the implementation of EU and national restrictive measures
- EBA Guidelines on exposures arising from the acquisition, development and construction of residential real estate under Article 126a of Regulation (EU) 575/2013
- Guidelines on common procedures and methodologies for the supervisory review and evaluation process (SREP) and supervisory stress testing EBA/CP/2025/21
- Updated Guidelines on internal governance EBA/CP/2025/20
- Updated Guidelines on the definition of default (Default) EBA/CP/2025/09
- Guidelines on third-party provider risk management (EBA/CP/2025/12)

2. Significant risks and threats related to the Group and its activity

2.1 Risk management principles

The Group carries out risk management by implementing cohesive rules, controls and tools through the Group, taking into account supervisory requirements and best market practices.

The risk management system used in the Group, which is based on the shared responsibility concept, is arranged on three independent levels ("three lines of defense"):

- Level 1, i.e. organizational units responsible for the activity which results in taking risks and responsible for risk management in the Bank's operational activity, as well as for risk identification and reporting to the second-line units,
- Level 2, i.e. risk management at organizational units, regardless of the first-line risk management, and the activity of the compliance unit – units or persons responsible for setting risk management standards in identifying, measuring or assessing, limiting, controlling, monitoring and reporting and for supervising control mechanisms applied by other organizational units of the Bank to mitigate risk – organizational units of the Risk Management Sector, Compliance Department, Finance Management Sector, Legal Division, Human Resources Division;
- Level 3, i.e. Audit Department which ensures independent assessment of both risk management processes and internal control system.

When organizing its risk management processes, the Group takes into account its risk profile, strategic and business objectives, available capital and liquidity resources, macroeconomic environment and regulatory requirements – these factors make up the framework of the risk control and management system.

Risk management processes are implemented on the basis of documented policies and rules relating to identification, measurement, mitigation, control, monitoring and reporting of risks to which the Group is exposed, approved by: the Management Board, authorized persons in accordance with the rules of issuance of legislative acts at the Bank or duly established Committees, including:

- Asset and Liability Committee (ALCO);
- Risk and Capital Management Committee, supervising the Risk Models Commission, the Consumer Bank Risk Commission and Sustainable Products Commission;
- New Products Committee;
- Operational Risk, Control and Compliance Committee.

The risks connected with activities of the Group are mitigated by a system of limits arising from risk appetite and the management information system used by the Bank enables it to monitor risk levels by providing management with portfolio information on a regular basis.

The Group carries out the management of all significant risk families arising from the execution of its business strategy. As part of the process initiated in 2025 to identify key risk families, the Management Board of the Bank concluded that the following risk families were significant for the purposes of risk management and the internal capital estimation and maintenance process:

- Credit risk;
- Counterparty credit risk;
- Market risk for the trading portfolio and banking book;
- Liquidity risk;
- Operational risk;
- Compliance risk;
- Strategic risk;
- Climate risk for credit, strategic, reputational and compliance risks;
- Environmental risks for compliance risks.

Credit risk and counterparty risk

Definition	• In Consumer Banking, credit risk is defined as the risk of financial loss resulting from an individual or small business customer's failure to repay a loan or to comply with other terms and conditions imposed on the borrower under a loan agreement. • Institutional Banking credit risk is the risk of loss resulting from a deterioration in credit quality (rating downgrade) or a breach of contract by a corporate banking client, business banking client, or securities issuer. • Counterparty credit risk is the risk of loss resulting from deterioration of credit quality (rating downgrade) or a breach of contract by a counterparty arising from activities on the financial instruments market as part of transactions concluded with counterparties for trading, hedging and liquidity management purposes, in particular from derivative transactions, repo/reverse repo transactions and securities-based financing.
Risk management strategy	• The primary objective of credit risk management is to support the long-term plan of stable growth of the credit portfolio, while maintaining appropriate quality in line with the Bank's strategy. The credit process is based on a number of fundamental principles, such as: – Business and independent risk management units share responsibility for quality of the credit portfolio and credit process and for any credit losses; – Conduct must be in compliance with the regulations on the portfolio structure to ensure its diversification and to keep balance between risk and capital; – A system of credit-related authorizations must be implemented which assumes that authorization to make credit decisions may only be granted to properly trained and experienced employees of Risk Management Sector and Operation Division, taking into account their track record and risk assessment skills and abilities; – Acceptance level must depend on assumed risk – higher-risk exposures (defined taking into account both amount and level of risk) require higher-level approval; – Diversified and adequate risk assessment standards must be used for each borrower and each commitment, including as part of corrective actions; – A consistent rating process is required, which is based, *inter alia*, on results produced by rating or scoring models; – Periodic, regular monitoring of results of a client's activities and identification of adverse changes in their situation which require additional activities related to monitoring credit exposures or corrective actions are necessary; – External environment must be monitored to ensure early detection of economic threats which may adversely affect particular portfolios / Bank's client sectors;; – The credit policy rules must be complied with and, in special cases, approval of exceptions is required at higher management levels in order to ensure control of implementation of its principles in compliance with internal regulations applicable at the Bank, generally applicable laws and regulations and regulations issued by competent regulators.
Risk measurement	• Risk measurement is carried out using: rating models, scoring models and scorecards at the level of a client and provision models for portfolio risk assessment and an integrated ICAAP process, both at aggregate level and by business line.
Monitoring	• Credit risk exposures are monitored and managed at two levels: client level and portfolio level. Tools used to monitor the current creditworthiness of a borrower include: – annual comprehensive review of limits, exposures, financial situation of and cooperation with borrowers, – tools or reports generated in the Early Warning process,

	– periodic financial reviews of borrowers, – internal classification system, – periodic reviews of credit exposures of debtors with higher financial leverage or with lower internal classification, – periodic visits to clients, – analysis and assessment of external information (rating reports, analytical reports, press, sector sources, etc.). • Portfolio-level monitoring – monitoring of utilization of risk concentration limits in the credit portfolio on the basis of appropriate reports, – regular periodic reviews of the credit portfolio, – "ad hoc" portfolio reviews triggered by sudden, significant external information, – monitoring of indicators determined for the retail exposure portfolio. • The monitoring of portfolio performance and the identification of trends in the portfolio are carried out using regular management information and control reports taking into account, *inter alia*, analysis of pace of changes in value and segmentation (sectors) of the credit portfolio, client risk (rating), quality of credit exposure collateral and exposures with reduced internal classification, departures from applicable risk acceptance rules and limit utilization level. • The package of control reports for each portfolio is prepared on a regular basis and delivered to unit heads responsible for the client segment in question, the Risk and Capital Management Committee and the Management Board of the Bank.

Market risk for the trading portfolio

Definition	• The market risk of a trading portfolio is defined as the risk of loss resulting from a potential negative change in the market value of the exposure due to changes in market factors such as interest rates, foreign exchange rates stock and commodity prices, interest rates spreads, currency or credit.
Risk management strategy	• Market risk management is to ensure that the amount of risk accepted in the Group is consistent with the level acceptable for the shareholders and banking supervision authorities and to ensure that all market risk exposures are adequately reflected in calculated risk measures notified to relevant managers and governing bodies. • Adopted market risk measures and limits should prevent excessive concentrations of exposures to a single risk factor or a group of related risk factors and should enable determination of the maximum level of the risk accepted in the trading book or the banking book. • Market risk management at the Bank is based on: – applicable Polish laws and regulations, in particular the Banking Act, – applicable EU regulations, in particular the 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 (CRR), – requirements of Polish and EU regulatory institutions and especially resolutions of the Polish Financial Supervision Authority (KNF), – principles of prudent and stable risk management at the Group and the general risk level accepted by the Supervisory Board of the Bank, taking into account best practices applied in the market. • Market risk management covers all portfolios that generate incomes which are exposed to an adverse impact of market factors, such as interest rates, currency rates, stock prices, commodity prices and parameters of volatility of those factors. • Trading portfolio includes transactions in financial instruments (on- and off-balance sheet ones) the purpose of which is to earn income connected with a change of market parameters in a short period. Trading portfolios cover on-balance sheet items, such as debt securities, categorized as held for trading, i.e. purchased for trading purposes and meeting specified liquidity criteria, and any positions in derivative instruments, provided that

	in this case portfolios are divided into those acquired for purely trading purposes and those created as hedging against the risk of positions included in a banking portfolio (so-called economic hedge). Valuation of trading portfolios is carried out either directly on the basis of market prices or by using valuation models that make use of price parameters quoted in the market. Activities on trading portfolios are carried out by the Interbank Transaction Division in the Financial Markets and Corporate Banking Sector for those portfolios which cover interest rate risk and currency risk. Trading portfolios also include options, including currency option transactions, interest rate options and option structures, which reflect the economic nature and risk arising from products offered to clients of the Bank. The operations of the Bank in that area are carried out so that they ensure the simultaneous (each time and immediate) conclusion of a counter transaction having the same parameters, as a result of which the option transaction portfolio generates no open market risk exposure. The only factor connected with the conclusion of option transactions which is taken into account in measurement of market risk, and specifically currency risk, is the amount of the premium paid/received in the foreign currency.
Risk measurement	• The following risk measurement methods are applied to trading portfolios: (factor sensitivity/DV01/CR01) method, value at risk (VaR) method and stress tests. • Sensitivity factors measure the change in the value of the position in a given underlying instrument in the case of a specified change of the market risk factor (for example a change of the interest rate in a given point on the interest rate curve by 1 basis point or a change of the currency rate or stock price by 1%). – For interest rates, the sensitivity measure is DV01/CR01; – For currency risk the sensitivity factor is equal in value to the position in a given currency; – For positions in equity securities, the sensitivity factor is equal in value to the net position in a given instrument (stocks, index, participation unit). • The integrated measure of market risk for trading portfolio, which combines the impact of the positions in particular risk factors and takes into account the correlation effect between volatilities of individual factors, is value at risk (VaR). VaR is used to estimate the potential decline in value of a position or portfolio in normal market conditions, for a fixed confidence level and in a specified period. For positions opened in a trading portfolio of the Bank, VaR is calculated using the 99% confidence level and one-day holding period. • Both DV01 and VaR for a trading portfolio are calculated as net amounts without any economic hedging of the portfolio of securities available for sale, i.e. excluding any derivative instruments which are to secure the fair value of the portfolio. The risk exposure of such transaction is controlled by using appropriate risk measurement methods and mitigated with risk limits adopted for banking portfolios. • On a daily basis, the analysis of stress test scenarios is carried out, while assuming risk factor changes higher than those adopted for VaR measurement and ignoring any observed historical correlations between those factors. • The Bank has market risk exposures of trading portfolios in more than twenty currencies, both for currency positions and exposures to interest rate risk, but only exposures to a few currencies are significant. For a large group of currencies, exposures arise from the imperfect match of the transactions concluded upon the client's order and the counter transactions with other counterparties from wholesale markets. Significant exposures to market risk are opened for PLN, developed market currencies (mainly USD and EUR and less frequently GBP, CHF or JPY) and even currencies from Central European countries.
Monitoring	• The Market Risk Department by the dedicated IT system provides the relevant executives and managers, on a regular basis, with reports on portfolio sensitivity, value at risk (VAR), securities positions, stress test

	results for market risk, allocation of capital requirements relating to market risk and utilization of Trading MAT and Trading Stop Loss limits (warning thresholds). • In addition, market risk analyses are presented systematically to the following committees: the Asset and Liability Committee, the Risk and Capital Management Committee and the Risk and Capital Committee of the Supervisory Board.

Market risk for banking book

Definition	• Market risk in the banking book (related to non-trading portfolios) is the risk of the potential negative impact of changes in market factors such as interest rates, foreign exchange rates, and credit spreads on net interest income (NII), economic value of equity (EVE), or accumulated other comprehensive income (AOCI). The types of interest rate risk in the banking book include: repricing date mismatch risk, yield curve risk, basis risk, and client option risk.
Risk management strategy	• The purpose of managing market risk related to non-trading portfolios is primarily to minimize the risk connected with the possibility of occurrence of adverse changes in market interest rates and with a negative impact of those changes on the net interest rate and, subsequently, financial result of the Group. • Market risk management at the Bank is based on: the requirements of Polish and European regulatory institutions, and especially resolutions of the Polish Financial Supervision Authority (KNF) and the EBA; and the principles of prudent and stable risk management at the Group and the general risk level accepted by the Supervisory Board of the Bank, taking into account best practices applied in the market. • Management of market risk related to non-trading portfolios is carried out both at strategic and operational level. Division into particular risk management levels depends on the nature and type of decisions made by particular decision-making fora at the Bank which affect the profile and level of interest rate risk. – The strategic risk management perspective is covered by the decision-making powers of the Asset and Liability Committee (ALCO) of the Bank. which carries out interest rate management by setting risk limits for banking portfolios and by conducting monthly reviews of exposures and results of management of those portfolios. – The operational management of market risk related to non-trading portfolios is carried out by the Asset and Liability Management Department, which is authorized to open risk positions within the framework of adopted limits.
Risk measurement	• The following risk measurement methods apply to non-trading portfolios (banking book portfolios): – net interest income (NII) measures i.e. measures of changes in expected future profitability within a given time horizon resulting from interest rate movements or from credit spread changes; they encompass interest income and interest expenses, e.g.: Interest Rate Exposure (IRE) – the potential increase / decline of interest income as a result of a change in interest rate by +/- 100 bps; – measures of economic value (EV), i.e. measures of changes in the net present value of interest rate sensitive instruments over their remaining life resulting from interest rate movements, in case of IRRBB, or from credit spread movements, in case of CSRBB, e.g.: EVE – Economic Value of Equity – a specific form of the EV measure that assumes the exclusion of capital from cash flows; and EVS – a measure of the potential change in the economic value of a bank's portfolio as a result of a specified interest rate change. – stress tests; – DV01 – generally defined as change in the value of the position as a result of a change in interest rates by 1 basis point. For reporting

	purposes, it is assumed that DV01 represents an increase in interest rates by 1 basis point; – CR01 – change in the value of the position as a result of a change in the (required) credit spread by 1 basis point; – SOT_NII - metric indicating a decline in the one-year net interest income from Tier 1 Capital, resulting from a sudden and unexpected movement in interest rates specified in any of the two supervisory shock scenarios referred to in Article 1(2) of the Commission Delegated Regulation (EU) 2024/856 of 1 December 2023; – SOT_EVE - metric indicating a decline in the economic value of equity from Tier 1 Capital, resulting from a sudden and unexpected movement in interest rates specified in any of the six supervisory shock scenarios referred to in Article 1(1) of the Commission Delegated Regulation (EU) 2024/856 of 1 December 2023. • The interest rate gap analysis uses the schedule of maturity or revaluation of on-balance sheet positions and derivatives recognized using hedge accounting or categorized as economic hedge in order to determine differences between positions whose maturity date or interest rate update date is in the subject time interval. • As a general rule applied in the interest rate gap analysis, transactions are allocated to particular bands of revaluation of positions in banking portfolios on the basis of contractual or assumed dates of change of transaction interest rates. • Stress tests measure a potential impact of significant changes in the level or shape of interest rate yields on the positions opened in a banking portfolio. • The Bank carries out stress tests for pre-defined scenarios of movements of interest rates, which are combinations of moves of market factors, both defined as significant changes (large move) and crisis changes (stress move), which occur both in Poland and abroad. The extent of assumed shifts of market factors are reviewed at least annually and adjusted as appropriate to changes in the market conditions in which the Bank operates. • The Asset and Liability Management Department in the Interbank Transaction Division carries out activities relating to securities available for sale. Three key objectives have been adopted for activities relating to the portfolio of securities available for sale: • carrying out financial liquidity management, • hedging against the risk taken over by the Interbank Transaction Division from other organizational units of the Bank • opening own interest rate risk positions in portfolios of the Bank by the Interbank Transaction Division. • In order to avoid excessive fluctuations of capital funds of the Bank, caused by revaluation of assets held for sale, maximum limits are set for the DV01 (Dollar Value of 1 basis point) position, which determines the potential change in the value of risk position for a given interest rate curve on a specified nodal point (to which all cash flows in a given period are brought) caused by a shift of the market interest rate by 1 basis point up for such portfolios. Limits also cover open derivative instrument positions (for example interest rate swaps) established to hedge the fair value of a portfolio.
Monitoring	• The Market Risk Department and a dedicated reporting unit in the Risk Management Sector provide the relevant executives and managers with reports on portfolio sensitivity, securities positions, stress test results for interest rate risk of the banking book. • In addition, market risk analyses are presented systematically to the following committees: the Asset and Liability Committee and the Risk and Capital Committee of the Supervisory Board.

Liquidity risk

Definition	• The risk that the Bank will be unable to effectively meet both expected and unexpected current and future cash flows and collateral needs without

	adversely affecting the Bank's daily operations or financial position. This risk may be exacerbated by the Bank's inability to access funding sources or monetize assets, as well as the structure of its liquid liabilities and assets.
Risk management strategy	• The overriding goal of liquidity risk management is to ensure that the Bank and other companies from the Group have access to liquid funds sufficient to meet their financial liabilities when due, also in the event of probable extreme crisis situations. • Liquidity risk management is based on: – applicable polish laws and regulations, in particular the Banking Act; – applicable provisions of EU law, in particular 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 (CRR) and EBA Guidelines, – requirements of Polish regulatory institutions and especially resolutions of the Polish Financial Supervision Authority (KNF); – principles of prudent and stable risk management at the Group and the general risk level accepted by the Supervisory Board of the Bank; – taking into account best practices applied in the market. • The Group analyses and manages liquidity risk in different time horizons and, to this end, distinguishes between current, short term, medium term and long term liquidity and applies adequate risk measurement and limitation methods. The adopted measures and limits are to limit excessive concentrations with respect to the assumed structure of the balance sheet or sources of funding. • The management of long-term liquidity risk is a task of Assets & Liabilities Committee (ALCO). It is carried out on the basis of monitoring of structural relations of the balance sheet and on the basis of long-term liquidity regulatory measures, and covers the liquidity gap analysis and the possibilities of obtaining sufficient financing sources in the future, as well as the analysis of funding costs in the context of the impact on the profitability of business operations. • The management of medium-term liquidity risk, within the 1-year time horizon, is a task of Assets & Liabilities Committee and is carried out on the basis of annual “Financing and Liquidity Plan”, which determine the levels of internal limits, plans prepared by business units of the Bank concerning changes in assets and liabilities, elaborated within the framework of financial plans for the next budget year. • The management of short-term liquidity risk, within the 30-days time horizon, is a task of the Financial Markets Sector and Corporate Banking Sector, and is carried out on the basis of both regulatory and internal measures of short-term liquidity. The Bank also analyses the liquidity level in emergency situations, assuming, as a must, that there will be no negative gap in all time brackets in a 12-month time horizon. • Interday and current liquidity risk management is a task of the Financial Markets and Corporate Banking Sector and is carried out on the basis of nostro accounts of the Bank, including in particular the mandatory reserve account with the National Bank of Poland and the level of liquidity surplus (liquidity buffer) monitored on a daily basis, using available products offered by the money market and the central bank.
Risk measurement	• Liquidity risk measurement is carried out by using external supervisory measures (LCR/NSFR and additional liquidity monitoring indicators – ALMM) and additional measures and tools developed internally and through the process of calculating economic capital for liquidity risk and allocating it: – liquidity risk appetite, – internal and regulatory stress tests, – structural liquidity ratios, – market warning signals,
Monitoring	• Liquidity risk monitoring and management are carried out using: supervisory and internal liquidity risk limits and warning thresholds

	determined for liquidity risk by the Asset and Liability Committee (ALCO), i.e. by: – limits and warning thresholds for supervisory measures, – limits and warning thresholds for the liquidity gap level over a one-year horizon under stressed conditions and broken down by established currencies and time bands; – warning thresholds for structural liquidity indicators and other internal measures. • On a regular basis, dedicated reporting unit in the Risk Management Sector provide the relevant executives and managers with reports on the liquidity position, stress test results for liquidity risk and allocation of capital requirements relating to liquidity risk. • In addition, liquidity risk analyses are presented systematically to the following committees: the Asset and Liability Committee, and the Risk and Capital Committee of the Supervisory Board.

Operational risk

Definition	• Operational risk should be understood as a possibility of loss as a result of application of inappropriate or unreliable internal processes, human factors or systems, or as a result of external events. The definition of operational risk also includes legal risk, i.e. the risk of incurring a loss (including the costs of court proceedings, settlements and penalties) resulting from the instability of the legal environment as well as the incorrect formation of legal relationships in every aspect of the Bank's business activity, excluding strategic and reputational risks. The definition of operational risk also includes "conduct risk," i.e., the risk related to the conduct of the Bank's business, which arises in particular when employees of the Bank or persons associated with the Bank, but not employed by it, intentionally or through negligence, cause harm to clients or to the integrity of financial markets, with an impact on the Bank's integrity. Within this risk category, ICT risk (Information, Communication, and Technology risk) is also recognized. The Bank recognizes the impact of operational risk on the possibility of occurrence of reputational losses related to the conducted activity; • For the purposes of the ICAAP process, the compliance risk is also included in the operational risk (i.e. the risk of negative effects of non-compliance with legal provisions, supervisory regulations, internal normative acts of the bank and the practices and standards available on the market).
Risk management strategy	• In terms of operational risk, the strategic goal of operational risk management is to ensure a permanent and effective approach to identification, measurement/assessment, limitation, control, monitoring and reporting of risk, as well as effective reduction of the level of exposure to operational risk, and as a consequence limiting the number and scale of events of an operational risk (policy of low level of tolerance to operational losses). • The main assumptions of the operational risk strategy focus on increasing the Group's capacity to early identifying areas of increased system risk and reduction of exposure areas resulting from the risk resulting from human errors. • When organizing the operational risk management process the Group takes into account the business strategy, risk profile of the Group, macroeconomic environment, available capital and liquidity resources and regulatory requirements, which make up the framework of preparation of the system used to control and manage operational risk at the Group. • The Group's operational risk management system is built to ensure proper risk management at every stage, i.e. identification, assessment/measurement, mitigation, monitoring and reporting.
Risk measurement	• In the risk assessment process, the Group uses combinations of various risk measurement or estimation methods. – Risk assessment is to determine the probability of occurrence and the amount of future losses attributable to operational risk. To this end

	both quantitative and qualitative indicators are used (such as risk appetite, capital requirements, KRIs, data about losses and operational risk events, control issues and corrective actions, self-assessment process, risk concentration areas and rising-risk areas, scenario analysis, stress tests, changes in processes and products, information from internal and external reviews and audits and information reported to Commissions and Committees). – Such assessment also includes an analysis of both internal and external threats. A correct assessment of operational risk enables the Group to properly determine and manage the risk profile.
Monitoring	• As part of consolidated supervision, operational risk data relating to the Bank and subsidiaries are presented to Commissions and Committees that support the Management Board and Supervisory Board of the Bank in the operational risk management process. • The ongoing monitoring of operational risk is the responsibility of the Operational Risk Committee, the Control and Compliance System, the Risk and Capital Management Committee, the New Products Committee and the various Commissions supporting the Committees. • Quality of the operational risk management process (including the self-assessment process) in particular units of the Group is checked and assessed by the Internal Audit function. • The Supervisory Board oversees the operational risk management system and assesses its adequacy and effectiveness. The Supervisory Board is supported by its committees: Audit Committee, Risk and Capital Committee and Remuneration Committee. • On the basis of synthetic reports which present the scale and types of operational risk to which the Group is exposed, risk concentration areas, operational risk management methods, probability of occurrence of operational risk events, assessment of potential adverse impact of the operational risk management methods, results of operational risk profile monitoring and operational risk appetite, submitted by the Management Board at least semiannually, the Supervisory Board, supported by the Audit Committee and the Risk and Capital Committee, assesses the implementation of the assumptions of the strategy by the Management Board (including with respect to the operational risk management principles) and may order a review of the strategy if it deems it necessary.

Strategic risk

Definition	• Strategic risk is defined as the risk of a permanent (not episodic) impact on the achievement of the Bank's key strategic objectives, measured by the impact on projected revenues and/or market capitalization, resulting from external factors affecting the Group's operating environment, as well as risk related to the definition and implementation of the strategy. It may materialize directly in the Group's financial results or in the core risk categories (credit risk, counterparty credit risk, market risk, liquidity risk, or operational risk) as a result of the effects of so-called transmission channels. Strategic risk includes operational environment risk (including geopolitical risk and other operational environment risks), financial performance risk (including strategic risk in institutional and consumer banking), and capital risk.
Management strategy	• Strategic risk can manifest itself or be amplified by existing risks within the risk taxonomy. Therefore, the risk management strategy encompasses processes applicable to other types of risk, including a comprehensive risk management cycle that includes risk identification, measurement, monitoring, control, and reporting, as well as monitoring the operational environment.
Risk measurement	• The Bank measures strategic risk using metrics and key indicators that align with various stakeholders and reflect business growth goals, financial objectives, regulatory obligations, and other stakeholder needs. Strategic risk is incorporated into the ICAAP process. • In the event of a transmission channel effect, strategic risks are included in the measurement of the appropriate risk category.
Monitoring	• Strategic risk is regularly monitored based on the methodology and measures described in the Principles of strategic/business risk analysis at Bank Handlowy w Warszawie S.A. • The level of strategic risk is assessed based on operating environment indicators, financial performance indicators, capital position indicators and the quality of the Bank's loan portfolio. • Additionally, strategic risk management is integrated with the following processes: Risk Appetite, stress testing, and the overall financial planning. Scenarios are used to conduct "what-if" analysis for stress testing purposes. The analysis and stress test results are used to identify key risk factors for the development and implementation of business lines' strategies to assess the materiality of strategic risks. Where the transmission channel effect occurs, strategic risks are incorporated into monitoring activities for a given primary risk category to the appropriate extent.

Capital risk (subcategory of strategic risk)

Definition	• Capital risk is a subcategory of strategic risk and is the risk resulting from failure to provide sufficient capital to absorb unexpected losses.
Management strategy	• Capital management covers ensuring the level of capital that is adequate to the risk of the business, as well as the strategy in terms of planning, structure and sources of capital acquisition, and the risk of its improper implementation (including failure to achieve an appropriate financial result). • The formal framework of the capital risk management process supports the Risk and Capital Management Committee (RCMC) and the Bank's Management Board in the allocation, measurement, management, monitoring and control of the Bank's capital position. • The level of own funds and qualifiable liabilities should provide coverage for risks identified as significant in the Bank's operations, while meeting supervisory standards in terms of total capital ratio (TCR), requirement for own funds and qualifiable liabilities (TLAC) and minimum requirement for own funds and qualifiable liabilities (MREL). • The bank mitigates capital risk by implementing a process for assessing internal capital adequacy, which combines elements of internal capital estimation, capital planning and capital management, and constitutes an

	integral part of BHW's management process. The Group has a number of capital planning tools, applied depending on the adopted scenario. • Capital risk management also includes the management of the risk of excessive financial leverage. The Group manages the risk of excessive financial leverage as part of a coherent risk management policy. • The key elements of capital management and the directional definition of capital needs are specified in the Bank's Strategy. Information on capital goals and the expected capital structure is also included in the ICAAP document.
Risk measurement	• TCR, LR, MREL TEM, MREL TREA, TLAC TEM, TLAC TREA are regulatory measures of capital. The TLAC TREA requirement was designated as a strategic limit due to its most severe impact and as it is, in the Bank's opinion, the first requirement that can adversely affect the strategic assumptions of the Bank. • Capital risk is measured using, among other things, processes such as assessment of internal capital adequacy, stress tests and reverse stress tests in BHW's capital planning activities.
Monitoring	• The Bank's capital ratios are monitored at least monthly and reported quarterly by the Financial Reporting, Control and Tax Department to the Risk and Capital Strategy Department. • In addition, the results of capital risk monitoring are presented systematically to the following committees: the Assets and Liabilities Committee, the Risk and Capital Committee and the Risk and Capital Management Committee. • All results of stress tests, reverse stress tests and capital adequacy assessment are presented to dedicated committees.

ESG Risk

Definition	• ESG risk (environmental, social, and governance risk) is the risk of negative financial consequences for the Bank resulting from the current or potential impact of environmental, social, and governance issues on counterparties or on the assets in which the Bank invests. Subcategories of ESG risk include environmental (including climate), social, and governance risks. • ESG risk is considered a cross-cutting risk, which means that it may manifest itself within existing basic risk categories (i.e. credit risk, market risk, strategic risk, etc.). As part of the 2025 risk materiality assessment process, ESG risk materiality was assessed over the short-term (less than 3 years), medium-term (3-5 years), and long-term (greater than 5 years) horizons. In the short-term, the following factors were considered: – the materiality of climate risk for strategic, credit, reputational and compliance risks, – the significance of environmental risk for compliance risk, – irrelevance of social risk and governance risk.
Management strategy	• The main objective of climate and environmental risk management is to effectively integrate these risk factors into existing risk management processes to ensure the effectiveness of the Group's risk profile in the short, medium and long term. • Due to the cross-cutting nature of ESG risks and the dynamic development of regulatory expectations and good practices, the Group has developed the document "Principles of ESG Risk Management", which is one of the documents describing the risk management strategy of the Group. This document: • describes the key elements of the organizational structure and processes used by the Bank to identify, measure, monitor, control and report ESG risk; • clarifies the roles and responsibilities in the area of ESG risk management at the levels of the Bank's Management Board and each of the three Lines of Defense. • ESG risk management is consistently developed within the framework of policies and procedures that govern the management of particular risk categories.

	• In 2024, the Bank introduced a Policy defining a framework for the classification of sustainable products in the Bank Handlowy w Warszawie S.A. Group, used by the Bank to classify transactions concluded on the products it offers based on three possible classification paths. A detailed description of the aforementioned Policy and sustainable finance classification process can be found in Chapter VI "The Sustainability Statement of Bank Handlowy w Warszawie S.A. and the Bank Handlowy w Warszawie S.A. Group for the year 2025". • In 2025, in response to the requirements of Article 76(2) of Directive 2013/36/EU and the European Banking Authority's guidelines on ESG risk management (EBA/GL/2025/01), the Bank has developed a prudential transition plan, which is a strategic document aimed at preparing the Bank for ESG risks in the short, medium, and long term. The transition plan includes a specific time frame and measurable targets for responding to financial risks arising from ESG risk factors, including those related to European Union and national regulatory objectives, in particular the objective of achieving climate neutrality by 2050.
Risk measurement	• In the risk assessment process, the Group applies a combination of various methods of risk measuring or estimating using a number of measures adapted to the risk category for which ESG risk is measured, including: – determining KRI indicators as part of the risk appetite covering priority portfolios, as well as types of risks having a significant impact of ESG factors, – monitoring credit exposure to transactions with increased environmental and social risk, – using an industry climate and environmental risk map at the portfolio and client level to identify and measure these risks, – conducting stress tests for significant ESG risks identified as part of the risk materiality assessment, – conducting a quantitative analysis of the impact of climate threats on the continuity of the Bank's operations as part of the risk materiality assessment process, – conducting a quantitative climate risk assessment for key market risk indicators/limits as part of the risk materiality assessment process. – analysis of portfolio alignment with emission reduction pathways resulting from the regulatory targets of the Paris Agreement and regional climate policies.
Monitoring	• Monitoring the correctness and ensuring the effectiveness of ESG risk management, and ensuring appropriate consideration of ESG risks in the Bank's risk profile and risk appetite are the tasks of the Risk and Capital Management Committee of the Bank's Management Board. • A package of ESG risk analysis reports is prepared periodically and submitted to the Bank's Management Board, including the Risk and Capital Management Committee, and the Supervisory Board, including the Risk and Capital Committee.

VI. Sustainability Statement of Bank Handlowy w Warszawie S.A. and Capital Group of Bank Handlowy w Warszawie S.A.

1. General information

1.1 Basis for preparation

1.1.1 Basis for preparation of the statement [BP-1]

This *Sustainability Statement of Bank Handlowy w Warszawie S.A.* has been prepared in consolidated form[2]. The Bank has taken the opportunity to prepare the report on activities and the consolidated report on activities as a single document.

The *Statement* covers both the Bank's own operations and the upstream and downstream value tiers.

The Bank has exercised its option to omit information regarding intellectual property, know-how or innovation results. The Bank has exercised its exemption from disclosure of information regarding expected events or matters covered by ongoing negotiations.

1.1.2 Special circumstances affecting disclosures [BP-2]

For reporting purposes, the Bank does not depart from the definition of time perspectives specified in ESRS 1[3] standard. The short-term time perspective at the Bank means a one-year reporting horizon. The medium-term, three-year perspective is used for strategy and financial planning. The long-term perspective, for the Bank's business model transformation plans that take into account ESG risk factors, is at least five years.

Information on value chain estimation is described in the Environmental Chapter, Disclosures E1-6, Gross Scope 1, 2 and 3 GHG Emissions and Total GHG Emissions.

The Bank does not identify in this Statement quantitative measures and amounts that are subject to a high level of measurement uncertainty, apart from those resulting from estimating the value of scope 3 greenhouse gas emissions.

In this Statement, the Bank has included the information referred to in Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investments. These disclosures are included in the chapter Environmental information, Taxonomy-Related Disclosures section.

Incorporation by reference

Data point incorporated by reference	Location
ESRS 2 GOV-1 21c	The report on activities of Bank Handlowy w Warszawie S.A. and the Group of Bank Handlowy w Warszawie S.A. for 2024. Chapter IX, section 11

Changes in the preparation and presentation of information

In the "Employees of City Handlowy" section [S1], all figures have been prepared in relation to the number of employees as of December 31, 2024, and 2025 to ensure a consistent approach to data presentation. In the Bank's 2024 Sustainability Statement, some of the information in the disclosures regarding employee characteristics [S1-6], diversity indicators [S1-9], and work-life balance measures [S1-15] has been prepared in relation to the number of full-time equivalents.

[2] Bank Handlowy w Warszawie S.A. is the parent company of the Group. The Bank's subsidiaries, whose activity is influenced by the Bank as their parent company, do not carry out any active operations. Those subsidiaries will be successively sold or liquidated. The Bank has no control over the operating activities of companies in which it is a minority shareholder.
[3] European Sustainability Reporting Standard (ESRS) included in the framework of Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards.

Data for 2024, which is presented differently than in the previous Statement:

Characteristics of employees [S1-6]

Number of employees in 2024	as of December 31 [HC]			in full-time equivalents [FTE]		
	Female	Male	Total	Female	Male	Total
Number of all employees	1,944	1,199	3,143	1,892	1,159	3,050
Number of permanent employees	1,768	1,073	2,841	1,742	1,051	2,794
Number of temporary employees	176	126	302	149	108	257
Number of full-time employees	1,856	1,144	3,000	1,857	1,144	3,001
Number of part-time employees	88	55	143	35	15	49
Number of persons who left the Bank in the reporting year	168	145	313	162	130	292
Employee turnover rate	9 %	12 %	10 %	9 %	11 %	10 %

Diversity metrics [S1-9]

Number of employees in 2024	as of December 31 [HC]	in full-time equivalents [FTE]
Number of employees under 30 years of age	446	400
Percentage of employees under 30 years of age	14 %	13%
Number of employees aged 30 to 50	2281	2 239
Percentage of employees aged 30 to 50	73 %	73%
Number of employees over 50 years of age	416	412
Percentage of employees over 50 years of age	13 %	13%

Work-life balance metric [S1-15]

	Corrected values [HC]			Previously stated values [FTE]		
	Female	Male	Total	Female	Male	Total
Percentage of eligible employees who took family leave in 2024	9 %	6 %	8 %	8 %	6 %	7 %

The previously stated work-life balance metric [S1-15] for full-time equivalents [FTE] did not include maternity-related sick leave. The comparative values for this indicator for 2024 [HC] disclosed in this statement include this category of sick leave.

Corrections to data disclosed in the Bank's 2024 Sustainability Statement

In the Taxonomy-Related Disclosures chapter, the 2024 data regarding the Green Asset Ratio for financial guarantees in 2024 have been adjusted to provide comparable data through 2025. The Bank has re-verified the scope of guarantee products included in the indicator and, in accordance with section 1.2.2.1 of Annex V to Regulation 2021/2178, identified and included in the disclosure financial guarantees supporting loans and advances and debt securities for enterprises.

EU Taxonomy: Green Assets Ratio on financial guarantees for financial and non-financial corporates (FinGuar KPI)

Financial Guarantee KPI	Corrected values 2024	Previously stated values 2024
Environmentally sustainable activities - turnover	PLN 0 mln	PLN 0 mln
Key Performance Indicator - turnover	0.45%	0.00%
Environmentally sustainable activities - CAPEX	PLN 1 mln	PLN 0 mln
Key Performance Indicator - CAPEX	1.69%	0.00%

In the Climate Change chapter [E1], in the Energy Consumption and Energy Mix Indicators [E1-5] section, the value for natural gas consumption was updated as a result of a calculation correction. This change affected the disclosed Scope 1 and Category 3 greenhouse gas emissions.

Corrected data on energy consumption

Energy consumption	Corrected values 2024	Previously stated values 2024
Fuel consumption from natural gas (MWh)	340	810
Total energy consumption from fossil sources (MWh)	11,564	12,035
Total energy consumption (MWh)	15,820	16,291

In the Climate Change [E1] chapter, in the Gross Scope 1, 2, and 3 Greenhouse Gas Emissions and Total Greenhouse Gas Emissions [E1-6] section, the value was for natural gas consumption in 2024 updated as a result of a calculation correction. A calculation correction was also made in the process of calculating financed emissions due to a mathematical error in the formula used to proportionally allocate financed emissions from short-term loans in last year's disclosures. A comparison of previously disclosed values with the adjusted values is presented in the table below.

Corrected greenhouse gas emissions data

Greenhouse gas emissions (in tons of CO2eq)	Corrected values 2024	Previously stated values 2024
Scope 1		
Gross Scope 1	699.06	795.15
Scope 3 (material categories)		
Gross Scope 3	4,561,246.55	3,251,268.84
3 Fuel and energy-related activities (not included in Scope 1 or 2)	1,167.11	1,182.79
15 Investments	4,558,806.50	3,248,813.11
Total GHG emissions		
Total GHG emissions by location-based method	4,568,184.69	3,258,303.07
Total GHG emissions by market-based method	4,565,549.02	3,255,667.40

Corrected data on greenhouse gas emissions intensity

GHG intensity per net revenue (tons of CO_2eq/PLN 1,000)	Corrected values 2024	Previously stated values 2024
Total GHG emissions (location-based) per net revenue	0.8569	0.6112
Total GHG emissions (market-based) per net revenue	0.8564	0.6107

Corrected data on greenhouse gas emissions scopes

Greenhouse gas emission scopes	Corrected values 2024	Previously stated values 2024
Scope 1	2,718,911.97	1,822,265.31
Scope 2	337,102.42	286,183.66
Scope 3	1,502,792.12	1,140,364.14
All Scopes	4,558,806.50	3,248,813.11

Corrected data on greenhouse gas emissions including government bonds

Greenhouse gas emission (tCO_2e)	excluding LULUCF		including LULUCF	
	Corrected values 2024	Previously stated values 2024	Corrected values 2024	Previously stated values 2024
Total GHG emissions including government bonds (location-based)	6,020,188.45	4,278,926.67	5,946,412.48	4,227,249.22
Total GHG emissions (market-based)	6,017,552.78	4,276,291.00	5,943,776.81	4,224,613.55

In the Employees of Citi Handlowy [S1] chapter, a calculation correction was made to the ratio of the paid individual to the median remuneration at the Bank for 2024 [S1-16]. The incorrect value resulted from an error in the formula, which did not include the portion of the 2024 salary due in financial instruments for the highest paid individual, thus underestimating the ratio.

Corrected remuneration ratio indicator

	Corrected value 2024	Previously stated value 2024
Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees	52.45	27.0

Taking advantage of gradually implemented regulations

The Bank exercised the option not to disclose the breakdown of total revenues into ESRS sectors (ESRS 2 SMB-1 40b, 40c); expected financial effects of significant risks and opportunities, including those related to climate (ESRS 2 SMB-3 48e, ESRS E1 E1-9) and to the characteristics of non-employees constituting own employee resources (ESRS S1 S1-7).

1.2 Governance

1.2.1 The role of the Management Board and Supervisory Board [GOV-1] [G1.GOV-1]

Structure of the Management Board and Supervisory Board

Management Board of the Bank	2024	2025
Executive members[4]	7	7
Non-executive members	0	0
Representatives of employees and other work providers	0	0
Female	3(43%)	2 (29%)
Male	4(57%)	5 (71%)

Supervisory Board of the Bank	2024	2025
Executive members	0	0
Non-executive members[5]	8	8
Representatives of employees and other work providers	0	0
Female	3(38%)	3 (38%)
Male	5(62%)	5 (62%)
Independent members	3(38%)	3 (38%)

Other aspects of diversity

	2024		2025	
Age	Management Board of the Bank	Supervisory Board of the Bank	Management Board of the Bank	Supervisory Board of the Bank
30 – 50 years	2	2	2	2
50 – 60 years	4	4	4	4
Over 60 years	1	2	1	2

When describing the experience and responsibilities of members of the Management Board and Supervisory Board [ESRS 2 GOV-1 21c], incorporation by reference was used, i.e. they are described in section 11 of Chapter IX of the Report on the Activities of Bank Handlowy w Warszawie S.A. and Bank Handlowy w Warszawie S.A. Group in 2025.

[4] All members of Citi Handlowy's Management Board are executive directors.
[5] All members of the Supervisory Board are non-executive directors

Role of the Management Board and Supervisory Board

Management Board of the Bank

The Bank's Management Board consists of seven persons and is the executive body responsible for representing the Bank and managing its affairs, including sustainability matters. The Management Board makes decisions on matters that are not within the exclusive powers of other bodies of the Bank. In accordance with relevant regulations applicable at the Bank, including the order *Internal division of powers within the Management Board of Bank Handlowy w Warszawie S.A.*, particular members of the Management Board have been assigned specified roles within the body, including roles related to sustainability matters. With regard to sustainability matters, Members of the Bank's Management Board perform, in particular, the following roles:

- The President of the Bank's Management Board oversees the development and implementation of the Bank's strategy, including a sustainability strategy covering environmental, social and corporate governance issues, oversees the Bank's compliance risk with regard to laws, internal regulations and market standards, supervises the assurance of corporate governance, and oversees the Bank's security function for the protection of persons and property, ensures the implementation of appropriate operational risk management rules in the Bank's supervised organisational units, as well as actively participates in the ESG Steering Committee;
- The Vice President of the Bank's Management Board in charge of Management of Significant Risks is responsible for the risk management system that covers ESG risks and for coordinating activities related to the implementation of the Bank's requirements arising from regulations in the area of risk management, including recommendations of supervisory authorities, providing the Bank's Management Board and Supervisory Board with comprehensive information on risk, and is responsible for adjusting the Bank's organizational structure to the size and profile of risks incurred by the Bank, accepts anonymous reports of violations of the law or violations of the Bank's ethical procedures and standards, and is responsible for the ongoing functioning of the anonymous reporting procedures, including providing the Supervisory Board with information, at least once every six months, on significant ethical issues occurring in the Bank, takes the required actions to implement the Bank's strategy, including the sustainability strategy; and actively participates in the activities of the ESG Steering Committee;
- The Vice President of the Bank's Management Board in charge of Finance oversees the area of sustainability reporting, ensures the implementation of appropriate operational risk management rules in the Bank's supervised organisational units, takes the required actions to implement the Bank's strategy, including the sustainability strategy, and actively participates in the activities of the ESG Steering Committee;
- The Vice President of the Management Board in charge of Financial Markets and Corporate Banking is responsible for the day-to-day operation of anonymous violation reporting procedures in the Brokerage Department of Bank Handlowy and for receiving anonymous reports of violations of the law or the procedures and ethical standards in force in the Brokerage Department of Bank Handlowy, ensures the introduction of appropriate operational risk management principles in the Bank's supervised organisational units, takes the required actions to implement the Bank's strategy, including the sustainability strategy, and actively participates in the activities of the ESG Steering Committee;
- The Vice President of the Management Board responsible for retail banking is responsible for the standard of quality of banking services for consumers, as well as ensures the implementation of appropriate rules for managing operational risk in the supervised entities, takes the required actions to implement the Bank's strategy, including the sustainable development strategy, and actively participates in the ESG Steering Committee;
- The Member of the Management Board in charge of Operations and Technology is responsible for operations and technologies, including information security management, management of the Bank's real estate, including environmental and energy initiatives, selection of service and product vendors that meet the criteria required by the Bank, supervises matters of occupational health and safety, ensures the implementation of operational risk management principles in supervised business units, takes the required actions to implement the Bank's strategy, including the sustainability strategy, and actively participates in the activities of the ESG Steering Committee;
- The Member of the Management Board in charge of the transaction and custodial banking services is responsible for overseeing services, products and operations related to the sector's activities, ensures the implementation of appropriate operational risk management rules in the Bank's supervised organisational units, and takes the required actions to implement the Bank's strategy, including the sustainability strategy, and actively participates in the activities of the ESG Steering Committee.

The Management Board of Citi Handlowy Bank reviews relevant topics arising from the analysis of the Bank's impacts, risks and opportunities related to environmental, social and corporate governance topics, and prepares a plan for related activities and periodically carries out their evaluations and reviews. The above powers of the Management Board are reflected in the Regulations of the Management Board of Bank Handlowy w Warszawie S.A. The materiality of an issue within the ESG topics is determined through a double materiality assessment based on an assessment of ESG impacts, risks and opportunities. In the process of overseeing relevant ESG topics resulting from the double materiality assessment, the Management Board is supported by the Bank's Strategy and Investor Relations Department, which manages the process of preparing and providing information that is necessary for the Management Board to properly conduct verifications and evaluations and prepare relevant plans. The Strategy and Investor Relations Department provides the required analyses and undertakes actions necessary for the verification and creation of the Bank's sustainability strategy, among other things. The Bank's Management Board also participates in the preparation, approves and monitors the implementation of transformation plans that take into account ESG factors.

All members of the Bank's Management Board are on the Steering Committee that oversees and makes decisions in the process of implementing the Bank's key project covering the following areas of sustainability: strategy, risk, corporate governance and sustainability disclosures. The project was established on 15 December 2023, and its initiator and sponsor is the President of the Bank's Management Board. During regular meetings of the ESG Steering Committee, members of the Management Board and representatives of the Bank's senior management select the tasks to be performed in the area of sustainability.

The key project dedicated to ESG implementation at the Bank and the ESG Steering Committee operate on the basis of the Bank's *Project Management Procedure*, under which the project has the special "key project" status, as it relates to the Bank's strategic goals. The ESG Steering Committee makes binding decisions on the implementation of the project and ESG at the Bank. Important decisions require the involvement of managers from various areas/units of the Bank, and some matters are decided by the Bank's corporate bodies.

The Management Board is responsible for the design and implementation of the Bank's organization, including the establishment of the organizational structure and the division of responsibilities, including with regard to sustainability and ESG risk aspects. Members of the Management Board are appointed by the Supervisory Board, which takes into account the criteria set out in the *Policy for Assessment of Qualifications of Members of the Management Board and Persons Holding Key Functions in Bank Handlowy w Warszawie S.A."*, and one of the criteria it assesses is competence in managing ESG risks understood as risks related to environmental, social and corporate governance factors. All members of the Bank's Management Board have appropriate qualifications in the field of sustainability and, as a result, can independently set goals and develop strategies in this area. These include education, titles, professional certificates, many years of practical professional experience and skills acquired while performing specific functions and holding various positions, and training. The Supervisory Board considered the qualifications and experience of the Management Board as a whole sufficient for the collective management of the Bank.

In addition, in accordance with the Training Program for the Management Board of Bank Handlowy w Warszawie S.A., the Bank provides sustainability training to members of the Management Board. Such training courses are designed to support the Management Board in managing significant sustainability-related impacts, risks and opportunities. In 2025, all members of the Bank's Management Board participated in the ESG Training. The training covered the following topics: implementation of sustainability strategy and sustainability reporting obligations, current and upcoming legal regulations, ESG risk management. The Management Board also benefits from the substantive support of the Bank's ESG Working Group. The Group consists of individuals (so-called ESG Champions) representing all key organizational units of the Bank, and its purpose is to implement ESG initiatives and popularize ESG issues through employee conferences and training.

Supervisory Board

The Bank's Supervisory Board is composed of eight persons and exercises continuous supervision over all areas of the Bank's operations, including sustainability. The supervisory duties of the Board are also performed by its dedicated committees: Audit Committee, Nomination and Remuneration Committee, Risk and Capital Committee and Strategy and Management Committee.

In order to efficiently monitor and oversee the Bank's activities in the area of sustainability, the Supervisory Board uses information provided by the Strategy and Investor Relations Department. It includes the results of the double materiality assessment of sustainability impacts, risks and opportunities, as well as the implementation of the key project dedicated to ESG implementation. Members of the Supervisory Board are appointed by the General Meeting of Shareholders on the basis of the *Qualification Assessment Policy for Members of the Supervisory Board at Bank Handlowy w Warszawie S.A.*, and one of the criteria it assesses is competence in managing ESG risks understood as risks related to environmental, social and corporate governance factors. In addition, given the Supervisory Board's role in the process of overseeing the Bank's sustainability-related activities, the Bank provides sustainability training to Supervisory Board members. In 2025, members of the Supervisory Board participated in the ESG Training: including sustainability strategy and reporting, related legal regulations and ESG

risks, which was part of the *Training Program for Members of the Supervisory Board of Bank Handlowy w Warszawie S.A.*

Roles and responsibilities

Management Board of the Bank

All members of the Bank's Management Board collectively manage important issues resulting from the analysis of the Bank's impacts, risks and opportunities in the area of environmental, social and governance topics. The Management Board is additionally supported in this respect by the Strategy and Investor Relations Department (Financial Management Sector), which, among other things, manages the process of preparing and providing the Management Board with information necessary for proper management of the area of sustainability, supervising and assuming responsibility for that area, as well as for making the right decisions in this area. In order to ensure the highest quality of support, the Strategy and Investor Relations Department collaborates with the Bank's organizational units dealing with significant sustainability-related issues and selected ESG-related issues.

ESG Steering Committee

The ESG Steering Committee of the Bank is an important element of the management structure for material sustainability topics within the key project dedicated to ESG implementation, which was initiated by the Bank's President in December 2023. That key ESG project, managed and supervised by the ESG Steering Committee, was divided into four modules - risk, strategy, corporate governance and sustainability reporting (CSRD). At the end of 2024, in connection with the approval of the Bank's new strategy, the tasks carried out under the project were reorganized, which will continue to be implemented in the following modules: E - environmental issues, S - social issues, G - corporate governance issues and sustainability reporting development (CSRD). The ESG Steering Committee, which includes all members of the Management Board and representatives of the Bank's senior management, meets regularly to oversee the implementation of and make decisions related to the project.

Sustainable Products Commission

In 2023, the Management Board established the Sustainability Products Commission (ESG), which develops rules for the classification of sustainable products at the Bank, issues opinions on the classification of the Bank's products as sustainable products, and provides support on other sustainability issues. The Commission performs consultative, opinion-giving, monitoring and advisory functions for the Bank's organizational units that create, implement and sell sustainable products. The tasks carried out by the Commission are supervised by the Risk and Capital Management Committee.

Supervisory Board

The Supervisory Board oversees the operation of the Bank's risk management system, including processes related to ESG risk management. In particular, it supervises whether ESG risks are taken into account in the development of the Bank's business model and strategy. When creating the Bank's strategy and then monitoring its implementation, the Supervisory Board takes into account the impacts, risks and opportunities identified in the double materiality assessment process.

The Bank sets its business objectives, including those related to significant impacts, risks and opportunities, during the preparation and approval of its three-year strategy. This process includes approval by the Management Board and the recommendation by the Strategy and Management Committee of the Supervisory Board and then the Supervisory Board. A report on progress in achieving the strategy objectives is presented quarterly at Supervisory Board meetings. The Risk and Capital Committee operates at the Supervisory Board and verifies whether the Bank's risk-taking policy is consistent with the adopted strategy and financial plan.

The Management Board, the Supervisory Board and their committees also have certain advisory, decision-making or supervisory roles with respect to specific topics described in this Statement, e.g. diversity policy, ethical issues or corporate governance.

Particular units of the Bank perform specific, important tasks related to sustainability, including:

Strategy and Investor Relations Department:

- manages the process of preparing and providing information that is necessary for the Management Board to oversee and make decisions on important sustainability issues,
- leads and manages the work carried out within the framework of the key project dedicated to ESG implementation,
- monitors the status of projects related to ESG goals,
- develops a sustainable development strategy that is an integral part of the Bank's strategy. As part of the sustainable development strategy, it implements and monitors goals over the period of the strategy,

- develops long-term goals reflecting the Bank's ambitions in the area of counteracting climate change and develops a path to achieve these goals,
- regularly reviews the *Policy* setting out the principles for classifying sustainable products to ensure that it is aligned with the Bank's business profile and scale of operations, external regulations and the macroeconomic environment,
- manages the preparation of the sustainability report and the double materiality assessment process of sustainability-related topics,
- prepares ESG disclosures as part of Information on capital adequacy,
- prepares sectoral analyses and participates in interbank forums in order to improve ESG process management at the Bank.

Risk Management Sector is responsible for the ESG risk management system. Detailed information on roles and responsibilities is included in the ESG risk management section. In addition, in the Risk Management Sector there is an ESG Risk Management Team, which:

- develops and updates ESG Risk Management Principles,
- coordinates ESG risk management to ensure effective and appropriate identification, measurement, monitoring, control, and reporting of this risk, and in particular:
  - coordinates the process of identifying and assessing the materiality of ESG risk at the Bank,
  - coordinates the process of determining ESG risk appetite and ESG risk management strategies, including setting limits,
  - prepares draft reports and measures related to ESG risk and reports the Bank's ESG risk profile to the relevant bodies of the Bank,
  - develops and updates ESG risk assessment tools,
- coordinates the development and updating of a transition plan for the loan portfolio (i.e., an ESG risk plan) in accordance with the regulatory requirements of the CRD Directive and the EBA Guidelines on ESG risk management,
- manages the process of calculating greenhouse gas emissions in scope 3.15 (financed emissions),
- prepares ESG risk management disclosures as part of Information on capital adequacy.

Human Resources Management Division implements human resources policies in accordance with the *ESG Strategy* adopted by the Bank's Management Board – the HR Division develops HR procedures and practices, actively participates in or supports activities promoting diversity, work-life balance, employee training and development and ensuring that compensation policies are consistent with the Bank's approach to ESG risks.

Procurement Department is responsible for compliance with the vendor selection principles described in the Purchasing Policy, including the use of environmental criteria in the evaluation of offers. The **Vendor Management Unit** is responsible for coordinating processes related to monitoring the implementation of contracts and cooperation with suppliers.

The Citi Realty Services Department is responsible for implementing the provisions of the Environmental and Climate Policy, the Energy Policy, and for preparing transition plans for its own operations, and monitoring emission reduction indicators in scopes 1 and 2.

ESG risk management

ESG risk management is implemented at multiple levels of the organizational structure: the Supervisory Board, the Management Board, and the committees appointed by them, as well as units responsible for risk identification, monitoring and mitigation. The Bank identifies, measures, monitors, controls and reports ESG risk, and the key elements of the organizational structure and processes used for this purpose, including roles and responsibilities, are described in the ESG Risk Management Principles in the Capital Group of Bank Handlowy w Warszawie S.A. (“ESG Risk Management Principles”). The document was adopted by the Management Board of the Bank and approved by the Supervisory Board.

The *ESG Risk Management Framework* also describes the roles of the Supervisory Board, which, among other things, approves the strategy and oversees the implementation of the risk management system, including processes related to ESG risk management. In particular, this includes consideration of ESG risks in the Bank's work on its business model and business strategy. The Supervisory Board's responsibilities related to overseeing ESG risk management processes may be delegated to individual Supervisory Board Committees by including such roles and responsibilities in their activities.

The Bank's Management Board is responsible for implementing the ESG risk management processes. In particular, the Bank's Management Board:

- Integrates ESG risks into the overall business strategy and risk management principles,
- Assigns clearly defined roles and responsibilities for ESG risk management to Board members or committees,
- Ensures a clear and consistent allocation of responsibilities related to ESG risks in the Bank's organizational structure,
- Develops the business model and business strategy of the Bank taking into account short-, medium- and long-term ESG risks,
- Ensures the accuracy of reports and disclosures containing sustainability-related information and their compliance with regulatory requirements,
- Sets measurable targets, develops specific plans and processes to monitor and address financial risks generated by ESG risks in the short, medium and long term, including risks arising from transition to a low-carbon economy as defined by EU and national targets and regulations, and particularly by European climate law,
- Decides on the materiality of risks and monitors the impact of ESG risk on risks identified as material for the Bank,
- Monitors exposure to ESG risk and decides on taking mitigating actions,
- Monitors progress towards ESG risk management objectives, regulatory expectations and requirements,
- Monitors progress of activities carried out to integrate ESG risks into standard risk management processes,
- Monitors the misconduct, litigation and reputational risks associated with lending to and investing in companies whose activities may be controversial from an ESG perspective or which use *greenwashing*.
- Assesses double materiality of environmental, social and governance topics,
- Develops, approves and monitors the implementation of ESG-related transition plans.

The Management Board's responsibilities related to ESG risk management may be delegated to individual Management Board Committees and other units of the Bank:

- Risk and Capital Management Committee - monitors the correctness and ensures the effectiveness of ESG risk management; ensures that ESG risks are appropriately incorporated into the Bank's risk profile and risk appetite,
- Operational Risk, Control and Compliance Committee - - monitors and ensures that ESG risks are taken into account - correctly and effectively - in the supervision over and control of operational risk and compliance risk management processes,
- Assets & Liabilities Committee (ALCO) - monitors and ensures that ESG risks are taken into account - correctly and effectively - in the processes of managing liquidity risk, interest rate risk for non-trading portfolios, the risk of unfavorable changes in the balance sheet structure, the risk of changes in the value of the Bank's capital, trading portfolio risk and foreign exchange risk,
- New Products Committee - monitoring the correctness and ensuring the effectiveness of ESG risk consideration in the business activity management process,
- Sustainable Products Commission - develops principles for classifying sustainable products, issuing opinions on the classification of products as sustainable, and providing support on other sustainability-related matters. The Committee performs consultative, opinion-giving, monitoring and advisory functions for the Bank's organizational units that create, implement and sell sustainable products. The tasks carried out by the Commission are supervised by the Risk and Capital Management Committee.

ESG risk management is based on a three line of defence model (specified in the Principles of Prudent and Stable Risk Management in the Capital Group of Bank Handlowy w Warszawie). The main responsibilities of each airline are described below.

- The first line of defense – the organizational units responsible for carrying out operational activities. They:
    - Identify, measure, monitor, control and report ESG risks and risks relating to the business operations of the organizational unit,
    - Ensure compliance with rules arising from regulatory ESG requirements, policies and standards, including the *ESG Risk Management Framework*,
    - Implement the sustainability strategy,
    - Develop and offer sustainable products and cooperate with customers on sustainability-related issues,
    - Identify clients' sustainability needs and financing options,
    - Engage in dialogue with customers on their own transition strategies and assess their coherence.

- The second line of defense:
  - Risk Management Sector:
    - Develops frameworks, policies, standards and procedures for effective ESG risk management and integrates them into the existing risk management system,
    - Independently identifies, measures, monitors and controls ESG risks and reports them to the Bank's Management Board and relevant committees,
    - Determines the level of ESG risk appetite and limits, and submits them to the Bank's Management Board for approval,
    - Provides independent information, analysis and expertise on ESG risk exposures,
    - Incorporates ESG risks into capital and liquidity planning processes in cooperation with the Finance Management Sector,
    - Ensures compliance with ESG regulations
    - Takes into account the risk of greenwashing in risk management processes,
    - Participates in the approval process for new sustainable products, including significant changes to existing products,
    - Ensures that the risk limits set out in the risk appetite are consistent with all aspects of the Bank's prudential transition plan.
  - Compliance Division:
    - Identifies and provides information on regulatory requirements for ESG risks, advises on regulatory changes at the Bank and the implementation of these changes,
    - Develops the compliance risk management framework and monitors the alignment of the Bank's operations with ESG regulations,
    - Assesses the risk of non-compliance with ESG regulations, recommends corrective actions, and reports the assessment results to the Management Board and relevant committees,
    - Ensures compliance with ESG regulations,
    - Supports the Risk Management Sector in managing reputational risks arising from ESG risks (in particular, greenwashing risks),
    - Participates in the approval process for sustainable products, including material changes to existing products,
    - Advises and verifies products offered as sustainable.
  - Legal Division:
    - Identifies and provides information on changes in ESG regulations,
    - Issues opinions and legal advice on ESG issues,
    - Reports on the ESG-related legal risks,
    - Manages and supervises litigation.
- The third line of defense – Audit Department:
  - Conducts independent and objective assessments of the adequacy and effectiveness of the risk management and internal control system in managing ESG risks, and integrate ESG risks into the strategic planning process,
  - Provides the Management Board, Supervisory Board and Audit Committee and banking supervision authorities with independent, objective and relevant information on the effectiveness of ESG risk management and related controls,
  - Provides support in identifying ESG risks and establishing an effective internal control system for ESG risks, with the nature and scope of support agreed with the Bank's units and approved by the Supervisory Board,
  - reviews the Bank's prudential transition plan as part of the risk management framework for compliance with legal and regulatory requirements and consistency with the risk strategy and risk appetite.

The Strategy and Investor Relations Department systematically monitors the degree to which ESG goals set in the Bank's Strategy are achieved. It reports the results to the Management Board, which reports them to the Supervisory Board. Managers in individual areas implementing the strategy manage opportunities within their units and report their activities to the Strategy and Investor Relations Department and committees operating in the Bank.

1.2.2 Informing the Management Board and Supervisory Board about ESG issues [GOV-2]

The Strategy and Investor Relations Department (Finance Management Sector) manages the process of preparing and providing the Management Board and Supervisory Board with sustainability-related information to enable them to monitor, manage and oversee these issues at the Bank. Sustainability-related issues are regularly presented to the ESG Steering Committee, which includes all members of the Management Board, and, when necessary, appropriate decisions are made.

The main topics related to the ESG Key Project presented and discussed in 2025 in relation to the ESG Steering Committee decisions:

- update of the scope of project-related activities and management *(ESG Governance Model*),
- discussion and approval of the results of the update to the double materiality assessment of sustainability topics,
- regulatory analyses for the ESG area,
- discussion and approval of the sustainable products classification,
- supervision of measures to prevent the materialization of *greenwashing* risk at the Bank,
- supervision of ESG training implementation,
- confirmation the roles and responsibilities in the area of sustainability reporting,
- review the progress on the Bank's ESG strategy implementation,
- corrective actions for selected paths to achieving ESG goals,
- review of the loan portfolio for sustainable financing,
- discussion on the impact of ESG regulations on vendors of the Bank (*vendor management*),
- discussions on the Bank's sustainability strategy.

The Management Board, Supervisory Board, Risk and Capital Management Committee and Risk and Capital Committee receive regular summaries from the Bank's Risk Management Sector regarding monitored KRIs established within the strategic limits of the Bank's risk appetite covering climate risk factors deemed material. The Audit Department provides the Management Board, Supervisory Board and Audit Committee with independent, objective and relevant information on the effectiveness of ESG risk management and related controls.

When creating the Bank's strategy and then monitoring its implementation, the Management Board and Supervisory Board take into account the impacts, risks and opportunities identified in the double materiality assessment process. The Bank assesses climate risk, among other things. To carry out this process, among other things, a map of environmental risk factors has been prepared for various industries to which the Bank has credit exposures.

Management Body	Selected resolutions of the Supervisory Board and the Management Board relating to sustainability issues adopted in 2024:
Supervisory Board	• Resolution on the approval of new strategic directions of Institutional Banking for the years 2025-2027 - "Bank for Global Business", • Information on the material notifications concerning violations of ethical standards in the period January – June 2025, • Information on the results of the Voice of Employee survey in 2025, • Resolution on the assessment of the Sustainability Statement of Bank Handlowy w Warszawie S.A. and the Bank Handlowy w Warszawie S.A. Group for 2024, • Resolution on the selection of an audit firm for the attestation of the Sustainability statement, • Resolution on the approval of the Annual Compliance Plan for the Bank in 2025, • Resolution on the evaluation of implementation by the Bank of the rules contained in the Principles of Corporate Governance for Supervised Institutions, issued by the Polish Financial Supervision Authority, • Resolution on the evaluation of functioning of the Procedure for Anonymous Reporting of Violations by Employees and Assessment of Compliance with the Code of Conduct in 2024, • Information on the summary of material notifications concerning violations of ethical standards at the Bank in 2024, • Resolution on periodic assessment of compliance with internal governance rules at the Bank, • Information on the status of implementation of the Bank's management strategy and the key related issues, in particular the information on the progress in pursuit of the set growth directions of the Bank's activities and departures from the previously set directions, with statement of grounds, • Information on grievances and complaints processed at Bank Handlowy w Warszawie S.A. in 2024;
Management Board	• Resolution on the evaluation of the Bank's application of the Principles of Corporate Governance for Supervised Institutions, • Resolution on the Overall Risk Appetite (including strategic limits for significant risks) together with supplementary Risk Appetite measures for 2025, • Resolution on the evaluation of functioning of the *Procedure for Anonymous Reporting of Violations by Employees* and acceptance of the information on the verification of the assessment of Bank's Management Board with respect to compliance with the *Code of Conduct* in 2024. • Resolution on acknowledging the information on complaints and claims handled at the Bank, • Resolution on approval of the *ESG Risk Management Framework in the Capital Group of Bank Handlowy w Warszawie S.A.*, • Resolution on revision of the *Policy defining a framework for the classification of sustainable products in the Bank Handlowy w Warszawie S.A. Group*, • Information on significant ethical issues in 2024, • Resolution on the assessment of the functioning of the Anonymous Reporting of Violations Procedure by employees and the verification and assessment of the Bank's Management Board in terms of compliance with the Code of Ethics in 2024., • Report on the activities of the Ethics and Discipline Committee, • Resolution on the approval of the program and financial activities of the Leopold Kronenberg Citihandlowy Foundation for the period from January 1 to December 31, 2024 and the program and financial assumptions for 2025, • Resolution on macroeconomic scenarios, including the climate scenario, as part of the ICAAP 2025 process, • Resolution on the approval of the Sustainability Statement of Bank Handlowy w Warszawie S.A. and the Bank Handlowy w Warszawie S.A. Group for 2024, • Resolution on the approval of the Prudential Transition Plan of the Bank Handlowy w Warszawie S.A. Group

1.2.3 Sustainability-related incentive schemes [GOV-3] [E1.GOV-3]

The Bank has not implemented any incentive systems in the form of variable remuneration directly related to sustainability or climate. In 2025, it was not required to include sustainability goals in employee assessment, but such goals could be set for senior managers. Depending on the area, such goals could be related to client or employee satisfaction as measured by the *Voice of Employee* survey, ESG risk reporting and measuring, strengthening an organizational culture based on responsibility and self-reliance, and developing a diverse talent pool within the organization. The assessment result therefore indirectly affects the variable remuneration of employees, including senior management. In December 2024, the Bank added a requirement to its remuneration policy that at least one ESG-related objective would be taken into account in the annual evaluation of the President of the Management Board. This new requirement came into force in 2025. Remuneration policies are adopted by the Bank's Management Board, reviewed by the Nomination and Remuneration Committee of the Supervisory Board and approved by the Bank's Supervisory Board.

1.2.4 Statement on due diligence [GOV-4]

The Bank runs its business in a responsible manner, taking into account due diligence risk, following the principles specified in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and other regulations. As part of conducting responsible business, the Bank implements and executes appropriate risk-based due diligence procedures by, among other things, appropriately considering due diligence risks in the Bank's risk management systems, in order to identify, mitigate and prevent actual and potential negative effects, and to be accountable for how it deals with such effects. When creating procedures, the Bank works with relevant stakeholders to ensure that their views can be taken into account. The procedures and processes performed by the Bank to conduct responsible business define the approach, among other things, in the following areas:

- Identifying and assessing actual and potential negative effects related to the Bank's activities, products or services;
- Stopping, preventing or mitigating negative effects;
- Monitoring the implementation of processes and achieved results;
- Providing information on how to proceed in the event of negative effects and, where appropriate, enabling appropriate remedial action or cooperation in remedial action.

The due diligence process for individual issues related to conducting responsible business (e.g., Employment and Employee Relations, Products and Services, Consumer Interest, Environment) is overseen within the Bank's units dedicated to the respective issues, while significant issues related to the due diligence process in each area are reported to the Management Board and the Supervisory Board as appropriate.

Elements of the distributed due diligence process and their disclosure in this report are presented in the table below

Element of the due diligence process	Disclosure
Integrating due diligence in corporate governance, strategy and business model	GOV-1, GOV-2, GOV-3, SBM-3
Collaborating with affected stakeholders at all key stages of the organization's due diligence process	GOV-2, SBM-2, S1.SBM-2, S4.SBM-2, IRO-1, E1-2, S1-1, S4-1, G1-2
Identifying and assessing negative impacts	IRO-1, SBM-3, E1.SBM-3
Taking actions to mitigate identified negative impacts	E1-3
Monitoring the effectiveness of these efforts and providing relevant information in this regard	E1-4, E1-6, GOV-2

1.2.5 Management of the risk of the sustainability reporting process [GOV-5]

The process of preparing sustainability information is covered by the Bank's internal control system, which ensures the effectiveness and efficiency of the Bank's operations, the reliability of reporting, compliance with risk management principles, and compliance with laws, internal regulations and market standards.

The main risk in the area of sustainability reporting at the Bank is the risk of not disclosing some of the data subject to mandatory disclosure due to difficulties in obtaining the data or the lack of adequate experience in preparing comprehensive sustainability disclosures and the time needed to implement ESG guidelines into the Bank's business model.

To mitigate these risks, in 2025 the Bank has continued a key project relating to ESG implementation, that was launched in December 2023. The project is overseen by a Steering Committee. At monthly meetings, the Committee monitors the various phases of the project's implementation, decides on the order of implementation of the necessary changes resulting from gap analyses at the Bank, and appoints the persons responsible for their implementation.

Formalized work on the sustainability statement of Citi Handlowy Bank was conducted by the ESG Working Group. The group met periodically, and was composed of the so-called ESG Champions representing both business units and the Finance Management Sector, Strategy and Investor Relations Department, Risk Management Sector, Corporate Communications and Marketing Department, Legal Division, Compliance Division, Support Division, Services Division, Human Resources Management Division, Citi Handlowy Leopold Kronenberg Foundation and Client Advocates.

Data collection for the 2025 Statement was managed in a structure that reflects the stages of control. The key roles in this process included:

- Accountable Executives – those members of the Management Board and direct reports to the President of the Management Board who make final decisions and final approval of disclosures,
- Accountable Executives Delegates – persons who verify disclosures for their areas,
- Data Owner Checkers – persons who check data accuracy for their areas,
- Data Owner Makers – persons who prepare data for their areas.

The ESG reporting preparation process is subject to self-assessment (MCA), and the results are reported to the Operational Risk, Control System and Compliance Committee and approved by the Board member in charge of finance. If irregularities are identified in the sustainability reporting process, a corrective action plan is prepared, the implementation of which is monitored at the Management Board level.

This statement has been verified by an independent auditor, approved by the Bank's Management Board, presented to the Supervisory Board, and will be subject to approval by the General Meeting of Shareholders as part of the Bank's annual report for 2025.

1.3 Strategy

1.3.1 Strategy and business model [SBM-1]

Bank Handlowy w Warszawie S.A., operating under the brand name of Citi Handlowy ("Bank" or "Citi Handlowy Bank") is Poland's oldest commercial bank and one of the oldest banks continuously operating in Europe. The Bank offers banking and investment products and services to businesses, local governments and the central government sector, as well as to individual customers, micro-enterprises and sole proprietors. The Bank operates in accordance with applicable laws and supervisory regulations.

The Bank's registered office is located in Warsaw with part of operational processes carried out also in operational centers located in Olsztyn and Łódź. At the end of 2025, the Bank had 3,149 employees. For more information on the employees, see the Characteristics of the employees section of this Statement.

The Bank wants to be a strategic partner of Polish companies by proactively supporting the foreign expansion of Poland's economy. With its diverse product range, the Bank supports entrepreneurs, including those with international needs and aspirations. The Bank is a leader in providing banking services to global companies operating in Poland in the area of investment banking, including brokerage, custody and cash management services. At the same time, the Bank serves as a Treasury Securities Dealer (DSPW) and is among the leading banks as regards trading in the Treasury BondSpot cash market. The Bank is also a depositary for investment and pension funds. In the consumer banking segment, it is the leader in the areas of credit cards and wealth management services. Citi Handlowy Bank also strives to maintain its status as one of the safest venues for keeping institutional clients' savings – it provides state-of-the art solutions that cover operational accounts and day-to-day cash management.

In 2025, the Bank provided services to:

- Financial institutions – domestic and foreign;
- Multinational corporations and largest domestic companies;
- SME companies, especially those with international needs and aspirations;
- Public sector entities;
- Consumer banking clients, including primarily the affluent customer segment.

In May 2025, Citi Handlowy entered into an agreement to sell its retail banking segment to VeloBank. The transaction is an important step towards the strategic goal of strengthening Citi Handlowy's market position in institutional banking. The merger of retail banking with VeloBank, together with the migration of clients, is planned for mid-2026.

Business model

The business model of Citi Handlowy Bank is built on dedicated employees who, through their knowledge and experience, support clients in meeting their financial needs and creating stakeholder value. The bank strengthens its market position by continuously developing its employees, fostering innovation and leveraging technology to enhance the customer experience and maintain flexibility in an ever-changing financial environment.

Citi Handlowy Bank runs its operations in Poland and has no branches or subsidiaries abroad. The Bank offers its products and services to clients through:

- A network of 18 branches in nine major Polish cities (the same as in 2024);
- Online and mobile banking;
- Telephone banking;
- A network of 35 own ATMs (the same as in 2024) and almost 21 thousand ATMs of other operators nationwide (in 2024 also about 21 thousand), including more than 4,9 thousand deposit machines owned by Euronet Poland (over 3.3 thousand in 2024).

In the area of Institutional Banking, the Bank provides comprehensive financial services to the largest Polish companies and strategic companies with a large potential of growth, and also to the largest financial institutions and to companies from the public sector.

The Bank's offer for institutional clients includes:

- deposits and current accounts,
- credits, loans,
- cross border (international) transfers,
- card products,
- liquidity management products,
- payments and receivables management,
- currency exchange on the CitiFX Pulse platform available 24/7,
- electronic banking via the CitiDirect BE platform,
- cash products,
- European Advisory Program,
- trade finance products,
- transaction activity on financial instruments,
- custody activities,
- depositary activities for investment funds and pension funds,
- brokerage activities.

The Bank's competitiveness, resulting from its network of international connections, allows it to build a leading position in the area of banking services for affluent clients. The proposal for Citi Private Client and Citigold clients is continuously being developed.

The Bank's offer for individual customers includes:

- wealth management services,
- intermediation in the sale of investment and insurance products,
- credit cards,
- deposits and current accounts,
- cash loans,
- mortgage products,
- online and mobile banking.

Net revenues of the Group

	Capital Group			
	2024	2025	Change	
			In PLN '000	%
Net revenues[6]	5,331,255	5,246,020	(85,335)	(1.6%)

[6] Net revenues was calculated as a sum of: 1) Net interest income, 1) Net fee and commission income, 3) Dividend income, 4) Net income on trading financial instruments and revaluation (excluding Net income on FX operations), 5) Net gain/(loss) on debt investment financial assets measured at fair value through other comprehensive income, 6) Net gain/(loss) on equity and other instruments measured at fair value through income statement, 7) Net gain on hedge accounting, 8) Net other operating income,

The Bank also offers financial products that address sustainability issues and help implement the Bank's sustainability strategy (see Sustainability Strategy):

- Green loan – a loan granted through cooperation with Bank Gospodarstwa Krajowego and financed by the European Funds for a Modern Economy program. This product is intended for, among others, small and medium-sized enterprises, which can apply for a redeemable subsidy for carrying out certain ecological investments to modernize their infrastructure and reduce primary energy consumption.
- Technology loan – a loan granted through cooperation with Bank Gospodarstwa Krajowego and financed by the European Funds for a Modern Economy program. This product is intended for, among others, small and medium-sized enterprises and mid-cap companies, which can apply for a redeemable subsidy for the purchase and implementation of a new, breakthrough technology or the implementation of their own new technology to produce new or significantly improved goods, processes or services. The technology loan allows clients to implement ecological innovations and to invest in renewable energy sources and processes to improve the energy efficiency of businesses.

- The European Advisory Program is a wide range of advisory products that help clients obtain funding and implement and manage such a project. The Program is dedicated to entrepreneurs who intend to make good use of development opportunities created by the European Union.

In 2024, the Bank introduced, and in 2025 updated, a *Policy defining a framework for the classification of sustainable products in the Bank Handlowy w Warszawie S.A. Group,* used by the Bank to classify transactions concluded on the products it offers based on three possible classification paths:

- Path A. Financing for clients carrying out activities having a positive environmental impact;
- Path B. Financing of pro-environmental investments;
- Path C: Financing of client transformation based on ESG key performance indicators (KPIs).

Individual transactions are classified as sustainable by business and credit decision-makers taking into consideration the opinion of the Sustainability Product Commission (ESG Commission). In 2024 and 2025, the Commission gave its opinion on transactions under existing products, but did not give opinions on new products.

In 2025, the Policy defining the framework for the classification of sustainable products was updated in line with the European Commission's correction regarding the technical eligibility criteria for the EU Taxonomy. The procedure and rules for monitoring the provision of sustainable products were clarified, as well as the classification conditions for financing clients conducting activities that have a positive impact on the environment.

The Member of the Bank's Management Board supervising the Financial Management Sector is responsible for monitoring the implementation of the policy.

Value Chain

Upstream	Own operations	*Downstream*
Entities positioned upstream in relation to the entity (e.g. suppliers) provide products or services that are used to develop the entity's products or services. • **Purchase of** products (e.g. paper and office furniture) and services (professional services, marketing communications, *bodyleasing*, IT, etc. • **Logistics –** storage and transportation of purchased products to the bank's branches and head office • **Real estate** (including certification of facilities accessible to persons with special needs) and ATMs of other operators	Significant activities, resources and relationships within the entity's own operations, such as human resources • Operations at the bank's headquarters • Sales of services at branches – Operations within two areas of banking services: consumer and institutional • Business partnerships (industry organizations) • Activities within the initiatives Citi Women, Citi Pride, Families Matter and Citi DisAbility Network Poland • Regulatory environment	Entities positioned downstream in the value chain in relation to the entity (e.g. distributors, customers) receive products or services from the entity. • **Customer service** (after-sales activities) – Individual client service – Institutional client service • **Clients' activities** (within the Bank's portfolio) – Investment projects – Loans granted (financing the economy and the needs of individual clients) – Securitization, syndications, etc.
Stakeholders (value chain actors)		
• Employees of vendors, certification bodies • Employment agencies/*bodyleasing*	• Employees (persons employed under employment contracts) and non-employees (B2B, contracts of mandate, etc.). • Social and business partners (investors, institutional environment) • Citibank Europe Plc	• Individual and institutional clients • Local communities (around own and partner facilities) • Shareholders • Citibank Europe Plc

Sustainability Strategy 2025-2027

The Bank recognizes its role as a supporter of global and domestic efforts to fuel the transformation towards sustainability, the importance of which is constantly growing. As a public trust institution, the Bank is obliged not only to act transparently and in accordance with evolving ESG standards, but also to actively participate in transforming the economy to make it environmentally neutral.

The Bank continues its sustainability efforts and in December 2024 adopted a new strategy for 2025-2027. It expands on the goals set in the Bank's previous strategy and expands its strategic directions. By including a long-term horizon of new ESG regulations, business strategy goals, results of the double materiality assessment, material ESG topics, as well as the results of the dialogue with stakeholders, the new *Sustainability Strategy* will strengthen the resilience of the Bank's business model, and will help it seize new business opportunities and manage risks and impacts.

The *Sustainability Strategy for 2025-2027* is based on three pillars:

Pillar 1: Sustainable Finance

The Bank wants to improve sustainable finance solutions, increase the share of green assets in the portfolio, share its knowledge and experience with clients to support them in their transformation, expand sustainability to include social aspects and support the development of new technologies.

To this end, the Bank will focus on three main strategic directions:
- continuing development of sustainable financial services,
- using its knowledge and experience to support clients in their sustainable transformation,
- including social aspects in credit decisions.

Progress in implementing the strategy will be measured by the following indicators:
- PLN 2 billion in financing classified as sustainable until 2027,
- At least 10% of the share of sustainable financing in the loan portfolio of institutional clients,
- 100% of ESG sales and consulting employees will complete ESG training by 2027.

Pillar 2: ESG Risk Management

The Bank wants to integrate ESG risk management across the organization, better understand and assess the physical and transition risks associated with the financed loan portfolio, and reduce the financing of high-emission projects.

To this end, the Bank will focus on three main strategic directions:

- developing a transition plan for climate change mitigation,
- reduction of the share of financing related to greenhouse gas emissions in the Bank's own loan portfolio,
- improving ESG risk management.

Progress in implementing the strategy will be measured by the following indicators:

- Collecting information for at least 60% of the credit exposure on their Scope 1 and 2 emission reduction targets and transformation plans and using this data in the credit process.

Pillar 3: Sustainable Own Operations

The Bank wants to reduce its own emissions and effectively manage resources, support employees and initiate socially responsible activities.

To this end, the Bank will focus on four main strategic directions:

- achieving climate neutrality of own operations by 2030 while reducing indirect emissions among others by switching to 100% renewable energy,
- including ESG aspects comprehensively in own operations mainly through the implementation of the CSDDD directive,
- continuing support for the development and well-being of employees among others by obtaining a level of employee engagement in the VOE survey of at least 80%,
- continuing socially responsible activities among others through the engagement of employees and other stakeholders of the Bank in the employee volunteering program.

The main assumptions of the current strategy, including the sustainability strategy, is available on the Bank's website: https://www.citibank.pl/poland/homepage/english/files/strategy_of_the_bank.pdf

Details regarding the implementation of the indicators and the current measurement levels can be found in the following sections of this Statement.

In connection with the conclusion of the agreement on the exit from retail operations, the Bank's Supervisory Board approved new strategic directions for 2025-2027 in May 2025. These assume the continuation of the activities set out in the sustainable development strategy, in particular by supporting clients in the transformation of their business models. The Bank also declared that it would allocate PLN 2 billion to sustainable transformation by 2027.

1.3.2 Dialogue with stakeholders [SBM-2]

The Bank works closely with key stakeholders, and tailors the frequency, channels and topics of communication to their needs. The Bank wants, first and foremost, to provide stakeholders with information about its operations, market environment, regulatory requirements and future challenges, but also to listen to their voices – to study their needs, receive feedback and look for areas for improvement.

Stakeholder involvement

Key stakeholder group	Form of dialogue	Specific objectives	Building on the results of dialogue
Investors and shareholders	• individual and group meetings with the President of the Management Board or the Vice President for Finance, • teleconferences related to the publication of results, • conferences with investors organized by other banks or brokerage firms, or by investors and advisory firms themselves,	• answering questions from investors and shareholders, • learning the opinions of investors and shareholders on issues that are important to them and related to the Bank's activities.	The Bank takes investors' expectations into account when determining its dividend policy and relevant topics for non-financial reporting or setting strategic goals.
Employees	• internal intranet network,	• providing information about employees, including	The Bank takes into account the expectations of

	• newsletters "Puls Citi Handlowy"", • emails, • letters from the President of the Management Board to employees, • *town hall* meetings with employees, • survey *Voice of the Employee*, • People Board activities – representatives elected by employees who present proposals, ideas and other issues raised by employees to the Management Board and implement them, • HR newsletters: "Manager Monthly" and "Employee Monthly", • *orientation* training for new employees.	benefits, goals, evaluation process, remuneration policy, development, training, etc., • answering employees' questions, including anonymously, • learning the opinions of employees on issues that are important to them and related to the Bank's activities, • familiarizing new employees joining the organization with the organizational culture, company values and key employee-related processes.	employees by setting strategic goals regarding labor issues and determining, among other things: • expense budget, • employee work model (flexible conditions, hybrid work), • the amount and method of distribution of funds from the Company Social Benefits Fund, • employee benefits, • relevant topics for non-financial reporting. • activities for diversity, work-life balance, training, employee development, equal rights for men and women and minority rights.
Clients	• surveys, • individual meetings between relationship managers and clients, • contact form on the website, • social media, • branch network, • *Citi Handlowy* magazine, • group meetings, workshops and webinars, • client advocates,	• presenting the offered product, • acquiring new clients, • expanding current banking services, • improving the clients' knowledge of secure banking, cybersecurity, data protection and financial education, • answering questions, • learning the opinions of clients on issues that are important to them and related to the Bank's activities.	The Bank takes into account the expectations of clients by setting strategic goals and determining, among other things: • product offering, • new services or changes to existing processes, • relevant topics for non-financial reporting.
Regulators and central administration	• meetings with representatives of authorities and regulators, • regulatory reporting, • written and electronic correspondence, • responses to surveys sent by regulators,	• learning about the expectations of the authorities and regulators regarding the Bank's activities.	The Bank takes into account the expectations of authorities and regulators by setting strategic goals and determining, among other things: • dividend policy, • how to implement legal and supervisory regulations, • relevant topics for sustainability reporting.
Banking sector	• participation in joint working groups, including within the framework of the Polish Bank Association.	• maintaining relationships with other banks and working together to develop and implement sector solutions for banking.	The Bank monitors the activities of the Polish banking sector, and solutions developed during the joint activities of banking working groups are implemented in the activities of Citi Handlowy Bank.
Vendors and business partners	• meetings with vendors at the business unit level, • *vendor manager* function for each vendor contract, • annual reviews of collaboration with vendors,	• maintaining relationships with vendors and business partners, • establishing new business relationships, • providing information on procurement policy,	When defining its procurement policy, vendor management policy or relevant topics for sustainability reporting, the Bank takes into account the expectations of its business

	• internal regulations regarding vendors,	• learning the opinions of vendors on issues that are important to them and related to the Bank's activities.	partners and the Bank's strategy, as well as the capabilities of its vendors.
Community	• activities of the Citi Handlowy Leopold Kronenberg Foundation,	• maintaining relationships with local communities, • help for those in need, • promoting volunteering among employees, • learning the opinions of local communities on issues that are important to them and related to the Bank's activities.	The Citi Handlowy Foundation, being the Bank's platform for dialogue with local communities, takes into account the expectations of such communities when planning the projects in the field of corporate social responsibility. When determining relevant topics for sustainability reporting, the Bank takes into account the expectations of local communities.
Non-governmental organizations	• activities of the Citi Handlowy Leopold Kronenberg Foundation,	• maintaining relationships with the local communities and non-governmental organizations, • helping those in need jointly with non-governmental organizations, • encouraging social engagement among employees, building a culture of community involvement and volunteer activity, • learning the opinions of non-governmental organizations on issues that are important to them and related to the Bank's activities.	The Citi Handlowy Foundation, being the Bank's platform for dialogue with non-governmental organizations, takes into account the expectations of such organizations when planning CSR partnerships and projects. When determining relevant topics for sustainability reporting, the Bank takes into account the expectations of non-governmental organizations.

1.3.3 Understanding the interests and views of key stakeholders and how they relate to the strategy and business model [S1.SBM-2] [S4.SBM-2]

The views and opinions of stakeholders, both internal and external, as well as the feedback they provide, are an important part of the process of identifying important topics (see Double materiality assessment process) and of defining the strategic areas and objectives for the Bank's operations and day-to-day planning and management.

The Management Board and Supervisory Board are informed of the opinions and interests of key stakeholders through the Bank's organizational units that have direct contact with key stakeholders. These units take into account, among other things, their opinions and demands when setting strategic goals for individual business areas.

The Sustainability Strategy of the Bank for 2025-2027 has been designed taking into account the results of the double materiality assessment, including the opinions of the Bank's key stakeholders. The stakeholders' opinions were presented to the Management Board and Supervisory Board as part of the presentation of the results of the double materiality assessment. Their content influenced the design and ambitions for the Bank's sustainable growth.

Citi Handlowy Bank treats its employees as key stakeholders. In order to take into account their opinions on its efforts, the Bank conducts a *Voice of Employee* (VOE) survey every year, in which employees can speak freely and anonymously on topics related to creating a work environment where every employee can be themselves. In the VOE, employees rate their involvement, the processes that affect them, ethical issues, managerial effectiveness and other areas that have an impact on employee-related issues. The VOE results are analyzed by the Bank's management and can influence decisions taken by the Bank's management bodies on the strategy, changes to the business model, remuneration policy, benefits or employee development. An important voice that

management takes into account in various projects implemented in the Bank are the demands submitted by trade unions operating in the Bank.

Citi Handlowy Bank's clients are also a very important group of stakeholders. In order to consider their opinions on initiated activities, the Bank regularly conducts an NPS (Net Promoter Score) survey to measure individual clients' satisfaction with banking services. Individual clients can also comment anonymously commenting, among others, in mobile application stores on the service model they would like to see or provide other comments and suggestions, which are then analyzed by the Bank's management. In this way, they can influence the decisions of the Bank's management bodies regarding the strategy or business model, in particular the functionalities of mobile tools and the service model in remote channels.

1.3.4 Material impacts, risks and opportunities [SBM-3]

The material impacts, risks and opportunities identified as a result of the double materiality assessment were mapped to the corresponding ESRS topical standards (E1, S1, S4 and G1). The impacts identified by the Bank result from the business strategy and sustainability strategy, and from the adopted business model.

The Bank believes that the financial effects of the risks and opportunities are difficult to estimate, however their transmission channels can be identified. In the case of risks, these are primarily higher costs related to financing clients with a high risk of transition to the zero-emission economy (including through higher loan write-offs) or other operating costs related to the costs of court proceedings. Higher above mentioned costs of risk have a negative impact on the Bank's financial result, which in turn is related to the inability to build the Bank's capital base. As a result, the Bank's lending activity may decrease.

The identified risks are not treated as a separate type of risk, but as so-called cross-cutting risks that affect the Bank's existing financial and non-financial risks to varying degrees and through different transmission channels. Transmission channels are cause-and-effect chains that explain how sustainability risks can materialize within the existing risks present at the Bank. The identified sustainability risks were integrated into the risk management framework, including strategic planning, risk appetite setting, and risk identification, measurement, monitoring, control and management.

Information on the resilience of the strategy and business model with respect to significant risks related to climate change is included in the subchapter Climate risks and strategy. Information on the Bank's approach to counteracting its significant negative impacts on the loan portfolio and on energy consumption in its own operations is described in the Environmental information chapter, in sections on Policies, Targets and Actions related to the financed loan portfolio. The Bank intends to capitalize on the opportunities identified in the double materiality assessment, primarily through the implementation of newly adopted ESG Strategy for 2025-2027, which takes into account opportunities in the area of climate change mitigation and employee training). The opportunity related to financial education of customers will be developed through the continuation of the Bank's comprehensive activities in this area (Customer education).

Material topics based on ESG impacts, opportunities and risks, analyzed through the lens of ESRS standards, are considered by Citi Handlowy as an integral part of the topics related to its core business activities.

Material sustainability issues in 2025

Topic	Sub-topic	Sub-sub-topics	Impacts, risks and opportunities	Type	Place of concentration	Time perspective	Sections with issue management descriptions
E1 Climate change	Climate change mitigation		Credit risk – the transition to a low-carbon economy is connected with significant challenges for the Bank's clients as it affects regulatory compliance costs, creditworthiness and access to capital. Climate-related factors affect the value of collateral (including primarily environmental and atmospheric factors), default risk and losses on default (higher capital requirements), access to and cost of capital and reduced liquidity.	Transition risk and physical risk	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation		Compliance risk – increased compliance risk is associated with changing environment and climate-related regulations. This may have significant financial consequences for the Bank in the form of legal or regulatory sanctions, financial losses and reputational damage.	Transition risk	The entire value chain	Short-, medium- and long-term	2.2.1 2.2.2 2.2.3 2.2.4 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation		Strategic risk – the possibility of strategic risk arising from various sources related to climate change and affecting Citi Handlowy's market position, operating costs and business model. Regulatory changes, technological risks, stakeholder concerns and social trends must be taken into account in a comprehensive strategic approach to ensure financial stability and strong financial performance. The described risk may negatively affect the Bank's financial position, for example by increasing operating or regulatory costs or capital expenditures.	Transition risk	The entire value chain	Short-, medium- and long-term	2.2.1 2.2.2 2.2.3 2.2.4 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation		Opportunity to adapt the strategy of investing, financing and supporting industries and companies that are an integral part of the low-carbon economy. Smart financing mechanisms thanks to which the Bank has the opportunity to develop transformation can contribute to the growth of revenues.	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation		Opportunity to finance low-carbon products due to changing customer preferences. The Bank has an opportunity to increase revenues related to environmental services within banking: sustainable finance, renewable energy financing, and ESG consulting and financial solutions.	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation		Opportunity to help clients achieve net zero emissions, identify opportunities and allocate capital to achieve sustainability goals. By working with clients in areas where they need support, the Bank has the opportunity to increase its market share and revenues, and ensure responsible growth.	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8

E1 Climate change	Climate change mitigation	Opportunity to invest in industries, companies and technologies for a low-carbon economy, such as renewable energy, water conservation and sustainable transportation, which support innovation and collective action. By increasing its participation in the financing of low-carbon products, the Bank reduces emissions financing and can move closer to achieving the UN Sustainable Development Goals (SDGs) and meeting the requirements of the European Banking Authority (EBA).	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation	Opportunity to assess and mitigate risks by regularly assessing climate change risks and integrating them into risk management programs. This will enable early detection of climate-related risks or opportunities that would affect revenues, operating costs and other expenses. This may also affect the ability to create and develop analytical tools exploring sustainability and climate issues, including portfolio management, quantitative modelling, climate exposure analysis as part of client reporting.	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation	Opportunity to finance disruptive low-carbon technologies, such as renewable energy, battery storage or hydrogen. The Bank can leverage increased revenues related to the financing of products and solutions in the area of energy demand resulting from increased demand, regulatory pressure related to new energy sources and other solutions.	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation	Opportunity to support clients committed to energy transformation and sustainability with products, services and advisors that facilitate capital raising, implementation of business plans and scaling.	Opportunity	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation	Opportunity to align transition pathways with governmental climate policies to obtain fiscal incentives, including subsidies, tax credits or grants.	Opportunity	Own operations	Short-, medium- and long-term	2.2.1 2.2.2 2.2.3 2.2.4
E1 Climate change	Climate change mitigation	Opportunity to improve reputation by demonstrating commitment to addressing climate change and other environmental issues, which can result in new partnerships, lower costs and increased revenue in the long term.	Opportunity	Own operations	Short-, medium- and long-term	2.2.1 2.2.2 2.2.3 2.2.4
E1 Climate change	Climate change mitigation	The Bank's positive impact on climate change mitigation is driven by clients who, through their activities, can have a direct and indirect impact on the green transition and climate stability.	Real positive impact	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change mitigation	The Bank's loan portfolio is partially linked to sectors that have a negative impact on climate stability.	Real negative impact	Downstream value chain	Short-, medium- and long-term	2.2.1 2.2.6 2.2.7 2.2.8

E1 Climate change	Energy		The bank is working toward the goal set by Citigroup Inc.: to source 100% of the energy used in its own buildings from renewable sources, thereby reducing greenhouse gas emissions associated with electricity generated from fossil fuels.	Real positive impact	Own operations	Long-term	2.2.1 2.2.2 2.2.3 2.2.4
E1 Climate change	Climate change mitigation		Reputational risk associated with greenwashing, e.g. discrepancies between publicly announced targets and adopted strategy, appetite or business decisions. The realization of the risk of greenwashing may affect the Bank's image in terms of financing companies polluting the environment, especially from the power sector. The activities of pro-environmental activists may also contribute to the Bank's image losses. (identified in 2025)	Ryzyko przejścia	Operacje własne i niższy szczebel łańcucha wartości	Short-, medium- and long-term	2.2.1 2.2.2 2.2.3 2.2.4 2.2.6 2.2.7 2.2.8
E1 Climate change	Climate change adaptation		Market risk – growing regulatory expectations and their impact on business models and global markets and key market indicators; taking into account the specificity of the exposures in the Bank's banking and trading portfolio and the anticipated impact of climate change, environmental degradation and social and governance factors. (identified in 2025)	Ryzyko przejścia	Downstream value chain	Long-term	2.2.1 2.2.6 2.2.7 2.2.8
S1 Own workforce	Working conditions	Work-life balance	The Bank positively influences its employees – it provides them with theoretical knowledge and practical tips on how to maintain a work-life balance. This is supported by networks operating in the Bank: Women's Network Poland, Families Matter Network Poland, Disability Network Poland, Pride Network Poland, Live Well at Citi initiative. VOE Ambassadors led a number of joint bank-wide projects to meet the expectations expressed by employees in the VOE survey.	Real positive impact	Own operations	Short-, medium- and long-term	3.1.3 3.1.4 3.1.5 3.1.6
S1 Own workforce	Equal treatment and opportunities for all	Training and skills development	The Bank runs programs that allow employees to develop their careers and help the Bank create a sustainable work environment. The goals that employees set in this area are part of the employee development strategy. Those programs have long-lasting, positive effects – they encourage employees to stay with the organization, help reduce operating costs, and can translate into higher productivity and revenue. Another area offering great opportunities for employee development is climate. Higher qualifications in this area help the Bank meet the changing needs of its clients. It is also an opportunity to increase revenue, as with more competent workforce the Bank can easier increase its market share in this growing market.	Opportunity	Own operations	Short-, medium- and long-term	3.1.8 3.1.9 3.1.10
S1 Own workforce	Equal treatment and opportunities for all	Diversity	The Bank's employees are a diverse group, with each person having their own strengths. The Bank leverages these strengths and thus creates an inclusive, equitable and productive workplace. Low employee turnover influences operating costs and results in providing better service to diverse client and vendor segments.	Real positive impact	Own operations	Short-, medium- and long-term	3.1.12 3.1.13 3.1.14
S4 Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy	The Bank has a positive impact on cybersecurity and information security – it designs and maintains physical, electronic and procedural safeguards that protect client information. The Bank requires its vendors to meet security standards and follow procedures, and in this way protects its physical and digital assets, including client data.	Real positive impact	Downstream value chain	Short-, medium- and long-term	3.2.1 3.2.2 3.2.3 3.2.4

S4 Consumers and end-users	Information-related impacts for consumers and/or end-users	Access to (quality) information	Direct and indirect educational programs through which clients can enhance their financial knowledge are an opportunity for the Bank to increase retention, maintain client confidence and for ongoing growth in financial value through the potential growth of acquisition and revenues.	Opportunity	Downstream value chain	Short-, medium- and long-term	3.2.9 3.2.10 3.2.11
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Non-discrimination Access to products and services	The Bank has a positive impact on its clients – it establishes rules, organizes training and develops systems to prevent discrimination, thus promoting financial inclusion and equal access to financial products and services. Supporting inclusiveness towards clients creates an opportunity to diversify the client base, which can translate into higher revenues of the organization.	Real positive impact and an opportunity	Downstream value chain	Short-, medium- and long-term	3.2.5 3.2.6 3.2.7 3.2.8
S4 Consumers and end-users	Social inclusion of consumers and/or end-users	Responsible marketing practices	The Bank has clear and transparent product and service policies, which give clients and counterparties the confidence that the organization actively prevents improper use of its services and products. This increases trust in the Bank and can enhance its reputation as a responsible business partner, which can also have a positive impact on the Bank's revenues.	Real positive impact and an opportunity	Downstream value chain	Short-, medium- and long-term	3.2.12 3.2.13 3.2.14 3.2.15 3.2.16
G1 Business conduct	Corporate culture		The Bank has a Code of Conduct that integrates its values into its business activities and presents best practices in management reporting, compliance with regulations, audits, etc., which contributes to transparency and responsible business practices. In addition, the Bank has established robust ESG governance roles and procedures that drive increased oversight, expand ESG expertise across functional areas and help integrate ESG principles and practices into its operations.	Real positive impact	Own operations	Short-, medium- and long-term	4.1.1
G1 Business conduct	Protection of whistle-blowers		The Bank has a policy that prohibits retaliation against whistleblowers who report cases of undesirable irregularities in the work environment. This approach encourages people to report suspicious or illegal activities.	Real positive impact	Own operations	Short-, medium- and long-term	4.1.1
G1 Business conduct	Corruption and bribery	Prevention and detection including training	The Bank has implemented the Anti-Corruption Program to define procedures and controls that prevent the facilitation of corruption and illegal financial activities in the global financial system. As part of the program, the Bank has adopted a zero tolerance policy towards corruption in all aspects of business activities among employees and vendors. The Bank cooperates with vendors who adhere to responsible and lawful business practices, which contributes to the elimination of exploitation or unethical labor practices as non-compliant vendors will be excluded from cooperation.	Real positive impact	Own operations and upstream value chain	Short-, medium- and long-term	4.1.3

Changes in the list of material impacts, risks and opportunities in relation to 2024

The changes in the list of material impacts, risks and opportunities result from the update of the materiality analysis of sustainability issues described in the Double materiality analysis process.

A real negative impact identified in 2024 in relation to the topic E1 Climate change:

„The Bank's facilities (offices, branches, data centers and operational centers) require energy for lighting, heating, cooling and operating electronic equipment, which contributes to greenhouse gas emissions."

Has been removed from the list of material impacts, risks and opportunities in 2025 because:

- The DMA in 2024 was conducted before the calculation of greenhouse gas emissions. The energy consumption of the bank's facilities has little impact on the bank's total greenhouse gas emissions and marginal impact on climate change.
- Based on the benchmark of the banking sector, energy consumption in own operations is not frequently reported as material.
- The list of significant impacts includes the pursuit of the target of 100% own energy consumption from renewable energy sources, so the issue is redundant.

The following were added to the list of material impacts, risks and opportunities in 2025:

„Market risk – growing regulatory expectations and their impact on business models and global markets and key market indicators; taking into account the specificity of the exposures in the Bank's banking and trading portfolio and the anticipated impact of climate change, environmental degradation and social and governance factors."

„Reputational risk associated with greenwashing, e.g. discrepancies between publicly announced targets and adopted strategy, appetite or business decisions. The realization of the risk of greenwashing may affect the Bank's image in terms of financing companies polluting the environment, especially from the power sector. The activities of pro-environmental activists may also contribute to the Bank's image losses."

These risks were identified as part of the Risk Identification and Assessment Process (RIAP) conducted in 2025. In the DMA update online survey, they were above the 80% materiality threshold. During the validation workshop, no one questioned the materiality of these risks.

Under the material topic E1 Own workforce, in 2025 the classification of an opportunity identified in 2024:

„The Bank's employees are a diverse group, with each person having their own strengths. The Bank can leverage these strengths and thus create a more inclusive, equitable and productive workplace. As a result, the Bank can reduce employee turnover and, in consequence, operating costs, and provide better service to diverse client and vendor segments."

To a real positive impact:

„The Bank's employees are a diverse group, with each person having their own strengths. The Bank leverages these strengths and thus creates an inclusive, equitable and productive workplace. Low employee turnover influences operating costs and results in providing better service to diverse client and vendor segments."

The bank is already taking advantage of this opportunity. For more information see chapters Activities in the area of diversity [S1-2] [S1-4] i Diversity metrics[S1-9].

1.3.5 Climate risk and strategy [E1. SBM-3]

The main source of climate risk for the Bank is the financing of institutional clients' activities. Although the Bank's own operations and activities are an important issue, the greatest impacts on the environment, climate, and society, as well as the greatest financial risks for the Bank, result from the financing it provides. Therefore, the analyses undertaken to assess the resilience of the business strategy and business model to climate change, using a scenario-based approach, focused on the Institutional Banking segment.

According to the definition adopted by the Task Force on Climate-Related Financial Disclosures (TCFD)[7], scenario analysis is a process of identifying and assessing the potential impacts of a range of plausible future states of the world under conditions of uncertainty. Scenarios are hypothetical constructs and are not intended to provide

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precise results or forecasts. Instead, scenarios enable institutions to consider what the future might look like if certain trends continue or certain conditions are met, and to make appropriate decisions.

The European Banking Authority (EBA), as part of its development of ESG risk management regulations, emphasizes the fundamental role of scenario analysis in assessing the resilience of financial institutions, which resulted in the publication of its Guidelines on environmental scenario analysis (EBA/GL2025/04) on 4 November 2025, to be effective from 1 January 2027. In 2025, the Bank's approach to scenario analysis was based on the consultation document "Guidelines on ESG Scenario Analysis" (EBA/GL/2025/02) published by the EBA in January 2025, which identified two key types of scenario analysis:

1. Climate Stress Testing – used to test the financial resilience of an institution to major shocks in the short and medium term and to verify its capital and liquidity adequacy;
2. Climate Resilience Analysis – used to verify the long-term resilience of an institution's business model, which includes maintaining diversified sources of income and the ability to respond to changing market conditions and customer preferences.

Stress tests

To assess the resilience of its business strategy and business model to ESG risk factors, in 2025, the Bank conducted a dedicated stress test for credit risk and a heuristic assessment for compliance and reputational risks.

The credit risk stress test was based on a dedicated macroeconomic scenario describing the impact of physical and transition risks over the standard ICAAP horizon (i.e., 2025-2027). The scenario depicted a disorderly transition, in which greenhouse gas emissions must be rapidly reduced and the prices of emissions rights rise sharply. At the same time, climate change is contributing to unfavorable weather events: droughts are hitting agricultural production worldwide, disrupting food supply chains, and heatwaves in Europe are causing losses in energy production. In response to these events, EU governments are implementing more aggressive climate policies, resulting in shifts in consumption patterns and changes in the value of selected assets that are most affected by climate change.

Furthermore, the impact on companies in specific industries and time horizons was analyzed using the Industry Climate Risk Map and the Industry Environmental Risk Map. Loan portfolio exposures as of the end of December 2024 were divided into groups of industries sensitive to climate risk (divided into transition risk and physical risk) and to environmental risk (divided into dependency and impact). The analysis also considered the long-term impact of social and corporate governance issues, identifying high-risk industries based on international SASB standards. For industries susceptible to the effects of those risks, the impact of risk factors on clients' credit ratings in the short-, medium- and long-term horizons was analyzed using projected migrations of indicators. In addition, with the expertise of risk managers, individual exposures were reviewed to take into account individual and client-specific factors, and, where necessary, individual assessments were made for potential impact on ratings.

The results of the stress tests showed that the Bank's portfolio is resilient to ESG risk factors. It was assessed that in the years 2025–2027, ESG risk will not have a significant impact on the expected losses and internal capital requirements related to ESG risk. Deterioration in client ratings as a result of ESG risk materialization is expected in the long term, but remains within established limits.

In 2025, the Bank also conducted a heuristic analysis of operational risk, including compliance and reputational risks (these risks are covered by capital allocated to operational risk), based on examples of penalties for violations of ESG regulations involving improper implementation of supervisory rules and regulations and for engaging in greenwashing practices. The analysis demonstrated the adequacy of capital requirements for operational risk and the ability to cover potential losses resulting from the materialization of ESG risks.

Resilience analysis

In 2025, the Bank conducted a long-term business model resilience analysis for the first time. The analysis aimed to assess the impact of climate risk on long-term revenue generation and to build the capacity to respond to changing market conditions and customer preferences. The analysis was conducted on the basis of data as at the end of 2024 and covered the Institutional Banking segment.

The analysis was qualitative in nature and considered only climate risk (physical and transitional), without taking into account the impact of mitigation measures. The impact of climate risk was assessed based on its impact on loan and deposit balances and on the Bank's revenues in each scenario and time horizon. The analysis was conducted in the medium term (until 2030) and long term (until 2040).

The physical risk scenarios were based on the widely recognized SSP-RCP (Shared Socioeconomic Pathways-Representative Concentration Pathways) scenarios of the Intergovernmental Panel on Climate Change (IPCC). In order to take into account the specific nature of the Polish context, the transition risk scenarios are based on the

draft update of the National Energy and Climate Plan for 2021-2030 (aKPEiK)[8], submitted for public consultation in October 2024. These scenarios incorporate key assumptions concerning, among other things, the impact of the transition on the low-carbon economy, energy consumption and mix, and technology implementation.

Two scenarios were used to assess the resilience of the Bank's business model: a central scenario and an extreme scenario. The central scenario, defined as a "business as usual" scenario, is a combination of the following scenarios:

- WEM (With Existing Measures) with the aKPEiK, presenting the development of the situation in Poland based on existing instruments and planned policies, and
- the SSP2 (Shared Socioeconomic Pathway 2 - "middle path," reflecting trends similar to historical ones) socio-economic scenario together with the RCP4.5 climate scenario (moderate emission reduction, temperature increase of approximately 2.5°C by the end of the century).

The extreme scenario, defined as the "active transformation" scenario, is a combination of the following scenarios:

- WAM (With Additional Measures) with the aKPEiK, assuming the implementation of new climate and energy policy instruments in Poland, and
- the SSP2 socio-economic scenario together with the RCP2.6 climate scenario (deep emission reductions, net zero emissions in 2060, keeping the temperature increase below 2°C).

The Bank believes that the scope of these scenarios covers credible risks and uncertainties, offering a perspective ranging from the status quo to active transformation. Physical risk and transition risk were analyzed separately, based on the selected scenarios.

The transition risk analysis used a sectoral approach based on NAICS codes. The Bank identified non-financial sectors for detailed analysis based on their relevance to the Bank's business model, their importance in the transition to a low-carbon economy, and their vulnerability to transition risk. The vulnerability of each sector to transition risk in 2030 and 2040 was assessed based on information contained in the WEM and WAM scenarios (taking into account the impact of policies and regulations, investment forecasts, emission forecasts, etc.). Next, based on sector assessments, the proportions of assets, deposits, and revenues exposed to at least medium transition risk were determined.

A similar approach was used to assess the impact of physical risk, replacing sectors with geographical areas. In terms of geographical scale, the analysis took into account data at the province level in Poland and at the country level in the case of clients from other countries. Due to the lack of data at the level of key client assets, the location of the registered office was used to assign a client to a specific geographical area. The physical risk analysis was based on the results of the COACCH (CO-designing the Assessment of Climate Change Costs)[9] project, which aimed to develop an improved assessment of climate change risks and costs in Europe. For each geographical area, the projected percentage change in GDP relative to the baseline for 2030 and 2040, in the SSP2-RCP2.6 and SSP2-RCP4.5 scenarios, was obtained from the publicly available COACCH database. A 4-point scale was used to assess these impacts. Based on the assessment for each geographical area, the proportions of assets, deposits, and revenues exposed to at least medium physical risk were determined.

The results of the Bank's business model resilience analysis indicate a generally low exposure of key indicators (deposits, assets, and revenues) to medium or high climate risk in the scenarios assessed. The results of the physical risk assessment indicate that a relatively small portion of deposits, assets, and revenues are exposed to higher levels of risk in both scenarios and time horizons. This proportion for each factor is higher in 2040 in both scenarios, reflecting the projected increase in the negative physical and economic impacts of climate change. In the extreme scenario of so-called active transformation, greater exposure to transition risk is predicted in both time horizons. The sectors considered most vulnerable are electricity and its supply, energy industry, and metal extraction and processing and mining. This result underscores the importance of the Bank's strategic objectives, which are to support the energy transition in Poland and actively engage clients in the transition process, especially those operating in energy-intensive and fossil fuel-related sectors.

The current analysis is a broad assessment. Due to limitations in data availability and the granularity of the study described above, it does not reflect the specifics of individual clients, which means that its results are high-level and indicative. Nevertheless, the results obtained will be included in the next update of the Bank's strategy and will be taken into account when developing mitigation measures.

[8] **Draft National Energy and Climate Plan until 2030 – version for public consultation from October 2024**

[9] COACCH (CO-designing the Assessment of Climate CHange costs)

1.3.6 Strategic approach to impact and opportunities in the employee area [SBM-3]

The double materiality assessment carried out at the Bank indicated three significant topics in the employee area: work-life balance, training and development, and diversity.

In line with the Sustainability Strategy for 2025-2027, the Bank is building an organizational culture based on promoting and developing talent and supporting diversity. By actively monitoring and expanding such initiatives, Citi Handlowy wants to create a workplace where every employee feels appreciated and supported so that they can use their full potential. In addition to fostering development, the Bank also actively responds to the evolving needs and requirements of its staff. The Bank's strategic goal is to achieve an employee engagement rate of 80% or higher in the VOE survey. Tackling pay inequality is also a priority – the bank wants the adjusted gender pay gap to be below 5%. In addition, in the following years employees involved in the implementation of the sustainability strategy will be encouraged to include ESG KPIs in their annual objectives. To support employee development in the area of ESG, the Bank will organize at least 6 educational initiatives covering sustainability each year.

The HR policies in force at the Bank apply solely to employees of Bank Handlowy w Warszawie S.A., i.e. persons hired under an employment contract. The Bank does not apply the policies, goals and actions described in this chapter directly to non-employees[10], as it has a different type of legal relationship with this group.

The Bank does not have any operations that, due to their type and geographic area, would be exposed to the risk of forced/compulsory labor or child labor. At the Bank, people with special characteristics are not at greater risk of harm.

1.3.7 Impacts of the Bank on clients and strategic approach [S4.SBM-3]

Through its activities, the Bank affects all client groups:

- Consumer Banking Segment:
  - Citigold Private Client (CPC) clients – clients with a net balance of at least PLN 4 million and a CPC account,
  - Citigold clients – clients with a net balance of at least PLN 400,000 and a Gold account,
  - other clients.
- Institutional Banking Segment:
  - corporate clients – the largest local corporations that want to operate or already operate in the international market, with the potential and intention to establish long-term and multi-product

[10] Non-employees:

- Natural persons cooperating with the Bank under civil law contracts, including contracts of mandate and contracts for specific work,
- Other persons who:
  - run a sole proprietorship and, on the basis of contracts concluded directly with the Bank, personally provide the Bank with services related to the Bank's financial activities, particularly in the Bank's buildings, on a continuous basis, for an agreed number of hours each business day; otherwise, such services would be performed by an employee of the Bank under an employment contract, ("B2B Contracts")
  - are employed by third parties whose business includes predominantly employment-related activities (code NACE N78) ("Body Leasing"). These are, in particular, temporary employment agencies or entities that provide employees to replace temporarily absent employees or perform additional work.

Employees and non-employees do not include persons performing work in the value chain as defined in ESRS S2 AR 3:

- employees performing specific services commissioned to third parties, working at the Bank (e.g. employees of external security or catering companies, translators, photographers),
- employees of vendors cooperating with the Bank working on the vendor's premises and using the vendor's work methods,
- employees of equipment suppliers to the Bank who perform regular maintenance work at the Bank, in accordance with the contract with the supplier.

The above mentioned exclusions do not apply to B2B Contracts.

cooperation and annual turnover exceeding PLN 1 billion, financial institutions (banks, insurance companies, investment funds) and public sector entities (central government entities and entities directly supervised by the central government, foreign representations of other countries' governments);

- global clients – entities that belong to a group of companies that is serviced globally within the Citi group,
- commercial banking clients – companies with a turnover of over PLN 40 million, active directly or indirectly (export/import) in international markets, with which the Bank can build multi-product and long-term strategic relationships.

The double materiality assessment identified four important topics in the client area: cybersecurity and information security, inclusiveness towards clients, financial education for clients, and responsible market practices:

The description of the approach to managing client-related topics presented in this chapter covers primarily individual clients of the Bank. This is due to the definition of the term "consumers and end-users" in the ESRS S4 standard, which defines this group as individuals. In May 2025, the Bank entered into an agreement to spin off its retail business to VeloBank. The spin-off will allow the Bank to focus on the development of Institutional Banking – the Bank's main business area. The rapid development of this segment, based on competitive advantages and scale, will enable the Bank to achieve higher returns on its operations as measured by Return on Equity (ROE) and Return on Assets (ROA) ratios. The exit from Retail Banking is consistent with the Bank's Strategy and is in line with Citi's global strategy.

1.4 Sustainability management

1.4.1 Double materiality assessment process [IRO-1] [G1.IRO-1]

The double materiality assessment process was conducted for the first time at the Bank in 2024, to identify material impacts, risks and opportunities related to sustainability issues. This process examined the materiality of sustainability issues covered by the ESRS (ESRS 1 AR 16) and issues specific to the financial sector and the Bank. A detailed description of this study can be found in the 2024 Sustainability Statement[11].

The results of the double materiality analysis were updated in 2025. The materiality of the sustainability reporting topics identified in 2024 was confirmed.

Update of the double materiality assessment

In 2025, there were no significant changes in the Bank's organizational structure, business model, or business environment. Citi Handlowy conducted a process of updating the results of the double materiality assessment of impacts, risks, and opportunities related to sustainability issues across the entire value chain. The perspective of the Bank's material impact on its environment and the impact of external factors with financial consequences for the Bank was taken into account.

Stakeholder involvement

Internal stakeholders were consulted during the process of updating the materiality analysis in 2025. These were persons representing all areas of the Bank related to sustainability issues. Among them were individuals who communicate with external stakeholders on a daily basis and are aware of the issues raised by individual stakeholder groups.

The voice of the Bank's external stakeholders was taken into account in the materiality study conducted in 2024, which formed the basis for the update of the double materiality analysis of sustainability issues in 2025. In 2026, in connection with the planned changes in the organizational structure and business model, the list of key stakeholders will be updated and a double materiality analysis involving key stakeholders will be conducted.

Update process

The process of updating the results of the double materiality analysis of sustainability issues carried out in 2025 consisted of five stages.

1. Representatives of areas related to sustainability issues within the Bank were asked to report potentially material impacts, risks, and opportunities that arose in their areas in 2025.
2. As part of an internal workshop attended by representatives of areas related to sustainability issues within the Bank, the following were presented:

[11] Oświadczenie dotyczące zrównoważonego rozwoju jest częścią Sprawozdania z działalności Banku Handlowego w Warszawie S.A. oraz Grupy Kapitałowej Banku Handlowego w Warszawie S.A. w 2024 roku, **https://www.citibank.pl/poland/files/podzial/2024_consolidated-financial-statemements_pl.zip**

a) the results of the sector benchmark for sustainability reporting for 2024,
b) the results of the risk identification and assessment process in 2025, which is part of the internal capital adequacy assessment process,
c) the results of the business model resilience analysis conducted in 2025,
d) potentially material impacts, risks, and opportunities reported by stakeholders in the first stage of the analysis in 2025,
e) impacts, risks, and opportunities related to sustainability issues that were identified as material in 2024,
f) survey questions regarding the materiality of the impact and financial materiality of individual impacts, risks, and opportunities that were identified as material in 2024 or reported as potentially material in 2025.

3. Internal stakeholders involved in the study completed a survey in which they answered "yes/no" to questions about whether individual impacts, risks, and opportunities are still material or, in the case of new, potentially material impacts and risks, whether they are material from their perspective.
4. During the second internal workshop, attended by representatives of areas related to sustainable development within the Bank, the list of material impacts, risks, and opportunities was calibrated based on:
   a) the results of an internal survey (the percentage threshold for "yes" answers was set at 80%),
   b) discussions on the materiality of individual impacts, risks, and opportunities.
5. The results of the double materiality analysis of sustainability issues, updated in 2025, were presented to the ESG Steering Committee, which includes all members of the Management Board. The ESG Steering Committee approved the list of material impacts, risks, and opportunities and the resulting scope of sustainability reporting for 2025.

The scope of material information to be disclosed was determined based on the mapping of impacts, risks, and opportunities that the Bank considered material to the ESRS disclosure requirements, in accordance with the criteria set out in ESRS 1 section 3.2 Material matters and materiality of information. For more information on how these criteria are implemented, see the section on the double materiality analysis process [IRO-1] [G1.IRO-1].

1.4.2 Risk scenario analyses [E1.IRO-1]

The table below presents ESG risk scenario analyses performed by the Bank in 2025.

Name	Material risks	Time horizon	Climate scenarios
Business model resilience analysis	Strategic risk	2025-2040	• Central scenario (WEM + SSP2 + RCP4.5) • Extreme scenario (WAM + SSP2 + RCP2.6)
Portfolio alignment analysis	Strategic risk Credit risk	2025-2030	• NZE2050 scenarios (aligned with 1.5^{0}C global warming mitigation goal)

The methodology and results of scenario analyses are presented in section Climate risk and strategy [E1. SBM-3].

1.4.3 Disclosure requirements in ESRS covered by the undertaking's sustainability statement [IRO-2].

In this Statement for 2025, the Bank has met the requirements for disclosing information required for the sustainability statement in accordance with the Act of 6 December 2024 amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision and certain other acts (Journal of Laws of 2024, item 1863); Journal of Laws of 2025, item 1020).

The list of the disclosure requirements fulfilled when preparing the sustainability statement is presented below.

Disclosure requirement	Page
ESRS 2 General disclosures	
BP-1	Basis for preparation of the statement [BP-1]
BP-2	Special circumstances affecting disclosures [BP-2]
GOV-1	Role of the Management Board and Supervisory Board [GOV-1] [G1.GOV-1]

GOV-2	Informing the Management Board and Supervisory Board about ESG issues [GOV-2]
GOV-3	Sustainability-related incentive schemes [GOV-3] [E1.GOV-3]
GOV-4	Statement on due diligence [GOV-4]
GOV-5	Management of the risk of the sustainability reporting process [GOV-5]
SBM-1	Strategy and business model [SBM-1]
SBM-2	Dialogue with stakeholders [SBM-2]
SBM-3	Material impacts, risks and opportunities [SBM-3]
IRO-1	Double materiality assessment process [IRO-1] [G1.IRO-1]
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement [IRO-2]
ESRS E1 Climate change	
E1. GOV-3	Sustainability-related incentive schemes [GOV-3] [E1.GOV-3]
E1-1	Transition plan for climate change mitigation [E1-1]
E1. SBM-3	Climate risk and strategy [E1.SBM-3]
E1. IRO-1	Double materiality assessment process [E1.IRO-1]
E1-2	Policies related to own operations [E1-2] Policies related to climate change in the loan portfolio [E1-2]
E1-3	Activities related to own operations [E1-3] Activities related to the financed loan portfolio [E1-3]
E1-4	Targets related to own operations [E1-4] Targets related to the financed loan portfolio [E1-4]
E1-5	Energy consumption and mix indicators [E1-5]
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]
E1-7	GHG removals and GHG mitigation projects financed through carbon credits [E1-7]
E1-8	Internal carbon pricing [E1-8]
ESRS S1 Own workforce	
S1. SBM-2	Understanding interests and views of the key stakeholders in relation to strategy and business model [S1.SBM-2] [S4.SBM-2]
S1. SBM-3	Strategic approach to impact and opportunities in the employee area [S1.SBM-3]
S1-1	Employees and human rights [S1-1] [S1-3] Work-life balance policies [S1-1] Training and development policies [S1-1] Diversity Policies [S1-1]
S1-2	Work-life balance collaboration [S1-2] Training and skills development activities [S1-2] [S1-4] Activities in the area of diversity [S1-2] [S1-4]
S1-3	Employees and human rights [S1-1] [S1-3]
S1-4	Work-life balance activities [S1-4] Training and skills development activities [S1-4] Activities in the area of diversity [S1-4]
S1-5	Work-life balance targets [S1-5] Goals for training and skills development [S1-5] Diversity targets [S1-5]

S1-6	Characteristics of employees [S1-6]
S1-9	Diversity metrics [S1-9]
S1-13	Employee training and development metrics [S1-13]
S1-15	Work-life balance metrics [S1-15]
S1-16	Remuneration metrics[S1-16]
S1-17	Incidents and complaints [S1-17]
ESRS S4 Consumers and end users	
S4.SBM-2	Understanding interests and views of the key stakeholders in relation to strategy and business model [S1.SBM-2] [S4.SBM-2]
S4. SBM-3	Impacts of the Bank on clients and strategic approach [S4.SBM-3]
S4-1	Cybersecurity Management Policies [S4-1] Client inclusiveness policies [S4-1] Policies related to increasing financial knowledge of clients through education [S4-1] [S4-2] Policies related to responsible market practices [S4-1]
S4-2	Cooperation for cybersecurity [S4-2] Collaboration for Inclusiveness [S4-2] Policies related to increasing financial knowledge of clients through education [S4-1] [S4-2] Cooperation for responsible market practices [S4-2]
S4-3	Channels for reporting irregularities and the complaint handling process [S4-3]
S4-4	Cybersecurity activities [S4-4] Client inclusiveness actions [S4-4] Actions taken to increase financial knowledge of clients through education [S4-4] Activities related to responsible market practices [S4-4]
S4-5	Cybersecurity targets [S4-5] Client inclusiveness targets [S4-5] Client education targets [S4-5] Targets for responsible market practices [S4-5]
ESRS G1 Business conduct	
G1.GOV-1	Role of the Management Board and Supervisory Board [GOV-1] [G1.GOV-1]
G1. IRO-1	Double materiality assessment process [IRO-1] [G1.IRO-1]
G1-1	Business conduct and corporate culture [G1-1]
G1-2	Management of relationships with suppliers [G1-2]
G1-3	Prevention and detection of corruption and bribery [G1-3]
G1-4	Cases of corruption or bribery [G1-4]

Below is a list of data points that arise from other EU legislation

List of all data points that are derived from other EU regulations used in the sustainability statement, based on Appendix B of ESRS 2

Disclosure Requirement and related datapoint	Reference to the Sustainable Finance Disclosure Regulation (SFDR)	Reference to Pillar 3	Reference to the Benchmark Regulation	Reference to the EU Climate Law	Page
ESRS 2 GOV-1 Management Board's gender diversity paragraph 21 (d)	Indicator 13 of Table # 1 of Annex I		Annex II of Commission Delegated Regulation (EU) 2020/1816		The role of the Management Board and Supervisory Board [GOV-1] [G1.GOV-1]
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Annex II of Delegated Regulation (EU) 2020/1816		The role of the Management Board and Supervisory Board [GOV-1] [G1.GOV-1]
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator 10 of Table # 3 of Annex I				Statement on due diligence [GOV-4]
ESRS 2 SBM-1 Involvement in activities related to fossil fuels activities paragraph 40 (d) (i)	Indicator 4 of Table # 1 of Annex I	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Annex II of Delegated Regulation (EU) 2020/1816		not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) (ii)	Indicator 9 of Table # 2 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816		not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) (iii)	Indicator 14 of Table # 1 of Annex I		Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II of Delegated Regulation (EU) 2020/1816		not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) (iv)			Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II of Delegated Regulation (EU) 2020/1816		not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Article 2(1) of Regulation (EU) 2021/1119	Transition plan for climate change mitigation [E1-1]
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Article 12(1) (d)-(g) and Article 12(2) of Commission Delegated Regulation (EU) 2020/1818		Transition plan for climate change mitigation [E1-1]
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator 4 of Table # 2 of Annex I	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		Transition plan for climate change mitigation [E1-1] Targets related to own operations [E1-4] Targets related to the financed loan portfolio [E1-4]
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator no. 5 in Table # 1 and indicator no 5 in Table # 2 of Annex I				not applicable
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator 5 of Table # 1 of Annex I				Energy consumption and mix indicators [E1-5]
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40–43	Indicator 6 of Table # 1 of Annex I				not applicable

ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 in Table #1 of Annex I	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Article 5(1), Article 6 and Article 8(1) of Delegated Regulation (EU) 2020/1818		Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]
ESRS E1-6 Gross GHG emissions intensity paragraphs 53–55	Indicator 3 of Table # 1 of Annex I	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Article 8(1) of Delegated Regulation (EU) 2020/1818		Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]
ESRS E1-7 GHG removals and carbon credits paragraph 56				Article 2(1) of Regulation (EU) 2021/1119	GHG removals and GHG mitigation projects financed through carbon credits [E1-7]
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Annex II of Delegated Regulation (EU) 2020/1818, Annex II of Delegated Regulation (EU) 2020/1816		The option of gradual disclosure was used
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		Article 449a of Regulation (EU) no. 575/2013; paragraphs 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk.			The option of gradual disclosure was used
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		Article 449a of Regulation (EU) no. 575/2013; paragraph 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking book – Climate change transition risk: Loans collateralized by immovable property – Energy efficiency of the collateral			The option of gradual disclosure was used
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Annex II of Delegated Regulation (EU) 2020/1818		The option of gradual disclosure was used
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 in Table # 1 of Annex I, indicator number 2 in Table #2 of Annex I, indicator number 1 in Table # 2 of Annex I and indicator number 3 in Table # 2 of Annex I				Topic deemed irrelevant
ESRS E3-1 Water and marine resources paragraph 9	Indicator 7 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E3-1 Dedicated policy paragraph 13	Indicator 8 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E3-1 Practices related to sustainable oceans and seas paragraph 14	Indicator 12 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator 6.2 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator 6.1 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS 2 SBM 3-E4 paragraph 16 (a) (i)	Indicator 7 of Table # 1 of Annex I				Topic deemed irrelevant
ESRS 2 SBM 3-E4 paragraph 16 (b)	Indicator 10 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS 2 SBM 3-E4 paragraph 16 (c)	Indicator 14 of Table # 2 of Annex I				Topic deemed irrelevant

ESRS E4-2 **Sustainable land / agriculture practices or policies** **paragraph 24 (b)**	Indicator 11 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E4-2 **Sustainable oceans / seas practices or policies** **paragraph 24 (c)**	Indicator 12 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E4-2 **Policies to address deforestation paragraph 24 (d)**	Indicator 15 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E5-5 **Non-recycled waste paragraph 37 (d)**	Indicator 13 of Table # 2 of Annex I				Topic deemed irrelevant
ESRS E5-5 **Hazardous waste and radioactive waste** **paragraph 39**	Indicator 9 of Table # 1 of Annex I				Topic deemed irrelevant
ESRS 2 SBM-3-S1 **Risk of incidents of forced labor** **paragraph 14 (f)**	Indicator 13 of Table # 3 of Annex I				Employees and human rights [S1-1] [S1-3]
ESRS 2 SBM-3-S1 **Risk of incidents of child labor** **paragraph 14 (g)**	Indicator 12 of Table # 3 of Annex I				Topic deemed irrelevant
ESRS S1-1 **Human rights policy commitments** **paragraph 20**	Indicator no. 9 in Table # 3 and indicator no 11 in Table # 1 of Annex I				Topic deemed irrelevant
ESRS S1-1 **Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8** **paragraph 21**			Annex II of Delegated Regulation (EU) 2020/1816		Employees and human rights [S1-1] [S1-3]
ESRS S1-1 **Processes and measures for preventing trafficking in human beings** **paragraph 22**	Indicator 11 of Table # 3 of Annex I				Topic deemed irrelevant
ESRS S1-1 **Workplace accident prevention policy or management system** **paragraph 23**	Indicator 1 of Table # 3 of Annex I				Topic deemed irrelevant
ESRS S1-3 **Grievance/complaints handling mechanisms** **paragraph 32 (c)**	Indicator 5 of Table # 3 of Annex I				Employees and human rights [S1-1] [S1-3]
ESRS S1-14 **Number of fatalities and number and rate of work-related accidents** **paragraph 88 (b) and (c)**	Indicator 2 of Table # 3 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816		Topic deemed irrelevant
ESRS S1-14 **Number of days lost to injuries, accidents, fatalities or illness** **paragraph 88 (e)**	Indicator 3 of Table # 3 of Annex I				Topic deemed irrelevant
ESRS S1-16 **Unadjusted gender pay gap** **paragraph 97 (a)**	Indicator 12 of Table # 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816		Remuneration metrics [S1-16]
ESRS S1-16 **Excessive CEO pay ratio** **paragraph 97 (b)**	Indicator 8 of Table # 3 of Annex I				Remuneration metrics [S1-16]
ESRS S1-17 **Incidents of discrimination** **paragraph 103 (a)**	Indicator 7 of Table # 3 of Annex I				Incidents and complaints [S1-17]
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines **paragraph 104 (a)**	Indicator no. 10 in Table # 1 and indicator no 14 in Table # 3 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Incidents and complaints [S1-17]
ESRS 2 SBM-3-S2 **Significant risk of child labor or forced labor in the value chain** **paragraph 11 (b)**	Indicators number 12 and 13 in Table # 3 of Annex I				Topic deemed irrelevant
ESRS S2-1 **Human rights policy commitments** **paragraph 17**	Indicator no. 9 in Table # 3 and indicator no 11 in Table # 1 of Annex I				Topic deemed irrelevant
ESRS S2-1 Policies related to value chain workers **paragraph 18**	Indicators number 11 and 4 in Table #3 of Annex I				Topic deemed irrelevant
ESRS S2-1 **Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines** **paragraph 19**	Indicator 10 of Table # 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Topic deemed irrelevant

ESRS S2-1 **Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8** **paragraph 19**			Annex II of Delegated Regulation (EU) 2020/1816		Topic deemed irrelevant
ESRS S2-4 **Human rights issues and incidents connected to its upstream and downstream value chain** **paragraph 36**	Indicator 14 of Table # 3 of Annex I				Topic deemed irrelevant
ESRS S3-1 **Human rights policy commitments** **paragraph 16**	Indicator number 9 in Table # 3 of Annex I and indicator number 11 in Table # 1 of Annex I				Topic deemed irrelevant
ESRS S3-1 **Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines** **paragraph 17**	Indicator 10 of Table # 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Topic deemed irrelevant
ESRS S3-4 **Human rights issues and incidents** **paragraph 36**	Indicator 14 of Table # 3 of Annex I				Topic deemed irrelevant
ESRS S4-1 Policies related to consumers and end-users **paragraph 16**	Indicator no. 9 in Table # 3 and indicator no 11 in Table # 1 of Annex I				Cybersecurity Management Policies [S4-1] Client inclusiveness policies [S4-1] Policies related to increasing financial knowledge of clients through education [S4-1] Policies related to responsible market practices [S4-1]
ESRS S4-1 **Non-respect of UNGPs on Business and Human Rights and OECD guidelines** **paragraph 17**	Indicator 10 of Table # 1 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Policies related to responsible market practices [S4-1]
ESRS S4-4 **Human rights issues and incidents** **paragraph 35**	Indicator 14 of Table # 3 of Annex I				not applicable
ESRS G1-1 **United Nations Convention against Corruption** **paragraph 10 (b)**	Indicator 15 of Table # 3 of Annex I				not applicable
ESRS G1-1 **Protection of whistle-blowers** **paragraph 10 (d)**	Indicator 6 of Table # 3 of Annex I				not applicable
ESRS G1-4 **Fines for violation of anti-corruption and anti-bribery laws** **paragraph 24 (a)**	Indicator 17 of Table # 3 of Annex I		Annex II of Delegated Regulation (EU) 2020/1816		Cases of corruption or bribery [G1-4]
ESRS G1-4 **Standards of anti-corruption and anti-bribery** **paragraph 24 (b)**	Indicator 16 of Table # 3 of Annex I				Cases of corruption or bribery [G1-4]

The scope of material information to be disclosed was determined based on the mapping of impacts, risks, and opportunities that the Bank considered material to the ESRS disclosure requirements, in accordance with the criteria set out in ESRS 1 section 3.2 Material matters and materiality of information. For more information on how these criteria are implemented, see the section on the double materiality analysis process [IRO-1] [G1.IRO-1].

2. Environmental information

2.1 Taxonomy-related disclosures

Pursuant to Art. 8 sec. 1 of 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 (**„Taxonomy"**), undertaking which is subject to an obligation to publish non-financial information shall include in its non-financial statement on how and to what extent the undertaking's activities are associated with economic activities that qualify as „environmentally sustainable" („Taxonomy").

Bank Handlowy w Warszawie S.A. is obliged to publish sustainability statements in accordance with the requirements of Directive 2022/2464/EU (Corporate Sustainable Reporting Directive - "CSRD"). Bank is obliged to report taxonomic disclosures as a credit institution. The detailed scope and dates of presentation of information on environmentally sustainable economic activities, which should be disclosed under the Taxonomy, are indicated in the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 **("Regulation 2021/2178"):** delegated act specifying taxonomy reporting obligations.

For the reporting period ending December 31, 2024, the Bank made full disclosures regarding the Taxonomy, including information on financed economic activities that are ineligible, eligible for the taxonomy for all environmental purposes, and compliant with the taxonomy for climate change mitigation and adaptation purposes under Regulation 2021/2178. In preparing the disclosures for 2025, the Bank is using the option provided by Regulation 2026/73 to apply the same disclosure templates for the 2025 reporting period.

Pursuant to Article 3 of Taxonomy, an economic activity shall qualify as „environmentally sustainable" if all of the following conditions are met: (i) contributes substantially to one or more of the environmental objectives set out in Taxonomy, (ii) does not significantly harm any of the environmental objectives set out in Taxonomy, (iii) is carried out in compliance with the minimum safeguards i.e. procedures implemented by an undertaking that is carrying out an economic activity to ensure the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and (iv) complies with technical screening criteria that have been indicated in the relevant regulations delegated to taxonomy. In this respect, at the end of 2024, the following European Commission regulations were in force, which specified the scope of taxonomic disclosures:

- Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021, as amended by Commission Delegated Regulation (EU) 2023/2485;
- Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, as amended by Commission Delegated Regulation (EU) 2022/1214 and 2023/2486;
- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023.

In order to meet the above regulatory obligation, the Bank made quantitative disclosures in accordance with templates 0-5 (for the purposes of disclosing key indicators - "KPIs") included in Annex VI of Regulation 2021/2178 for the state of the Bank's assets as at the balance sheet date of December 31, 2025 and the Bank's assets flow in the financial year ended December 31, 2025. At the same time, in accordance with Annex XII of Regulation 2021/2178, the Bank disclosed information related to nuclear energy and natural gas.

Based on the answer to question 3 in the draft fourth Commission Notice of 17 December 2025 (DRAFT COMMISSION NOTICE on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation, as amended by the Omnibus Delegated Act, on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (fourth notice)), the Group does not disclose the information required by Template 6 (KPI for fee and commission income from services other than lending and asset management) and Template 7 (KPI for trading book).

Description of the methodology for preparing disclosures according to Annex VI of Regulation 2021/2178

Disclosures required by the Taxonomy were prepared on the basis of data provided by the Credit Information Bureau in terms of turnover KPI and capital expenditure KPI (CAPEX) reported by enterprises obliged to disclose non-financial information in accordance with the CSRD Directive for 2024, which includes:

1. Financial enterprises: asset managers, credit institutions, investment companies, insurance and reinsurance companies;
2. Non-financial enterprises.

When preparing taxonomic disclosures, the Bank used consolidated data, both in the case of credit exposures that the Bank had and taxonomic disclosures of its clients.

Quantitative disclosure tables 1, 2 and 3 (in accordance with templates 0-5) contain information according to the number of loans held, table 4 contains flows in the scope of granting new loans, while table 5 in terms of off-balance sheet exposures in accordance with the indicated regulator's template includes information in terms of state and flow.

In order to determine the amount of the Bank's exposures eligible and ineligible for the taxonomy for financial and

non-financial enterprises, the Bank identified its clients subject to the obligation to disclose non-financial information in accordance with the CSRD Directive.

Financial companies

The analysis included financial enterprises that published the green assets ratio in relation to turnover and capital expenditure at consolidated level.

Non-financial companies

For non-financial enterprises, in the field of general financing, the analysis in terms of assigning identified exposures as eligible and compliant with the Taxonomy was determined by multiplying the exposure value with the percentage indicators of eligibility and compliance to the Taxonomy in relation to turnover and capital expenditure based on information on all goals specified in the Taxonomy, i.e. climate change mitigation, adaptation to climate change, the sustainable use and protection of water and marine resources, transition to a circular economy and pollution prevention and control. Additionally, the above analysis takes into account only general financing, excluding special-purpose loans.

Households

In connection with the agreement to sell the Consumer Banking to VeloBank S.A., the Bank reclassified the Consumer Banking Business as held for sale in accordance with IFRS 5. As a result, the Bank reclassified receivables from households to other assets in 2025.

Exposures to local government units

The Bank did not identify exposures to local government units that could be recognized as eligible or consistent with the Taxonomy, as a result, in the completed tables, the Bank entered 0 for activities qualifying for the Taxonomy.

Taxonomic goals were not taken into account when designing products for the Bank's clients and implementing the Sustainable Strategy. In order to increase customer engagement in sustainable investments, the Bank developed a questionnaire that facilitates the classification of a given financing as Taxonomy-eligible or Taxonomy-aligned. The questionnaire is based on the sustainable financing criteria, in accordance with the Policy defining the framework for the classification of sustainable products in the Capital Group of Bank Handlowy w Warszawie S.A. Thanks to this tool, the Bank will be able to disclose Taxonomy-eligible and Taxonomy-aligned special purposes loans defined in the Taxonomy in subsequent Sustainable Statements.

The Bank's total green asset ratio (GAR) at the end of 2025 was 0.44% according to the Turnover KPI and 0.73% according to the Capex KPI. The Bank's total green asset ratio (GAR) at the end of 2024 was 0.08% according to the Turnover KPI and 0.42% according to the Capex KPI.

The Bank reported Taxonomy-aligned assets at the following levels:

- PLN 203 million in environmentally sustainable assets according to the Turnover KPI, representing a more than five-fold increase compared to 2024
- PLN 333 million in environmentally sustainable assets according to the Capital Expenditure KPI, representing a 64% increase compared to 2024.

Exposures to non-financial corporations accounted for the largest share of the Green Asset Ratio (GAR). This increase was primarily due to the Bank's higher lending volumes to clients subject to the CSRD directive, which translated into an increase in assets subject to the Taxonomy.

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation - 2025

		Total environmentally sustainable assets - turnover	Total environmentally sustainable assets - CAPEX	KPI Turnover****	KPI CAPEX****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	197	327	0,43%	0,71%	57,08%	52,58%	42,92%

		Total environmentally sustainable activities - turnover	Total environmentally sustainable activities - CAPEX	KPI Turnover****	KPI CAPEX****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	246	244	2,76%	2,74%	51,36%	44,19%	48,64%
	Trading book*	n/d	n/d	n/d	n/d			
	Financial guarantees	0	11	0,00%	7,10%			
	Assets under management	n/d	n/d	n/d	n/d			
	Fee & commission income**	n/d	n/d	n/d	n/d			

*For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR
**Fees and commissions income from services other than lending and AuM
Instutitons shall disclose forward-looking information for these KPIs, including information in terms of targets, together with relevant explanations on the methodology applied
***% of assets covered by the KPI over banks' total assets
****Based on the Turnover KPI of the counterparty
*****Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation - 2024

		Total environmentally sustainable assets - turnover	Total environmentally sustainable assets - CAPEX	KPI Turnover****	KPI CAPEX****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	38	203	0,08%	0,42%	64,65%	52,80%	35,35%

		Total environmentally sustainable activities - turnover	Total environmentally sustainable activities - CAPEX	KPI Turnover****	KPI CAPEX****	% coverage (over total assets)***	% of assets excluded from the numerator when calculating the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPI's	GAR (flow)	18	118	0,45%	2,93%	46,45%	15,52%	53,55%
	Trading book*	n/d	n/d	n/d	n/d			
	Financial guarantees	0	1	0,45%	1,69%			
	Assets under management	n/d	n/d	n/d	n/d			
	Fee & Commission Income**	n/d	n/d	n/d	n/d			

*For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

**Fees and commissions income from services other than lending and AuM

Instutitons shall disclose forward-looking information for these KPIs, including information in terms of targets, together with relevant explanations on the methodology applied

***% of assets covered by the KPI over banks' total assets

****Based on the Turnover KPI of the counterparty

*****Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

1. Assets for the calculation of GAR - Turnover based - 2025

31.12.2025

million PLN		Total gross carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)						Water and marine resources (WTR)						Circular economy (CE)						Pollution (PPC)						Biodiversity and Ecosystems (BIO)						TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
				Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)					
					Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which specialised lending	Of which transitional/ adaptation	Of which enabling			
1	**GAR - Covered assets in both numerator and denominator**																																											
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	3 618	573	197	0	0	184	1	0	0	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	578	197	0	0	184										
3	**Financial corporations**	**1 018**	**244**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**244**	**0**	**0**	**0**	**0**										
4	Credit institutions	1 018	244	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	244	0	0	0	0										
5	Loans and advances	16	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0										
6	Debt securities, including UoP	1 002	239	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	239	0	0	0	0										
7	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0		0	0	0										
8	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
9	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
10	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
11	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
12	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0		0	0	0										
13	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
14	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
15	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
16	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0		0	0										
17	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
18	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
19	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
20	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0		0	0	0										
21	**Non-financial corporations**	**2 600**	**329**	**197**	**0**	**0**	**184**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**4**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**334**	**197**	**0**	**0**	**184**										
22	Loans and advances	2 600	329	197	0	0	184	1	0	0	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	334	197	0	0	184										
23	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0										
24	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0		0	0	0										
25	**Households**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**				0	0	0	0										**0**	**0**	**0**	**0**	**0**										
26	of which loans collateralised by residential immovable property	0	0	0	0	0	0	0	0	0	0	0	0				0	0	0	0										0	0	0	0	0										
27	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0				0	0	0	0										0	0	0	0	0										
28	of which motor vehicle loans	0	0	0	0	0	0	0																						0	0	0	0	0										
29	**Local governments financing**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**										
30	Collateral obtained by taking possession: residential and commercial immovable properties	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**										
31	Other local government financing	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**										
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	**42 252**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**										
33	**Non-financial and financial corporations**	21 837																																									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	9 256																																									
35	Loans and advances	9 256																																									
36	of which loans collateralised by commercial immovable property	0																																									
37	of which building renovation loans	0																																									
38	Debt securities	0																																									
39	Equity instruments	0																																									
40	Financial corporations	12 376																																									
41	Non-EU country counterparties not subject to NFRD disclosure obligations	205																																									
42	Loans and advances	205																																									
43	Debt securities	0																																									
44	Equity instruments	0																																									
45	**Derivatives**	0																																									
46	**On demand interbank loans**	29																																									
47	**Cash and cash-related assets**	287																																									
48	**Other assets (e.g. Goodwill, commodities etc.)**	20 099																																									
49	**Total GAR assets**	45 870	573	197	0	0	184	1	0	0	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	578	197	0	0	184										
50	**Other assets not covered for GAR calculation**	34 490																																									
51	**Sovereigns**	19 367																																									
52	**Central banks exposure**	8 890																																									
53	**Trading book**	6 233																																									
54	**Total assets**	80 360																																									
Off-balance sheet exposures - Corporates subject to NFRD disclosure obligations																																											
55	Financial guarantees	155	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0	0										
56	Assets under management																																										
57	Of which debt securities																																										
58	Of which equity instruments																																										

1. Assets for the calculation of GAR – Turnover based – 2024

31.12.2024

million PLN		Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)					Circular economy (CE)					Pollution (PPC)					Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
					Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling
1	**GAR - Covered assets in both numerator and denominator**																																		
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8 856	279	13	0	0	7	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	304	38	0	0	7
3	**Financial corporations**	**1 037**	**243**	**4**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**244**	**4**	**0**	**0**	**0**
4	Credit institutions	1 037	243	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	244	4	0	0	0
5	Loans and advances	34	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	0	0	0	0
6	Debt securities, including UoP	1 003	236	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	236	4	0	0	0
7	Equity instruments																																		
8	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	of which investment firms																																		
10	Loans and advances	0																																	
11	Debt securities, including UoP																																		
12	Equity instruments																																		
13	of which management companies	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Loans and advances	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Debt securities, including UoP																																		
16	Equity instruments																																		
17	of which insurance undertakings	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Loans and advances	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Debt securities, including UoP																																		
20	Equity instruments																																		
21	**Non-financial corporations**	**1 459**	**36**	**9**	**0**	**0**	**7**	**24**	**24**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**60**	**34**	**0**	**0**	**7**
22	Loans and advances	1 459	36	9	0	0	7	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60	34	0	0	7
23	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Equity instruments	0	0	0		0	0	0	0		0	0																		0	0		0	0
25	**Households**	**6 360**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**																		**0**	**0**	**0**	**0**	**0**
26	of which loans collateralised by residential immovable property	2 357	0	0	0	0	0	0	0	0	0	0																		0	0	0	0	0
27	of which building renovation loans																																		
28	of which motor vehicle loans																																		
29	**Local governments financing**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
30	Collateral obtained by taking possession: residential and commercial immovable properties																																		
31	Other local government financing																																		
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	39 446	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	**Non-financial and financial corporations**	22 016																																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	12 678																																	
35	Loans and advances	12 678																																	
36	of which loans collateralised by commercial immovable property																																		
37	of which building renovation loans																																		
38	Debt securities																																		
39	Equity instruments																																		
	Financial corporations	9 281																																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	56																																	
41	Loans and advances	56																																	
42	Debt securities																																		
43	Equity instruments																																		
44	**Derivatives**	55																																	
45	**On demand interbank loans**	12																																	
46	**Cash and cash-related assets**	498																																	
47	**Other assets (e.g. Goodwill, commodities etc.)**	16 865																																	
48	**Total GAR assets**	48 302	279	13	0	0	7	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	304	38	0	0	7
49	**Other assets not covered for GAR calculation**	26 409																																	
50	**Sovereigns**	13 536																																	
51	**Central banks exposure**	6 295																																	
52	**Trading book**	6 577																																	
53	**Total assets**	74 710																																	
Off-balance sheet exposures - Corporates subject to NFRD disclosure obligations																																			
54	Financial guarantees	39	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
55	Assets under management																																		
56	Of which debt securities																																		
57	Of which equity instruments																																		

1. Assets for the calculation of GAR - CAPEX based - 2025

	million PLN	31.12.2025																																				
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)						Water and marine resources (WTR)						Circular economy (CE)						Pollution (PPC)						Biodiversity and Ecosystems (BIO)						TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Total gross carrying amount	Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
				Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)					
					Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds	Of which enabling				Of which specialised lending	Of which transitional/ adaptation	Of which enabling	
1	**GAR - Covered assets in both numerator and denominator**																																					
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	3 618	1 312	325	0	4	297	7	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1 319	327	0	4	297
3	**Financial corporations**	**1 018**	**244**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**244**	**0**	**0**	**0**	**0**
4	Credit institutions	1 018	244	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	244	0	0	0	0
5	Loans and advances	16	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0
6	Debt securities, including UoP	1 002	239	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	240	0	0	0	0
7	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0	0	0	0	0		0	0	0	0	0
8	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0	0	0	0	0		0	0	0	0	0
13	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0	0	0	0	0		0	0	0	0	0
17	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0	0	0	0	0		0	0	0	0	0
21	**Non-financial corporations**	**2 600**	**1068**	**325**	**0**	**4**	**296**	**6**	**1**	**0**	**0**	**0**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**1075**	**327**	**0**	**4**	**296**
22	Loans and advances	2 600	1068	325	0	4	296	6	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1075	327	0	4	296
23	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Equity instruments	0	0	0		0	0	0	0		0	0	0	0	0		0	0	0	0	0		0	0	0	0	0	0	0	0	0		0	0	0	0	0
25	**Households**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**							**0**	**0**	**0**	**0**							**0**	**0**	**0**	**0**	**0**
26	of which loans collateralised by residential immovable property	0	0	0	0	0	0	0	0	0	0	0	0							0	0	0	0							0	0	0	0	0
27	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0							0	0	0	0							0	0	0	0	0
28	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
29	**Local governments financing**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
30	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Other local government financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	42 252	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	**Non-financial and financial corporations**	21 837																																				
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	9 256																																				
35	Loans and advances	9 256																																				
36	of which loans collateralised by commercial immovable property	0																																				
37	of which building renovation loans	0																																				
38	Debt securities	0																																				
39	Equity instruments	0																																				
40	Financial corporations	12 376																																				
41	Non-EU country counterparties not subject to NFRD disclosure obligations	205																																				
42	Loans and advances	205																																				
43	Debt securities	0																																				
44	Equity instruments	0																																				
45	**Derivatives**	0																																				
46	**On demand interbank loans**	29																																				
47	**Cash and cash-related assets**	287																																				
48	**Other assets (e.g. Goodwill, commodities etc.)**	20 099																																				
49	**Total GAR assets**	45 870	1312	325	0	4	297	7	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1319	327	0	4	297
50	**Other assets not covered for GAR calculation**	34 490																																				
51	**Sovereigns**	19 367																																				
52	**Central banks exposure**	8 890																																				
53	**Trading book**	6 233																																				
54	**Total assets**	80 360																																				
Off-balance sheet exposures - Corporates subject to NFRD disclosure obligations																																						
55	Financial guarantees	155	39	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	39	11	0	0	11
56	Assets under management																																					
57	Of which debt securities																																					
58	Of which equity instruments																																					

1. Assets for the calculation of GAR - CAPEX based - 2024

31.12.2024

	million PLN	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)					Circular economy (CE)					Pollution (PPC)					Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
					Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling
1	**GAR - Covered assets in both numerator and denominator**																																		
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8 856	584	174	0	26	39	42	29	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	626	203	0	26	41
3	**Financial corporations**	**1 037**	**263**	**5**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**264**	**5**	**0**	**0**	**0**
4	Credit institutions	1 037	263	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	264	5	0	0	0
5	Loans and advances	34	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	0	0	0	0
6	Debt securities, including UoP	1 003	256	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	256	5	0	0	0
7	Equity instruments																																	
8	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	of which investment firms																																	
10	Loans and advances	0																																
11	Debt securities, including UoP																																	
12	Equity instruments																																	
13	of which management companies	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Loans and advances	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Debt securities, including UoP																																	
16	Equity instruments																																	
17	of which insurance undertakings	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Loans and advances	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Debt securities, including UoP																																	
20	Equity instruments																																	
21	**Non-financial corporations**	**1 459**	**321**	**169**	**0**	**26**	**39**	**42**	**28**	**0**	**0**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**362**	**198**	**0**	**26**	**41**
22	Loans and advances	1 459	321	169	0	26	39	42	28	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	362	198	0	26	41
23	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Equity instruments	0	0	0		0	0	0	0		0	0																		0	0		0	0
25	**Households**	**6 360**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**																		**0**	**0**	**0**	**0**	**0**
26	of which loans collateralised by residential immovable property	2 357	0	0	0	0	0	0	0	0	0	0																		0	0	0	0	0
27	of which building renovation loans																																	
28	of which motor vehicle loans																																	
29	**Local governments financing**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
30	Collateral obtained by taking possession: residential and commercial immovable properties																																	
31	Other local government financing																																	
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	39 446	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	**Non-financial and financial corporations**	22 016																																
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	12 678																																
35	Loans and advances	12 678																																
36	of which loans collateralised by commercial immovable property																																	
37	of which building renovation loans																																	
38	Debt securities																																	
39	Equity instruments																																	
	Financial corporations	9 281																																
40	Non-EU country counterparties not subject to NFRD disclosure obligations	56																																
41	Loans and advances	56																																
42	Debt securities																																	
43	Equity instruments																																	
44	**Derivatives**	55																																
45	**On demand interbank loans**	12																																
46	**Cash and cash-related assets**	498																																
47	**Other assets (e.g. Goodwill, commodities etc.)**	16 865																																
48	**Total GAR assets**	48 302	584	174	0	26	39	42	29	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	626	203	0	26	41
49	**Other assets not covered for GAR calculation**	26 409																																
50	**Sovereigns**	13 536																																
51	**Central banks exposure**	6 295																																
52	**Trading book**	6 577																																
53	**Total assets**	74 710																																
Off-balance sheet exposures - Corporates subject to NFRD disclosure obligations																																		
54	Financial guarantees	39	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0
55	Assets under management																																	
56	Of which debt securities																																	
57	Of which equity instruments																																	

2. GAR sector information (turnover) - 2025

	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	19,2	1	0			1	0			1	0			1	0			1	0			1	0			1	0		
2	24,41	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
3	24,42	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
4	25,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
5	25,94	36	0			36	0			36	0			36	0			36	0			36	0			36	0		
6	27,51	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
7	29,1	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
8	35,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
9	35,13	550	131			550	0			550	0			550	0			550	0			550	0			550	131		
10	45,31	287	0			287	0			287	0			287	0			287	0			287	0			287	0		
11	46,39	277	0			277	0			277	0			277	0			277	0			277	0			277	0		
12	46,47	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
13	46,71	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
14	46,74	7	0			7	0			7	0			7	0			7	0			7	0			7	0		
15	47,3	42	0			42	0			42	0			42	0			42	0			42	0			42	0		
16	47,71	127	0			127	0			127	0			127	0			127	0			127	0			127	0		
17	47,72	24	0			24	0			24	0			24	0			24	0			24	0			24	0		
18	47,91	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
19	52,2	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
20	58,13	86	0			86	0			86	0			86	0			86	0			86	0			86	0		
21	61,1	25	0			25	0			25	0			25	0			25	0			25	0			25	0		
22	62,01	26	0			26	0			26	0			26	0			26	0			26	0			26	0		
23	69,2	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
24	93,19	0	0			0	0			0	0			0	0			0	0			0	0			0	0		

2. GAR sector information (turnover) - 2024

	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	19,2	1	0			1	0			1	0			1	0			1	0			1	0			1	0		
2	24,41	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
3	24,42	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
4	25,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
5	25,94	36	0			36	0			36	0			36	0			36	0			36	0			36	0		
6	27,51	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
7	29,1	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
8	35,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
9	35,13	550	131			550	0			550	0			550	0			550	0			550	0			550	131		
10	45,31	287	0			287	0			287	0			287	0			287	0			287	0			287	0		
11	46,39	277	0			277	0			277	0			277	0			277	0			277	0			277	0		
12	46,47	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
13	46,71	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
14	46,74	7	0			7	0			7	0			7	0			7	0			7	0			7	0		
15	47,3	42	0			42	0			42	0			42	0			42	0			42	0			42	0		
16	47,71	127	0			127	0			127	0			127	0			127	0			127	0			127	0		
17	47,72	24	0			24	0			24	0			24	0			24	0			24	0			24	0		
18	47,91	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
19	52,2	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
20	58,13	86	0			86	0			86	0			86	0			86	0			86	0			86	0		
21	61,1	25	0			25	0			25	0			25	0			25	0			25	0			25	0		
22	62,01	26	0			26	0			26	0			26	0			26	0			26	0			26	0		
23	69,2	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
24	93,19	0	0			0	0			0	0			0	0			0	0			0	0			0	0		

2. GAR sector information (CAPEX) – 2025

	Breakdown by sector – NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject		Non-Financial corporates		SMEs and other NFC not subject	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	19,2	1	0			1	0			1	0			1	0			1	0			1	0			1	0		
2	24,41	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
3	24,42	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
4	25,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
5	25,94	36	0			36	0			36	0			36	0			36	0			36	0			36	0		
6	27,51	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
7	29,1	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
8	35,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
9	35,13	550	255			550	0			550	0			550	0			550	0			550	0			550	255		
10	45,31	287	0			287	0			287	0			287	0			287	0			287	0			287	0		
11	46,39	277	0			277	0			277	0			277	0			277	0			277	0			277	0		
12	46,47	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
13	46,71	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
14	46,74	7	0			7	0			7	0			7	0			7	0			7	0			7	0		
15	47,3	42	2			42	0			42	1			42	0			42	0			42	0			42	3		
16	47,71	127	3			127	0			127	0			127	0			127	0			127	0			127	3		
17	47,72	24	1			24	0			24	0			24	0			24	0			24	0			24	1		
18	47,91	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
19	52,2	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
20	58,13	86	0			86	0			86	0			86	0			86	0			86	0			86	0		
21	61,1	25	0			25	0			25	0			25	1			25	0			25	0			25	1		
22	62,01	26	0			26	0			26	0			26	0			26	0			26	0			26	0		
23	69,2	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
24	93,19	0	0			0	0			0	0			0	0			0	0			0	0			0	0		

2. GAR sector information (CAPEX) – 2024

	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCM)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (CCA)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (WTR)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (CE)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (PPC)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	24,42	2	0			0	0			0	0			0	0			0	0			0	0			2	0		
2	25,11	85	8			0	0			0	0			0	0			0	0			0	0			85	8		
3	25,94	38	4			0	0			0	0			0	0			0	0			0	0			38	4		
4	27,51	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
5	29,1	1	1			0	0			0	0			0	0			0	0			0	0			1	1		
6	35,11	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
7	35,13	28	23			0	0			0	0			0	0			0	0			0	0			28	23		
8	46,39	227	44			0	0			0	0			227	0			0	0			0	0			227	44		
9	46,47	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
10	46,71	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
11	46,74	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
12	47,3	83	9			0	0			0	0			0	0			0	0			0	0			83	9		
13	47,71	108	2			0	0			0	0			108	0			0	0			0	0			108	2		
14	47,72	204	44			204	14			0	0			204	0			0	0			0	0			204	58		
15	47,91	41	2			0	0			0	0			41	0			0	0			0	0			41	2		
16	52,2	19	1			0	0			0	0			0	0			0	0			0	0			19	1		
17	58,13	96	29			96	27			0	0			0	0			0	0			0	0			96	57		
18	61,1	0	0			0	0			0	0			0	0			0	0			0	0			0	0		
19	62,01	21	8			21	0			21	0			21	0			0	0			0	0			21	8		

3. GAR KPI stock (turnover) – 2025

	% (compared to total covered assets in the denominator)	31.12.2025																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling		
1	**GAR - Covered assets in both numerator and denominator**																															
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16%	6%	0%	0%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	16%	6%	0%	0%	5%	5%
3	**Financial corporations**	**24%**	**1%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**24%**	**1%**	**0%**	**0%**	**0%**	1%
4	Credit institutions	24%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	24%	1%	0%	0%	0%	1%
5	Loans and advances	30%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	30%	2%	0%	0%	0%	0%
6	Debt securities, including UoP	24%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	24%	0%	0%	0%	0%	1%
7	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
8	Other financial corporations	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	of which investment firms	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
13	of which management companies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
17	of which insurance undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
21	**Non-financial corporations**	13%	8%	0%	0%	7%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	13%	8%	0%	0%	7%	3%
23	Loans and advances	13%	8%	0%	0%	7%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	13%	8%	0%	0%	7%	3%
24	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
25	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
26	**Households**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**
27	of which loans collateralised by residential immovable property	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
28	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	of which motor vehicle loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	**Local governments financing**	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
33	Total GAR assets	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	57%

3. GAR KPI stock (turnover) - 2024

	% (w porównaniu z aktywami ogółem uwzględnionymi w mianowniku)	31.12.2024																														
		Łagodzenie zmian klimatu (CCM)					Adaptacja do zmian klimatu (CCA)					Zasoby wodne i morskie (WTR)				Gospodarka obiegu zamkniętego (CE)				Zanieczyszczenie (PPC)				Bioróżnorodności i ekosystemy (BIO)				Ogółem (CCM + CCA + WTR + CE + PPC + BIO)					
		Udział procentowy uwzględnionych aktywów ogółem przeznaczonych na finansowanie sektorów istotnych dla systematyki (kwalifikująca się do systematyki)	Udział procentowy uwzględnionych aktywów ogółem przeznaczonych na finansowanie sektorów istotnych dla systematyki (zgodna z systematyką)				Udział procentowy uwzględnionych aktywów ogółem przeznaczonych na finansowanie sektorów istotnych dla systematyki (kwalifikująca się do systematyki)	Udział procentowy uwzględnionych aktywów ogółem przeznaczonych na finansowanie sektorów istotnych dla systematyki (zgodna z systematyką)				W tym wobec sektorów istotnych dla systematyki (kwalifikujące się do systematyki)	W tym zrównoważone środowiskowo (zgodne z systematyką)			W tym wobec sektorów istotnych dla systematyki (kwalifikujące się do systematyki)	W tym zrównoważone środowiskowo (zgodne z systematyką)			W tym wobec sektorów istotnych dla systematyki (kwalifikujące się do systematyki)	W tym zrównoważone środowiskowo (zgodne z systematyką)			W tym wobec sektorów istotnych dla systematyki (kwalifikujące się do systematyki)	W tym zrównoważone środowiskowo (zgodne z systematyką)			Udział procentowy uwzględnionych aktywów ogółem przeznaczonych na finansowanie sektorów istotnych dla systematyki (kwalifikująca się do systematyki)	Udział procentowy uwzględnionych aktywów ogółem przeznaczonych na finansowanie sektorów istotnych dla systematyki (zgodna z systematyką)					Udział procentowy uwzględnionych aktywów ogółem
				W tym przeznaczenie wpływów	W tym na rzecz przejścia	W tym wspomagają ca			W tym przeznaczenie wpływów	W tym na rzecz przejścia	W tym wspomagają ca			W tym przeznaczenie wpływów	W tym wspomagają ca			W tym przeznaczenie wpływów	W tym wspomagają ca			W tym przeznaczenie wpływów	W tym wspomagają ca			W tym przeznaczenie wpływów	W tym wspomagają ca			W tym przeznaczenie wpływów	W tym na rzecz przejścia	W tym wspomagają ca	
1	**Wskaźnik zielonych aktywów - aktywa objęte wskaźnikiem zielonych aktywów zarówno w liczniku, jak i mianowniku**																															
2	Kredyty i zaliczki, dłużne papiery wartościowe i instrumenty kapitałowe nieprzeznaczone do obrotu niekwalifikującego się do obliczenia wskaźnika zielonych aktywów	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	12%
3	**Instytucje finansowe**	**23%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**23%**	**0%**	**0%**	**0%**	**0%**	1%
4	Instytucje kredytowe	23%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	23%	0%	0%	0%	0%	1%
5	Kredyty i zaliczki	22%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	22%	0%	0%	0%	0%	0%
6	Dłużne papiery wartościowe, w tym UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
7	Instrumenty kapitałowe	0%	0%	0%	[redacted]	0%	0%	0%	0%	[redacted]	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	[redacted]	0%	0%
8	Inne instytucje finansowe	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	w tym firmy inwestycyjne	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Kredyty i zaliczki	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	Dłużne papiery wartościowe, w tym UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	Instrumenty kapitałowe	0%	0%	0%	[redacted]	0%	0%	0%	0%	[redacted]	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	[redacted]	0%	0%
13	w tym spółki zarządzające aktywami	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Kredyty i zaliczki	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Dłużne papiery wartościowe, w tym UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	Instrumenty kapitałowe	0%	0%	0%	[redacted]	0%	0%	0%	0%	[redacted]	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	[redacted]	0%	0%
17	W tym zakłady ubezpieczeń	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Kredyty i zaliczki	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Dłużne papiery wartościowe, w tym UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	Instrumenty kapitałowe	0%	0%	0%	[redacted]	0%	0%	0%	0%	[redacted]	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	[redacted]	0%	0%
21	**Przedsiębiorstwa niefinansowe**	2%	1%	0%	0%	0%	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	4%	2%	0%	0%	0%	2%
23	Kredyty i zaliczki	2%	1%	0%	0%	0%	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	4%	2%	0%	0%	0%	2%
24	Dłużne papiery wartościowe, w tym UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
25	Instrumenty kapitałowe	0%	0%	0%	[redacted]	0%	0%	0%	0%	[redacted]	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	[redacted]	0%	0%
26	**Gospodarstwa domowe**	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	9%
27	w tym kredyty zabezpieczone nieruchomościami mieszkalnymi	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%
28	of w tym kredyty na renowację budynków	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	w tym kredyty na pojazdy silnikowe	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	**Finansowanie samorządów terytorialnych**	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	Finansowanie mieszkalnictwa	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	Inne finansowanie samorządów terytorialnych	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
33	**Aktywa wskaźnika zielonych aktywów ogółem**	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	65%

3.GAR KPI stock (CAPEX) – 2025

	% (compared to total covered assets in the denominator)	31.12.2025																													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	Proportion of total assets covered
1	**GAR - Covered assets in both numerator and**																														
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	36%	9%	0%	0%	8%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	36%	9%	0%	0%	8%	5%
3	**Financial corporations**	**24%**	**1%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**24%**	**1%**	**0%**	**0%**	**0%**	1%
4	Credit institutions	24%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	24%	1%	0%	0%	0%	1%
5	Loans and advances	31%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	31%	2%	0%	0%	0%	0%
6	Debt securities, including UoP	24%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	24%	0%	0%	0%	0%	1%
7	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
8	Other financial corporations	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	of which investment firms	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
13	of which management companies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
17	of which insurance undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
21	**Non-financial corporations**	41%	12%	0%	0%	11%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	41%	13%	0%	0%	11%	3%
23	Loans and advances	41%	12%	0%	0%	11%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	41%	13%	0%	0%	11%	3%
24	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
25	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
26	**Households**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**
27	of which loans collateralised by residential immovable property	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
28	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	of which motor vehicle loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	**Local governments financing**	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
33	**Total GAR assets**	3%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	1%	0%	0%	1%	57%

3.GAR KPI stock (CAPEX) - 2024

	% (compared to total covered assets in the denominator)	31.12.2024																													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
1	**GAR - Covered assets in both numerator and denominator**																														
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	7%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	7%	2%	0%	0%	0%	12%
3	**Financial corporations**	**25%**	**1%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**25%**	**1%**	**0%**	**0%**	**0%**	1%
4	Credit institutions	25%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	1%	0%	0%	0%	1%
5	Loans and advances	22%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	23%	1%	0%	0%	0%	0%
6	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
7	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
8	Other financial corporations	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	of which investment firms	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
13	of which management companies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
17	of which insurance undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
21	**Non-financial corporations**	22%	12%	0%	2%	3%	3%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	14%	0%	2%	3%	2%
23	Loans and advances	22%	12%	0%	2%	3%	3%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	14%	0%	2%	3%	2%
24	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
25	Equity instruments	0%	0%	0%		0%	0%	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%
26	**Households**	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	9%
27	of which loans collateralised by residential immovable property	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%
28	of which building renovation loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	of which motor vehicle loans	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	**Local governments financing**	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
49	**Total GAR assets**	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	65%

4.GAR KPI flow (% turnover KPI) – 2025

	% (compared to flow of total eligible assets)	31.12.2025																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total new assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
1	**GAR - Covered assets in both numerator and**																															
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	23,84%	19,79%	0,00%	0,00%	19,71%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,97%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	24,81%	19,79%	0,00%	0,00%	19,71%	7,18%
3	**Financial corporations**	29,72%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	29,72%	0,00%	0,00%	0,00%	0,00%	0,05%
4	Credit institutions	29,72%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	29,72%	0,00%	0,00%	0,00%	0,00%	0,05%
5	Loans and advances	29,72%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	29,75%	1,68%	0,00%	0,00%	0,00%	0,05%
6	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
8	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
13	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
17	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
21	**Non-financial corporations**	23,81%	19,92%	0,00%	0,00%	19,84%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,97%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	24,78%	19,92%	0,00%	0,00%	19,84%	7,13%
23	Loans and advances	23,81%	19,92%	0,00%	0,00%	19,84%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,97%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	24,78%	19,92%	0,00%	0,00%	19,84%	7,13%
24	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
26	**Households**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%																	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	**Local governments financing**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
33	**Total GAR assets**	3,33%	2,76%	0,00%	0,00%	2,75%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,13%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	3,47%	2,76%	0,00%	0,00%	2,75%	51,36%

4.GAR KPI flow (% turnover KPI) – 2024

	% (compared to flow of total eligible assets)	31.12.2024																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total new assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
1	**GAR - Covered assets in both numerator and denominator**																															
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,76%	0,17%	0,00%	0,00%	0,13%	0,51%	0,51%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	1,27%	0,68%	0,00%	0,00%	0,13%	3,68%
3	**Financial corporations**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	**Non-financial corporations**	2,75%	0,61%	0,00%	0,00%	0,47%	1,85%	1,85%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	4,59%	2,45%	0,00%	0,00%	0,47%	1,02%
23	Loans and advances	2,75%	0,61%	0,00%	0,00%	0,47%	1,85%	1,85%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	4,59%	2,45%	0,00%	0,00%	0,47%	1,02%
24	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	**Households**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	2,66%
27	of which loans collateralised by residential	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,68%
28	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%																	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	**Local governments financing**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
45	**Total GAR assets**	0,51%	0,11%	0,00%	0,00%	0,09%	0,34%	0,34%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,85%	0,45%	0,00%	0,00%	0,09%	5,53%

4. GAR KPI flow (% CAPEX) – 2025

	% (compared to flow of total eligible assets)	31.12.2025																													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total new assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling		
1	**GAR - Covered assets in both numerator and**																														
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	31,89%	19,39%	0,00%	1,61%	17,54%	0,24%	0,24%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	32,13%	19,63%	0,00%	1,61%	17,54%	7,18%
3	**Financial corporations**	30,11%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,05%
4	Credit institutions	30,11%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,05%
5	Loans and advances	30,11%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,05%
6	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%
8	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%
13	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%
17	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%
21	**Non-financial corporations**	31,90%	19,51%	0,00%	1,62%	17,65%	0,24%	0,24%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	32,15%	19,76%	0,00%	1,62%	17,65%	7,13%
23	Loans and advances	31,90%	19,51%	0,00%	1,62%	17,65%	0,24%	0,24%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	32,15%	19,76%	0,00%	1,62%	17,65%	7,13%
24	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%
26	**Households**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%											0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%											0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%											0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%																			0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	**Local governments financing**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
33	**Total GAR assets**	4,46%	2,71%	0,00%	0,22%	2,45%	0,03%	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	4,49%	2,74%	0,00%	0,22%	2,45%	51,36%

4. GAR KPI flow (% CAPEX) – 2024

	% (compared to flow of total eligible assets)	Disclosure reference date T																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total new assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
1	**GAR - Covered assets in both numerator and denominator**																															
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6,79%	4,08%	0,00%	0,71%	0,36%	0,51%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	7,30%	4,12%	0,00%	0,71%	0,36%	3,93%
3	**Financial corporations**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
8	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
13	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
17	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
21	**Non-financial corporations**	26,16%	15,72%	0,00%	2,75%	1,40%	1,98%	0,16%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	28,14%	15,88%	0,00%	2,75%	1,40%	1,02%
23	Loans and advances	26,16%	15,72%	0,00%	2,75%	1,40%	1,98%	0,16%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	28,14%	15,88%	0,00%	2,75%	1,40%	1,02%
24	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	Equity instruments	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%
26	**Households**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	2,66%
27	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,68%
28	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%					0,00%	0,00%	0,00%	0,00%									0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%																	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	**Local governments financing**	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,25%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
49	**Total GAR assets**	4,83%	2,90%	0,00%	0,51%	0,26%	0,36%	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	5,19%	2,93%	0,00%	0,51%	0,26%	5,53%

5. KPI off-balance sheet exposures Turnover based - 2025

% (compared to total eligible off-balance sheet assets)	31.12.2025																																					
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)														
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)														
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)														
			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling								
1 Financial guarantees (FinGuar KPI)	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%					
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d					

5. KPI off-balance sheet exposures Turnover based - 2024

% (compared to total eligible off-balance sheet assets)	31.12.2024																																					
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)														
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)														
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)														
			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling								
1 Financial guarantees (FinGuar KPI)	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%					
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d					

5. KPI off-balance sheet exposures - Capex based - 2025

% (compared to total eligible off-balance sheet assets)	31.12.2025																																					
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)														
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)														
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)														
			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling								
1 Financial guarantees (FinGuar KPI)	25%	7%	0%	0%	7%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	7%	0%	0%	7%					
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d					

5. KPI off-balance sheet exposures - Capex based - 2024

% (compared to total eligible off-balance sheet assets)	31.12.2024																																					
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)														
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)														
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)														
			Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling				Of which specialised lending	Of which transitional	Of which enabling								
1 Financial guarantees (FinGuar KPI)	3%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	2%	0%	0%	0%					
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d					

5. KPI off-balance sheet flow exposures - Turnover based 2025

% (compared to total eligible off-balance sheet assets)	31.12.2025																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d

5. KPI off-balance sheet flow exposures - Turnover based 2024

% (compared to total eligible off-balance sheet assets)	31.12.2024																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	38%	0%	0%	0%	0%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	43%	5%	0%	0%	0%
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d

5. KPI off-balance sheet flow exposures - CAPEX based 2025

% (compared to total eligible off-balance sheet assets)	31.12.2025																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	25%	2%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	2%	0%	0%	1%
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d

5. KPI off-balance sheet flow exposures - CAPEX based 2024

% (compared to total eligible off-balance sheet assets)	31.12.2024																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	38%	0%	0%	0%	0%	5%	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	43%	5%	0%	0%	0%
2 Assets under management (AuM KPI)	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d	n/d

1. Activities Related to Nuclear Energy and Natural Gas (turnover) 2025

	Nuclear Energy Activities	
1	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them	Yes
2	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safetyoriented modernisation using best available technologies, finances such activities, or has exposure to them.	Yes
3	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	Yes
	Natural Gas Activities	
4	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes
5	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes
6	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes

1. Activities Related to Nuclear Energy and Natural Gas (turnover) 2024

	Nuclear Energy Activities	
1	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them	No
2	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safetyoriented modernisation using best available technologies, finances such activities, or has exposure to them.	No
3	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	No
	Natural Gas Activities	
4	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes
5	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes
6	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes

1. Activities Related to Nuclear Energy and Natural Gas (CAPEX) 2025

	Nuclear Energy Activities	
1	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them	Tak
2	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safetyoriented modernisation using best available technologies, finances such activities, or has exposure to them.	Tak
3	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	Tak
	Natural Gas Activities	
4	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	Tak
5	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	Tak
6	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	Tak

1. Activities Related to Nuclear Energy and Natural Gas (CAPEX) 2024

	Nuclear Energy Activities	
1	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them	No
2	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safetyoriented modernisation using best available technologies, finances such activities, or has exposure to them.	No
3	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	No
	Natural Gas Activities	
4	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes
5	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes
6	.The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	Yes

2.Taxonomy-Aligned Business Activities (Denominator) [PLN million] (turnover) 2025

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation(CCM)		Climate Change Adaptation(CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**197**	**0,43%**	**197**	**0,43%**	**0**	**0,00%**
8.	**Total applicable key performance indicator**	**197**	**0,43%**	**197**	**0,43%**	**0**	**0,00%**

2.Taxonomy-Aligned Business Activities (Denominator) [PLN million] (turnover) 2024

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation		Climate Change Adaptation	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**38**	**0,08%**	**13**	**0,03%**	**25**	**0,05%**
8.	**Total applicable key performance indicator**	**38**	**0,08%**	**13**	**0,03%**	**25**	**0,05%**

2.Taxonomy-Aligned Business Activities (Denominator) [PLN million] (CAPEX) 2025

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**325,8**	**0,71%**	**325,1**	**0,71%**	**0,7**	**0,00%**
8.	**Total applicable key performance indicator**	**325,8**	**0,71%**	**325,1**	**0,71%**	**0,7**	**0,00%**

2.Taxonomy-Aligned Business Activities (Denominator) [PLN million] (CAPEX) 2024

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation		Climate Change	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**203.1**	**0.42%**	**174.5**	**0.36%**	**28.6**	**0.06%**
8.	**Total applicable key performance indicator**	**203.1**	**0.42%**	**174.5**	**0.36%**	**28.6**	**0.06%**

3.Taxonomy-Aligned Business Activities (Numerator) [PLN million] (turnover) 2025

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation(CCM)		Climate Change Adaptation(CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	88,1	44,8%	88,1	44,8%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	19,2	9,8%	19,2	9,8%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**89**	**45,4%**	**89**	**45,4%**	**0**	**0,0%**
8.	**Total applicable key performance indicator**	**197**	**100,0%**	**197**	**100,0%**	**0**	**0,0%**

3.Taxonomy-Aligned Business Activities (Numerator) [PLN million] (turnover) 2024

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change		Climate Change	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**38**	**100.0%**	**13**	**34.9%**	**25**	**65.1%**
8.	**Total applicable key performance indicator**	**38**	**100.0%**	**13**	**34.9%**	**25**	**65.1%**

3.Taxonomy-Aligned Business Activities (Numerator) [PLN million] (CAPEX) 2025

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**325,8**	**100,0%**	**325,1**	**99,8%**	**0,7**	**0,2%**
8.	**Total applicable key performance indicator**	**325,8**	**100,0%**	**325,1**	**99,8%**	**0,7**	**0,2%**

3.Taxonomy-Aligned Business Activities (Numerator) [PLN million] (CAPEX) 2024

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change		Climate Change	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**203,1**	**100,0%**	**174,5**	**85,9%**	**28,6**	**14,1%**
8.	**Total applicable key performance indicator**	**203,1**	**100,0%**	**174,5**	**85,9%**	**28,6**	**14,1%**

4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million] (turnover) 2025

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**377,0**	**0,78%**	**376,3**	**0,78%**	**0,8**	**0,0%**
8.	**Total applicable key performance indicator**	**377,0**	**0,78%**	**376,3**	**0,78%**	**0,8**	**0,00%**

4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million] (turnover) 2024

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change		Climate Change	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1,2	0,0%	1,2	0,0%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,1	0,0%	0,1	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**265,0**	**1,08%**	**264,8**	**1,08%**	**0,0**	**0,0%**
8.	**Total applicable key performance indicator**	**266,3**	**0,13%**	**266,1**	**0,55%**	**0,1**	**0,00%**

4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million] (CAPEX) 2025

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change Mitigation		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%	0,0	0,0%	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	242,8	0,5%	242,8	0,5%	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	55,4	0,1%	55,4	0,1%	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	11,3	0,0%	11,3	0,0%	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**683,7**	**1,42%**	**677,7**	**1,40%**	**5,9**	**0,01%**
8.	**Total applicable key performance indicator**	**993,1**	**2,06%**	**987,2**	**2,04%**	**5,9**	**0,01%**

4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million] (CAPEX) 2024

No.	Type of Business Activity	Amount and Share					
		(CCM+CCA)		Climate Change		Climate Change	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%	0.0	0.0%	0.0	0.0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	7.4	0.0%	7.4	0.0%	0.0	0.0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.8	0.0%	0.8	0.0%	0.0	0.0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1.2	0.0%	1.2	0.0%	0.0	0.0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**413.8**	**1.69%**	**400.0**	**1.63%**	**13.8**	**0.06%**
8.	**Total applicable key performance indicator**	**423.2**	**0.88%**	**409.4**	**0.85%**	**13.8**	**3.25%**

5: Non-Taxonomy-Eligible Business Activities [PLN million] (turnover) 2025

No.	Type of Business Activity	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**45 292**	**98,7%**
8.	**Total applicable key performance indicator**	**45 292**	**98,7%**

5: Non-Taxonomy-Eligible Business Activities [PLN million] (turnover) 2024

No.	Type of Business Activity	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	4,5	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**24 460**	**99,7%**
8.	**Total applicable key performance indicator**	**24 465**	**99,7%**

5: Non-Taxonomy-Eligible Business Activities [PLN million] (CAPEX) 2025

No.	Type of Business Activity	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,8	0,0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,0	0,0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**44 550**	**97,1%**
8.	**Total applicable key performance indicator**	**44 551**	**97,1%**

5: Non-Taxonomy-Eligible Business Activities [PLN million] (CAPEX) 2024

No.	Type of Business Activity	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1.2	0.0%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1.2	0.0%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0.0	0.0%
7.	**Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator**	**24 159**	**98.5%**
8.	**Total applicable key performance indicator**	**24 162**	**98.5%**

2.2 Climate change

Society around the world is increasingly understanding and analyzing global climate change and its consequences. The scientific community agrees that human activities (including the exploitation of fossil fuels) increase greenhouse gas emissions and directly contribute to the gradual destabilization of the climate, which is already manifested by extreme weather phenomena, among other things.

Humans and organizations they create play a key role in efforts to overcome the global challenge of climate change. In order to minimize its negative impact, mitigate its risks, and take advantage of emerging opportunities, a company must first identify the stages of its value chain and their emissions. Financial institutions, including banks, affect the climate mainly through their loan portfolios, which carry both financial risks and opportunities.

As a responsible financial institution, Citi Handlowy Bank supports clients in achieving their sustainability goals. An effective response to the global climate crisis requires collaboration and a long-term approach. The Bank engages in dialogue, adapts its product offerings and invests in reducing emissions, thereby supporting the commitment of Citigroup Inc. to achieve net zero emissions in 2050. The Bank adopted the ESG Strategy of Bank Handlowy w Warszawie S.A. in December 2024. It sets out key targets for the Bank's own sustainable operations and for its financed loan portfolio. The Bank is also working on a comprehensive decarbonization strategy covering all three emissions scopes according to the GHG Protocol[12]. This strategy will set measurable targets and actions to achieve the Paris Agreement goals.

2.2.1 Transition plan for climate change mitigation [E1-1]

In its Sustainability Strategy for 2025-2027, the Bank has committed to developing a transition plan for climate change mitigation, covering both its own operational activities and its loan portfolio. With respect to its own operational emissions (Scope 1 and 2), the Bank is working on developing a transition plan and expects to adopt it by the end of 2026.

Since the adoption of the Strategy, both the regulatory environment at the EU level (including the scope and timing of the CSDDD Regulation and other legislative initiatives) and at the national level (including updates to the National Energy and Climate Plan and related sectoral policies) have undergone significant changes. This impacts the manner and pace of further work on the final approach to the transition plan for the loan portfolio. As of the date of this report, the Bank has not adopted a formal transition plan within the meaning of ESRS E1. The Bank is currently developing analyses and improving data quality, which includes developing methods for assessing climate risks in the loan portfolio, obtaining ESG data from clients, and assessing possible directions for further action.

Notwithstanding the above, in 2025, in response to the requirements of Article 76(2) of Directive 2013/36/EU and the European Banking Authority's Guidelines on ESG Risk Management (EBA/GL/2025/01), the Bank developed a Prudential Transition Plan, a strategic document designed to prepare the Bank for ESG risks in the short, medium, and long term. This plan includes a specific timeframe and measurable targets for responding to financial risks arising from ESG risk factors, including those related to European Union and national regulatory objectives, in particular the goal of achieving climate neutrality by 2050.

Further decisions regarding the possible adoption of a transition plan for climate change mitigation in relation to the credit portfolio, including potential decarbonisation targets, will depend on the results of the analyses and the final shape of the regulatory/legal environment at the EU and Polish level.

2.2.2 Policies related to own operations [E1-2]

Environmental and climate policy

In 2025, the Bank issued an updated Environmental and Climate Policy, in which it clarified its objectives related to the impact of its activities on the environment (climate change mitigation, climate change adaptation, pollution prevention, sustainable use of water resources, impacts related to biodiversity and ecosystems, and support for the circular economy). In accordance with the Policy, the Bank counters climate change by:

- minimizing its impact on the environment – reducing greenhouse gas emissions, limiting the consumption of natural resources, and reducing the amount of waste generated in the Bank's operational processes;
- promoting energy efficiency – optimizing operational processes (in the Bank's own properties and branches) in terms of energy consumption and increasing the use of renewable energy sources;
- stakeholder engagement – building environmental awareness among employees.
- compliance with regulations – ensuring that the Bank's activities comply with applicable environmental protection and climate change mitigation laws;
- responsible environmental management – regular analysis of environmental performance, and improvement of processes related to the ISO 14001 standard.

The Environmental and Climate Policy covers the Bank's own buildings covered by the ISO 14001 system, branches, and car fleet located in Poland. In order to achieve some of the objectives set out in this Policy, the Bank has

[12]https://ghgprotocol.org/sites/default/files/ghgp/standards_supporting/Diagram%20of%20scopes%20and%20emissions%20across%20the%20value%20chain.pdf

established and monitors measurable, time-bound targets (KPIs) as part of its annual operating plans. For the remaining objectives, the Bank is in the process of developing measurable indicators. In addition, the Bank maintains an ongoing, two-way dialogue with employees, vendors, and regulators. The purpose of the dialogue is not only to inform about the Bank's activities, but also to collect feedback that is used to improve this Policy. The provisions of the Environmental and Climate Policy were consulted with internal stakeholders from selected units – its co-authors. The document is available on the intranet and on the Bank's external websites. The Citi Realty Services Department is responsible for implementing this regulation.

In the Environmental and Climate Policy, approved by the Bank's management, the Bank committed itself that it will:

- conduct its activities in accordance with international, national, and local laws and regulations, as well as ISO 14001 and other environment protection requirements;
- improve, maintain, and optimize the Environmental Management System in accordance with ISO 14001;
- apply the principle of double materiality – identifying the Bank's impact on the environment;
- ensure the completeness of environmental disclosures in accordance with the European Sustainability Reporting Standards (ESRS);
- undertake educational, informational, and motivational activities to raise environmental awareness among employees and vendors;
- meet the requirements of stakeholders in terms of reporting obligations related to the provision of data and reports in accordance with the regulations of: the Marshal's Office, Provincial Inspectorate for Environmental Protection, National Revenue Administration, National Center for Emissions Management, Statistics Poland, City Hall.

Sustainability Strategy for 2025-2027

The *Sustainability Strategy for 2025–2027*, which is described in the general information part (see Sustainability Strategy) is focused on issues relevant to climate change in the Bank's own operations and sets directions in the areas of climate change mitigation, energy efficiency or renewable energy use. In the *Strategy*, the Bank has committed itself to making its own operations climate neutral by 2030. The Bank intends to reduce direct emissions (Scope 1) and indirect emissions (Scope 2 and 3, categories 1-14) and compensate for emissions through so-called offsets[13].

Responsibility for implementation of the *Strategy*, which takes into account emission reductions in Scope 1 and 2, will rest with the Citi Realty Services Department, and in Scope 3 (categories 1-14) with the relevant business units. In 2025 the Bank began work on a transition plan for its own operations. The indicator monitoring process is handled by the Citi Realty Services Department and relevant business units. The provisions of the Strategy are available to employees in the Bank's intranet system.

Energy Policy

In 2025, the Bank updated its Energy Policy, clarifying the scope and limits of reporting, and responsibility for compliance monitoring and stakeholder communication and engagement. The Policy sets out the basic principles of operation that serve as guidelines for energy management at the Bank. It provides a framework for continuous improvement, energy efficiency improvement and energy consumption reduction, as well as for minimizing and mitigating environmental impact. It sets the following energy-related tasks and objectives for the organization:

- reducing the carbon footprint (reducing greenhouse gas emissions resulting from energy consumption in owned buildings and fuels in scopes 1 and 2 – own operations),
- increasing energy efficiency through optimization projects, increasing the share of renewable energy and reducing consumption of non-renewable energy, monitoring and effective energy management,
- stakeholder engagement – promoting good practices for saving electricity among employees,
- compliance with regulations – ensuring that the Bank's activities comply with applicable energy law;
- responsible energy management – regular analysis of energy performance, and improvement of processes related to the ISO 50001 standard.

The provisions of the Energy Policy apply to owned buildings covered by the ISO 50001 system, located in Poland. The Citi Realty Services Department is responsible for implementing this regulation.

The Bank monitors the above objectives and tasks by:

- control of energy consumption and costs,
- monitoring energy performance,
- gradual transition to energy from renewable sources,
- monitoring the condition of buildings in accordance with BREEAM certification,
- projects aimed at improving the energy efficiency of buildings,
- internal audits,
- annual supervision by the accreditation body,

[13] A term describing a voluntary mechanism used by organizations to offset their emissions by investing in projects that reduce or remove an equivalent amount of emissions outside the company's value chain.

- assessments of compliance with legal requirements and regulations.

In accordance with the provisions of the *Policy*, the Bank conducts ongoing dialogue with stakeholders (employees, suppliers, regulators). The provisions of the *Energy Policy* were consulted with internal stakeholders from selected units – its co-authors. The document is available on Citi Handlowy Bank's website and intranet.

2.2.3 Targets related to own operations [E1-4]

The Bank has set the following goals related to climate change mitigation and adaptation in its own operations under the Environmental and Climate Policy (compliant with the ISO 14001 standard) and Energy Policy (compliant with the ISO 50001 standard):

- preparing a transition plan (determining the extent of carbon footprint reduction),
- obtaining energy from renewable sources,
- improving the energy efficiency of its own buildings,
- annual measurement and reporting of its greenhouse gas emissions in scopes 1 and 2 and material emissions in scope 3, in accordance with the GHG Protocol methodology,
- striving for the most efficient management of utilities, in particular energy, and minimizing the consumption of natural resources,
- ensuring the availability of alternative electricity sources for current operations,
- conducting operations in its own facilities having a multi-criteria BREEAM certification system.

As part of the Sustainability Strategy for 2025-2027, the Bank pursues the following quantitative targets for sustainable own operations:

Goal	Base value	Base year	Result 2024	Result 2025
Gradual optimization of electricity consumption, in particular by 2027 energy consumption in own properties is to be reduced by 20%[14]	7,829 MWh Excluding the sold building: 7,252 MWh	2022	6,972MWh (2024) -11% (2024/2022) Excluding the sold building: 6449 MWh (2024) -11% (2024/2022)	6,255 MWh (2025) -20% 2025/2022) Excluding the sold building: 6117 MWh (2025) -16% (2025/2022)
By 2030, 100% of the electricity used will be from renewable sources (according to the progress: 2025 – 75%, 2026 – 80%, 2027 – 85%)[15]	0%	2020	60% (2024)	78% (2025)

[14] Monitoring of the target will be the responsibility of the Citi Realty Services Department. Electricity consumption will be calculated for the properties owned by the Bank in accordance with the methodology adopted for the purposes of disclosing indicators on energy consumption and energy mix [E1-5].

[15] Data regarding the progress are based on the value of contracted electricity from renewable sources. Monitoring of the target will be the responsibility of the Citi Realty Services Department. The share of energy from renewable sources will be calculated in accordance with the methodology adopted for the purposes of disclosing indicators on energy consumption and energy mix [E1-5].

The designated targets are monitored under the ISO 14001 and 50001 systems. Their effectiveness and implementation progress are analyzed, recorded, and supervised on the basis of specific indicators by the Citi Realty Services Department. The Bank's internal stakeholders were involved in setting the adopted targets. The targets were set on the basis of the Bank's internal analysis and forecasts of possible impairment and are not based on specific scientific evidence.

Work is currently underway to prepare a transition plan for own operations. GHG reduction targets in absolute value (in tons of CO2 equivalent) will be set in the next stage of work as part of the Bank's Decarbonization Strategy.

2.2.4 Activities related to own operations [E1-3]

The Bank continues its activities related to climate change mitigation and adaptation. With a view to reducing indirect and direct emissions, it began work on a transition plan for its own operations in 2025. This plan will define the levers for decarbonization and identify key actions to achieve climate neutrality. The adoption of the transition plan for its own operations (scope 1 and 2) is planned for 2026.

In 2025, as part of its emission reduction targets, the Bank increased the share of renewable energy and ensured in contracts that it would receive guarantees of origin. As a result, in 2026, 80% of the energy consumed in the Bank's own buildings will come from renewable sources. The Bank's actions are a step towards achieving its goal of full transition to renewable energy sources by 2030. The Bank is currently in the process of reorganizing its real estate portfolio. This process has directly influenced the optimization of electricity consumption in buildings and contributed to the achievement of the goal of reducing energy consumption in the Bank's own properties by 20% by 2025 (compared to 2022). Based on an analysis of electricity consumption in owned facilities, excluding the sold property (at 29 Sokolska Street in Katowice), the target accomplishment ratio was 16% compared to 2022. The result was influenced by projects carried out during the renovation completed in 2024 at the headquarters at 16 Senatorska Street in Warsaw and the adaptation and optimization of space to current demand (at the facility at 6 Goleszowska Street in Warsaw). The energy efficiency of buildings in subsequent years will also be improved by the launch of photovoltaic installations in buildings in Warsaw at 16 Senatorska Street and 7/9 Traugutta Street, as well as the completed project of constructing a photovoltaic installation in the building in Olsztyn at 16 Pstrowskiego Street, which is scheduled to be launched in Q1 2026.

***Details of completed projects*:**

Projects	Power [kWp]	Date of completion	Estimated production [MWh/year]	Avoided CO_2, emissions [kg/year]
Fotowoltaika Senatorska 16, Warszawa	49.6	2025	49.67	23,321
Fotowoltaika Traugutta 7/9, Warszawa	16.84	2025	15.67	7,359
Fotowoltaika Pstrowskiego 16, Olsztyn	29.8	2025	17.73	10,640

The above projects have been analyzed in terms of greenhouse gas emission reductions; the data presented comes from the project documentation. They are directly in line with the Sustainability Strategy for 2025-2027. In 2026-2027, the Bank plans to implement further projects to increase the energy efficiency of its own buildings in Warsaw, including the replacement of passenger elevators at 16 Senatorska Street and the expansion of the photovoltaic power plant in the building at 7/9 Traugutta Street.

In order to achieve climate neutrality in its own operations, the Bank conducts an annual carbon footprint analysis for scopes 1 and 2 and significant categories of scope 3 (details in section 2.2.11 Gross greenhouse gas emissions for scopes 1, 2, and 3).

The Bank effectively manages utilities and monitors and analyzes their consumption. This data is used as part of the Environmental and Energy Management System compliant with ISO 14001, 50001, in the BREEAM certification process and energy audit, and also forms the basis for the development of the transition plan. The Bank is currently undergoing BREEAM certification for its buildings at 16 Senatorska Street and 7/9 Traugutta Street in Warsaw, and at 16 Pstrowskiego Street in Olsztyn. The certificates are expected to be obtained in 2026.

The implementation of the above actions will depend on the technical capabilities of the buildings to implement innovative technologies, the adaptation and optimization of specific processes and the availability of skilled workforce in the relevant fields. The implementation of energy projects will also depend on the availability of green energy in the market. The implemented and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

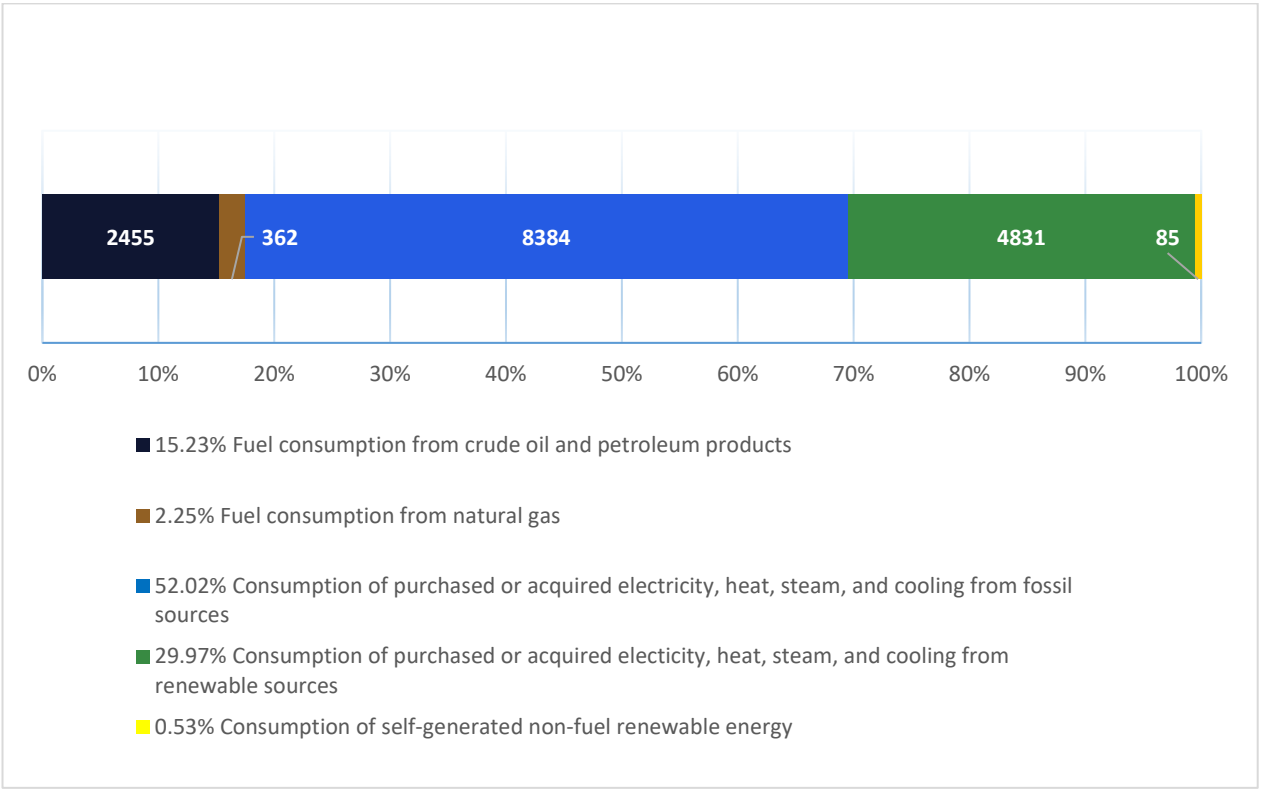
2.2.5 *Energy consumption and mix indicators [E1-5]*

The table below presents data on energy consumption in the Bank's own operations for 2025.

Energy consumption	2024	2025	Change [%] 2025/2024
Fuel consumption from coal and coal products (MWh)	0	0	-
Fuel consumption from crude oil and petroleum products (MWh)	2,423	2,455	1.32
Fuel consumption from natural gas (MWh)	340	362	6.47
Fuel consumption from other fossil sources (MWh)	0	0	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	8,801	8,384	-4.74
Total energy consumption from fossil sources (MWh)	**11,564**	**11,201**	**-3.14**
Share of fossil sources in total energy consumption (%)	74	69	-6.76
Energy consumption from nuclear sources (MWh)	0	0	-
Share of energy consumption from nuclear sources in total energy consumption (%)	0	0	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	4,209	4831	14.78
Consumption of self-generated non-fuel renewable energy (MWh)	46	85	84.78
Total consumption of renewable and low-carbon energy (MWh)	**4,256**	**4,916**	**15.51**
Share of fossil sources in total energy consumption (%)	26%	31	19.23
Total energy consumption [kWh]	**15,820**	**16,117**	**1.88**
Production of own energy from non-renewable sources (MWh)	0	0	-

As in the previous year, the largest consumption was electricity and heat from fossil fuels, which supplied own premises, branches, and ATMs. This energy consumption accounted for 52.02% of total energy consumption, which was 4.74% lower than in the previous year. Despite an increase in thermal energy consumption due to weather conditions, a decrease in electricity consumption was recorded, confirming the effectiveness of the investments implemented (headquarters renovation, adaptation and optimization of space, and real estate portfolio reorganization). The second largest consumption was electricity from renewable energy sources, used primarily in owned buildings, with a share of 29.97%, which is 14.78% higher than in 2024. This increase is due to the increased volume of purchased guarantees of origin. Fuel consumption in the company's vehicle fleet and generators also remained significant, accounting for 15.23% of total consumption, remaining stable (1.32% increase compared to 2024). Natural gas consumption, used to heat several branches, accounted for 2.25% of the total (an increase of 6.47% compared to 2024), due to increased demand for thermal energy. Photovoltaic energy production had the lowest share, accounting for 0.53%. Due to the implementation of new projects, this category saw an 84.78% increase. Total energy consumption from all energy sources fluctuated at similar levels year-on-year (an increase of 1.88%), primarily driven by increased demand for thermal energy.

Energy consumption in 2025 split by sources [MWh]



2.2.6 Policies related to climate change in the loan portfolio [E1-2]

ESG Risk Management Framework in the Capital Group of Bank Handlowy w Warszawie S.A.

The *ESG Risk Management Framework* (also described in the ESG Risk Management section of this *Statement*) promote a consistent and effective approach to the management of ESG risks at the Bank, including risks related to climate change (areas: climate change mitigation and adaptation). That document is part of the Bank's risk management strategy and describes key elements of the organizational structure and processes used to identify, measure, monitor, control and report ESG risks. The *ESG Risk Management Framework* also clarify the roles and responsibilities of the Bank's Management Board and employees with respect to ESG risk management – including climate risk – across three lines of defense.

The *ESG Risk Management Framework* apply throughout the Bank and apply to those business units and employees of the Bank that identify, measure, monitor, control and report ESG risks across all lines of defense. The document – as an element of the risk management strategy – was approved by the Bank's Management Board and Supervisory Board. The Bank has entrusted the Vice President in charge of the Risk Management Sector with responsibility for the risk management system covering ESG risks. The ESG Risk Management Manager, acting as a representative of the Risk Management Process Quality Assurance Department within the Risk Management Sector, is responsible for overseeing the implementation of the *Framework*. The provisions of the Policy are available to employees in the Bank's intranet system.

Environmental and Social Risk Management Regulations for Corporate Banking Clients

The *Environmental and Social Risk Management Regulations for Corporate Banking Clients ("ESRM Regulations")* are intended to provide the effective identification, assessment and management of potential social and environmental risks (focusing primarily on the area of climate change mitigation) associated with the Bank's clients. The *Regulations* provide guidelines for working with clients and allow for mitigation of environmental and social risks associated with the financial activities of the organization. The document creates a framework for managing the impacts and risks associated with financing high-emission industries or industries exposed to transition risk, such as coal mining, coal-fired power generation and oil and gas.

The document assigns a special role in monitoring environmental and social risks to the Risk and Capital Management Committee, which monitors the Bank's risk profile at an aggregate level, including the profile of individual risk categories, to ensure compliance with the approved risk appetite. Violations, i.e. any instance of non-compliance with that policy, must be reported and escalated in accordance with the internal regulations of the Bank.

The *Regulation* applies to business units and Risk Management Sector employees that prepare, review and approve client transactions, manage such transactions and perform their periodic reviews. Prior to engaging with clients, employees in the first and second line of defense of business units conduct preliminary analyses to identify

transactions and clients subject to the *Environmental and Social Risk Management Regulations*. This is to identify the need for additional *due diligence* analyses. Some industries are particularly sensitive to environmental and social risks and therefore additional requirements apply to them, that take into account industry specifics:

- agriculture – crops, livestock and processing, among others in terms of forestry subsector
- coal mining,
- coal-fired power generation,
- non-coal mining,
- oil and gas industry,
- production of lethal military equipment.

In addition the Bank conducts a detailed due diligence analysis of clients operating in areas of increased caution (biodiversity, cultural heritage, local people, large physical and economic displacements, risk of conflict, increased risks of human rights violations).

The Policy refers to global standards and initiatives, including the Washington Convention and the International Finance Corporation (IFC) Performance Standards.

ESRM regulations must be approved by the member of the Management Board in charge of the Risk Management Sector, acting as the owner of the document. The provisions of the Policy are available to employees in the Bank's intranet system.

Policy defining the framework for the classification of sustainable products in the Capital Group of Bank Handlowy w Warszawie S.A.

The *Policy defining the framework for the classification of sustainable products in the Capital Group of Bank Handlowy w Warszawie S.A.* is a set of principles for identifying, assessing, classifying and monitoring sustainable products (products that support, among others, the areas of climate change mitigation, climate change adaptation, energy efficiency or renewable energy use). The document contains, including but not limited to:

- sustainable finance definition applied by the Bank,
- rules for classifying products as sustainable,
- client eligibility conditions and criteria for financing,
- monitoring requirements for the financing provided,
- scope of duties, responsibilities and roles of the Bank's organizational units in assessing the classification and monitoring of products qualified as sustainable.

The *Policy* applies to all products that can be classified as sustainable. The provisions of the Policy are available to employees in the Bank's intranet system.

Currently, the Bank has implemented an operational process according to which it classifies transactions into credit products, receivables and liquidity financing products, and trade finance products.[16]

Opinions on the classification of sustainable products are provided by the Sustainability Products Committee, which also monitors product compliance with the *Policy*. Monitoring results are reported to the Risk and Capital Management Committee. The Policy refers to international standards and regulations, including the European Union Taxonomy, LMA Sustainability-Linked Loan Principles, LMA Green Loan Principles and LMA Social Loan Principles.

The Bank may classify financing as sustainable based on the client's business or a specific investment project. It uses three paths for this purpose:

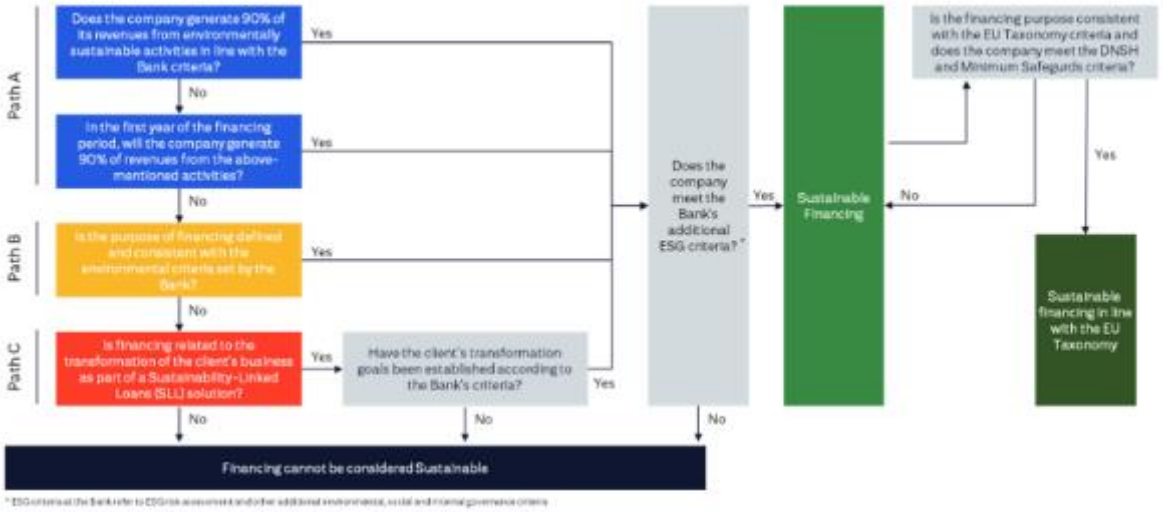
A. Financing clients who conduct activities that have a positive environmental impact

B. Financing clients' environment-friendly investments

C. Financing a client's transformation based on ESG KPIs

[16]The product range includes overdrafts; revolving loans; long-term loans; bridge loans, syndicated loans, income-generating property financing loans, trade service products (bank guarantees, documentary letters of credit), factoring, and trade credit.

Overall scheme for the classification of sustainable finance in accordance with the Bank's Sustainability Strategy



A. Financing clients who conduct activities having a positive environmental impact

The Bank attaches great importance to promoting and supporting businesses that conduct activities that have a positive impact on the environment. In accordance with its *Sustainability Strategy,* the Bank provides financing to clients that meet the following criteria:

1a. the company derives at least 90% of its revenues from activities that meet the criteria of a substantial contribution or activities that comply with the EU Taxonomy[17]; or

1b. at least 90% of the company's revenues, within one year from the date financing is granted, will come from activities that meet the criteria of a substantial contribution or activities compliant with the EU Taxonomy[1] and

2. the company does not operate in sectors excluded from financing under the ESRM Regulations.

B. Financing pro-environmental investments

In a situation where the client does not meet the requirements specified for financing any activities that have a positive environmental impact, but the purpose of financing can be precisely defined and concerns investments that have a positive environmental impact, the financing is classified as sustainable on the basis of environmental criteria coinciding with the criteria for substantial contribution specified for environmental purposes in the EU Taxonomy. The investment assessment process is based on widely recognized market standards for green loans – Green Loan Principles.

C. Financing a client's transformation based on ESG KPIs

In line with its *Sustainability Strategy,* the Bank supports clients in transforming their businesses. One form of such support is sustainability-linked financial products, which the Bank offers in accordance with generally accepted market standards (*sustainability-linked loans*).

To determine whether a client's transformation is sustainable, the Bank analyzes ESG KPIs.

In accordance with the provisions of the Policy, the clients have developed a plan to transform their activities (or part of their activities) in terms of improving energy efficiency, reducing carbon footprint or adapting to the criteria set out in the EU Taxonomy. ESG KPIs measure the effectiveness of the transformation process and are:

1. material for the client's business activities;
2. measurable and comparable to best market practices;
3. compliant with generally recognized environmental science initiatives and standards (e.g. decarbonization pathways established under the Paris Agreement).

The cost of financing incurred by the client is dependent on the extent to which the client has achieved the agreed ESG KPIs related to its transformation. In addition, to ensure the credibility and transparency of transformation activities, the achievement of KPIs is confirmed by independent third parties.

[17] 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.

In 2025, the Bank had provided sustainable financing in the amount of PLN 448 million (of which PLN 320 million under Path C and PLN 128 million under Path A), aiming to achieve the target for 2025–2027, which was set at PLN 2 billion. In 2022–2024, the Bank provided PLN 1.3 billion in sustainable financing.

Sustainability Strategy for 2025-2027

The *Sustainability Strategy for 2025–2027*, which is described in the general information part is focused on issues relevant to climate change in the Bank's financed loan portfolio and sets directions in the areas of climate change mitigation, energy efficiency or renewable energy. In line with the new *Strategy*, the Bank will continue to use its knowledge and experience to be a trusted partner for its clients in the ESG transformation process. The Bank wants to improve sustainable finance solutions, create products to support clients in their sustainable transformation and meet their individual needs, expand its product offering with additional sustainable products (FX, deposits) and classify new products as sustainable, increase the share of green assets in the portfolio, use its extensive knowledge to support clients in their transformation, refine the principles of sustainable finance and support the development of new technologies.

The responsibility for the implementation and monitoring of the implementation of the *Strategy* in the area of the financed loan portfolio will belong to the Strategy and Investor Relations Department. The provisions of the Strategy are available to employees in the Bank's intranet system.

2.2.7 Targets related to the financed loan portfolio [E1-4]

As part of its Sustainability Strategy for 2025-2027, the Bank has set quantitative targets for the sustainable loan portfolio, which, as in last year's report, are presented in the first four items of the table below. In addition, in 2025, as part of its prudential transition plan, the Bank adopted a medium-term target in the area of ESG risk management, in line with the second pillar of the Strategy. This target is also included in the table below as the fifth item:

Goal	Base value	Base year[18]	2025 Result
Allocating PLN 2 billion to finance the sustainability of its clients by 2027[19]	PLN 0	2024	PLN 448 million
At least 10% share of sustainable finance in the institutional client loan portfolio by 2027[20]	5.3%	2024	5.9%
Obtaining information on the Scope 1 and 2 emission reduction targets and transition plans of at least 60% of credit exposure and using this data in the lending process [21]	0%[22]	2024	0%
Completion of ESG training by 100% of employees responsible for ESG sales and consulting by 2027[23]	0	2024	0%
Conducting an extended ESG risk assessment of institutional (non-financial) clients for 60% of credit exposure by 2027	0	2025	2025 is the base year

[18] For the first four metrics presented in this table, the base year has been adjusted to 2024. In last year's report, the base year for these metrics was incorrectly indicated as 2025.
[19] In 2022–2024, the Bank allocated PLN 1.3 billion for the green transformation of its clients and exceeded the previously applicable goal set in the Sustainability Strategy for 2022–2024 by almost PLN 300 million. The current goal means allocating an additional PLN 2 billion for sustainable financing in line with the definition contained in the Policy defining the framework for the classification of sustainable products in the Capital Group of Bank Handlowy w Warszawie S.A. described earlier. The target is not based on specific scientific evidence.
[20] The total value of sustainable finance granted in 2025-2027 in relations to the institutional client loan portfolio at the end of 2027. The goal does not include any specific milestones and is not based on specific scientific evidence.
[21] To ensure methodological clarity, the name of the indicator has been changed from "borrowers" to "credit exposure". Obtaining from the clients transition plans or at least GHG emissions reduction plans. The goal is supposed to be achieved at the end of 2027. The goal is not based on specific scientific evidence.
[22] The baseline has been adjusted to 0% (the previous report reported 27%). This change reflects an updated methodology for calculating this indicator, which will be linked to an expanded ESG risk assessment.
[23] The bank has been taking action in the field of ESG training, but the new goal concerns directly dedicated and structured training for all sales department employees, so that all units present the same information to potential customers in a uniform manner. The goal is not based on specific scientific evidence.

With regard to sustainable finance targets, their implementation in 2025 did not proceed as expected by the Bank. This situation was primarily due to the changing business environment for institutional clients, mainly regulatory uncertainty in the area of ESG in Europe, which translated into weaker demand for sustainable finance solutions.

The Bank applies uniform guidelines for the entire institutional client loan portfolio with regard to the identification and consideration of ESG risk factors in the debtor analysis and assessment process. At the same time, the Bank has developed tools that extend the scope of the analysis for clients who meet specific criteria. These criteria are based on the size of the credit exposure to the client, the share in the portfolio of financed emissions, the obligation to prepare a sustainability statement, and involvement in high-emission industries. This tool is a formal part of the debtor analysis and assessment process. It uses, among other things, information obtained from the ESG Survey (described in the section below) and publicly available information about the client, sector data, as well as knowledge about the client's business profile built up through the existing business relationship.

In 2025, the Bank began to operationalize its objective of using primary client data related to transformation planning in the lending process. An ESG Survey was launched with the aim of obtaining primary data from clients. The achievement of that objective will be measured by monitoring the share of exposure to institutional (non-financial) clients for whom information on their scope 1 and 2 emission reduction targets and transformation plans was obtained and used in the credit assessment process.

With regard to the ESG training objective, last year the Bank successfully conducted mandatory ESG training for all employees, thus building a solid knowledge base in this area. To continue these activities in 2026, work has been planned to prepare special training, dedicated in particular to employees responsible for ESG sales and consulting, which should ultimately contribute to the achievement of the adopted objective.

The Bank's internal stakeholders were involved in setting the adopted targets. Progress in the implementation of ESG goals is regularly reported to the Bank's Management Board in management reports.

2.2.8 Activities related to the financed loan portfolio [E1-3]

Last year, the Bank took key steps in loan portfolio management, focusing on the integration of ESG factors. In 2025, the Bank launched an ESG Survey for institutional clients. This activity is directly related to the operationalization of the Bank's goal of using primary client data in the lending process, and is also a response to growing regulatory and supervisory requirements for ESG risk management. The ESG Survey, prepared on the basis of the EBA Guidelines[24] on the management of ESG risks, but also based on interbank consultations within the POLSIF Association, covers questions from the following scopes:

- Exposure of key company assets to physical risk,
- Current and target GHG emissions of scope 1, 2, and 3,
- Company's dependence on fossil fuels,
- Energy and water consumption,
- Current and anticipated financial impact of environmental risks and opportunities on the company,
- Transition plans (decarbonization plans),
- Compliance with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work,
- Negative impact on own employees, people working in the value chain, affected communities, and consumers (including due diligence processes and mitigants).

The data collected will be used, among other things, for enhanced ESG risk assessment. In December 2025, the Bank introduced the obligation to use ESG Surveys as part of credit reviews.

In addition, with regard to the sustainable product classification framework, the Bank intends to begin work on incorporating social criteria into the financing assessment framework in 2026, which will allow for a more comprehensive consideration of social aspects in decisions to approve financing.

[24] **EBA/GL/2025/01**

2.2.9 Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]

Methodology

The calculations of greenhouse gas (GHG) emissions, which include carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O), are based on the global GHG Protocol standards developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). The GHG Protocol methodology distinguishes greenhouse gas emissions divided into:

- Scope 1 – direct emissions associated with the combustion of energy carriers in stationary and mobile sources owned or managed by the organization,
- Scope 2 – indirect emissions related to the consumption of purchased electricity, steam, heat and cooling,
- Scope 3 – other indirect emissions in the value chain.

Scope 3 category 15 calculations are additionally prepared in accordance with the 2nd version of *Global GHG Accounting and Reporting Standard for the Financial Industry*, developed by the international organization *Partnership for Carbon Accounting Financials* (PCAF). PCAF has created a standard for calculating the carbon footprint resulting from portfolio and investment activities for financial institutions. This approach ensures consistency, transparency and compliance with best practices in terms of data on financed emissions.

In order to determine the scope of calculations of direct and indirect emissions that will be reported as the Bank's emissions, it is necessary to define the organizational boundaries of the activities in accordance with the GHG Protocol methodology. The operational control criterion was adopted as the method of determining the organizational boundaries according to which the organization accounts for 100% of the GHG emissions resulting from the Bank's activities and the functioning of the assets that the Bank can influence by making decisions, e.g. decisions on investments in a given building or decisions on the use of a given asset in a specific way.

The calculations of Scope 1 and 2 GHG emissions were based on the consumption of individual energy carriers used by Citi Handlowy in 2025, i.e. fuels for heating purposes (natural gas), liquid fuels for the car fleet and generators (petrol and diesel fuel), electricity and heat.

Scope 3 emissions arise throughout a company's value chain and include both upstream and downstream activities. For financial institutions, the most significant source of Scope 3 emissions are financed emissions that result from investments, loans and other financial services. These emissions are classified as Scope 3 category 15 under the GHG Protocol and represent the largest share of the Bank 's total emissions. The calculations of the Scope 3 category 15 GHG emissions included significant assets for which PCAF provides a calculation methodology, as well as assets covered by Article 449a of the Capital Requirements Regulation (CRR)[25]: corporate loans and equity other than those held for trading or held for sale.

Categories 1, 2, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14 of scope 3 were considered inadequate or immaterial. The Bank considered categories 3, 7, 15 as material:

- category 3 - fuel and energy-related activities (not included in Scope 1 or 2) – material category due to the reduction possibilities and the real impact on the consumption of energy and fuel in own operations;
- category 7 - employee commuting - material category due to the necessity to assure human resources to perform the fundamental activities of the Bank;
- category 15 - investments - material category due to the scope of activities of the Bank as a financial institution.

[25] Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards set out in Implementing Regulation (EU) 2021/637 with regard to disclosure of environmental, social and corporate governance risks.

Input data description by GHG Protocol scope and category

Scope of the GHG Protocol	Input data description
Scope 1	The calculations of Scope 1 GHG emissions were based on the consumption of individual energy carriers used by Citi Handlowy in 2025, i.e. fuels for heating purposes (natural gas), liquid fuels for the car fleet and generators (petrol and diesel fuel), and the size of refrigerant leaks. To calculate the emissions, the values of GWP-100 factors (*Global Warming Potential*) were used from the latest report of the Intergovernmental Panel on Climate Change (IPCC), Climate Change 2021: IPCC Sixth Assessment Report (AR6), and factors published in the DEFRA database: https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025.
Scope 2	The calculations of Scope 2 GHG emissions were based on the consumption of electricity from the power grid and heating from the district heating network, the values of which were determined based on relevant invoices. In the event that invoices for last months of 2025 were not available, consumption was estimated based on consumption levels in previous months . For those energy consumption points for which consumption was not known, an estimate was made based on surface area. The emissions resulting from electricity consumption were calculated using the location-based and market-based method. The location-based calculations of GHG emissions used the emission factor published by KOBIZE: CO_2, SO_2, NOx, CO and total dust emission factors for electricity based on information contained in the National database on emissions of greenhouse gases and other substances for 2024 https://www.kobize.pl/uploads/materialy/materialy_do_pobrania/aktualnosci/2025/142_Wskazniki_emisyjnosci_2025.pdf. For calculations using the market-based method, factors made available on the websites of electricity producers whose services are used by a given energy consumption point were applied, as well as documents confirming the origin of the purchased energy from renewable sources. For consumption points for which the producer of the purchased electricity was unknown or the factor from the producer was not available, the "Residual mix" factor designated by the Association of Issuing Bodies was used: European Residual Mixes Results of the calculation of Residual Mixes for the calendar year 2024 https://www.aib-net.org/facts/european-residual-mix/2024. CO_2 emission factors for district heating were adopted in accordance with the information published on the websites of heating companies distributing heat in individual locations. In a case where the producer of purchased heat energy was unknown or the factor from the producer was not available, the factor published in the following URE report was used: Thermal energy in numbers – 2024, https://www.ure.gov.pl/download/9/15797/Raport-Energetykacieplna2024.pdf.
Scope 3 category 3 **Fuel and energy-related activities (not included in Scope 1 or 2)**	In category 3, emissions related to the production and supply of fuels (diesel fuel, petrol, natural gas) and electricity used by the Bank were analyzed. To avoid double counting, emissions resulting from losses in the transmission and distribution of purchased electricity were not included in the calculations, because these losses were included in the factor published by KOBiZE, used to calculate Scope 2 emissions. Emission factors for diesel fuel, petrol and natural gas were adopted based on the DEFRA database: Greenhouse gas reporting: conversion factors 2025 https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025. The CO_2e emission factor for electricity was adopted based on the online CaDI database. The percentage of the emissions that were calculated on the basis of actual data for category 3 is 93.17%.
Scope 3 category 7 **Employee commuting**	Within category 7, emissions related to employees' commuting to work by means of transport such as bus, private car, train, taxi, tram, motorcycle, electric scooter and subway were analyzed. Data on employees' commuting were obtained from a survey completed by 421 employees (13% of the annual average employee headcount). The results from the sample were extrapolated to the total annual average headcount. CO_2e emission factors for a given means of transport were adopted based on the DEFRA database: Greenhouse gas reporting: conversion factors 2025 https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025. For electric scooters, our own emission factor was used, obtained on the basis of the electric energy consumption factor for the scooter available on the vendor's website and the emission factor for electricity published by KOBIZE: CO2, SO2, NOx, CO and total dust emission factors for electricity based on information contained in the National database on emissions of greenhouse gases and other substances for 2024 https://www.kobize.pl/uploads/materialy/materialy_do_pobrania/aktualnosci/2025/142_Wskazniki_emisyjnosci_2025.pdf. The percentage of emissions calculated based on actual data for category 7 is 13.33%.
Scope 3 category 15	The Bank calculated absolute financed emissions in accordance with the 2nd version of the Global GHG Accounting and Reporting Standard for the Financial Industry, developed by *the Partnership for Carbon Accounting Financials* (PCAF). In this work, the calculations focused on business loans and unlisted equity,

Investments	listed equity and corporate bonds, as these asset classes within the assets covered by Article 449a of the Capital Requirements Regulation (CRR) constitute the core business of the Bank. Category 15 emissions were calculated using customer-provided emissions data, where available (32.06% of the calculated category 15 emissions) or, where not available, a sector expenditure approach, using NAICS (*North American Industry Classification System*) codes associated with the company's activities and the relevant sector emission factors from the PCAF database (67.94% of the calculated category 15 emissions). Share of the actual data and the calculations made on the basis of expenditure has an impact on the assessment of data quality according to the PCAF methodology (tier 1 includes verified data on a client's emissions with available financial data of the client, and tier 5 includes emissions estimated on the basis of sector factors). The average data quality score according to the PCAF approach for the analysis performed is 2.58. Considering that a significant part of the business loans (35.89%) is short-term financing for fewer than 365 days, an approach proportionate to the financing duration was applied for these financings. This method takes into account the financing duration when calculating emissions. **Loans and unlisted equity** The calculation of absolute financed emissions related to loans or equity is based on the Bank's loan portfolio and the statement of equity investments as at the end of the year. The Bank decided to expand the scope of the calculation beyond standard loans to include other financial products such as credit cards, factoring, credit lines and revolving finance. Emissions were estimated based on the breakdown of loan credit portfolio by industry, using emission factors from the PCAF database. In such cases, a data quality score of 4 was assigned, in line with the PCAF methodology. Where business-reported emissions were available, these were used as the most accurate representation of the entity's environmental impacts – for such cases a data quality score of 1 or 2 was assigned (a score of 1 was assigned when the Bank was aware of an independent third-party verification of the data reported by the client). Emission calculations include Scope 1 and 2 emissions and, where possible, Scope 3 emissions. **Equity investments – listed and unlisted equity** Absolute emissions financed from equity investments, including listed and unlisted equity, were calculated based on the Bank's ownership interest in other entities, including subsidiaries in which the Bank holds equity interests. When calculating the Bank's financed emissions from listed and unlisted capital, emission factors from the PCAF database were used, and a data quality score of 4 was assigned. Emission calculations include Scope 1 and 2 emissions and, where possible, Scope 3 emissions.

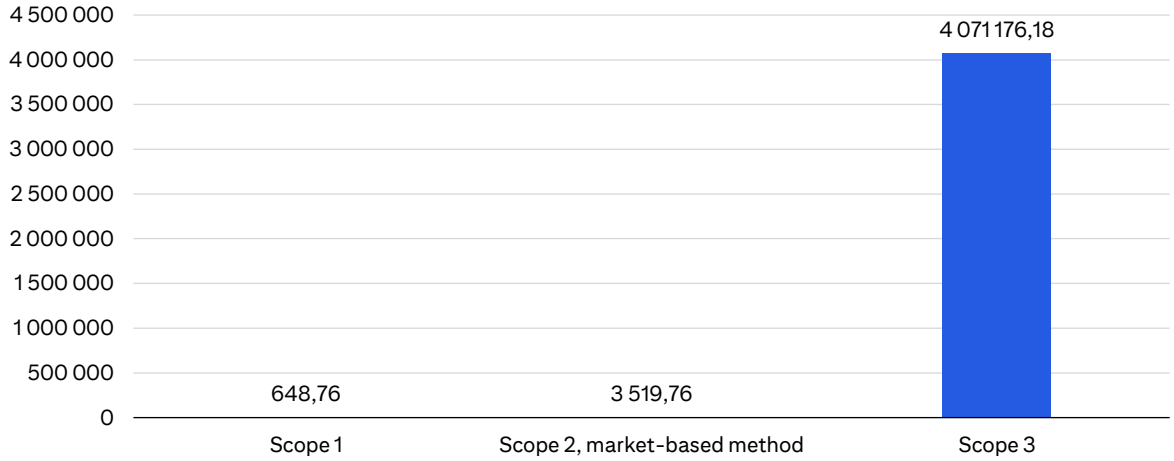
Gross Scopes 1, 2, 3 and Total GHG emissions

Greenhouse gas emissions (in tons of CO_2eq)[26]	2023	2024[27]	2025	% 2025/2024
Scope 1				
Gross Scope 1	566.81	699.06	648.76	-7%
Scope 2				
Scope 2 by location-based method	6,604.95	6,239.08	6,045.1	-3%
Scope 2 by market-based method	4,017.00	3,603.41	3,519.76	-2%
Scope 3 (material categories)				
Gross Scope 3		4,561,246.55	4,071,176.18	-11%
3 Fuel and energy-related activities (not included in Scope 1 or 2)	1,222.33	1,167.11	1,063.26	-9%
7 Employee commuting		1,272.94	1,264.43	-1%
15 Investments		4,558,806.5	4,068,848.49	-11%
Total GHG emissions				
Total GHG emissions by location-based method		4,568,184.69	4,077,870.04	-11%
Total GHG emissions by market-based method		4,565,549.02	4,075,344.7	-11%

GHG intensity per net revenue (tons of CO_2eq/PLN 1,000)	2024[28]	2025
Total GHG emissions (location-based) per net revenue	0.8569	0.7773
Total GHG emissions (market-based) per net revenue	0.8564	0.7768

[26] Tonne of carbon dioxide equivalent (t CO_2e) is the standard unit used to compare emissions of different greenhouse gases based on their global warming potential.
[27] The emission values for 2024 presented in last year's report have been updated as a result of the calculation corrections described in [BP-2]
[28] The emission intensity values for 2024 presented in last year's report have been updated as a result of the calculation corrections described in [BP-2]

Gross Scopes 1, 2, 3 and Total GHG emission [t CO_2e] in 2025



Total emissions of the Bank and their intensity

In 2025, total GHG emissions amounted to 4,077,870.04 tCO_2e for the location-based method and 4,075,344.70 tCO_2e for the market-based method.

The GHG emission intensity, expressed as emissions per net revenues (net revenues: 5,246,020 thousand PLN), was 0.7773 tCO_2e/PLN 1,000 for the location-based method and 0.7768 tCO_2e/PLN 1,000 for the market-based method.

Emissions from own operations

The Bank's direct GHG emissions result from its operational activities, including the use of company cars, power generators and fire pumps, gas boilers, and refrigeration and air conditioning systems, and are calculated under Scope 1. In 2025, the Bank's own Scope 1 GHG emissions amounted to 648.76 tCO_2e. An analysis of the Scope 1 emissions structure showed that the percentage of direct emissions decreased by 7% compared to 2024. This decrease in emissions is a consequence of updating emission factors and the fact that refrigerants were not replenished in refrigeration and air conditioning systems at the Bank's locations.

Indirect emissions related to electricity consumption and district heating are calculated under Scope 2. Indirect emissions related to energy use under Scope 2 amounted to 6,045.10 tCO_2e for the location-based method and 3,519.76 tCO_2e for the market-based method. By comparing the Scope 2 carbon footprint result in 2025 versus 2024, it can be seen that the Bank's emissions decreased by approximately 3% for the location-based method and 2% for the market-based method. Despite the reduction in emissions from electricity and the higher volume of purchased guarantees of origin, the final result was burdened by the increase in emissions from thermal energy resulting from weather conditions. In 2025, biogenic emissions resulting from the combustion or biodegradation of biomass amounted to 36.00 tCO_2. These emissions resulted from the combustion of biocomponents contained in petrol and diesel fuel used for the needs of the Bank's car fleet, power generators and fire pumps.

Emissions from relevant categories for the value chain

In 2025, the Bank made calculations in relevant Scope 3 categories that were deemed material – categories 3 and 7 – related to the value chain outside the financed loan portfolio and investments which are covered by category 15. The emissions in categories 3 and 7 totaled 2,327.69 tCO_2e in 2025, representing 0.06% of the Bank's total scope 3 emissions.

The decrease in category 3 emissions (Fuel and energy-related activities) in 2025 versus 2024 of 9% can be explained by change in media consumption and updating of indicator sources.

The decrease in category 7 emissions (Employee commuting) by approximately 1% from 2025 to 2024 is due to updated emission factors.

Emissions from the financed loan and investment portfolios

The Bank's total carbon footprint is dominated by Scope 3 category 15, which is related to activities in the area of financed loan and investment portfolios. In 2025, these emissions amounted to 4,068,848.49 tCO_2e, constituting 99.94% of the Bank's total emissions from Scope 3 scopes. 99.85% of the Bank's financed emissions came from the loan portfolio, and 0.15% from the investment portfolio. The 10.75% decrease in financed emissions from the loan and investment portfolio in 2025 compared to 2024 is primarily due to a decrease in emissions of the Bank's clients, coupled with a 2.66% increase in credit exposure.

Emissions from financed loan and investment portfolios (tCO_2e):

Year	Scope 1	Scope 2	Scope 3	Total Scope
2024[29]	2,718,911.97	337,102.42	1,502,792.12	4,558,806.50
2025	2,185,171.57	284,993.34	1,598,683.57	4,068,848.49

Financed emissions by portfolio category in 2025 (tCO2e):

Year	Scope 1	Scope 2	Scope 3	Total Scope
Loan portfolio	2,183,912.88	283,970.22	1,594,830.23	4,062,713.34
Trade finance and services products	1,764,822.45	32,379.05	386,211.68	2,183,413.18
Loans	419,090.43	251,591.17	1,208,618.56	1,879,300.16
Investment portfolio	1,258.70	1,023.11	3,853.34	6,135.15

Additional contextual information

Government bonds

In addition, The Bank calculated financed emissions from government bonds held, excluding the trading portfolio. In accordance with the PCAF standard, the absolute emissions financed from investments in government bonds were calculated based on the carrying value of the Bank's position for a given country, divided by the adjusted purchasing power parity (PPP) Gross Domestic Product (GDP). Then, the obtained value was multiplied by the reported emissions for the corresponding country. The calculation took into account exposures to countries, excluding supranational entities.

The carbon footprint calculations of government bonds include only emissions from Scope 1 so called production emissions, i.e. greenhouse gas emissions occurring within a given country's borders, covering both domestic consumption and exports. This definition is consistent with the approach to territorial emissions used by the United Nations Framework Convention on Climate Change (UNFCCC) in its annual national inventories and is widely used by governments in their Nationally Determined Contributions (NDCs)[30]. Emissions from scopes 2 and 3 are not taken into consideration due to the lack of unified and reliable data.

The reported GHG emissions from government bonds are presented both including and excluding LULUCF[31] (emissions resulting from land use, land use change and forestry). Emissions from financed government bonds amounted to 1,723,741.17 tCO_2e (excluding LULUCF) and 1,636,410.07 t CO_2e (including LULUCF). All data regarding the emissions reported by the countries comes from UNFCCC[32] and are based on the most recent available data. Therefore, this category was assigned a data quality rating of Tier 1. The data related to the GDP adjusted by PPP GDP comes from the World Bank database[33]. The increase in financed emissions from government bonds in 2025 by 18.73% compared to 2024 is primarily due to the increase in the Bank's exposure to this asset class by 21.56% compared to the previous year.

[29] The emission values for 2024 presented in last year's report have been updated as a result of the calculation correction described in [BP-2]

[30] See more: **Nationally Determined Contributions (NDCs): https://unfccc.int/process-and-meetings/the-paris-agreement/nationally-determined-contributions-ndcs.**

[31] LULUCF sector is related to land use, land use change and forestry https://unfccc.int/topics/land-use/workstreams/land-use--land-use-change-and-forestry-lulucf.

[32] **Greenhouse Gas Inventory Data - GHG Profiles - Annex I**. The most recent available data covering the year 2021 were taken into account when preparing the statement.

[33] **World Development Indicators | DataBank**. GDP adjusted by PPP (current international $). The most recent available data covering the year 2024 were taken into account when preparing the statement.

Total greenhouse gas emissions including government bonds are as follows:

Greenhouse gas emissions (tCO_2e)	excluding LULUCF		including LULUCF	
	2024[34]	2025	2024[35]	2025
Total GHG emissions including government bonds (location-based)	6,020,188.45	5,801,611.21	5,946,412.48	5,714,280.11
Total GHG emissions (market-based)	6,017,552.78	5,799,085.87	5,943,776.81	5,711,754.77

2.2.10 GHG removals and GHG mitigation projects financed through carbon credits [E1-7]

In 2025, the Bank did not engage in GHG removals and GHG mitigation projects financed through carbon credits.

2.2.11 Internal carbon pricing [E1-8]

In 2025, the Bank did not use internal carbon pricing and did not assign a specific financial value to its CO_2 emissions as part of its decision-making processes.

2.2.12 Anticipated financial effects from climate-related risks and opportunities [E1-9]

In the *Sustainability Statement for 2025*, the Bank is taking the opportunity to gradually disclose information on the anticipated financial effects of climate-related risks and opportunities.

[34] The emission values for 2024 presented in last year's report have been updated as a result of the calculation correction described in [BP-2]
[35] The emission values for 2024 presented in last year's report have been updated as a result of the calculation correction described in [BP-2]

3. Social information

3.1 Employees of Citi Handlowy

3.1.1 Characteristics of employees [S1-6]

As at 31 December 2025, the Bank had 3,149 employees[36], of which 62% were females and 38% were males. Procentowy udział kobiet i mężczyzn nie uległ zmianie w stosunku do poprzedniego roku. The percentage of women and men remained unchanged from the previous year. As of December 31, 2024, the number of employees was 3,143[37].

Number of employees as of December 31, 2024 and 2025

Number of employees as of December 31 (HC)	2024				2025			
	Female	Male	Other	Total	Female	Male	Other	Total
All employees[38]:	1,944	1,199	0	3,143	1,957	1,192	0	3,149
Number of permanent employees	1,768	1,073	0	2,841	1,801	1,077	0	2,878
Number of temporary employees[39]	176	126	0	302	156	115	0	271
Number of full-time employees	1,856	1,144	0	3,000	1,867	1,132	0	2,999
Number of part-time employees	88	55	0	143	90	60	0	150
Number of persons who left the Bank in the reporting year	168	145	0	313	200	171	0	371
Employee turnover rate[40]	9%	12%	0	10%	10%	14%	0	12%

[36] The value is given in headcount [HC].
[37] In the Sustainability statement for 2024 the number of employees was presented in full-time equivalents [FTE]: 3050.
[38] Data based on reports from the Bank's TETA HR payroll system cover persons under an employment contract (HC).
[39] Including substitution contracts.
[40] Number of persons who left the Bank in the reporting year / number of all employees at the end of the reporting period

Employees by gender, region and full-time/part-time status

	2024				2025			
City/town	Working time basis	Female	Male	Total	Working time basis	Female	Male	Total
Warsaw	Full time	1,013	756	1,769	Full time	1,026	739	1,765
	Part-time	61	44	105	Part-time	65	48	113
Olsztyn	Full time	466	147	613	Full time	472	154	626
	Part-time	16	11	27	Part-time	16	11	27
Łódź	Full time	198	95	293	Full time	198	94	292
	Part-time	5	0	5	Part-time	4	0	4
Katowice	Full time	31	32	63	Full time	28	32	60
	Part-time	0	0	0	Part-time	0	0	0
Kraków	Full time	35	34	69	Full time	37	33	70
	Part-time	1	0	1	Part-time	0	1	1
Poznań	Full time	36	23	59	Full time	30	24	54
	Part-time	0	0	0	Part-time	1	0	1
Gdańsk	Full time	26	22	48	Full time	25	24	49
	Part-time	3	0	3	Part-time	2	0	2
Wrocław	Full time	24	19	43	Full time	25	17	42
	Part-time	1	0	1	Part-time	1	0	1
Szczecin	Full time	11	4	15	Full time	11	4	15
	Part-time	1	0	1	Part-time	1	0	1
Gdynia	Full time	7	4	11	Full time	8	4	12
	Part-time	0	0	0	Part-time	0	0	0
Others	Full time	9	8	17	Full time	7	7	14
	Part-time	0	0	0	Part-time	0	0	0
Total		1,944	1,199	3,143		1,957	1,192	3,149

3.1.2 Employees and human rights [S1-1] [S1-3]

One of the Bank's main social goals is to protect human rights – the Bank adheres to the fundamental principles enshrined in the Universal Declaration of Human Rights of the United Nations, Declaration on Fundamental Principles and Rights at Work of the International Labor Organization and the United Nations Guiding Principles on Business and Human Rights.

In accordance with the adopted regulations, only adults can work at the Bank, and the primary form of employment is an employment contract.

Human rights issues are not regulated in a separate policy but are part of more general internal regulations governing the Bank's operations in Poland: *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics), Work Regulations* and *Corporate Collective Labor Agreement (CCLA)*. The Bank respects the human rights described in those documents. Employees learn about those documents during training and onboarding procedures, and they are also available on the intranet. The Bank's Management Board is responsible for implementing the policies. The *Work Regulations* and the *CCLA* have been agreed with the trade unions operating in the Bank, and the *Code of Conduct* with the units responsible for standards of operation in a given area.

The Bank works with employees to ensure that human rights are respected, implements corrective measures and has procedures in place for reporting possible irregularities, including internal grievance procedures.

Each employee of Citi Handlowy Bank may report a breach of ethical standards – anonymously (anonymous report) or by providing their personal data (confidential report). The Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics) defines the methods and channels for reporting violations. For more information, see the Business conduct and corporate culture section.

The Bank has implemented the *Procedure for dealing with complaints filed by employees of Bank Handlowy w Warszawie S.A. (Employee Complaints)* , which describes the principles under which employees and former employees of Citi Handlowy Bank and job candidates may report undesirable behaviors in the work environment: discrimination, mobbing, harassment, sexual harassment and any other unequal treatment in connection with employment, as well as the procedure for handling such complaints.

Confidential reports may be delivered directly to the following persons or business units:

- the immediate line manager or a higher-level manager,
- the Head of the Brokerage Department of Bank Handlowy or employees of the Internal Supervision and Control Bureau – in the case of employees of the Brokerage Department of Bank Handlowy,
- a representative of the Human Resources Division,
- an employee of the Citi Security and Investigative Services Department (CSIS).

An employee who has any questions concerning proper conduct in a given situation should contact one of the persons or organizational units mentioned below:

- the immediate line manager or a higher-level manager,
- the Head of the Brokerage Department of Bank Handlowy or an employee of the Internal Supervision and Control Bureau – in the case of employees of the Brokerage Department of Bank Handlowy,
- an employee of the Compliance Division,
- a representative of the Human Resources Division,
- an employee of the Audit Department,
- an employee of the Legal Division if legal provisions are infringed,
- an employee of the Citi Security and Investigative Services Department (CSIS),
- the Member of the Bank's Management Board in charge of the Risk Management Sector or the Financial Markets and Corporate Banking Sector – in the case of employees of the Brokerage Department of Bank Handlowy,
- the Supervisory Board to the email address or by letter, in case the report concerns a Member of the Supervisory Board.

The Bank conducts a thorough investigation regardless of whom the questions and doubts raised concern.

The Bank has an Ethics and Disciplinary Commission. The Commission performs consultative and advisory functions towards the Bank's Management Board and supports the Supervisory Board and Members of the Management Board responsible for receiving anonymous reports of violations of law and ethical procedures and standards in force at the Bank. The Commission monitors whether tasks are performed properly and ensures the effectiveness of supervision and control over compliance with ethical standards at the Bank.

3.1.3 Work-life balance policies [S1-1]

The work-life balance policies of Citi Handlowy Bank include in particular:

- *Corporate Collective Labor Agreement (CCLA)* and *Work Regulations,*
- *Diversity Policy for Employees of Bank Handlowy w Warszawie S.A.,*
- *Remote work agreement,*
- *Policy on eligibility for additional paternity care,*
- *Regulations concerning occasional days off in relation to employees' anniversaries,*
- *Regulations of the Company Social Benefit Fund.*

The above documents apply to all Bank employees[41][42] and are available on the intranet.

The above-mentioned documents were not updated in 2025.

Those documents are in line with the UN Guiding Principles on Business and Human Rights.

[41] The provisions of the CCLA do not apply to members of the Bank's Management Board and persons on unpaid leave lasting more than three months.
[42] Remote work is not available to employees in direct customer service roles in dedicated organizational units and employees supporting direct customer service in branches whose physical presence is necessary to perform such work.

Corporate Collective Labor Agreement and Work Regulations

The *CCLA* and the *Work Regulations* establish the most important rules related to work at the Bank. They concern, among other things, working hours, vacations, sick leave and absence rules. They also set protective standards limiting the time an employee remains at the employer's disposal and thus support the work-life balance. Both policies – fully compliant with the Labor Law – apply throughout the organization. Their content has been agreed with the trade unions operating at the Bank and the Management Board and the Human Resources Management Division are responsible for implementing those regulations. The Bank obligatorily familiarizes new employees with the *Work Regulations*, and all[43] employment contracts are concluded on the terms resulting from the *Corporate Collective Labor Agreement*.

The *CCLA* and the *Work Regulations* applicable at the Bank are intended to help employees maintain a work-life balance. This goal is consistent with the Bank's Strategy for 2025-2027, which in the employee relations area indicates the need to take actions to support the well-being of employees.

Diversity Policy for Employees of Bank Handlowy w Warszawie S.A.

The *Diversity policy for employees of Bank Handlowy w Warszawie S.A.* is consistent with the Bank's diversity strategy and introduces HR procedures and practices that are intended, among other things, to help all employees maintain a work-life balance. The *Policy* was adopted by a resolution of the Management Board in 2021 and implemented in 2022. The Management Board and the Human Resources Management Division are responsible for implementing its provisions.

The Bank, in accordance with the *Policy*, strives to ensure that all employees can enjoy a work-life balance and therefore:

- promotes and supports employee networks: Citi Women Network, Families Matter Network Poland, Disability Network, Citi Pride Network, charitable activities or joint sports activities (Live Well at Citi initiative),
- allows employees to freely express their opinions in the *Voice of Employee* survey,
- employees leaving the Bank can provide feedback in the *exit interview* survey,
- ensures equal pay for employees, including equal access to various benefits other than pay,
- ensures equal access for employees to development projects and training available at the Bank,
- takes care of ensuring friendly work environment and organizational culture based on mutual respect.

The policy of Citi Handlowy prohibits retaliation towards whistleblowers who have reported undesirable events in the work environment or persons participating in investigations conducted in accordance with the *Procedure for dealing with complaints filed by employees of Bank Handlowy w Warszawie S.A. (Employee Complaints)*.

Remote work agreement

The *Agreement on the principles of remote work (remote work agreement)* has been in force at the Bank since 2023 and regulates how work is to be performed at a place indicated by the employee other than the employer's premises. The *Agreement* supports the Bank in the implementation of the remote work model called *How We Work* and the implementation of the Bank's Strategy for 2025-2027. The *Agreement* is intended to combine efficiency in achieving business goals with work flexibility. Remote work – according to the *Agreement* – is not an option available to persons who provide direct customer service in certain units of the Bank, as well as employees supporting this service whose physical presence at the employer's premises is required.

The *Agreement* provides that the Bank's employees are entitled to 24 days of occasional work, in accordance with the law, and additional six days of remote work offered by the employer, i.e. a total of 30 days of remote work per year. The remote work rules have been agreed with the trade unions operating in the Bank. The employer covers, as a lump sum, the costs of electricity consumption in the room where the employee performs remote work and telecommunications services necessary to perform it. The Human Resources Management Division is responsible for implementing the *Agreement*.

Policy on eligibility for additional paternity care

The *Policy on eligibility for additional paternity care*, introduced by the Bank in 2021, offers father-employees additional paid time off from work to take care of their child. The procedure was issued as a decision of the Head of the Human Resources Management Division to make it easier for employed men raising a child to reconcile their work with the role of a parent. The Bank offers them two weeks of additional paid paternity care, provided that paternity leave has been used before.

The *Policy on eligibility for additional paternity care* was not consulted with employees. It is a result of the Bank's pursuit of balance (*well-being*) and inclusiveness. The HR Management Division is responsible for implementing the *Policy*.

[43] Members of the Management Board are excluded.

Regulations concerning occasional days off in relation to employees' anniversaries

The Bank has introduced the *Regulations concerning occasional days off in relation to employees' anniversaries* to recognize employees for their length of service. In accordance with the provisions of the Regulations, the Bank offers persons celebrating round anniversaries (5, 10, 15, 20... years) of work in Citi Group additional paid days off they can spend as they like. The Regulations have been agreed with the trade unions representing all employees of the Bank and take into account the expectations expressed by employees to the People Board group (a forum of employee representatives from various areas elected by the Bank's employees in elections, operating in the Bank in the years 2018 - 2024), which collected proposals from employees how to celebrate work anniversaries and submitted them to the Bank's Management Board for approval. The Human Resources Management Division is responsible for implementing the Regulations.

Regulations of the Company Social Benefit Fund

The *Regulations of the Company Social Benefit Fund* specify the conditions and principles under which employees may use the Company Social Benefit Fund. The Regulations support the work-life balance of persons employed by the Bank – the Fund subsidizes, among other things, holidays for employees and their children, sports, recreational and cultural activities, child care in nurseries and kindergartens. In addition, employees can apply for non-repayable financial assistance and repayable loans for housing purposes.

The *Regulations* were issued as an order of the President of the Management Board, and their provisions meet the requirements of the Company Social Benefit Fund Act. The *Regulations* have been agreed with the trade unions operating in the Bank. In accordance with the *Regulations*, the benefits from the Fund may be used by all employees[44] and former employees – retirees, pensioners and persons using pre-retirement benefits for whom the Bank was the last place of employment, and their designated family members, including life partners. The Human Resources Management Division is responsible for implementing the Regulations. The *Regulations* are available on the intranet, and information on the principles and procedure for obtaining social benefits is provided by the Employee Service Centre. The Employee Relations, Compliance and Human Resources Project Management Department monitors the *Regulations* and implements changes agreed with the trade unions operating in the Bank.

3.1.4 Work-life balance targets [S1-5]

The Bank has not set quantitative targets for work-life balance; instead, the Bank monitors progress in this area through designated ambition levels derived from the policies described above.

3.1.5 Work-life balance activities [S1-4]

The Bank works to ensure a work-life balance through the regular efforts of its employees, who are of key importance in this process – not only they report their needs, but also analyze the requests and laws and, on their basis, make the necessary improvements in their daily work.

In 2023, the Bank implemented changes resulting from amendments to the Labor Law regarding work-life balance and remote work. For example, work began on the *How We Work* model, which gives many employees the opportunity to work in a hybrid model – three days a week in the office and two days of remote work. In addition, during the holiday period (August) and in the second half of December 2023, 2024 and 2025 employees who can perform their tasks remotely were allowed to work from outside the office. Employees of the Bank can benefit from additional 6 days of occasional remote work, for a total of 30 days per year (24 + 6 Citi Handlowy days),

In 2025, 35 employees of the Bank took additional paternity leave (in 2024, 50 employees). Over the past four years, more than 70% of employees on parental leave returned to work each year. Of the employees who returned in 2024, 85%, including 84% of women and 86% of men, worked for another 12 months after their return. Of those who returned from parental leave in 2023, 82%, including 76% of women and 94% of men, worked for another 12 months after their return.

Since 2024, employees have earned the right to additional days off after every five years of work at the Bank, with the number of days off from one to four depending on seniority. In 2024, the right to an additional day off was exercised by 301 employees and in the year 2025, 453 employees.

The Families Matter Network Poland initiative brings together employees who are interested in issues related to parenthood, family life, and raising children. In 2025, the network actively supported employees and their parents and families, helping them find a healthy work–life balance in the face of the growing challenges increasingly experienced by the generation that supports both their ageing parents and their growing children.

Another objective of the network's activities in 2025 was to strengthen employees' sense of inclusion through events addressed to them and their families, with a particular focus on the youngest members. The main cyclical event was Family Day, organized in June to celebrate Mother's Day, Father's Day and Children's Day, at three locations in Poland (Warsaw, Olsztyn and Łódź). During picnics for employees and their children, fun, animations, integration games, sports competitions and volunteer activities were organized. In cooperation with Live Well at Citi, during the IRONMAN

[44] Employees on parental leave may use the Social Benefit Fund to a limited extent.

70.3 Warsaw event, children could also take part in the IRONKIDS running competition as part of the promotion of physical activity and healthy eating. Additionally, in the fan zone, animations were organized for children and parents in the form of planting flowers for the beneficiaries of the Warsaw Family Assistance Center, as well as making "tugs" for dogs from the Dog Angel's Asylum Foundation.

The retirement benefits the Bank grants are higher than required by the labor law. Their amount depends on the length of employment and ranges from 300% of the base amount after five years of service to 1100% after 20 years of service.

In the case of termination of the employment contract for reasons not attributable to the employee, Citi Handlowy guarantees a higher severance payment than the amount required by law. This principle is reflected in the *Corporate Collective Labor Agreement (CCLA)* in force at Citi Handlowy Bank. The Bank has also added two more days to job search leave for those dismissed for reasons not attributable to the employee.

The Bank offers special support in various areas under the EAP (Employee Assistance Program), available to employees 24/7.

In 2025, the Bank continued the series of webinars for employees and managers on building mental resilience and stress management. Additionally, a webinar and workshop sessions on neurodiversity were organized. In October, employees could also participate in a webinar promoting reading and its impact on building mental resilience and developing future skills.

At the bank's main locations in Warsaw there are rooms where employees can rest and regenerate, known as a *chillout room* or *energy room*. Active rest rooms – Energy Rooms – created in three locations are equipped with cardio equipment (treadmills, exercise bikes, ergometers) and equipment for general training. Employees can use them individually or in groups: yoga, Zumba and stretching. As part of Live Well at Citi, employees can also join Energy Online relaxation sessions from any location. Such sessions take place twice a week and include mindfulness training and exercises to prevent posture defects and ailments associated with a sedentary work style.

The Live Well at Citi initiative combines a passion for sport with sharing the good. In 2025, we participated in many sporting events to provide better access to sport for children and young people with disabilities and to share the joy of physical activity. Thanks to this collective effort, Citi Handlowy once again provided funding to support the "Be Active" project. The project is implemented by the Polish Paralympic Committee and enables young people with disabilities to train in one of 75 sports sections in a selected discipline, including para swimming, boccia, goalball, para athletics, para archery, wheelchair fencing, and para table tennis, under the supervision of specially trained coaches and assistants. The "Be Active" project provides a total of 60,000 training hours annually for 300 children from across Poland.

Every member of the Live Well at Citi team contributes their own part to this initiative. In 2025, our #ExtraordinaryTeam was made up of nearly 750 committed participants: employees of Citi Handlowy and Citi Solutions Center, business clients, and athletes representing the Paralympic movement. Together, we took part in nine sporting events, including three editions of the IRONMAN triathlon (in Warsaw, Kraków, and Poznań) and running races in Warsaw and Olsztyn. In total, we covered almost 11,000 kilometers. Our joint starts were accompanied by incredible emotions and a true fighting spirit, which helped us reach the podium an impressive 26 times. All of this was done to support an important cause and to ensure that young people with disabilities can also experience the joy and empowerment that sport brings.

The implemented and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

3.1.6 Work-life balance collaboration [S1-2]

The Bank works with employees to better manage work-life balance. An important element of this collaboration is the annual VOE survey, in which employees express their opinions on issues related to their work, including work-life balance. The survey consists of closed-ended questions and open-ended comments in which survey participants can offer their opinions and ideas. The results are analyzed and discussed by the Bank's top management, VOE ambassadors and the People Board group, who initiate specific actions at the level of both the entire Bank and individual units. The VOE survey is anonymous and voluntary. It is conducted by an external company. Managers of teams in which at least six employees have expressed their opinion in the survey receive an individual report. For years, the turnout for the VOE survey has been very high: 92% in 2025, 93% in 2024 and 92% in 2023.

The Bank informs employees about the goals achieved and actions taken. Employees learn about important topics at *Town Hall* meetings with the participation of the President of the Bank's Management Board, the Head of the Human Resources Management Division and other senior executives, and from newsletters: "Manager Monthly", "Employee Monthly", "Puls Citi Handlowy" and letters from the President of the Management Board and the Head of the HR Management Division to employees. Both VOE Ambassadors and People Board operate under the leadership of senior managers reporting directly to the President of the Bank. In both groups, HR representatives designated for cooperation by the Head of the HR Management Division play an important role. The teams meet regularly and work on specific initiatives in working groups. The results of their work are presented to the Bank's Management Board and employees at dedicated *Town Halls* summarizing VOE activities.

3.1.7 Work-life balance metrics [S1-15]

	2024			2025		
	Female	Male	Total	Female	Male	Total
Percentage of eligible employees who took family leave[45]	9%	6%	8%	9%	5%	7%

In the 2025 *Voice of Employee* survey, 93% (in 2024, 93%of employees positively assessed the support they receive from their direct manager in maintaining work-life balance. As many as 91% of employees agreed with the statement: "My direct manager cares about my well-being." This indicator in 2024 was also at the level of 91%.

Training and skills development

The Bank is committed to the continuous development of its employees. This enables it to create a sustainable work environment and respond to changing market needs on an ongoing basis. The bank has implemented policies, set goals and takes actions that ensure good professional preparation of employees.

3.1.8 Training and development policies [S1-1]

At Citi Handlowy Bank, all employees can develop their competencies, acquire new skills on the job, learn from others and participate in training. Some training is mandatory for all employees. The Bank has implemented the following Policies related to training and development of employee skills:

- *Rules of Improving Professional Qualifications of Employees of Bank Handlowy w Warszawie S.A. – Training Procedure,*
- *Performance management procedure,*
- *Training program for the Management Board.*

Those documents are in line with the UN Guiding Principles on Business and Human Rights.

Rules of Improving Professional Qualifications of Employees of Bank Handlowy w Warszawie S.A. – Training Procedure

Rules of Improving Professional Qualifications of Employees of Bank Handlowy w Warszawie S.A. – training procedure describe the Bank's approach to professional development of employed persons. At the Bank, the basis for training includes:

- equal development opportunities for leaders and line workers who co-decide on the available development offer,
- a flexible approach to creating educational content that allows for quick response to changing employee needs,
- improving the experience of stakeholders using Citi's educational resources,
- continuous adaptation of educational content to the dynamically changing market reality and the Bank's business priorities.

The *Rules of improving professional qualifications* are intended to ensure that the professional development of employees takes place in accordance with the Bank's top priority business goals and strategy. In particular, the Bank wants to create conditions in which all employees can develop their strengths and potential. Citi Handlowy Bank's human resources management strategy encompasses the entire employee life cycle and is fully consistent with the leadership strategy, annual assessment process, and the diversity management and engagement policies. Every year, the Bank analyzes the potential of employees in the formal *Talent Review* process – it conducts a review of critical roles, assesses the potential of their holders and plans their succession, and also identifies and analyzes gaps and plans the actions necessary to ensure business continuity at the highest level.

According to the procedure, the Bank's employees can participate in the following training:

- Internal training to develop professional, managerial and soft skills,
- English language courses offered by a provider selected by the Bank,
- individual and group training courses organized by external companies supplementing the internal training proposal, organized with the employer's consent.

[45] According to ESRS standards, family leave includes maternity leave, paternity leave, parental leave or family leave and caregiving leave that are available under the law or collective agreements. At Citi Handlowy Bank, family leave is available to all (100%) employees under an employment contract.

During external training, employees can also improve their skills in the field of climate change and ESG consulting. The Bank is prioritizing this area as an opportunity to prepare staff for the changing needs of the market and clients.

The Human Resources Management Division is responsible for implementing the *Rules of improving professional qualifications of employees of Bank Handlowy w Warszawie S.A.* The document is available to employees on the intranet.

Performance management procedure

The *Performance management procedure* specifies in particular the goal setting method and the employee evaluation rules. According to the *Procedure*, managers at each organizational level can monitor these processes and manage performance on an ongoing basis. The *Procedure* is designed to implement the Bank's strategy and enable employees to achieve their individual professional and personal development goals. At the Bank, it is the employee who sets development goals and determines how they intend to achieve them, e.g. through training. The performance management process starts with defining individual goals in two areas: *What* and *How*. The goals set by the employee are then accepted by their manager in the system.

In accordance with the *Procedure*, the goal achievement level is verified twice a year. The first evaluation – descriptive – takes place in the middle of the year and consists of summarizing the results achieved so far and planning activities for the second part of the year. If necessary, the goals can be updated and priorities can be redefined. In the second summary, in the fourth quarter, the employee receives a numerical rating and descriptive feedback on the goal achievement level. The annual evaluation summarizes the employee's performance throughout the year.

Both mid-year and annual evaluations include the following:

- feedback from co-workers provided at the request of the employee or manager,
- employee self-assessment,
- assessment by the manager,
- the employee evaluation interview with the manager,
- confirmation by the employee that the manager conducted an evaluation interview with the employee.

According to the *Procedure*, managers and employees receive information on the rules and deadlines for the performance management process from the Human Resources Management Division. It is the responsibility of the manager and the employees to carry out the entire process.

The document is available to employees on the intranet.

Training program for the Management Board

The *Training program for the Management Board* defines the process of induction of members of the Bank's Management Board and their training. It has been prepared under the *Policy for Assessment of Qualifications of Members of the Management Board and Persons Holding Key Functions at Bank Handlowy w Warszawie S.A.*, adopted by the Management Board and approved by the Supervisory Board. The *Program* specifies, among other things:

- onboarding of members of the Management Board,
- rules for establishing a training plan for members of the Management Board,
- rules under which any member of the Management Board may request onboarding or training,
- principles and criteria for evaluating onboarding and training, including the quality of such onboarding.

Members of the Bank's Management Board may improve their qualifications, in particular by participating in general training and training tailored to their individual needs. The *Training program for the Management Board* is established by the Head of the Human Resources Management Division in consultation with the Legal Division, Compliance Division, Organizational Bureau, and Business Planning and Analysis Department, and after consulting the Management Board. The Head of the Human Resources Management Division is responsible for the implementation of the Program.

The *Program* is designed to expand the skills, knowledge and competences of members of the Management Board. The effects of the *Program* are evaluated by the Nomination and Remuneration Committee of the Supervisory Board as part of the periodic evaluation of the Management Board. The document is made available to members of the Management Board by the Head of the Human Resources Management Division as a Memorandum.

Sustainability Strategy for 2025-2027

In the social area, the *Sustainability Strategy for 2025-2027* (see Sustainability Strategy) is focused on improving the skills of employees. This becomes particularly important in the case of ESG consulting for the Bank's clients. In the coming years, the Bank will offer products and services that promote sustainability, encourage its clients to take sustainable actions, and work with them to accelerate the transformation of their business models and reduce greenhouse gas emissions. Business units will be responsible for implementing the *Strategy* in this area and the Strategy monitoring process will be a responsibility of the Strategy and Investor Relations Department. The provisions of the Strategy are available to employees in the Bank's intranet system.

3.1.9 Goals for training and skills development [S1-5]

Progress in the area of training and development is monitored at the Bank through designated ambition levels derived from the policies described above.

The Bank has additionally set a quantitative target for training and development as part of its newly adopted Sustainability Strategy for 2025-2027:

Goal	Base value	Base year	Result
Completion of ESG training by 100% of employees responsible for ESG sales and consulting by 2027	0	2024	100% in 2025

The Bank's internal stakeholders were involved in setting the adopted target.

3.1.10 Training and skills development activities [S1-2] [S1-4]

Each new employee of the Bank participates in an induction training (Orientation), during which they learn about the Bank's structure, values, culture, leaders, and ethical and development aspects. In 2025, 299 newly hired employees participated in the training, and in 2024, 266 newly hired employees participated in the induction training (Orientation).

The bank monitors employee development through individual development plans (IDPs). Each employee has their own individual profile, which they complete in the HR system. The profile summarizes the employee's professional experience, education, competencies and skills. Once a year, employees are also asked to update their individual development plan (IDP), in which they describe their strengths and the development activities they plan to undertake to develop their competencies. Employees plan development activities in three areas that are the basis of the Bank's development philosophy: experience, learning from others and training. The Bank encourages employees to discuss with their managers their individual development plans, including internal or external training needed for their development. The IDP prepared by the employee in the system is the basis for discussions with the manager and for planning the employee's development. During the conversation, the employee discusses their development goals, strengths and development areas, and agrees with the manager on the actions they intend to take and the support they need to implement the development plan. The plan enables the employee to use an approach based on the 70-20-10 development model: gaining experience (70%), interacting and learning from others (20%), and education (10%). The employee can update their development plan throughout the year. Once a year, in the first half, after defining annual goals, employees are asked to update their individual development plan in preparation for a development conversation with their manager. Information on updates to individual development plans goes to top management.

During the annual assessment, employees receive information about their strengths and the areas they should develop. In 2025, such assessment was given to 99,2% of employees.[46] In 2024, 88% of eligible employees participated in this process.

Employees can participate in various training and development projects – including educational laboratories, sessions that will allow them to change their role or place in the Bank's structure, internal conferences during which employees share knowledge and build a collaboration network, coaching, and mentoring. In addition, every employee has access to learning platforms, including Leadership Development Catalogue and Degreed.

Specialists and experts in the relevant areas participate in mandatory specialist training as part of their professional development (e.g. compliance, risk or business).

Internal training includes an evaluation survey, in which participants provide feedback on the training. Employees benefit from general training and also participate in training tailored to their specific needs. In 2025, the Bank continued soft skills trainings for Consumer Banking managers, “Managerial Communication during Change.” These trainings and workshops were aimed at strengthening managers’ communication and change management skills. In 2025, change management training and workshops were also conducted for Retail Banking employees.

[46] Annual assessment does not cover employees with long-term absences during the year or employees for whom an annual assessment is not possible due to a short length of service at the Bank.

Citi Handlowy Bank promotes development and encourages discussion on learning in the organization and its impact on work results. Development programs for managers are tailored to their level of managerial sophistication. Development is divided into several stages. At each stage, managers can choose from a range of development activities:

- Welcome to Citi Management , Management Essentials , Managing at Citi for new managers and Human Centered Leadership ,
- Management Development programs for experienced managers,
- training for executive level managers, including several-week international programs conducted in cooperation with the largest universities in the world,
- Citi New Way special training in the organizational culture for all employees. These training activities are to embed employees in the change of organizational culture and organizational values that are an important part of such change.

ESG risks training for members of the Management Board

In March 2025, the Nomination and Remuneration Committee positively assessed the introduction to the duties of and the training for members of the Management Board in 2024 and their quality.

The implemented and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

3.1.11 Employee training and development metrics [S1-13]

Employee training and development metrics by gender

	2024			2025		
	Female	Male	Total	Female	Male	Total
All employees	1,944	1,199	3,143	1,957	1,192	3,149
Employees who participated in regular performance and career development reviews[47]	1,691	1,085	2,776	1,722	1,075	2,797
Percentage of employees who participated in regular performance and career development reviews[48]	87%	90%	88%	88 %	90 %	89 %
Number of employee training hours by gender	86,515.31	57,634.04	144,149.35	66,147.36	43,611.72	109,759.08
Average training hours per employee (full-time position)	44.5	48.07	45.86	33.8	36.59	34.86

[47] As part of cyclical evaluation conversations.
[48] The percentage of employees participating in periodic evaluations was calculated using the total number of employees from Disclosure S1-6. This metric also includes employees who do not qualify for ratings, so the disclosed metric cannot reach 100%.

Employee training and development metrics by position

	2024			2025		
	Number of employees	Number of training hours	Average training hours per employee	Number of employees	Number of training hours	Average training hours per employee
Management Board	7	323.71	46.24	7	331.45	47.35
Senior management	150	5,884.2	39.23	151	4,736.1	31.36
Managers	350	15,478.64	44.22	322	10,722.27	33.3
Other employees	2,636	122,462.8	46.46	2,669	93,969.26	35.21
Total	3,143	144,149.35	45.86	3,149	109,759.08	34.86

In the VOE survey, employees positively assess the support they receive from their direct managers in the area of training and development. 92% of employees participating in the 2025 survey, same as in 2024 (92%), were satisfied with the conversation they had with their direct manager to discuss their career aspirations and further development. Understanding among employees about what they can do to manage their careers increased by two percentage points to 88% in 2025 (2024, 86%), and by 1% (2024, 82%), 83% are satisfied with the development opportunities the organization offers them.

93% of employees were positive about the feedback they received from their manager to improve their performance. the level of this indicator remains at the same level as in 2024 (3%).

92% of employees are satisfied with how they use their skills and abilities at work, 1% more than in the previous year (2024, 91%).

Diversity

Citi Handlowy Bank has implemented policies, set goals and is taking steps to create a work environment that fosters diversity and inclusion, and where every employee can be proud of what makes them different – their backgrounds, views, experiences and ideas. In the Bank's opinion, this may constitute a competitive advantage: the diversity of teams, ideas and opportunities in the Bank supports growth and development, and the multitude of perspectives results in innovation and strengthens ethical conduct in business.

- For employees, the culture of diversity and inclusion means that they feel comfortable in the workplace, are eager to engage in their tasks and can be themselves.
- For the Bank, belonging to a global financial group brings benefits resulting from its global reach and diversity of views.

3.1.12 Diversity Policies [S1-1]

Employees of Citi Handlowy Bank have the right to be in a safe and healthy work environment, where personal talents and merits are appreciated, diversity is valued, privacy is respected and work-life balance is supported. Under a resolution of the Bank's Management Board, the Bank adopted a separate and formalized *Diversity Policy for Employees of Bank Handlowy w Warszawie S.A.*, which defines the Bank's diversity management strategy. The *Policy* applies to all employees and every employee must comply with it and act to implement the diversity strategy.

Citi Handlowy Bank prohibits all discrimination and this applies to managers, colleagues, clients or vendors. Such behaviors are incompatible with the organizational culture of Citi Handlowy Bank, in which mutual respect and professionalism are the foundation of employee relations. Employees who commit sexual harassment or any other form of harassment or discrimination face immediate consequences.

Citi Handlowy Bank's *Policy* prohibits retaliation against those who report undesirable events in the work environment or those who participate in investigations.

Citi Handlowy Bank's approach to diversity is governed by the following policies aimed at eliminating discrimination, promoting equal opportunities and enhancing diversity and inclusion:

- *Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A.*
- *Diversity Policy for Employees of Bank Handlowy w Warszawie S.A.*
- *Work Regulations for Employees of Bank Handlowy w Warszawie S.A.*
- *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics).*

Those documents are in line with the UN Guiding Principles on Business and Human Rights.

Diversity Policy for Employees of Bank Handlowy w Warszawie S.A.

The *Diversity policy for employees of Bank Handlowy w Warszawie S.A.* defines the Bank's strategy for managing diversity among its employees. The Bank believes that workforce diversity has a positive impact on the organization, its culture and values. The Bank prohibits any discrimination in employment, in particular with regard to gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination, sexual orientation, employment for a definite or indefinite term, or full or part-time employment.

The Bank cares about diversity and therefore:

- takes HR actions and decisions based on the results achieved by employees, their knowledge and professional experience, skills and competences, so that all employees have equal opportunities in the workplace,
- respects and promotes the principles of equal treatment and anti-discrimination,
- ensures equal pay for employees,
- ensures equal access to training,
- builds diverse employee teams,
- ensures a friendly working environment and an organizational culture based on mutual respect,
- promotes and supports employee initiatives, in particular the Citi Women, Citi Disability and Citi Pride networks,
- uses an internal system for providing early warnings and reporting ethical concerns;

The *Policy* applies to all employees of the Bank. The document does not contain any provisions regarding the monitoring of compliance of activities with its assumptions – these issues have been regulated at the level of individual HR procedures and practices, including the *Procedure for dealing with complaints filed by employees of Bank Handlowy w Warszawie S.A.*

The *Policy* was adopted under an order of the President of the Management Board, issued on the basis of a resolution of the Management Board, and its provisions are consistent with Recommendation Z of the Polish Financial Supervision Authority. The *Policy* was not consulted with employees. The Human Resources Management Division is responsible for its implementation. The document is available to employees on the intranet.

Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A.

The *Policy* ensures diversity of the Management Board and its principles are applied when appointing all members of the Management Board and during succession planning. The *Policy* counters discrimination on the basis of, among other things, racial and ethnic origin, skin color, gender, sexual orientation, gender identity, disability, age, religion, political views, national or social origin and other forms thereof covered by the European Union and national laws. The *Policy* is intended to ensure that persons elected as members of the Management Board are diverse in terms of gender, age, education and professional experience. The Bank prepared the document jointly with a specific group of employees.

Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A:

- defines the Bank's diversity management strategy, which promotes diversity of the Management Board so that people with different qualifications and competencies are reached during recruitment and succession planning,
- is intended to ensure that persons elected as members of the Management Board are diverse in terms of gender, age, education and professional experience, have different views, present independent opinions and make sound decisions,
- is intended to ensure that competent persons are appointed to the Management Board – selected on the basis of criteria arising from the *Policy for Assessment of Qualifications of Members of the Management Board and Persons Holding Key Functions at Bank Handlowy w Warszawie S.A.*, taking into account the benefits of diversity – as a result of which the Management Board properly fulfils its role and performs its tasks, and the Bank can achieve its strategic goals.

In 2025, there was no gender under-representation in the composition of the Bank's Management Board – therefore, the target gender under-representation ratio was not determined. In accordance with the *Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A.*: the Nomination and Remuneration Committee of the Supervisory Board will determine the representation ratio if, in the course of recruiting for the position of a member of the Management Board, it determines that a particular gender may be under-represented on the Management Board.

The *Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A.* was adopted by the Nomination and Remuneration Committee of the Supervisory Board, and its content is consistent with the Banking Law. The Human Resources Management Division, the Nomination and Remuneration Committee and the Supervisory Board are responsible for implementing the *Policy*. Annually, the Nomination and Remuneration Committee of the Supervisory Board evaluates whether the composition of the Management Board complies with the principles arising from the *Diversity Policy for Members of the Management Board*. The evaluation documentation is collected and kept by the Organizational Bureau. The *Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A.* can be provided by the Human Resources Management Division.

Work Regulations for Employees of Bank Handlowy w Warszawie S.A.

The *Work Regulations for Employees of Bank Handlowy w Warszawie S.A.* provide that in its ongoing activities the Bank respects human dignity and counteracts discrimination and mobbing. The *Regulations* define the employer's expectations towards employees, including expectations related to countering mobbing, define undesirable events in the work environment and show the consequences of unethical conduct. The *Regulations* clearly prohibit all discrimination, in particular on the basis of racial and ethnic origin, skin color, gender, sexual orientation, gender identity, disability, age, religion, political views, national or social origin and other forms of discrimination covered by the European Union and national laws.

The provisions of the *Regulations* apply to all employees and compliance with the *Regulations* is overseen by the Bank's Management Board and managers of employees. The *Regulations* are consistent with the Labor Code and do not contain any specific obligations regarding social inclusion. The *Regulations* have been agreed with the trade unions operating at the Bank. All newly hired employees are informed of the *Regulations* and this document is also permanently available to employees on the intranet and is part of the training attended by all persons hired by the Bank.

Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics)

Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics) was adopted by the Management Board of the Bank and approved by the Supervisory Board. The *Code* is a collection of best practices that are intended to guarantee that employees act ethically, in accordance with the law, principles of social coexistence and the values of Citi Handlowy Bank. In the *Code*, the Bank makes a commitment that it will implement appropriate HR procedures and practices that will allow it to continually nurture diversity throughout the organization. The Bank wants to create and promote a work environment that embraces the principles of equal treatment, that is free from discrimination of any kind, and that ensures equal opportunities. An overarching goal of the Bank is balanced gender representation, which the Bank is particularly concerned about when selecting individuals for executive positions and which manifests itself in equal development opportunities and equal access to training. Also, the *Code of Ethics* explicitly states that the Bank treats staff diversity as a value and values and respects differences among employees.

The provisions of the *Code of Ethics* apply to all employees, and they were not consulted with the Bank's employees. The document is available on the intranet and all persons starting work at Citi Handlowy Bank are required to read it.

Sustainability Strategy for 2025-2027

The *Sustainability Strategy for 2025–2027* (see Sustainability Strategy) outlines the specific goals the Bank has set: implement new and monitor existing diversity, equality and inclusion programs to create a sustainable work environment; conduct an analysis of pay inequalities and take appropriate measures to reduce them. In the *Strategy*, the Bank declares that it wants to keep the adjusted gender pay gap below 5%. The HR Division will be responsible for implementing the *Strategy* in this area and monitoring its implementation. The provisions of the Strategy are available to employees in the Bank's intranet system.

3.1.13 Diversity targets [S1-5]

The diversity area is monitored at the Bank through designated ambition levels derived from the policies described above.

The Bank has additionally set a quantitative target for diversity as part of its newly adopted Sustainability Strategy for 2025-2027: maintaining an adjusted gender pay gap below 5%.

In 2024 (adopted as the base year), the ratio was maintained below 5% and amounted to 1.47%.[49]

The Bank's internal stakeholders were involved in setting the adopted target.

3.1.14 Activities in the area of diversity [S1-2] [S1-4]

The Bank undertakes various activities to counteract discrimination, by educating on discrimination, unequal treatment and mobbing and creating an appropriate organizational climate that supports fair play in the workplace. The Bank's activities include:

- regular training on the rules of conduct for employees of Bank Handlowy in Warsaw – in 2024, 2,972 employees of Citi Handlowy completed the training, which means that the target achievement rate was 99,23%; in 2025, 3,218 Citi Handlowy employees completed the training, which means that the goal was achieved in 100%,
- regular training on undesirable events in the work environment – in 2024, 2,980 persons completed the training, which means that the target achievement rate was 99.07%; In 2025, 3,063 people completed the training, which means that the goal was achieved in 100%.

Such training is held annually and is mandatory for all employees. The Bank checks whether employees have completed the training, and information about failure to complete is sent to the Business Risk, Compliance and Controls Committee (BRCC).

The Bank promotes diversity by striving to ensure adequate participation of women also during the recruitment process. Women's representation is recommended both among candidates and in the evaluation panel, which as a good practice should include at least two women. The Bank, through the Leopold Kronenberg Citi Handlowy Foundation, also supports the professional activation and professional development of women, for example through cooperation with non-governmental organizations:

- *Welcome* program implemented jointly with the Mamo Pracuj Foundation,
- *Shesnnovation Academy* program carried out with the *Perspektywy* Foundation.
- *Business in Women's Hands* program implemented in cooperation with the Foundation for Female Entrepreneurship.

Anti-discrimination activities also include information, education and diagnostic activities. Diagnostics include in particular the VOE survey, the Early Warning System and the activities of the Ethics and Disciplinary Commission.

The Bank also conducts a survey of employee satisfaction – in 2025, the value of the Belonging index (DEI, *Diversity, Equity & Inclusion)* was 87% (88% in 2024), and the ethical index – 94% (93% in 2024).

The Bank also has networks in place to support diversity activities.

The Citi Women Network Poland has been operating at Citi Handlowy Bank since 2004 and is part of the broader Citi Inclusion Networks program implemented by Citi worldwide. Citi Women Network Poland draws attention to the situation of women who work in Citi Handlowy and strives to ensure that they have equal opportunities for professional development and the possibility of realizing their career ambitions at the Bank. The network carries out regular activities. Citi Women Network Poland mission:

- creating encouraging professional development conditions for women and support in overcoming barriers;
- ensuring that women can realize their ambitions while maintaining work-life balance.

Citi Women Network inspires women to invest in themselves – it offers training, mentoring, meetings with successful people and integration meetings. It organizes inspirational meetings (e.g. with leaders from Citi) and various workshops or sessions to support women's development (e.g. in the IT area). Citi Women Network also conducts mentoring for women who need friendly advice in professional career development. It supports women in establishing new and close contacts, promotes a pro-woman approach inside and outside the Bank and helps women find a work-life balance.

[49] Progress is measured in accordance with the methodology described in the Remuneration metrics [S1-16] section.

Citi Pride Network Poland involves all employees in its actions, attempting to create and reinforce a safe space, and also works together with non-profit organizations. It is one of the most active employee initiatives within the company in the context of promoting diversity and inclusiveness. Its activities are furthered by all employees of Citi Handlowy Bank, who acknowledge the great value of diverse work environment for the organization. The network carries out regular activities.

The Citi Disability Network creates a space open to disabilities in all their forms – both for employees and their loved ones, as well as for the Bank's clients. The Citi Disability Network raises awareness about the situation of disabled people – inside and outside the organization – so that everyone feels respected and understood at work, and teaches how to talk about their needs and properly understand the needs of others. The network carries out regular activities. The mission of Citi Disability Network:

- to spread knowledge about disability,
- to initiate conversations about taboo topics and create experience-sharing platforms,
- to organize meetings and workshops,
- to promote a healthy lifestyle and regular check-ups.

The implemented and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

3.1.15 Diversity metrics[50] [S1-9]

Number of employees	2024	2025
Number of employees under 30 years of age	446	470
Percentage of employees under 30 years of age	14 %	15 %
Number of employees aged 30 to 50	2281	2197
Percentage of employees aged 30 to 50	73 %	70 %
Number of employees over 50 years of age	416	482
Percentage of employees over 50 years of age	13 %	15 %

Gender distribution by number in top management[51]	2024	2025
Female	6	5
Male	7	8
Other	0	0
Total	13	13
Percentage gender distribution in top management	**2024**	**2025**
Female	46%	38%
Male	54%	62%
Other	0%	0%

[50] These indicators include all employees of Bank Handlowy w Warszawie S.A. on the last day of the year (reporting period).
[51] President of the Bank's Management Board and Managers reporting directly to the President of the Bank's Management Board.

The Bank conducts a regular *Voice of Employee* survey to examine the effectiveness of its activities, including in the area of diversity. In the survey, employees respond to the following statements: "The atmosphere in my team is supportive and appreciative of diverse perspectives," "People with diverse backgrounds have an equal opportunity to succeed at the Bank," "I can be myself at work," "I feel I belong at Citi," "Leaders demonstrate support for diverse backgrounds and ideas through their decisions and actions," and "I feel appreciated as a Citi employee." In the 2025 VOE survey, the Bank asked employees to assess the climate within their team, which fosters appreciation for diverse perspectives, and for the first time in 2025, to assess how managers foster employee team belonging. Employees rated both questions positively in the VOE survey, indicating 93% (92% in 2024) and 92% satisfaction, respectively.

3.1.16 Remuneration metrics [S1-16]

When building its remuneration policy, Citi Handlowy Bank hinges it on the best market practices and takes into consideration corporate governance requirements, market trends and the organization's standing and potential.

The Bank determines the level of employee remuneration based on the experience and competencies required for a given position, performance assessment, present remuneration, and the position against a new group of employees and the market.

The Bank understands the market as data from reports of the consulting firm that cover positions in other organizations that are similar to positions in the Bank in terms of duties, skills and responsibilities.

Levels of remuneration are reviewed on an annual basis taking into account the employee's annual assessment, skills and responsibilities versus data from market research concerning the level of remuneration in the industry.

As defined by the ESRS S1-16 standard, the pay gap between female and male employees based on the arithmetic mean and the ratio of the highest earner's pay to the median employee pay is:

	2024	2025
The percentage gender pay gap between female and male employees – an indicator based on the arithmetic mean calculated on the basis of average gross hourly rates, determined on the basis of the annual total gross remuneration[52]	32.36 % (i.e. the average remuneration of women was 67,64 % of the average remuneration of men).	35.92 % (i.e. the average remuneration of women was 64.08 % of the average remuneration of men).
The ratio of the highest earner's remuneration to the median employee remuneration	52.45	48.41

[52]All employees employed by the Bank as of 31 December 2025 were included in the calculations.
The analysis excludes employees hired after 1 October 2025 (i.e. those recruited during the three months before the end of the year for which the variable remuneration was awarded), persons employed for <0.2 full-time (so-called technical positions) and employees who did not work for at least three consecutive months in 2025 with an absence lasting as of December 31, 2025. The calculations were made based on the remuneration awarded for 2025 (and not the remuneration paid in 2025). Part-time employees were converted to full-time equivalents and the remuneration of employees who did not work the full year was annualized for the purposes of further calculations.
The gross hourly rate for individual employees was determined by dividing the total annual gross remuneration by 253 working days in 2025, and then by 8 working hours resulting from full-time work, to which all rates were previously converted.
The pay gap ratio based on the arithmetic mean was calculated according to the following formula: (average gross hourly rate of men – average gross hourly rate of women) / average gross hourly rate of men.

As the pay gap based on the arithmetic mean is predominantly driven by the employment structure, the Bank also presents, as contextual information, the adjusted pay gap that allows for a more accurate verification of potential remuneration inequality and identification of areas that need attention.

	2024	2025
The percentage gender pay gap between female and male employees – an adjusted indicator calculated on the basis of average gross hourly rates, determined on the basis of total gross annual remuneration[53]	1.47% (i.e. the average remuneration of women was 98.53% of the average remuneration of men).	1.72% (i.e. the average remuneration of women was 98.28% of the average remuneration of men).
The percentage gender pay gap between female and male employees – an adjusted indicator calculated on the basis of average gross hourly rates, determined on the basis of annual gross base remuneration[54]	1.56% (i.e. the average remuneration of women was 98.44% of the remuneration of men).	1.80% (i.e. the average remuneration of women was 98.20% of the remuneration of men).

Every year, during the annual remuneration review, the Bank analyzes remuneration in terms of pay equality and does not rule out allocating additional funds for this purpose in subsequent years. In previous years, as well as during the annual remuneration review in 2025, the Bank analyzed and indicated areas that require special attention when planning pay increases in order to gradually increase pay equality between women and men.

3.1.17 Incidents and complaints [S1-17] [S1-17]

Each employee of the Bank may anonymously report a violation of ethical standards via the Ethical Helpline of the competent member of the Management Board. It is a special, independent and autonomous communication channel in the form of a separate telephone line of a member of the Management Board and postal address for correspondence. Anonymous reports are directed to the relevant member of the Management Board in charge of the Risk Management Sector or the Financial Markets and Corporate Banking Sector (in the case of employees of the Bank's Brokerage Department) – by phone or by letter via the Ethical Helpline. Reports concerning a member of the Management Board may be directed to the Supervisory Board – by letter or electronically.

Each employee of Citi Handlowy Bank is obliged to report immediately any unethical behavior. The rules for reporting violations are described in the *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics)*. For more information on the Code of Ethics and reporting channels, see the Business conduct and corporate culture section.

The Bank has implemented the *Procedure for dealing with complaints filed by employees of Bank Handlowy w Warszawie S.A. (Employee Complaints)* , which describes the principles under which employees and former employees of Citi Handlowy Bank and job candidates may report undesirable behaviors in the work environment: discrimination, mobbing, harassment, and sexual harassment, as well as the procedure for handling such complaints.

Employees are obliged to report any business issues that may pose a potential threat to the interests or reputation of the Bank to their managers, employees of the Independent Control and Operational Risk Department, employees of the Legal Division or employees of the Compliance Division, and in cases that cover employee-related issues – in accordance with the *Procedure for dealing with complaints filed by employees of Bank Handlowy w Warszawie S.A. (Employee Complaints).*

[53] Both the population covered by the analysis and the hourly rate for individual employees were calculated in a similar way to the pay gap based on the arithmetic mean.
The adjusted pay gap ratio was calculated using the weighted method as described below:

- The Bank's employee population was divided into groups describing the assignment of employees to pay grade levels, a given location and the appropriate family for a given position (Job Family), according to the organizational structure as of 31 December 2025,
- for each such group of employees, the average pay of women and the average pay of men were calculated, converted to the average hourly rate, and then the pay gap ratio was calculated according to the following formula: (average gross hourly rate of men – average gross hourly rate of women) / average gross hourly rate of men,
- if, for the purposes of calculating the ratio, there were no women or men employed in any of the distinguished groups, this group was excluded from further analyses,
- for each group, a weight was determined, i.e. the share of this group in the population of the entire Bank that was the subject of the analysis,
- the ratio for the entire Bank was calculated as the sum of the products of the ratios of each group and the weight of a given group.

[54] The calculation process for determining the adjusted pay gap based on the annual gross base salary is the same as that for determining the adjusted wage disparity based on the annual gross base remuneration. The annual gross base remuneration used to calculate the hourly rate was determined by annualizing the employees' December pay, previously adjusted to the full-time level.

The Bank conducts a thorough investigation regardless of whom the questions and doubts raised concern.

In 2024, through the channels for reporting problems by employees, Citi Handlowy Bank received one complaint subject to examination in accordance with the employee complaint procedure, which allows for reporting undesirable events. In accordance with the procedure, undesirable events include unequal treatment, discrimination, including mobbing, and harassment. The investigation revealed no undesirable events, in particular those indicating discrimination, including harassment. In 2025, through the channels for reporting problems by employees, Citi Handlowy Bank received three complaints subject to examination in accordance with the employee complaint procedure, which allows for reporting undesirable events. In accordance with the procedure, undesirable events include unequal treatment, discrimination, including mobbing, and harassment. The investigations revealed no undesirable events, in particular those indicating discrimination, including harassment.

In 2024, there were two incidents concerning employees and potential violations of human rights. These were two lawsuits filed by employees in labor law cases. According to the ESRS definition, they do not concern serious incidents concerning respect for human rights. Both court cases ended in 2025 with the Bank winning. In 2025, there were two incidents concerning employees and potential violations of human rights. These were two lawsuits filed by employees in labor law cases. According to the ESRS definition, they do not concern serious incidents concerning respect for human rights. As of the date of this statement, both lawsuits are pending. In 2024 and 2025 the Bank did not record any complaints filed with the OECD National Contact Points for Responsible Business Conduct handling notifications of violations of the OECD Guidelines for Multinational Enterprises, including in the labor area.

In 2024, the total amount of fines, penalties and compensation for damages resulting from incidents that took place in previous reporting periods amounted to PLN 36,537.42 – this is the amount of compensation adjudicated in employee-related court cases. This amount is not material compared to the most adequate amount disclosed in the financial statements for 2024, i.e. "Other costs", which amounted to PLN 45,220,000 (the amount is 0.08% of Other costs). In 2025, the total amount of fines, penalties and compensation for damages resulting from incidents that took place in previous reporting periods amounted to PLN 22,265.26 – this is the amount of compensation adjudicated in employee-related court cases. This amount is not material compared to the most adequate amount disclosed in the financial statements for 2025, i.e. "Other costs", which amounted to PLN 5,040,000 (the amount is 0.44% of Other costs). In 2024 and 2025 the Bank was not penalized for violations of employee rights.

3.2 Consumers and end-users [S4]

Cybersecurity and information security

The role and obligation of the Bank, as a public trust institution, is to protect information entrusted to it by its individual clients, including individuals employed by institutional customers but using Citi Handlowy's banking services. The Bank has implemented policies, set goals and takes actions to meet its obligations in the area of cybersecurity and information security.

3.2.1 Cybersecurity Management Policies [S4-1]

Information security and protection of personal data of the Bank's clients have been regulated in adopted, implemented and strictly observed policies and standards. The most important of them are:

- *Information Security Rules,*
- *IT Security Standards,*
- *Principles of Conduct in Case of Information Security Breach Incidents,*
- *Rules for Personal Data Protection at Bank Handlowy w Warszawie S.A.,*
- *Client protection from fraud – the process of monitoring and blocking suspicious transactions.*

Those documents are in line with the UN Guiding Principles on Business and Human Rights. No significant changes were made to these regulations in 2024.

The Bank's approach to human rights – including those particularly important to clients – is regulated in the *Code of Conduct for Employees (Code of Ethics)*. The *Code of Ethics* is in line with the principles set out in the United Nations Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. The *Code* describes, among other things, the obligation of employees to comply with the principles of protecting bank secrecy, including client data. Employees have an obligation to protect all personal data and confidential information from misuse by third parties, not to disclose them to any unauthorized persons and to use them and permit their use only for permitted purposes. The *Code* does not describe how the Bank cooperates with clients to protect their personal data (this issue is regulated in separate *Rules for personal data protection at Bank Handlowy w Warszawie S.A.*). In accordance with the regulations, in the event of irregularities concerning personal data employees are obliged to inform their manager, the Data Protection Bureau and the Information Security Bureau.

When setting the objectives for the adopted regulations, the Bank was guided by applicable legal provisions, regulatory guidelines, the current and expected geopolitical situation, plans for technologies implemented around the world and knowledge obtained from business partners, including Citi Group.

Information Security Rules

The *Information Security Rules* are the basic standards of information security. They apply to all units of the Bank and concern employees, contractors, vendors and clients. The *Rules* are the basis for the functioning of the Information Security Management System and cover, among other things:

- human resources security,
- asset management,
- access control,
- cryptography,
- physical and environmental safety,
- safe operation of equipment,
- communication security,
- incident management,
- information security in business continuity management.

The *Rules* ensure an appropriate level of security and define the requirements and standards that apply throughout the Bank. Their content is consistent with the elements of the ISO 27001 standard – the Bank has a certificate of compliance with this standard, as well as with ISO 22301 and 20000. Oversight over compliance with the *Information Security Rules* is carried out by the Information and Communications Technology Commission, and the Head of the Information Security Management Division is responsible for their implementation. The *Rules* are available to all employees on the intranet and are part of mandatory training for all employees.

IT Security Standards

The *IT Security Standards* overlap with elements of ISO 27001 and refine the cybersecurity guidelines determined in the *Information Security Rules*. They are designed to ensure a sound level of IT security – they describe the scope of requirements and technology standards for Citi Handlowy Bank's systems, in particular regarding, among other things, authentication, cryptography, key and certificate management, event logging standards, and data security and protection. They introduce a number of processes that are monitored on an ongoing basis by the teams of the Information Security Management Division. The Head of the Technology Division is responsible for the implementation of the *Standards*, and the Information and Communications Technology Commission oversees the implementation of their provisions.

The provisions regarding the protection of data and information of clients and the Bank apply in particular to employees of the Technology Division and the Information Security Management Division. They also affect the business partners and vendors of Citi Handlowy Bank both in Poland and other countries. Indirectly, the policy also affects some stakeholder groups, including business application owners, systems control teams and control units. The *Standards* are available to employees on the Bank's intranet and are part of mandatory training for all employees.

Principles of Conduct in Case of Information Security Breach Incidents

The *Principles of Conduct in Case of Information Security Breach Incidents* have been developed to ensure confidentiality, integrity (including authenticity) and availability of information and systems and thus guarantee an appropriate level of security. The *Principles* introduce a coherent process for identifying, reporting, explaining, recovering and resolving information security issues. They describe how to identify and mitigate the risk of information security breaches and how to effectively respond to events. The *Principles* specify how the Bank analyzes individual incidents to check whether regulatory reporting is necessary and include requirements for the process of reporting to the competent authorities. The Bank monitors incoming reports so that it can respond appropriately to incidents. In addition, reports are periodically reviewed for quality and timely handling.

The requirements of the *Principles* overlap with the incident management elements of ISO 27001. The Policy introduces a number of processes that are monitored on an ongoing basis by the teams of the Information Security Management Division. The results of their activities are presented at a meeting of the Information and Communications Technology Commission.

The *Principles* apply to all business units and all employees. They also affect business partners, vendors and other stakeholders in identifying, reporting and managing security incidents.

The Head of the Information Security Management Division is responsible for implementing the *Principles of conduct in case of information security breach incidents*. The document is available to employees on the Bank's intranet and its regulations are part of mandatory employee training.

Rules for Personal Data Protection at Bank Handlowy w Warszawie S.A.

The *Rules for Personal Data Protection at Bank Handlowy w Warszawie S.A.* are intended to ensure that the Bank operates in compliance with the regulations concerning the protection of personal data. They define all aspects related to the processing of all personal data in each organizational unit of the Bank, regardless of the physical location of the processing equipment. The *Rules* are applied to data located, for example, in IT systems, files, indexes, books, lists, forms and agreements. The *Rules* are there to help prevent:

- undesirable modification of data,
- unauthorized or accidental destruction of data,
- unauthorized or accidental access to data,
- obtaining or disclosing data against the law,
- other cases of processing in violation of personal data protection regulations.

The policy is a manifestation of the Bank's determination to ensure compliance with legal regulations and the regulator's recommendations, as well as to identify and assess risks. The regulation applies to all employees without exception and concerns the processing of personal data both at the Bank and third parties, and applies to various stakeholder groups. Its content refers in particular to the Regulation of the European Parliament and of the Council (EU) on the protection of individuals with regard to the processing of personal data and on the unrestricted movement of such data and the national Personal Data Protection Act. Its provisions also coincide with the elements of the ISO 27001 standard in the scope of security control at vendors.

Once every three months, the Bank reviews the *Rules* and, if necessary, modifies their content to take into account legal changes and the guidelines and decisions of the regulator. The document and the introduced changes require an opinion and all relevant stakeholders in Citi Handlowy Bank are informed about their content. The Data Protection and Artificial Intelligence Bureau is obliged to provide information on personal data protection breaches identified by the Bank to the Operational Risk, Control System and Compliance Committee in the manner and on the principles specified by this Committee.

Rules for Personal Data Protection at Bank Handlowy w Warszawie S.A. are available to employees on the Bank's intranet. They are also part of mandatory training for all employees. The Data Protection and Artificial Intelligence Bureau is responsible for the policy and the Bank's units are responsible for implementing its principles in the processes. The relevant Personal Data Processing Coordinators oversee the process of collecting full and uniform information on the processing of personal data in the Bank's organizational units and their further transfer to the Data Protection and Artificial Intelligence Bureau.

Client protection from fraud – the process of monitoring and blocking suspicious transactions

Client protection from fraud – the process of monitoring and blocking suspicious transactions is a set of operational procedures that are intended to reduce the number of fraudulent transactions and protect the funds of clients of Citi Handlowy Bank. The Bank monitors alerts from internal systems, analyzes transaction data in search of chains of suspicious events and updates prevention and detection rules. This is carried out throughout the Bank's value chain. Procedures restricting suspicious transactions are applied without exception, and they refer, among other things, to regulations on the protection of consumer interests and PSD2 – the EU Payment Services Directive.

Protection procedures take into account the interests of all clients and minimize the likelihood of transactional fraud and the use of stolen personal data by criminals, for example to take a loan. Client protection rules are confidential and the Bank does not reveal them to the public. In addition, the Bank works with a wide range of stakeholders (external suppliers of technological security, suppliers from the Citi Group and CSIRT KNF[55]) to improve its protection policies and techniques. Reviews of protection procedures take place periodically in accordance with internal regulations. Information on the effectiveness of the process is presented to the Risk Committee and the Business Risk, Compliance and Controls Committee (BRCC).

The Bank informs its clients about threats and safe use of payment instruments – it publishes newsletters, announcements on the Bank's website, on social media and in the online banking system. This information is also sent to employees. The procedures and their changes require an opinion and all relevant stakeholders in the Bank are informed about their content.

3.2.2 Cybersecurity targets [S4-5]

The Bank has not set quantitative cybersecurity targets; instead, the Bank monitors progress in this area through designated ambition levels derived from the policies described above.

3.2.3 Cybersecurity activities [S4-4]

The Bank undertakes cybersecurity activities thanks to the involvement of employees who use their knowledge and experience, systems and applicable regulations to manage significant impacts. Cybersecurity activities include:

- weekly meetings of employees of the Information Security Management Division with employees of the Technology Division. Meeting participants analyze the extent to which individual requirements have been met, discuss key changes in processes, and escalate issues that require such action. Qualitative and quantitative information is compiled in the form of minutes after such meetings and in the form of records used in control processes.
- regular security checks at selected vendors of the Bank. Such checks are visits to vendors or online meetings during which the Bank's requirements and the degree to which the vendor meets them are discussed. Qualitative and quantitative information from such checks is presented at a meeting of the Information and Communications Technology Commission. Those activities are financed from the budget of the Information Security Management Division.
- mandatory training for new employees and annual, comprehensive information security training for all employees, and:
  - annual “Information Security Week” for all employees,
  - meetings with information security experts, depending on the needs of particular units,
  - a special page on Citi Handlowy Bank’s intranet dedicated to information security, along with specially prepared guidelines for all employees,
- quarterly phishing tests covering all employees of the Bank.
- educational and information activities and monitoring of transactions involving all payment instruments to counteract fraudulent transactions. Technology projects that improve client security and the effectiveness of transaction monitoring are financed in accordance with the standard budgeting process.

Information on the conducted trainings, the “Information Security Week” and the results of phishing tests are presented at a meeting of the Information and Communications Technology Commission. Training is financed in accordance with the standard budgeting process.
The executed and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

[55] Computer Security Incident Response Team of the Polish financial sector

3.2.4 Cooperation for cybersecurity [S4-2]

The Bank cooperates with its clients to increase information security. An important part of this process is cooperation with authorities representing the interests of consumers (including the Office of Competition and Consumer Protection, consumer ombudsmen and the Financial Ombudsman), as well as with regulators (including the Polish Financial Supervision Authority – PFSA and the Personal Data Protection Authority). In addition, Citi Handlowy Bank responds directly to reports or requests and recommendations from authorities and regulators. In addition, every year the Bank undergoes a supervisory review and evaluation process during which the PFSA evaluates the Bank's operations and recommends necessary changes. The Compliance Department for Regulations and Regulatory Relations is responsible for this cooperation.

Cooperation with clients is carried out at the Bank through complaint handling processes, satisfaction surveys, Citiphone, branches and online and mobile banking systems. If submitted comments concern cybersecurity, the Bank checks whether policies and processes require modifications. Citiphone Managers are responsible for this cooperation.

Client inclusiveness

The Bank treats relations with stakeholders as a priority and actively counteracts discrimination of clients. Through its policies, goals and actions, it creates an inclusive business environment.

3.2.5 Client inclusiveness policies [S4-1]

Citi Handlowy Bank has regulated inclusive banking in the *Procedure for handling requests for providing documents to persons with special needs.*

That document is in line with the UN Guiding Principles on Business and Human Rights. No significant changes were made to it in 2024.

A description of other policies relating to the proper conduct of the Bank's employees towards clients is included in the subchapter Responsible Market Practices.

The Bank's approach to human rights – including those relating to clients – is regulated in the *Code of Conduct for Employees (Code of Ethics)*. The *Code of Ethics* expressly prohibits discrimination against prospective or actual clients on the basis of race, gender, religion or other factors (which are not credit risk factors). Any reports on violations of ethical principles and cases of discrimination are thoroughly examined by the Bank.

Procedure for handling requests for providing documents to persons with special needs

The *Procedure* specifies the principles and method of making bank documents available to persons with special needs. The *Procedure* is consistent with the *Act on ensuring accessibility for persons with special needs* and the *Banking Law* and specify the categories of documents that the Bank makes available to persons with special needs. These are general terms and conditions of agreements, including model agreements and regulations, and documents listed in Article 111 of the Banking Law. Every person with special needs – whether a client or not – may ask the Bank for documents in the form of:

- Braille printout,
- recordings in Polish sign language,
- audio recordings,
- print with font size adjusted to their needs.

In the *Procedure,* the Bank undertakes to prepare and deliver such documents within seven calendar days of the request.

This regulation applies to all employees of the Consumer Banking Segment and employees serving clients or prospective clients with special needs, as well as to regulators and supervisory bodies, as it takes into account supervisory requirements and mandatory provisions of law. The purpose of the *Procedure*, which is to increase the availability of services for people with special needs, was not consulted with clients and was determined on the basis of mandatory provisions of law.

The Electronic Banking Development and Customer Experience Management Department is responsible for preparing, distributing and monitoring the policy. The Procedure is available to employees in an internal IT system. The Bank does not make the Procedure available to clients; however, they can find information on the application process on the Bank's website. In 2025, the Bank did not receive any request for access to documents in accordance with the *Procedure for handling requests for providing documents to persons with special needs.*

3.2.6 Client inclusiveness targets [S4-5]

The Bank has not set quantitative targets for client inclusiveness; instead, the Bank monitors progress in this area through designated ambition levels derived from the policy described above.

3.2.7 Client inclusiveness actions [S4-4]

The Bank's employees monitor actions related to inclusiveness on an ongoing basis and the Bank adapts its branches to meet the needs of its clients. The vast majority of the Bank's branches are located in large commercial centers equipped with a lift and infrastructure to facilitate access for clients with disabilities. The vast majority of the Bank's ATMs have free[56] architectural access – without barriers for clients in wheelchairs. ATMs are equipped with functions that make them more accessible to clients with visual or hearing impairments and with impaired motor skills, as well as to clients with epilepsy.

The implemented and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

3.2.8 Collaboration for Inclusiveness [S4-2]

The Bank works with its clients to increase its inclusiveness. A key element of this process is the Net Promoter Score (NPS) client survey. During a phone call, clients can provide comments on any area of interaction with the Bank, including its potential non-inclusive approach. In addition, clients can provide feedback as complaints or inquiries addressed directly to the Bank.

Client opinions and problems reported in NPS surveys are discussed at regular meetings of the Consumer Banking Customer Experience Council with the participation of management and at working group meetings attended by the Marketing Research Bureau, a representative of the unit responsible for a given contact channel or product and representatives of the Customer Experience Management Bureau. Comments and remarks made by clients often become the basis for decisions to implement improvements and changes.

NPS surveys are done in a continuous process. The Bank sends questionnaires to persons selected based on specific criteria (*top-down research*) or asks clients about their last interaction with the Bank (*bottom-up research*). This cooperation is supervised by senior managers supported by the Consumer Banking Customer Experience Council, which summarizes the activities and their results. The effectiveness of the actions taken is assessed based on the number of complaints reported to the Bank.

Client education

The Bank is aware of its responsibility associated with providing financial services. Proper education of clients about finance and the economy may be an opportunity for the Bank to increase their trust and, as a result, to improve the security of management of the Bank's capital.

3.2.9 Policies related to increasing financial knowledge of clients through education [S4-1] [S4-2]

Financial and economic client education policy

In 2024, the Bank adopted its *Financial and economic client education,* which is implemented in the Consumer Banking Sector by the Internet Marketing Department. The *Policy* describes the Bank's approach to expanding client's knowledge of available financial solutions and safe use of electronic and mobile banking and online payments, and also defines the Bank's responsibility in this regard. Proper education of clients about finance and the economy is an opportunity for the Bank to increase their trust and, as a result, to improve the security of management of the Bank's capital. That document is in line with the UN Guiding Principles on Business and Human Rights.

The Bank shares its knowledge with individual clients so that they can better understand financial concepts, learn the essence of the products and services offered by the Bank and be aware of both financial opportunities and risks. Such knowledge will make it easier for them to make financial decisions.

The Bank has adopted the following guidelines for responsible education and communication:

- disseminate knowledge of electronic banking, cybersecurity and available financial solutions,
- build the image of the Bank as a public trust institution,
- promote informed financial decisions and a responsible approach to risk,
- provide clients using financial services with the access to basic and up-to-date information, and therefore provide them with information that is clear, understandable and free of specialist jargon.

In accordance with the *Policy*, financial education programs conducted by the Bank are fair, transparent and objective, respond to the needs of consumers and are consistent with the *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A.* (*Code of Ethics*).

[56] Free access means no steps, no thresholds, a flat floor, the ability to directly approach and manoeuvre a wheelchair (no doors, tight spaces, etc.), as well as placing key contact points on the ATM (keyboard, card slots, banknote slots) at a height that allows for use by a wheelchair user.

At least once a quarter, the Internet Marketing Department prepares financial education materials and publishes them on social media, on the website or in the banking application, sends it by email or organizes special webinars. The Department, in consultation with the Customer Experience Management Bureau, prepares an action plan, the execution of which in the past year is reported to the Vice President of the Management Board of Bank Handlowy for Consumer Banking in December.

The *Financial and economic client education policy*, which is implemented in the Consumer Banking Sector by the Internet Marketing Department, is binding on all employees participating in the preparation of educational materials addressed to individual clients. The *Policy* is developed, issued and monitored by the Internet Marketing Department, which is also responsible for the implementation of its provisions. The *Policy* is available to employees on the Bank's intranet. The *Policy* and any changes to it are reviewed by all relevant stakeholders in the Bank. The document will be updated in connection with changes in legal regulations, supervisory requirements and market standards. The objectives of the *Policy* have not been consulted with consumers or end-users.

3.2.10 Client education targets [S4-5]

The Bank has not set quantitative targets for client education; instead, the Bank monitors progress in this area through designated ambition levels derived from the policy described above.

3.2.11 Actions taken to increase financial knowledge of clients through education [S4-4]

Organizing online educational meetings, open to everyone – both clients and people not associated with the Bank. Those meetings cover topics related to banking, the current market situation and wealth management, and topics of public interest. The overarching goal of the meetings is to educate and build client awareness; references to the Bank's products may appear during such meetings. In 2025, similar to 2024, nine meetings were held with Citi Handlowy Bank's experts and external specialists (last year, invited guests included Paweł Miszkurka). The webinars were attended by 4,103 people (compared to 3,742 in 2024). The meetings covered, among other things:

- legal and financial solutions for succession planning,
- market and economic prospects in 2025,
- opportunities and threats related to the development of artificial intelligence – from the perspective of consumers, employees, and parents,
- investing abroad,
- art as an investment of the future,
- updates on online security.

"Investment Barometer", which is a monthly publication describing the situation in global financial markets prepared by experts from the Investment Advisory and Mutual Funds Bureau. The "Investment Barometer" is sent to more than 36-37 thousand clients of the Bank.
Cyclic information campaigns for clients on cybersecurity, which provide them with access to current knowledge on potential threats and safe online behavior patterns. Activities carried out through various communication channels include:

- sending four newsletters containing information on online security and cyberattacks,
- publishing 16 news items on the website on threats and frauds,
- cybersecurity banners in the Citi Mobile application – before and after logging in,
- publishing 46 different information materials on current threats on social media – all these publications generated reach to over 1.7 million unique users, who viewed them over 3.4 million times and clicked on the link over 11,000 times,
- changes to the website's security section: adding a new banner to draw customers' attention to the most important message,
- launching security-related communications via PUSH messages on the website.

Educational activities of the Leopold Kronenberg Citi Handlowy Foundation – the foundation focused on activities related to financial education and entrepreneurship, including:

- cooperation with the THINK! Foundation, the Mamo Pracuj Foundation, the Entrepreneurial Women Network Foundation and the Olsztyn Food Bank. Its elements included educational meetings for young women who want to develop their own businesses and for start-ups in the STEM industry,
- preparation, together with the THINK! Foundation, of the annual research report "Poles' Attitudes Towards Finance,"
- developing, together with partners, 3 reports on market challenges: "Barriers faced by young entrepreneurs in Poland", "Problems of women who want to start their own business", "Report on business activities established by Ukrainians in Poland
- participation in business and economic conferences dedicated to financial education (EFNI, EFC, EEC).

In addition, the foundation conducted activities financed globally by the Citi Foundation as part of the programs Business in Women's Hands, Welcome, Entrepreneurship Development Program, Food is the Greatest Human Need, Dreams into jobs.

In 2025, the foundation participated in the most important business events on topics including financial education.

During the European Forum for New Ideas (EFNI), the Foundation hosted a panel discussion organized as part of EFNI Talks: "National Financial Education Strategy – One Year After Implementation." The panel included Monika

Wojciechowska, Plenipotentiary of the Minister of Finance for Financial Education Strategy, Anna Bichta, President of the Think! Foundation, and Paweł Zegarłowicz, President of the Citi Handlowy Foundation.

Additionally, in June, during the European Financial Congress (EFC), the Citi Handlowy Foundation organized a panel entitled "Security and Financial Education."

As part of the Economic Education Congress (EEC), the Citi Handlowy Foundation also participated in a panel on "The Longevity of Poles – Educational Signposts on the Polish Credit Map."

The implemented and planned activities do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

Responsible market practices

The market practices applied by the Bank as a financial institution, including client-related practices, are strictly regulated by Polish and European law. Thanks to the proper application of this law, as well as internally implemented policies, goals and actions, the Bank has the opportunity to build long-term relationships with its clients.

3.2.12 Policies related to responsible market practices [S4-1]

The Bank follows responsible market practices. It is supported in this by the regulations it has implemented and complies with, for example:

- *Rules of proper treatment of clients at Bank Handlowy w Warszawie S.A.*
- *Conduct Risk Management Policy at Bank Handlowy w Warszawie S.A.*
- *Business Activity Management Policy at Bank Handlowy w Warszawie S.A.*
- *Rules for development of Special Offers for Consumer Bank Sector Customers of Bank Handlowy w Warszawie S.A.*
- *Rules of creating marketing materials and assessing the suitability of marketing campaigns at Bank Handlowy w Warszawie S.A.*
- *Rules for the preparation of marketing materials in connection with the provision of investment or investment-linked insurance services by the Bank.*

Those documents are in line with the UN Guiding Principles on Business and Human Rights. No significant changes were made to these regulations in 2025.

The Bank's approach to human rights – important for clients in the context of responsible market practices – is regulated in the *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A.* (*Code of Ethics*). The document refers to the principles set out in the United Nations Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

Under the *Code*, employees are required to escalate issues that pose or may pose a risk to the Bank's operations, including identified activities that may have negative impacts on human rights, taking into account the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, so that the Bank can effectively manage emerging issues.

The *Code* also stipulates that the Bank supports free trade and fair competition in the financial markets. The Bank does not engage in any practices that are deceptive, misleading, fraudulent or unfair.

In terms of respect for clients, the Bank declares that it conducts its business activities responsibly, which is achieved, for example, by respecting and caring for human rights and preventing negative human rights impacts in caring for and considering the interests of its clients. In its activities, the Bank takes into account internationally recognized standards set by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. When applying the principles of respect for clients, the Bank takes into account the needs of consumers, especially those who may be vulnerable or in a disadvantaged situation, and also recognizes the challenges that e-commerce may pose to consumers. The Bank implements the due diligence process in relation to human rights through an adequate management system, meeting the requirements of regulations dedicated to entities in the financial sector, while declaring the inclusion, in the processes of adapting to legal and regulatory requirements, of the expectations arising from the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises in the Bank's management processes.

The Bank makes every effort to ensure that its operations are consistent with fair business, marketing and advertising practices and that all reasonable steps are taken to ensure the quality and reliability of the products it offers.

Rules of proper treatment of clients at Bank Handlowy w Warszawie S.A.

The *Rules of proper treatment of Customers at Bank Handlowy w Warszawie S.A.* apply to all employees of the Bank and set out the principles for analyzing products and their matching to a client's needs, as well as marketing materials and advertising messages[57] . The *Rules* are intended to ensure that:

- each product has been developed with the needs of a specific client group in mind and is dedicated to a target market and target client group,
- product information in offers and advertisements is understandable and appropriate,
- products are as intended in their description, client contract and marketing materials,
- agreements contain general terms and conditions for offering products and clear provisions regarding product features, conditions for making changes and – in the case of consumers – clauses regarding the complaint and grievance process,
- clients are treated and served appropriately, in accordance with the principles of due diligence.

In accordance with the *Rules*, all organizational units of the Bank providing services or serving clients are required to exercise due diligence at all levels of the Bank's operations, including when creating new business activities and marketing materials. In particular, they are required to ensure that:

- products meet potential needs of clients,
- characteristics of products, transactions and services are transparent and employees demonstrate extensive knowledge of counteracting greenwashing,
- the Bank thoroughly examines ESG preferences of clients,
- sustainability statements, declarations, commitments, information of the Bank are verifiable, transparent, restrained, proportionate and in line with the Bank's sustainability strategy,
- the Bank analyzes the actual value of the product for the client, including the costs and risks associated with the offered product,
- prices, contractual penalties and other fees related to the product are adequate and proportionate,
- nature and design of the product take into account the needs of clients, in particular their individual situation, knowledge and experience in the financial market and, where justified, the desired duration of the contract and the level of acceptable risk,
- employees of the Bank who are offering the product undergo the required training,
- rules apply that allow the client to withdraw from or terminate the product agreement,
- clients have the right to file complaints and grievances and to receive responses containing full and exhaustive factual and legal justification,
- persons offering products are properly prepared for this – among other things, thanks to the training they participate in – so that the information they provide is reliable and the explanations are understandable.

The Compliance Division is responsible for developing, issuing and monitoring the policy, while the first line of defense units are responsible for its execution and implementation. Once a quarter, the Product Compliance Bureau tests the implementation of and compliance with the guidelines for marketing materials and special offers that are not subject to ongoing verification. The Bank has an escalation and monitoring system for possible irregularities. The Compliance Division also conducts training on the *Rules* and decisions issued on their basis. Such training is mandatory for all employees. The *Rules* apply without exception.

The *Rules* contain references to many external standards, including:

- Banking Law,
- Act on combating unfair competition,
- Act on preventing dishonest market practices,
- Act on the protection of competition and consumers,
- Civil Code,
- Telecommunications Law,
- Act on the provision of services by electronic means,
- Recommendation S of the Polish Financial Supervision Authority regarding good practices in managing mortgage-secured credit exposures,
- Recommendation T of the Polish Financial Supervision Authority on good practice related to the management of risk of retail credit exposures,
- Recommendation U of the Polish Financial Supervision Authority on good bancassurance practices,
- approach of regulators, in particular decisions of the President of the Office of Competition and Consumer Protection regarding the infringement of the collective interests of consumers and the approach of the Polish Financial Supervision Authority, the Office of the Polish Financial Supervision Authority and the Financial Ombudsman,
- The Code of Good Practices, to which Citi Handlowy Bank has acceded, in particular the Corporate Governance Principles, Good Practices for consumer credit advertising standards and the Advertising Code of Ethics.

[57]Excluding investment products and investment-linked insurance products for which the MIFID appropriateness test is mandatory.

The *Rules* take into account the interests of clients to ensure that they are treated professionally and equally. They obligate all employees of the Bank to eliminate any activities that may be misleading, inconsistent with due diligence standards or laws, or abusive.

The *Rules* are available to employees on the Bank's intranet. The regulation and its amendments are reviewed by all relevant stakeholders in the Bank. Its objectives are established on the basis of legal regulations and supervisory guidelines as well as good market practices. In addition, Citi Handlowy Bank regularly analyzes consumer opinions expressed, for example, in complaint notifications and customer satisfaction surveys and if it finds any irregularities or reservations concerning the areas regulated by the *Rules*, it modifies their provisions accordingly.

Conduct Risk Management Policy at Bank Handlowy w Warszawie S.A.

The *Conduct Risk Management Policy* describes how the Bank manages the risk of misconduct – how it identifies, assesses, monitors, controls and reports it. This risk is related to the Bank's activities and in particular results from the fact that employees or persons associated with the Bank who are not its employees – intentionally or through negligence – may do harm to clients or endanger the integrity of financial markets, and thus the integrity of the Bank.

In accordance with the *Policy*, the Bank limits activities and behaviors that may generate conduct risk, including:

- violations of ethical standards, including corruption-related activities,
- improper preparation, sale or advertising of the Bank's products and services, including proposing to clients the purchase of financial services that do not meet their needs or in a manner inadequate to their nature (*misselling*), selling products and services only in a package, insufficient information about products or adding prohibited (abusive) provisions or clauses to agreements,
- unfair treatment of the Bank's clients, including improper management of complaints,
- unauthorized transactions carried out in the name and on behalf of clients,
- inadequate protection of data of the Bank’s clients
- making statements related to sustainable development that are not transparent, precise, reliable or true, and may consequently mislead customers, stakeholders of the Bank and other market participants (Greenwashing).

Persons designated by the relevant Management Board members monitor the established indicators and provide information on risk to bodies involving the relevant Members of the Management Board, the Compliance Division and the operational risk unit. Once a quarter, information and escalations in the area of conduct risk are provided to the Business Risk, Compliance and Controls Committee (BRCC) of Bank Handlowy w Warszawie S.A. The *Conduct Risk Management Policy at Bank Handlowy w Warszawie S.A.* applies to all employees of the Bank with respect to products, services and opportunities under partnership agreements intended for clients, counterparties and business partners. The regulation contains no exemptions. The Compliance Division is responsible for its development, issuance and monitoring. The first line of defense units are responsible for the implementation and execution of the Policy.

The Policy is available on the Bank's intranet. Once a year, all employees are required to complete training on the rules, which also includes the provisions of the Policy.

The Policy and any changes to it are reviewed by all relevant stakeholders in the Bank. The document is updated in connection with changes in legal regulations, regulatory requirements and market standards.

Business Activity Management Policy at Bank Handlowy w Warszawie S.A.

The *Business Activity Management Policy at Bank Handlowy w Warszawie S.A.* establishes coherent principles for reviewing business activities at the Bank, approving them and supervising them on an ongoing basis. The *Policy* concerns, among other things, the inventory of products and services and monitoring of risks, roles and responsibilities of the Bank's organizational units. The objectives of the *Policy* refer to significant risks related to business activities and their:

- proper identification and assessment,
- approval at the appropriate level,
- control using defined mechanisms.

The designated target level is absolute in nature, i.e. the Bank wants to ensure that all key risks present in business activities are properly identified and assessed.

At least once a year, the Risk Management Process Quality Assurance Department conducts a review of the *Policy* to ensure that it is adequate to the profile and scale of the Bank's operations, external regulations and the macroeconomic environment. The Bank has a system for escalating and monitoring any non-compliances. The Department also ensures that any changes to the regulations are approved by the Management Board and the Supervisory Board.

The *Business Activity Management Policy at Bank Handlowy w Warszawie S.A.* is addressed to all employees who participate in the implementation of business activities, and in relation to products and services and situations resulting from partnership agreements, also to clients, counterparties and business partners. The regulation also covers regulators and supervisory bodies – it applies regulatory requirements and mandatory provisions of law and obliges the Bank to apply them.

The Risk Management Process Quality Assurance Department is responsible for the development, issuance and monitoring of the *Policy* and the first line of defense units are responsible for its implementation and execution.

The *Policy* refers to legal provisions and regulatory recommendations and guidelines, including:

- Banking Law,
- Regulation of the Ministry of Finance, Funds and Regional Policy on the risk management system, the internal control system and remuneration policy,
- Recommendation A of the Polish Financial Supervision Authority on the management by banks of the risks associated with operations on derivative instruments,
- Recommendation D of the Polish Financial Supervision Authority concerning good practices in, among other things, data management,
- Recommendation M of the Polish Financial Supervision Authority concerning operational risk management at banks,
- Recommendation S of the Polish Financial Supervision Authority regarding good practices in managing mortgage-secured credit exposures,
- Recommendation T of the Polish Financial Supervision Authority on good practice related to the management of risk of retail credit exposures,
- Recommendation U of the Polish Financial Supervision Authority on good bancassurance practices,
- Recommendation Z of the Polish Financial Supervision Authority on corporate governance at banks,
- EBA Guidelines on:
  - product oversight and governance arrangements for the consumer banking products,
  - internal governance,
  - loan origination and monitoring,
- European Central Bank guide on climate-related and environmental risks,
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU,
- Insurance Distribution Act,
- International Accounting Standards and International Financial Reporting Standards,
- Accounting Act,
- Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

The Policy is available to employees on the Bank's intranet.

Rules for development of Special Offers for Consumer Banking Sector Customers of Bank Handlowy w Warszawie S.A.

The *Rules for development of Special Offers for Consumer Bank Sector Customers of Bank Handlowy w Warszawie S.A.* are intended to protect consumer rights by standardizing the process of developing special offers so that:

- they meet the needs of clients,
- the terms & conditions are clear, unambiguous, standardized and in line with the regulations,
- clients receive accessible and reliable information about the nature and structure of the offer, the benefits and the conditions for receiving them.

When developing special offers, the Bank aims to ensure that all terms & conditions documents of these offers are in compliance with the law, regulatory guidelines and internal standards. The policy does not cover special offers addressed to employees of the Bank, its subsidiaries and entities cooperating with the Bank in the direct sale of Bank products.

The Policy takes into account the needs of key stakeholders – it assumes an analysis of guidelines issued by regulators representing consumer interests, as well as complaints, grievances and opinions of clients related to special offers. The *Rules* monitoring process covers changes in the regulatory and legal environment and potential submissions by clients. It includes both ongoing verification and quarterly checks of compliance of the terms & conditions of special offers with the assumptions of the policy, the results of which are presented at the meeting of the Business Risk, Compliance and Controls Committee (BRCC) of Bank Handlowy w Warszawie S.A.

The *Rules* cover all employees of Citi Handlowy Bank involved in the process of creating special offers for consumers, as well as those who order the preparation of such offers externally. They also apply to clients or prospective clients – they ensure that the provisions of the offers are understandable to them and developed to address their needs. The *Rules* also relate to regulators and supervisory authorities, as they apply supervisory requirements and obligate the Bank to apply them.

Once a year, the Compliance Division organizes training on the *Rules* for those employees of the Bank who prepare special offers and direct them to consumers. The *Rules* are appropriately modified if there are irregularities or reservations in the areas regulated by the *Rules*. Changes require the opinion of all relevant stakeholders in the Bank. The objectives of the regulations have not been consulted with clients.

The Compliance Division is responsible for developing, issuing and monitoring the *Rules*, while the first line of defense units are responsible for their implementation and execution.

The *Rules* refer to external regulations:

- Act on combating unfair competition,
- Act on preventing dishonest market practices,
- Act on the protection of competition and consumers,
- Act on ensuring compliance with the requirements for the availability of certain products and services by economic entities,
- Civil Code,
- approach of regulators, including decisions of the President of the Office of Competition and Consumer Protection regarding the infringement of the collective interests of consumers and the approach of the Polish Financial Supervision Authority, the Office of the Polish Financial Supervision Authority and the Financial Ombudsman,
- Codes of good practice to which Citi Handlowy Bank has acceded.

The Policy is available to the Bank's employees on the intranet.

Rules of creating marketing materials and assessing the suitability of marketing campaigns at Bank Handlowy w Warszawie S.A.

All marketing materials published by the Bank should comply with applicable legal regulations, internal regulations of the Bank and good market practices. Marketing information of the Bank must also be transparent, reliable and not misleading (also in relation to the sustainable nature of the Bank's products or activities). The *Rules* ensure compliance of marketing content with the recommendations of supervisory authorities and chambers of commerce, and also introduce the obligation to examine whether given materials are appropriate for the group of recipients to which they are directed. The policy applies to marketing activities both at the Bank level and at the level of third parties that distribute marketing materials of the Bank. The policy affects vendors (advertising agencies cooperating with the Bank) and clients.

The *Rules* ensure that information directed to clients is reliable and transparent, protects them from misleading marketing practices, and allows the Bank to eliminate the risk of greenwashing (pseudo-ecological marketing). Through such actions, the Bank protects the client's interests. Employees of the Compliance Division and the Legal Division verify on an ongoing basis whether marketing materials comply with the *Rules* and check:

- marketing materials used in advertising campaigns targeted at consumers,
- first marketing creations for new credit, deposit and insurance products,
- materials related to sustainable products.

On a quarterly basis, the Compliance Department for Regulations and Regulatory Relations checks whether other marketing materials[58] are in compliance with the *Rules*, and any non-compliance is escalated and monitored in accordance with the system that is in place at the Bank. The results of these activities are presented at a meeting of the Business Risk, Compliance and Controls Committee. The *Rules* relate to individual and institutional clients and, in the scope of compliance with guidelines and recommendations, to regulators and supervisory authorities.

[58]The policy does not apply to investment products or investment-linked insurance products.

The Compliance Division is responsible for developing, issuing and monitoring the *Rules*, while the first line of defense units are responsible for their implementation and execution. The *Rules of creating marketing materials and assessing the suitability of marketing campaigns at Bank Handlowy w Warszawie S.A.* refer to:

- Act on combating unfair competition,
- Act on preventing dishonest market practices,
- Act on the protection of competition and consumers,
- Civil Code,
- approach of regulators – the President of the Office of Competition and Consumer Protection, the Polish Financial Supervision Authority, the Office of the Polish Financial Supervision Authority and the Financial Ombudsman,
- Codes of good practice to which Citi Handlowy Bank has acceded.

The *Rules* are available to employees on the Bank's intranet. Additionally, once a quarter, the Bank's Compliance Division organizes workshops for employees of the Internet Marketing Department to discuss the results of the quarterly monitoring of marketing materials.

The Policy and its changes – introduced in response to changes in legal regulations, the positions of regulators or chambers of commerce – are reviewed by all relevant stakeholders in the Bank. The objectives of the *Rules* have not been consulted with consumers or end-users.

Rules for the preparation of marketing materials in connection with the provision of investment or investment-linked insurance services by the Bank

The *Rules for the preparation of marketing materials in connection with the provision of investment or investment-linked insurance services by the Bank* protect consumers from misleading marketing practices and ensure that the Bank's marketing materials are in compliance with the law and market standards, as well as the recommendations of the PFSA. The *Rules* ensure that marketing materials are up-to-date, reliable and clear and avoid greenwashing in information on investment and investment-linked insurance products and services.

In accordance with the *Rules*, marketing materials for these products must be agreed with the product unit responsible for the product, the Legal Division, the Compliance Division and, as appropriate, the Communication and Media Relations Department or the Internet Marketing Department. The policy objectives are monitored by, among others, the Insurance and Investment Commission. The Bank has a system for escalating and monitoring any irregularities.

The policy applies to individual clients of the Bank and external partners – advertising agencies, marketing services providers and other organizations cooperating with the Bank to create and distribute marketing materials.

The Internet Marketing Department is responsible for developing, issuing and monitoring the policy, while the first line of defense units are responsible for its implementation and execution. The provisions of the regulations refer to the principles of directing information and marketing materials to clients specified in MIFID, the Act on Trading in Financial Instruments and the Directive of the European Parliament and of the Council on markets in financial instruments, together with implementing acts and approach of regulators.

The *Rules* are available in an internal IT system of the Bank. The policy and its changes – introduced in response to changes in legal regulations or internal regulations of Citi Handlowy Bank – are reviewed by all relevant stakeholders in the Bank. The objectives of the *Policy* have not been consulted with consumers or end-users.

3.2.13 Targets for responsible market practices [S4-5]

The Bank has not set quantitative targets for responsible market practices; instead, the Bank monitors progress in this area through designated ambition levels derived from the policies described above.

3.2.14 Activities related to responsible market practices [S4-4]

The Bank applies responsible market practices through the regular efforts of its employees, who are of key importance in this process. Responsible market practices are dealt with on a daily basis by the relevant departments and bodies, including :

- Compliance Division,
- Customer Experience Management Bureau,
- Internet Marketing Department,
- product teams responsible for preparing special offers,
- Consumer Banking Customer Experience Council,
- Client Advocate in the Consumer Banking Sector (Client Advocate).

Key activities regarding responsible market practices include:

- determining target groups and distribution strategies in accordance with the Product Management Policy and the rules of defining target groups and distribution strategies for instruments of the Consumer Banking Sector of Bank Handlowy w Warszawie S.A.,
- determining the so-called client profile, which allows for matching the client with financial instruments and investment services that will be appropriate for the client, as well as assessing the affiliation of a given financial instrument to the target group,
- implementing a control process for the sale of credit and deposit products by phone, which allows for monitoring telephone conversations and checking whether they are in compliance with the regulations in force at the Bank, including whether the offered products are in line with the needs of clients. The process involves, among other things:
  - listening to sales calls,
  - giving employees grades for the quality of their telephone conversations with clients, the use of applicable procedures, the correct execution of instructions, the information provided and verification performed,
  - monitoring employees and informing their managers about recurring irregularities and recommending actions to improve the quality of customer service.

Every month, such checks cover, on average, about 1,700 calls in 40 teams in different locations. Approximately 450 lines are recorded, and calls for 16% of products sold on recorded lines are verified

- activities of the Investment and Insurance Product Sales Control Bureau, including:
  - control of employees selling and servicing products, services and insurance offered by the Bank on recorded lines,
  - listening to sales and non-sales calls – to check whether they meet the requirements of the MIFID II regulations, and in the case of conversations regarding insurance – whether they are in line with the principles of selling insurance products,
  - control of security of information and data provided by clients for verification,
  - control of SMS/MMS correspondence,
  - control of risky transactions – whether they meets the requirements of the MIFID II regulations,
  - control of email correspondence – whether it meets the requirements of the MIFID II regulations and regulatory requirements related to processes used for sales of insurance products,
  - control of notes made by employees after meetings with clients – whether they meet the requirements of the MIFID II regulations,
- mandatory training for employees in the Rules of Sales of Insurance Products in the Consumer Banking Sector,
- training for employees in the Rules of Sales of Investment Products and Investment-Linked Insurance Products in the Consumer Banking Sector at Bank Handlowy w Warszawie S.A. and the introduction of general principles of sales and communication with clients,
- periodic training of all employees of the Bank in the *Rules of proper treatment of clients,*
- ongoing verification and quarterly monitoring of compliance with the terms and conditions of special offers, and periodic training of employees responsible for preparing such offers.
- In addition, Citi Handlowy Bank introduced plain language rules to the terms and conditions for special offers and responses to complaints and inquiries (in line with the recommendations of the Polish Bank Association), making them more understandable to consumers. Employees participated in workshops during which best practices were analyzed in terms of accessibility, comprehensibility and transparency of communication directed to clients via responses to chat inquiries or instructions. A total of 400 employees took part in the workshops in 2024.

The implemented and planned activities related to responsible market practices do not involve the need to incur operating expenses or capital expenditures that the Bank considers significant.

3.2.15 Cooperation for responsible market practices [S4-2]

The Bank cooperates with its clients on an ongoing basis to better manage the area of responsible market practices. A key element of this process is indirect cooperation with authorities representing the interests of clients, including the President of the Office of Competition and Consumer Protection, the Financial Ombudsman, the President of the Office for Personal Data Protection and the Office of the Polish Financial Supervision Authority. The Bank cooperates directly with clients – it analyzes complaints and grievances and conclusions from satisfaction surveys, and then takes them into account in actions affecting clients.

These activities are supervised by the Vice President of the Bank's Management Board – Head of the Consumer Banking Sector, and their effectiveness is assessed based on the number of complaints and grievances, the results of customer satisfaction surveys, guidelines and recommendations of regulators and the number of lawsuits.

The Bank's clients are not directly involved in the process of creating or improving financial products, but their complaints and grievances as well as opinions expressed in the NPS survey are taken into account in the analyses.

3.2.16 Channels for reporting irregularities and the complaint handling process [S4-3]

The Bank examines complaints and grievances of clients promptly, reliably, thoroughly and objectively, in compliance with applicable laws and regulations. This issue is regulated by the *Rules of Handling Client Complaints and Grievances at Bank Handlowy w Warszawie S.A.* Information on the possibility of filing complaints by individual clients of Citi Handlowy Bank is available on the Bank's website, in the agreements templates and at branches.

Individual clients can submit complaints:

- in writing – in person at the Bank's organizational units, by mail or to the Bank's electronic delivery address,
- orally – by telephone or in person for the record during the client's visit at the Bank's branch;
- electronically – via the Citibank Online banking service or to the Bank's email address.

The Bank examines client complaints submitted via the Office of the Polish Financial Supervision Authority, the Office for Personal Data Protection, the Office of Competition and Consumer Protection, the Commissioner for Human Rights, the Polish Bank Association and the Financial Ombudsman. Every year, the Compliance Division provides the Financial Ombudsman with information on the handling of complaints and the number of cases brought to court by clients after the Bank rejected their requests.

Additionally, clients can contact the Bank via Facebook Messenger and express their opinion on the functionality of the mobile application in mobile application stores.

In order to ensure proper cooperation with clients, the Bank has appointed a Client Advocate through via whom clients can also submit complaints and raise concerns. The Client Advocate:

- coordinates, analyzes and monitors the process of handling complaints and grievances filed by clients,
- provides the Bank's Management Board with annual information on the number of and topics covered by complaints and grievances,
- cooperates with the Bank's organizational units to improve the quality of services and products and to improve the satisfaction and loyalty of the Bank's clients,
- participates in projects and work aimed at improving the quality of service provided to the Bank's clients.

In addition, the Bank has established the Consumer Banking Customer Experience Council, which, among other things, monitors complaints, grievances and irregularities reported by clients. The Council members meet periodically and provide the Business Risk, Compliance and Controls Committee with information on:

- areas affected by the highest number of customer complaints and grievances, with information on actions taken or recommended,
- complaints and grievances indicating the possibility of a critical irregularity that prevents the achievement of the objectives of the internal control system.

The Bank also has:

- the Investment and Insurance Commission, which analyzes the complaints and grievances report, reasons behind and trends of complaints and grievances and the manner and timeliness of their handling during its meeting.
- the Consumer Banking Branch and Remote Channel Quality and Control Council, which reviews and monitors the control environment for sales processes; checks key quality indicators and sales process control results; monitors the quality of corrections of sales processes and significant operational problems and irregularities in sales processes, as well as conclusions from proceedings conducted by the Citi Security and Investigative Services Department (CSIS) and counteracting abuse proceedings.

The Bank continuously monitors signals from clients and the scope of irregularities reported to the appropriate units in order to fix errors and develop solutions to avoid complaints in the area in question in the future. The Bank runs the *Client Obsession* program, where any employee can provide comments, reports or ideas for improvement. They are recorded and then discussed in order to provide the Bank's clients with increasingly improved service.

Each client who has filed a complaint is informed of the outcome in the manner they have chosen. If the proceedings are conducted by supervisory bodies, the Financial Ombudsman or the Banking Arbiter, clients are informed about any irregularities in accordance with the scope of the proceedings and in a manner consistent with the provisions of law applicable to the specific path of proceedings.

Citi Handlowy Bank does not have any data that would allow it to determine the level of knowledge of clients about the channels for reporting complaints and grievances. The Bank never retaliates against clients who file complaints and grievances.

Individual clients can also provide information about irregularities in the Bank's activities during regular NPS surveys, by phone or online. Client opinions and problems reported in NPS surveys are discussed at regular meetings with the participation of management and at working group meetings attended by the Marketing Research Bureau, a representative of the unit responsible for a given contact channel and representatives of the Customer Experience Management Bureau. Comments were taken into account by product teams in implementations. The Bank intends to conduct customer experience research based on the NPS top-down survey on an annual basis.

3.2.17 Metrics for complaints [entity-specific]

The Bank, aiming to provide the best customer experience, has set internal standards for the complaint response time. For complaints that do not require in-depth analysis or consultation, and when they are submitted by key clients, the standard is to respond within 1 business day. In other cases, the internal standard is 4 business days.

	2024	2025
Number of complaints from individual clients of Citi Handlowy Bank	35,039 (14% were considered justified)[59]	31,689 (11% were considered justified)
Number of submissions to the Client Advocate	255	172
Percentage of retail customer complaints resolved within the designated four-day period	94%, of which 35% were resolved within one day	94%, of which 34% were resolved within one day
Percentage of retail customer complaints resolved within the statutory 30-day deadline	99,60%; 99,59% of complaints were resolved within 15 days	99,21% of individual client complaints were resolved within the statutory 30 days; 92,92% of complaints were resolved within 15 days

In 2025 and 2024, the Bank did not record any complaints submitted by clients to the OECD National Contact Points for Responsible Business handling notifications of violations of the *OECD Guidelines for Multinational Enterprises*. The above indicators have not been approved by an external body other than the assurance provider.

[59] Including appeals (3,430), chargebacks (5,255) and complaints to supervisory authorities (163).

4. Governance information

4.1 Business conduct

4.1.1 Business conduct and corporate culture [G1-1]

The corporate culture of Citi Handlowy Bank is based on standards that combine ethical values with business activities and represent best practices in management, application of regulations and auditing (positive impact identified in own operations).

In response to market changes, the Bank has also established appropriate ESG management roles and procedures that support improved oversight, expand expertise and help integrate ESG principles and practices into internal operations (positive impact identified in own operations).

Compliance with the principles of professional ethics in everyday activities is one of the basic duties of every employee, and the basis of employee relations in the Bank are mutual respect and professionalism. Another element of the organizational culture is respect for diversity and support for work-life balance. The Bank expects its employees to act in a certain way, and devotes a separate module to ethical issues during the training organized for newly hired employees on their first day of work. In addition, all employees participate in annual mandatory training on the *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A.* (*Code of Ethics*), during which they learn about the Bank's basic internal regulations regarding professional conduct in the workplace and how to recognize situations that need to be reported as questionable conduct.

The main documents that make up the organization's culture are:

- *Code of Conduct for Employees of Bank Handlowy w Warszawie S.A. (Code of Ethics)*
- *Regulations of the Management Board of Bank Handlowy w Warszawie S.A.*

Documents that complement the Bank's organizational culture are:

- *Procedure for handling anonymous reports of violations of law, ethical standards and procedures in force at Bank Handlowy w Warszawie S.A.,*
- *Internal reporting procedure at Bank Handlowy w Warszawie S.A.*
- *Policy for Managing Conflicts of Interest at Bank Handlowy w Warszawie S.A.*
- *Principles of Selection of Vendors of Goods and Services and of Procurement in Bank Handlowy w Warszawie S.A.,*
- *Principles of Management of Cooperation with Vendors of Goods and Services in Bank Handlowy w Warszawie S.A.,*
- *Escalation Policy of Bank Handlowy w Warszawie S.A.,*
- *Diversity Policy for Employees of Bank Handlowy w Warszawie S.A.,*
- *Conduct Risk Management Policy at Bank Handlowy w Warszawie S.A.*

Those documents are in line with the UN Guiding Principles on Business and Human Rights. All documents are available to employees in the Bank's intranet system.

Code of conduct for employees of the Bank (Code of Ethics)

In accordance with the *Code of Conduct for Employees of the Bank (Code of Ethics)*, Citi Handlowy Bank requires all employees to adhere to the highest ethical standards and act professionally. This allows the Bank to fulfil its mission, provide better services to clients, ensure good cooperation with counterparties and engage in the community life.

All employees of the Bank must:

- see actual or potential problems of ethical nature,
- report and respond to problems,
- eliminate factors that may discourage employees from reporting ethical issues.

The *Code* also supports the Bank in protecting and upholding human rights and preventing discrimination. For more information, see the Employees and human rights and Diversity sections of this *Statement*.

Every employee of Citi Handlowy Bank can anonymously report a breach of ethical standards. The Bank has implemented an effective procedure for handling reports while maintaining independence and confidentiality (*Procedure for handling anonymous reports of violations of law, ethical standards and procedures in force at Bank Handlowy w Warszawie S.A.*). Once a year, the Supervisory Board assesses the adequacy and effectiveness of the procedure, while its implementation is supervised by the member of the Management Board in charge of the Risk Management Sector. For more information on the possible ways to report violations and the number of incidents investigated in 2024, see the Incidents and complaints section of this *Statement*.

The Bank has also defined the rules of internal escalation of non-ethical business issues, such as violations resulting in reputational or financial losses. The *Escalation Policy of Bank Handlowy w Warszawie S.A.* allows the entire organization to recognize such situations early and to quickly notify the appropriate persons in the management hierarchy, which is of key importance for risk mitigation. The *Policy* defines who and what is to be escalated, how quickly, to whom and how.

Part of the corporate culture of Citi Handlowy Bank is also counteracting conflicts of interest. This issue is regulated by the *Policy for Managing Conflicts of Interest at Bank Handlowy w Warszawie S.A.* Its provisions define the general principles of preventing, identifying, reporting and assessing conflicts of interest, as well as managing all conflicts of interest, potential and actual. During dedicated training, employees confirm that they are not in a conflict of interest. The statuses of training and confirmations are monitored monthly.

Regulations of the Management Board of Bank Handlowy w Warszawie S.A.

The *Regulations of the Management Board of Bank Handlowy w Warszawie S.A.* define the scope and methods of work of the Management Board, and also specify the roles and responsibilities of individual members of the Management Board in the area of sustainability. In accordance with the *Regulations*, the President of the Management Board oversees the development and implementation of the Bank's strategy, including the sustainability strategy covering environmental, social and corporate governance issues. The Vice President of the Management Board of the Bank in charge of managing significant risks is responsible for the risk management system covering ESG risks.

The *Regulations* obliges the Board's to regularly review material topics identified in the double materiality assessment. The Management Board systematically analyzes and monitors material topics and related action plans. The Management Board is responsible for periodical assessment of progress in implementing these actions and their verification, as well as for developing, approving and monitoring the implementation of the transformation plan, taking into account ESG factors.

The Management Board's responsibility for sustainability is an integral part of the Management Board's daily work and a permanent element of the Bank's management structure. These activities are not only to ensure compliance with applicable regulations, but also to reflect the Bank's aspiration to achieve its goals in the area of social and environmental responsibility.

ESG operating model

In 2025 the Bank continued the work on improvement of an internal ESG operating model, which is the foundation for the daily management of sustainability issues. This model specifies in detail the scope of operational responsibility – it assigns appropriate roles and responsibilities to specific business units and defines the key processes that must be implemented or improved in response to the increasing sustainability requirements. With the adopted model, the Bank can effectively manage ESG aspects, monitor its progress and take action to continue its transformation in the spirit of sustainability.

The organizational culture of Citi Handlowy Bank also consists of other key documents. One of them is the sustainability strategy. The strategy development process is structured and described in the *Planning Principles at Bank Handlowy w Warszawie S.A.* It is monitored by the Strategy and Investor Relations Department. Particular organizational units of the Bank responsible for dialogue with external stakeholders participate in the preparation of the strategy for their scope of activities, set financial, market and qualitative targets, and sustainability goals, and define main business initiatives. The organizational units of the Bank whose scope of authorization includes individual goals set in the strategy are responsible for achieving ESG goals. At least twice a year, the Bank's Management Board and the Strategy and Management Committee of the Bank's Supervisory Board evaluate the execution of the strategy, including the achievement of ESG goals. In addition, the strategic goals are also monitored during the analysis of business risk that is performed by the Strategy and Investor Relations Department, which reviews on a regular basis the level of business risk based on the analysis of competitive position, financial performance and macroeconomic environment. In addition, a review of the status of projects related to the applicable strategy is carried out monthly.

Voice of Employee

One of the ways used by the Bank to assess its corporate culture is the *Voice of Employee* survey, which examines employee satisfaction and engagement. The survey is voluntary and anonymous and the questions answered by employees concern communication, professional development opportunities, meritocracy, relations with the manager and co-workers, participation in a decision making process, work-life balance, diversity, and values promoted by the Bank.

Whistleblower protection

The Bank introduces appropriate procedures and actions to protect whistleblowers, and in this way has a positive impact on its business activities (positive impact identified throughout the value chain).

Citi Handlowy Bank takes seriously all reports of violations of law and ethical principles. The whistleblower protection conditions are specified in the Bank's *Internal Reporting Procedure at Bank Handlowy w Warszawie S.A.* The Head of the Compliance Division is responsible for its implementation, and its provisions are consistent with the Whistleblower Act (transposing Directive (EU) 2019/1937 of 23 October 2019), which is binding on the Bank. The procedure includes:

- method of submitting internal reports,
- follow-up actions taken by the Bank,
- conditions for whistleblower protection,
- data protection.

The Bank defines a whistleblower as a natural person who reports or publicly discloses information on a breach of specific law categories, acquired in the context of their work. In accordance with the *Procedure*, no retaliatory actions may be taken against such individuals at Citi Handlowy Bank. Attempts or threats to use such actions are also prohibited. In particular, the Bank prohibits the following actions against whistleblowers:

- termination of employment with or without notice,
- pay reduction,
- suspension of or omission for promotion,
- transfer to a lower-level position,
- suspension from the performance of employment or official duties,
- transfer of the whistleblower's duties to another employee,
- an unfavorable change in the place of work or working time schedule;
- intimidation and mobbing,
- discrimination.

In accordance with the *Internal Reporting Procedure at Bank Handlowy w Warszawie S.A.*, whistleblowers who are not full-time employees of the Bank and provide work or services on the basis of a legal relationship other than an employment contract are also protected, in particular against termination of their contracts.

The whistleblower protection procedure covers all employees of the Bank and it has been consulted with trade unions. In 2025, the whistleblower protection rules at Citi Handlowy Bank were included in annual training for all employees. The provisions of the procedure are available to employees in the Bank's intranet system.

Counteracting corruption and money laundering

The Bank implements appropriate programs and training related to the prevention of corruption and money laundering that may occur throughout the value chain and thus the Bank exerts a positive impact on its business operations (positive impact identified throughout the value chain).

The Bank categorically opposes any corruption-related activities and fraud. These issues are regulated by:

- Anti-Corruption Program at Bank Handlowy w Warszawie S.A.
- Program of Anti-Money Laundering and Counteracting the Financing of Terrorism at Bank Handlowy w Warszawie S.A.

Both documents are available to employees in the Bank's intranet system.

Potential cases of corruption at Citi Handlowy Bank are investigated in accordance with: *Procedure for handling anonymous reports of violations of law, ethical standards and procedures in force at Bank Handlowy w Warszawie S.A.*, *Procedure for reporting by employees infringements of laws, ethical standards and procedures applicable at the Brokerage Department of Bank Handlowy* and *Internal reporting procedure at Bank Handlowy w Warszawie S.A.* During and after investigations, the Bank follows applicable laws, supervisory regulations, internal procedures and accepted standards of conduct.

Animal welfare

The Bank has also implemented animal welfare practices. In accordance with the *Environmental and Social Risk Management Regulations for Corporate Banking Clients*, the Bank does not finance projects related to the production of and trade in products classified as wild fauna and flora species protected by the Washington Convention (CITES) or other activities inconsistent with national regulations. Moreover, appropriate to the scale of its involvement, the Bank takes into account in the due diligence process the degree of implementation of environmental objectives by its clients, including the potential impact of their activities on wild animal habitats.

4.1.2 Management of relationships with suppliers [G1-2]

Citi Handlowy actively promotes key ethical principles throughout its supply chain. In accordance with the Principles of Selection of Vendors of Goods and Services and of Procurement in Bank Handlowy w Warszawie S.A., the Bank requires its vendors to adhere to the highest ethical standards in their business practices. This commitment is reflected in the implemented process of ESG assessment of bids submitted by vendors during procurement procedures. The ESG criterion is a mandatory element in the selection of a business partner, and its assessment is an integral part of the procurement process. In order to ensure transparency and uniformity of standards in the area of sustainable development, the Bank provides the Sustainable Development Code for Vendors of Bank Handlowy w Warszawie S.A., while Ethical Business Practices, which are part of the list of clauses used by the Bank in contracts with vendors, specify the Bank's expectations towards its contractors. The Bank strives to ensure that, already at the procurement stage, bidders become familiar with the Bank's ethical standards, as well as its adopted anti-corruption policy and whistleblower protection framework, thereby strengthening its commitment to building a responsible supply chain. The main guidelines arising from the ethical business practices of the Bank include:

- business integrity,
- respect for human rights in the workplace,
- counteracting discrimination and behaviors of violent nature,
- respecting the ban on child and forced labor,
- actively minimizing environmental impact,
- compliance with the law, cooperation in audits, and undertaking socially responsible activities.

The Principles of Management of Cooperation with Vendors of Goods and Services in Bank Handlowy w Warszawie S.A. specify how the Bank monitors relations with vendors to ensure that they are in compliance with the terms of the agreement, the Bank's internal regulations, legal regulations and regulatory requirements, thus limiting the risks of cooperation and ensuring its continuity.

In addition, in 2025, Bank Handlowy w Warszawie S.A. successfully completed the verification of 100% of its Tier 1[60] vendors against ESG criteria, which was set as one of the objectives presented in the Strategy of Bank Handlowy w Warszawie S.A. Group for 2025-2027.

At the beginning of 2026, Citi Handlowy issued the Principles of Cooperation with Vendors of Bank Handlowy w Warszawie S.A. in the area of environmental and ESG activities, which aim to minimize potential environmental, social, and corporate governance risks in the supply chain and to promote ethical and responsible business practices.

Preventing payment delays

Bank Handlowy w Warszawie S.A. treats the timely settlement of liabilities in commercial transactions as a priority, which is key to maintaining stable relations with vendors, ensuring operational continuity, and complying with applicable laws, including the Act of 19 July 2019 on the amendment of certain acts to reduce payment backlogs (Journal of Laws of 2019, item 1649). In order to actively prevent payment delays (payment backlogs), the Bank has implemented a comprehensive set of procedures, controls, and monitoring mechanisms.

I. Policy and Internal Regulatory Framework

The process of preventing payment delays at the Bank is based on a consistent framework of policies and internal regulations, which include:

- The Bank Expenditure Management Policy, which defines the general principles of expenditure management.
- The Procurement Policy, which sets out the principles of selection of vendors of goods and services and of procurement in Bank Handlowy w Warszawie S.A.
- Procedures of the Acting Payment Services Department (DRW): "Procedure for settling employee business expenses, purchase invoices, internal and sales invoices, internal accounting entries, and VAT and fixed asset records."

II. Vendor and Contract Terms Management

The Bank implements a proactive approach to managing vendor relationships and contract terms to ensure timely payments:

Information required in Invoices:

- Employees placing orders for goods/services are responsible for informing vendors of the need to include the following in all invoices and bills: the name of the person placing the order, the ID number of the contract (which specifies the price rates, payment terms, and vendor terms), or the order number in the P2P system.
- Correctly issued accounting documents delivered to the Acting Payment Services Department (DRW) must contain the data defined in the Goods and Services Tax Act.

[60] The Tier 1 group includes the 20% of suppliers with the highest annual cost of cooperation.

Determination and Control of Payment Terms:

- Payment terms for third party vendors are determined and approved by the Procurement Department, taking into account local market conditions, regulations, legal provisions, negotiated discounts, and/or contractual terms.
- Deviations from the established payment terms require approval in accordance with the "Principles of Selection of Vendors of Goods and Services and of Procurement in Bank Handlowy w Warszawie S.A."
- The use of a payment date shorter than the recommended 30 days requires the consent of the Head of the Procurement Department or persons he or she has designated.
- Payment dates longer than 60 days are not allowed in transactions where the creditor is a micro, small or medium-sized business.

The role of the Vendor Manager in invoice monitoring:

- The Vendor Manager is required to periodically verify the timeliness of invoicing by vendors for all contracts. If an invoice is not received, the Vendor Manager creates a provision for costs (for foreign vendors also for self-assessment of VAT) and takes steps to obtain it.

III. Payment Processing and Control

The Bank has implemented detailed procedures for the purposes of processing and controlling invoices to ensure their timely and correct settlement.

Verification and Acceptance of Accounting Documents:

- Substantive Acceptance: The person who accepts an expense based on its subject matter (an employee of the Bank's organizational unit responsible for confirming the performance of the service/delivery of goods) is responsible for the accuracy of the data contained in the accounting document. This includes: bank account number and payment date, business justification for the expense, compliance with the contract, and required accounting information (e.g., APA code, contract ID, or detailed description of the transaction).
- Collective Acceptance: Collective requests for acceptance of accounting documents are permitted provided that they relate to a single recipient (or multiple individuals in the case of marketing campaigns), the same cost category, are financially approved by a single person, and their financial limit is sufficient. If any of these conditions is not met, the request will be rejected.

IV. Delay Monitoring and Reporting.

The Bank uses systematic monitoring and reporting to identify and minimize delays:

Verification of Payment Terms:

- All payments to vendors are made on the dates and under the terms specified in the contracts or accounting documents. Non-standard settlements require the approval of the Accounting Operations Manager or the Head of the Services Division.
- Invoices from foreign vendors are paid immediately after receiving all required approvals, due to tax obligations and tax settlement deadlines.

Regular Checks and Reports:

Daily/Weekly Checks:

- **Monitoring of P2P and Symfonia Systems:** Checks are carried out on an ongoing basis and cover verification of documents awaiting acceptance/posting/payment in the P2P system and the Symfonia application. The aim is to detect potential technical errors, payment problems, and problems with timeliness of actions. The results are forwarded for verification to the employees of the Invoice, Employee Expenses and Purchase Records Verification Bureau.
- **Unpaid Invoices Reports:** The P2P system generates reports showing unpaid invoices to verify documents awaiting payment.
- **Purchase Invoice Quality Control in e-Invoice:** Analysis of the correctness of the transfer of approved documents from the e-Invoice module to AP.
- **Purchase Invoice Payment Date Control in e-Invoice:** Verification of the compliance of system-generated payment dates with the dates in the invoice.

Notifications of Pending Invoices:

- Lists of invoices awaiting substantive or financial approval in Symfonia and the e-Invoice module are generated and sent to the relevant employees to speed up processing.
- Notifications about invoices requiring additional clarification/information are sent to the relevant employees.
- Reports on invoices that do not match the order (IP/PO) and uncollected invoices are sent to ESC EMEA Buying Desk Poland BHW for verification and clarification.

Monthly Checks:

- KPI Reports: Checks of the timeliness of purchase invoices being processed.
- Reports on Documents Awaiting Approval: Lists of documents that have been received by DRW but do not meet formal requirements (e.g., invoices awaiting approval for more than 15 days).
- Reports on Invoices Paid After the Due Date: Lists of invoices sent to business units.

V. Internal Communication and Awareness

- **Informing Business Units**: In order to minimize potential penalties related to late payments, DRW employees inform business units on a monthly basis about any irregularities that have occurred. These activities are aimed at raising awareness among the Bank's employees and improving the Bank's image.
- **Verification of requests for payment**. Upon receipt of a request for payment, DRW forwards it by email to the Bank's organizational unit responsible for substantive verification of the item in question. In the case of invoices awaiting approval, the unit takes action to obtain it.

The above activities constitute a comprehensive payment management system designed to minimize the risk of payment bottlenecks and to support ethical and effective business practices at the Bank.

4.1.3 Prevention and detection of corruption and bribery [G1-3]

Anti-Corruption Program at Bank Handlowy w Warszawie S.A.

Citi Handlowy has adopted a zero tolerance policy towards corruption in all areas of business activities. This approach applies to all employees and business partners acting on behalf of the Bank. The *Anti-Corruption Program at Bank Handlowy S.A.* defines the rules for giving and receiving benefits, hiring employees, cooperating with third parties, carrying out charitable activities and conducting employee training in this area. The Anti-Money Laundering and Terrorist Financing Department in the Compliance Division is responsible for implementing the *Program*. The *Program* is reviewed by the units involved in the process and approved by the Head of the Compliance Division.

The *Program* defines the principles that the Bank applies to manage corruption risk in both external and internal relations. The *Program* covers:

- giving and receiving gifts,
- participating in meals and events,
- recording the benefits received/given and their approval,
- rules of conduct (reporting fraud),
- cooperation with vendors,
- making donations to charity,
- training programs,
- information activities.

Citi Handlowy Bank monitors whether the provisions of the *Program* are observed: it regularly checks all benefits entered in the Register of Benefits, and periodically the limits of benefits given and received. In the event of a significant violation of the *Program*, persons independent of the management structures involved in the case conduct internal investigations. Based on the evidence collected, they conduct a case analysis and prepare a draft report containing a description of the factual situation and proposed conclusions and recommendations. The results of the proceedings are approved by the Head of Citi Security and Investigative Services Department (CSIS), who previously verifies the evidence collected and the adequacy of the conclusions.

After approval by the CSIS Head, the results of the investigation, presented in a report, are forwarded to, among others, the President of the Management Board and the Vice-President of the Management Board in charge of the Risk Management Sector. Every six months, the Bank Crime Combating Team (BCCT) submits information on significant ethical issues to the Compliance Department for Regulations and Regulatory Relations. This information is then presented to the designated member of the Management Board, who forwards it to the Supervisory Board.

According to the Bank, all employees (100%) are equally exposed to the risk of corruption. Statistics and system data, including the results of audits, do not confirm that increased corruption risks materialize for specific positions. The Bank mitigates the risk of corruption and money laundering related to employees through appropriate HR processes, as part of which the Bank:

- confirms the clean criminal record of job applicants and periodically checks the clean criminal record of employees,
- checks sanctions lists,
- verifies reasonable suspicions of a crime being committed to the detriment of banks or other financial institutions.

Anti-Money Laundering and Terrorist Financing Program

The *Anti-Money Laundering and Terrorist Financing Program* establishes principles that protect the Bank from being used for money laundering and terrorist financing. The provisions of this regulation are consistent with the applicable laws and regulations.

All employees of the Bank are required to make every effort to prevent the use of the Bank's products and services for money laundering and terrorist financing. Any suspicious activities must be reported immediately to the Anti-Money Laundering and Terrorist Financing Department in the Compliance Division. The President of the Bank's Management Board is responsible for implementing these regulations.

All employees of the Bank are required to comply with anti-money laundering regulations and procedures of their organizational unit in this regard.

The *Anti-Money Laundering and Terrorist Financing Program* specifies the activities and actions that the Bank undertakes to limit the risk of money laundering and terrorist financing, as well as the principles for recognizing and assessing this risk. The provisions of the *Program* cover in particular:

- financial security measures as appropriate to client-related risk,
- obligation to notify the General Inspector of Financial Information about transactions,
- rules for organizing employee training and the principle of reporting violations,
- principles for ensuring protection against repressive actions for employees involved in counteracting money laundering and terrorist financing,
- internal control and supervision rules,
- principles for recording discrepancies between information collected in the Central Register of Beneficial Owners and information on the client's beneficial owners obtained in connection with the application of the Act,
- principles for documenting difficulties in verifying the identity of the beneficial owner and actions taken in connection with the identification of an individual person holding a senior management position as the beneficial owner.

The Program is reviewed by the units involved in the process and approved by the President of the Management Board.

Anti-corruption and anti-money laundering training

All employees of Citi Handlowy Bank are required to complete annual anti-corruption training, during which they familiarize with the rules of conduct in business relations, giving and receiving gifts, and participating in meals and events. The Bank requires employees to record all benefits they have received and given. The training also covers reporting fraud, cooperation with vendors, and making charitable donations. The training ends with a test. The Bank also conducts regular information campaigns refreshing the knowledge about the anti-corruption rules, especially during periods of increased relational activity, e.g. during the holiday season. The Bank's anti-corruption rules are available to all employees on the intranet site and to other stakeholders also on the Bank's public website.

Once a year, all employees of the Bank also participate in anti-money laundering training. Additional training is conducted if it is justified. Training completion is monitored on a monthly basis.

99% of the Bank's employees completed the training "Rules for giving and accepting gifts, participating in events and counteracting corruption practices at Bank Handlowy w Warszawie S.A." for 2025. The training did not require escalation. In 2024, the training completion rate was at the same level.

Activities related to preventing and detecting corruption and bribery do not require operating expenses or capital expenditures that the Bank considers significant.

4.1.4 Cases of corruption or bribery [G1-4]

In 2024, no cases of corruption were identified at Citi Handlowy Bank.

VII. Cultural patronage and sponsorship

For the seventh consecutive year, Citi Handlowy partnered with the **Polish Paralympic Committee** to jointly advocate for better access to sport for children and youth with disabilities and to implement initiatives fostering a more inclusive society. In 2025, once again we supported the "Be Active" project implemented by the **Polish Paralympic Committee**, thanks to which 300 young people with disabilities from all over Poland could participate in training and sports camps throughout the year under the care of specially trained certified coaching staff. The project delivered a total of 60,000 hours of sports training across 75 sections, including para-swimming, boccia, goalball, para-athletics, para-archery, wheelchair fencing, and para-table tennis. The Bank supported the project as part of its Live Well at Citi sports activities. In 2025, 750 participants: employees of Citi Handlowy and Citi Solutions Center, business clients, and athletes representing the Paralympic movement, took part in nine sporting events, including three editions of **IRONMAN** triathlon races as well as running events in Warsaw and Olsztyn, covering a total distance of 11,000 kilometers. The sporting engagement of employees and clients translated into financial support for the "Be Active" project.

In order to promote inclusive attitudes, Bank employees once again took part in the 5th **ORLEN Paralympic Run** – an event that brings together everyone who wishes to engage in sport, regardless of their level of ability.

For the eighth time, the Bank was a committed sponsor, partner and active participant of the prestigious **IRONMAN** triathlon competition, which took place in 3 cities: Warsaw, Cracow and Poznań. This year, Citi employees in Poland, corporate clients and Paralympic champions took part in the 5150 relay races in an unusual line-up to combine sports struggles with support for people with disabilities. Citi Handlowy's employees and customers were joined by titled paraathletes – multi-medalists of the European Championships, the World Championships and the Paralympic Games. Our "Blue Team" included, among others: Wojciech Makowski, silver medalist in the 100m backstroke at the Rio de Janeiro Paralympic Games; Witold Misztela, a para-cyclist and para cross-country skier and winner of the Wings for Life World Run in Zug in 2024; Zbigniew Maciejewski, bronze medalist at the Paris Paralympic Games in the C1 category individual road time trial in para-cycling; and Alicja Giedryś, a medalist at the Polish Championships for Athletes with Disabilities in swimming (400m freestyle and 100m butterfly), who swam the La Manche Channel in 2024.

Citi Handlowy was also involved in supporting the 7th edition of the Success University. Success University is a one-year, free scholarship program run by the **Digital University Foundation** to support young women from less privileged backgrounds in acquiring future-oriented skills and entering the labor market. The opening of the 7th edition took place at Citi Handlowy's headquarters on Senatorska Street in Warsaw, where the ambitions of young women seeking to develop their technological competencies were presented – ambitions that, thanks to the Bank's support, they are able to pursue and achieve.

Citi Handlowy for Olsztyn – support for the city and the region

Together with the Citi business services center and as one of the region's largest employers, Citi Handlowy has been supporting the Olsztyn community and issues important to the residents of the Warmia-Mazury region for more than 20 years. In 2025 the Bank was, once again, a strategic partner of the **Most Popular Athlete of Warmia and Mazury Award**, and the Bank's representatives presented awards in the Athlete of the Year and Athlete without Barriers categories. During the gala ceremony, Katarzyna Majewska, Vice President of the Management Board of Citi Handlowy, presented awards for Best Athlete and Best Athlete Without Barriers from the Warmia and Mazury region.

Citi Handlowy, together with Citi Solutions Center, was the title partner of the **Citi Warmia Run Challenge 2025 Olsztyn** for the third time. In the competition at Koszary Park in Olsztyn, 160 Live Well at Citi competitors took part in three distances: 5, 10 and 21.1 kilometers. The event promoted an active lifestyle combined with a social goal: supporting the **Polish Paralympic Committee's** project, "Be Active".

In 2025, Citi and Citi Handlowy also assumed the unique role of a title partner of the **UKIEL Olsztyn Half Marathon**. As part of the Live Well at Citi initiative and the "Be Active" project of the **Polish Paralympic Committee**, the Bank has been working throughout the year to improve access to sport for children and young people with disabilities. During the **Citi UKIEL Olsztyn Half Marathon**, Citi and Citi Handlowy teams competed in both distances: 5 km and 21.1 km – around Lake Ukiel.

Expenses for social purposes and other

	2025 (PLN'000)	2024 (PLN'000)
Cultural patronage, sponsorship and media	535	448
Social involvement (charitable and social institutions)	3,732	3,637

VIII. Investor information

1. Ownership structure and stock prices on the Warsaw Stock Exchange

1.1 Shareholders

The Bank's share capital amounts to PLN 522,638,400 and is divided into 130,659,600 bearer shares with a nominal value of PLN 4 each.

In 2025, the shareholder structure did not change compared to the end of 2024. The majority and strategic shareholder of Citi Handlowy is Citibank Europe Plc based in Dublin, Ireland – a company in the Citi group that brings together foreign investments.

Shareholding structure of Bank Handlowy w Warszawie S.A.

Shareholder	No. of shares	% equity
Citibank Europe Plc	97,994,700	75.00%
Other shareholders with the share below 5%	32,664,900	25.00%
Total	**130,659,600**	**100.00%**

Citibank Europe Plc is a part of the Citi Group - the largest global financial institution in the world, which has a physical presence in 95 countries and territories and supports its clients in nearly 160 countries and jurisdictions. Citi group of companies provides services to individual, corporate, public sector and institutional clients while providing them with a broad range of financial products and services in the retail, corporate and investment banking segments, brokerage services, Treasury and Trade Solutions and wealth management.

The parent company in the Citi Group is the American financial institution Citigroup Inc. More information about the Citi Group can be found on its website www.citigroup.com

Investors holding the Bank's shares include open-end pension funds (OFE), which - according to available annual reports on their asset structure - held, as at 31 December 2025, 16.77% of the Bank's shares, i.e. 0.42 p.p. less than as at 31 December 2024.

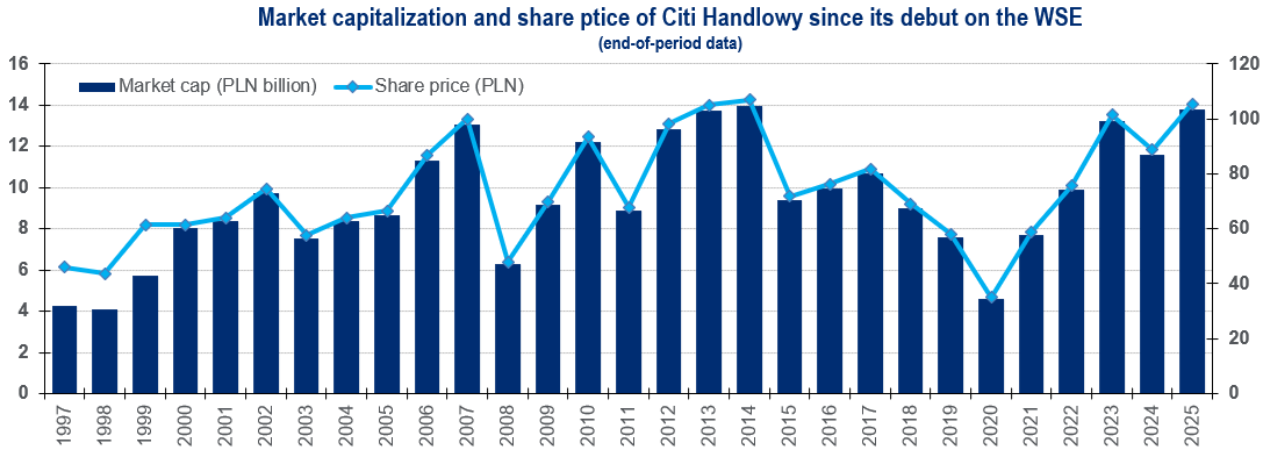
OFE investments in the Bank's shares were as follows:

Shareholder	31.12.2025		31.12.2024	
	Number of shares and votes in GSM	% of total number of shares and votes in GSM	Number of shares and votes in GSM	% of total number of shares and votes in GSM
OFE Allianz Polska	6,173,576	4.72%	6,173,576	4.72%
OFE Nationale Nederlanden	5,864,977	4.49%	6,142,812	4.70%
OFE PZU	2,918,803	2.23%	2,918,803	2.23%
OFE Generali	2,213,116	1.69%	2,278,346	1.74%
OFE UNIQA	1,967,476	1.51%	1,967,476	1.51%
OFE VIENNA	1,592,823	1.22%	1,592,823	1.22%
OFE PKO BP Bankowy	712,099	0.55%	880,157	0.67%
OFE Pocztylion Arka	475,131	0.36%	512,489	0.43%
Total	**21,918,001**	**16.77%**	**22,466,482**	**17.19%**

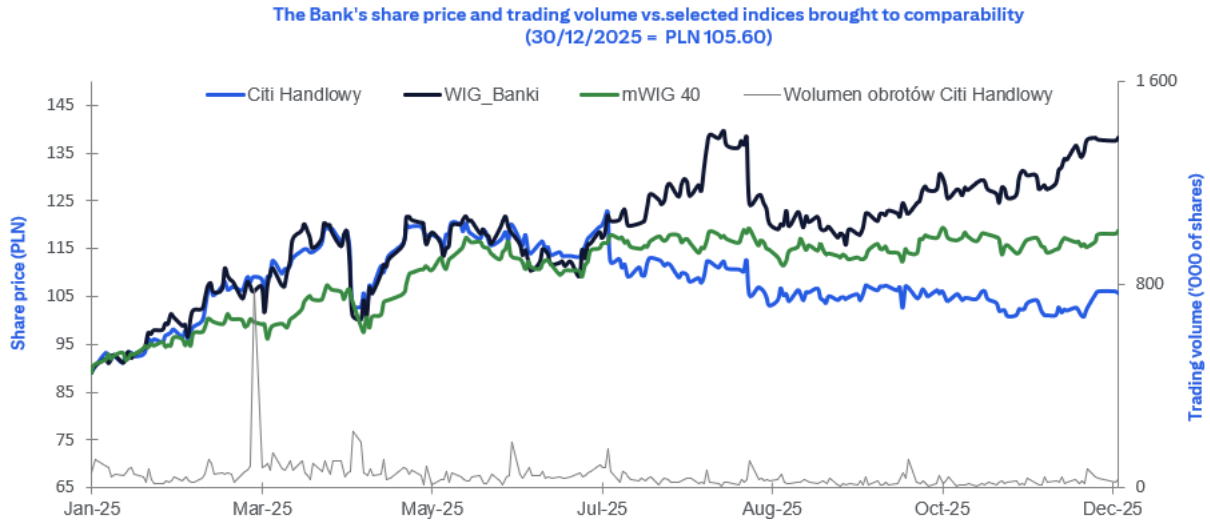
Source: Annual information about the structure of assets of Open Pension Funds; Bank share closing price at the end of the period.

1.2 Performance of the Bank's shares on the WSE

In 2025, the Bank's shares were part of the following indices: WIG, mWIG40 and WIG Banks. At the last session in 2025 (i.e. on 30 December 2025), the price of the Bank's shares was PLN 105.60, i.e. 19.1% below the level of 30 December 2024 (PLN 88.70). In the same period, mWIG40 recorded an increase by 33.6%, and WIG-Banks was up 55.3%.



As at the end of 2025, the capitalization of the Bank was PLN 13.8 billion (as compared to PLN 11.8 billion at the end of 2024). The stock market ratios were: price/earnings (P/E): 8.3 (versus 6.6 in 2024); price/book value (P/BV): 1,4 (versus 1.2 in 2024).



Throughout the first quarter of 2025, the Bank's share price showed an upward trend (average price at that time was PLN 103.74). The highest share price of the Bank in 2025 was reached on 3 July 2025 (PLN 122.60), whereas the lowest price was recorded on 2 January 2025 (PLN 89.00). The average price of the Bank's shares in the last 12 months was PLN 108,02, with the average daily turnover above 47,200 shares.

2. Information on own shares buy-back

On February 14, 2025, the Bank received a decision of the Polish Financial Supervision Authority dated February 13, 2025, in which the PFSA granted the Bank permission to buy-back own shares in 2025 for the purpose of offering them by the Bank to eligible employees under the incentive program. Under the above permission issued for the period until December 16, 2025, the Bank could acquire a maximum of 477,450 own shares, and the price of the own shares purchased by the Bank could not exceed PLN 16,667,000 in total.

In the period from 1 January 2025 to 31 December 2025, the Bank acquired a total of 150,019 own shares with a nominal value of PLN 4 per share, representing 0.1148167% of the Bank's share capital and entitling to 150,019 votes at the General Meeting of the Bank, which constitutes 0.1148167% of the total number of votes at the General Meeting of the Bank, for a total price of PLN 16,666,927.

Since the beginning of the share buyback, i.e. from January 2024, to the date of this report, the Bank has acquired a total of 485,920 own shares with a nominal value of PLN 4 per share, representing 0.3718977% of the Bank's share capital and entitling to 485,920 votes at the Bank's General Meeting, which constitutes 0.3718977% of the total number of votes at the Bank's General Meeting. During the period in which the Bank owned its own shares, the Bank did not exercise the voting rights attached to these shares.

In 2025, the Bank initiated the transfer to the Bank's eligible employees, free of charge, a total of 102,139 own shares previously acquired by the Bank The transferred shares represented a total of 0.0781718% of the Bank's share capital and entitled them to a total of 0.0781718% of the total number of votes at the Bank's General Meeting and completed the process of transferring own shares in 2025.

As at the end of December 2025, the Bank retained a total of 266,787 treasury shares representing in total 0.2041848% of the Bank's share capital and entitling to a total of 0.2041848% of the total number of votes at the General Meeting of Shareholders of the Bank.

On March 2, 2026, the Bank received a decision of the Polish Financial Supervision Authority dated February 27, 2026, in which the PFSA granted the Bank permission to buy-back own shares for the purpose of offering them by the Bank to eligible employees under the incentive program. Under the above permission issued for the period until February 27, 2026, the Bank may acquire a maximum of 285,000 own shares, and the price of the own shares purchased by the Bank may not exceed PLN 30,000,000 in total.

3. Dividend payment history

On June 27, 2025, the Annual General Meeting of the Bank adopted a resolution on distribution of net profit for 2024. Pursuant to the resolution the net profit for 2024 in the amount of PLN 1,791,978,477.05 was distributed as follows:

- Dividend: PLN 1,342,776,931.65 , i.e. PLN 10.29 per share,
- Net profit in the amount of PLN 449,201,545.40 was left undivided.

Dividend day was set for July 7, 2025, and the dividend payment date for July 14, 2025.

The dividend amount per share was calculated by dividing the dividend amount for shareholders by the total number of shares in the Bank reduced by the number of treasury shares held by the Bank on the dividend date. As a result, 130,493,385 shares participate in the dividend distribution

The dividend accounted for 75% of the net profit for 2024, and the payment of funds in this amount was in line with the individual recommendation of the Polish Financial Supervision Authority regarding fulfilling by the Bank of requirements for dividend payment from net profit generated in 2024.

On 22 August 2025, The Bank was advised by the Polish Financial Supervision Authority that the PFSA did not have any objections to the potential payout by the Bank of the dividend (advance dividend) from the 2019 profit in the amount of PLN 449,201, 545.40.

The Advance Dividend of PLN 448,551,276.72 was paid from part of the reserve capital created by the Ordinary General Meeting of the Bank in resolution No. 26/2025 of the Ordinary General Meeting of the Bank of 27 June 2025, to be used for the payment of dividends, including advance dividends (Dividend capital), while the funds for the payment of the Advance Dividend came from part of the Bank's profit generated in 2019 year. 130 392 813 shares give entitlement to the Advance Dividend. The Advance Dividend per share was: PLN 3.44 gross. The record date for the Advance Dividend was: October 21, 2025 and the date of the Advance Dividend payment was: October 28, 2025.

On February 27, 2026 Bank received a letter from the Polish Financial Supervision Authority with an individual dividend recommendation for the Bank. The PFSA confirmed that the Bank fulfils the criteria for the payment of dividend up to 75% of the profit for 2025, however the maximum payout amount cannot exceed the amount of annual net profit reduced by the profit earned in 2025 and already included in own funds. The PFSA also recommended not undertaking, without prior consultation with the supervisory authority, any actions outside the scope of the current business and operating activities, which could result in a reduction of the Bank's own funds, including possible dividend payments from undistributed profit from previous years as well as share buybacks and buyouts.

The table below presents the history of dividend payments since 1997 when the Bank was floated on the Warsaw Stock Exchange.

Financial year	Dividend (PLN)	EPS (PLN)	Dividend per share (PLN)	Dividend pay-out ratio
1997	130,000,000	6.21	1.40	22.5%
1998	93,000,000	3.24	1.00	30.8%
1999	186,000,000	5.08	2.00	39.4%
2000	130,659,600	1.57	1.00	63.8%
2001	163,324,500	1.25	1.25	99.8%
2002	241,720,260	1.86	1.85	99.6%
2003	241,720,260	1.86	1.85	99.7%
2004	1,563,995,412	3.17	11.97	377.6%[1]
2005	470,374,560	4.51	3.60	79.8%
2006	535,704,360	4.75	4.10	86.4%
2007	620,633,100	6.19	4.75	76.8%
2008	-	4.94	-	-[2]
2009	492,586,692	4.02	3.77	94.0%
2010	747,372,912	5.72	5.72	99.9%
2011	360,620,496	5.52	2.76	50.0%
2012	756,519,084	7.72	5.79	75.0%
2013	934,216,140	7.15	7.15	99.9%
2014	971,422,828	7.43	7.43	99.9%
2015	611,486,928	4.75	4.68	98.6%
2016	591,887,988	4.62	4.53	98.0%
2017	537,010,956	4.11	4.11	100.0%
2018	488,666,904	5.00	3.74	74.8%
2019	-	3.66	-	-[3]
2020	156,791,520	1.21	1.20	99.2%
2021	714,708,012	5.48	5.47	99.8%
2022	1,175,936,400	12.01	9.00	74.9%
2023	1,454,930,607	17.28	11.15	64.5%[4]
2024	1,342,776,932	13.48	10.29	100.0%[5]

1) Dividend-payout ratio for 2004 - 100% plus prior year profits
2) On 18 June 2009, the Bank's Ordinary General Meeting decided to pay no dividend for 2008 following the recommendation of the Polish Financial Supervision Authority (KNF) for the whole banking sector.
3) On June 4, 2020, the Ordinary General Meeting of the Bank decided to pay no dividend for 2019 following the recommendation of the Polish Financial Supervision Authority (KNF) for the whole banking sector.
4) On September 29, 2023, the Bank got a decision of the Polish Financial Supervision Authority on the consent for recognition part of first half of 2023 net profit (PLN 800,000,000) in Tier 1 capital
5) The dividend payout ratio for 2024 also includes an advance payment towards the expected dividend of PLN 448.6 million paid in October 2025.

4. Rating

As at the end of 2025, the Bank had a full rating from the international rating agency: Fitch Ratings ("Fitch").

On 30 June 2025, after the annul rating review, Fitch affirmed all ratings for the Bank and removed the viability rating ("VR") of the Bank from the Rating Watch Negative (RWN).

The Bank's current ratings are as follows:

Long-term entity ranking *Long-term rating outlook*	A- *stable*
Short-term entity ranking	F1
Viability rating*	bbb+
Support rating	a-
National long-term rating	AA+ (pol) stable
National short-term rating	F1+ (pol)

** Viability rating is the view of the intrinsic creditworthiness of an institution, independent of external factors.*

The Bank's Ratings (IDRs) are driven by its intrinsic strength (as reflected in Viability rating ("VR") and potential parental support.

For the full announcement published by Fitch please visit: Fitch Affirms Handlowy's IDR at 'A-'; Affirms VR at 'bbb+'; off Rating Watch Negative

5. Investor relations

Investor relations, which provide existing and prospective investors, capital market analysts and rating agencies with necessary information, are an integral component of the information policy of the Bank, which is to meet the information needs of all persons and institutions searching for information on the Company. The information policy tools used in investor relations are:

- regular contacts with investors and analyst during conference calls and meetings, also at the Bank's seat, with participation of members of the Bank's Management Board;
- support by the Press Office during quarterly press conferences for the media, held after publication of periodic reports;
- the website of the Bank where information on the Bank and its activities and all periodic and current reports are published; the website is also a convenient venue for contacting the Investor Relations Unit (BRI), which is a source of comprehensive information on the Bank and the Group.
- presence of the media at General Meetings of Shareholders of the Bank.

In 2025, after each quarter the Bank organized meetings regarding the publication of financial results with capital market analysts and representatives of investors.

IX. Statements of Bank Handlowy w Warszawie S.A. concerning application of corporate governance standards in 2024

1. Corporate governance standards applied by Bank Handlowy w Warszawie S.A.

Since 2003, Bank Handlowy w Warszawie S.A. ("Bank" or "Company") has been adhering to the corporate governance standards adopted by the Warsaw Stock Exchange, initially as the "Best practices of public companies 2002"and subsequently replaced by: "Best practices of public companies 2005", "„Best Practice of GPW Listed Companies 2008", „Best Practice of GPW Listed Companies 2016" and from 1 July 2021 by „Best Practice of GPW Listed Companies 2021" ("BPLC"). This document is available on the website of the Warsaw Stock Exchange (Giełda Papierów Wartościowych w Warszawie S.A.) (http://www.gpw.pl) in the section dedicated to corporate governance of listed companies.

The primary goal of the decision to adopt the corporate governance principles of the Warsaw Stock Exchange as the standard of the Bank was and is the intention to build transparent relations between all the bodies and entities involved in the functioning of the Company and to ensure that the management of the Company and its undertaking is carried out in a proper and prudent manner, with loyalty to all shareholders. The willingness to ensure transparency of the Bank's activities, in particular with respect to relations and processes between statutory bodies of the Company, also resulted in the adoption of best practices covered by the latest, 2021 amendment to the document for application at the Bank.

On 28 July 2021, the Management Board of the Bank decided that the Bank would comply with the corporate governance rules contained in the document "Best Practice for WSE Listed Companies 2021", adopted by the Supervisory Board of the Warsaw Stock Exchange by Resolution no. 13/1834/2021 of 29 March 2021, with the exception of principles 5.6 and 5.7, which shall not apply to the Bank.

On 29 July 2021, the Supervisory Board of the Bank decided that the Bank would comply with the corporate governance rules contained in the document "Best Practice for WSE Listed Companies 2021", adopted by the Supervisory Board of the Warsaw Stock Exchange by Resolution no. 13/1834/2021 of 29 March 2021, with the exception of principles 5.6 and 5.7, which shall not apply to the Bank.

In connection with changes in the composition of the Bank's Management Board in 2025, the Bank published on 24 July 2025 a current report (ESPI) providing justification for the application of the following corporate governance principle:

1. 2.1, as follows: "The Bank applies the "Diversity Policy for Members of the Management Board of Bank Handlowy w Warszawie S.A." (hereinafter: the "Diversity Policy"), which defines the diversity strategy. This strategy, in particular, provides for promoting the selection and succession planning of Members of the Management Board with consideration for the principle of diversity, i.e. while ensuring equal opportunity in the processes for women and men regardless of their age, who have diverse individual knowledge, skills and experience which are at the same time adequate to the positions held by them and the entrusted duties, and which complement each other to ensure an appropriate level of collective management of the Bank, which is verified in a collective assessment of the suitability of the Management Board. In the recruitment process conducted in connection with the resignation from a Management Board position, the Bank sought to select the best candidate. As a result of this recruitment, the representation of the minority on the Management Board is only slightly below the threshold specified in this principle. Nevertheless, in accordance with the new standard on gender balance in the governing bodies of listed companies arising from Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures (the so-called 'Women on Boards' Directive), the Bank ensures the participation of the underrepresented gender at a level as close as possible to 33% of all positions on the company's governing bodies. With respect to the Supervisory Board, the Bank has implemented appropriate regulations adopted by its Annual General Meeting defining the requirements and criteria for assessing candidates for the Supervisory Board, taking into account the principles of ensuring diversity in the composition of this body, including gender diversity. The current composition of the Bank's Supervisory Board meets the criterion of participation of each gender at a level of not less than 30%."

2. 2.2, as follows: "According to the regulations adopted at the Bank, the Nomination and Remuneration Committee of the Supervisory Board recommends candidates for Management Board Members, taking into account the necessary knowledge, skills and experience of the Bank's Management Board as a whole that are necessary to manage the Bank, and ensuring diversity on the Management Board. Based on these recommendations, the Supervisory Board assesses whether the individuals concerned possess the required qualifications individually and whether the Management Board, as a collective body in its given composition, ensures the prudent and stable management of the Bank. In the selection process for the Management Board, the Supervisory Board seeks to ensure diversity. In the recruitment process conducted in connection with the resignation from a Management Board position, the Bank sought to select the best candidate. As a result of this recruitment, the representation of the minority on the Management Board is only slightly below the threshold specified in this principle. Nevertheless, in accordance with the new standard on gender balance in the governing bodies of listed companies arising from Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures (the so-called 'Women on Boards' Directive), the Bank ensures the

participation of the underrepresented gender at a level as close as possible to 33% of all positions on the company's governing bodies. With respect to the Supervisory Board, the Bank has implemented appropriate regulations adopted by its Annual General Meeting defining the requirements and criteria for assessing candidates for the Supervisory Board, taking into account the principles of ensuring diversity in the composition of this body, including gender diversity. The current composition of the Bank's Supervisory Board meets the criterion of participation of each gender at a level of not less than 30%."

The above explanations regarding the manner in which the Bank applies the corporate governance principles set out in the document "Best Practice for GPW Listed Companies 2021", with respect to Principles 2.1 and 2.2 concerning gender diversity in the composition of the Bank's governing bodies, were approved by both the Management Board and the Supervisory Board of the Bank.

2. Information on the application of Corporate Governance Principles for Supervised Institutions

The Polish Financial Supervision Authority in a resolution of 22 July 2014 issued a document entitled Principles of Corporate Governance for Supervised Institutions ("Principles"), which came in force on 1 January 2015. The Principles are available on the official website of the Polish Financial Supervision Authority:
https://www.knf.gov.pl/knf/pl/komponenty/img/knf_140904_Zasady_ladu_korporacyjnego_22072014_38575.pdf

The principles are a set of rules governing internal and external relations of institutions supervised by the KNF, including their relationships with shareholders and customers, their organization, the operation of internal oversight as well as of key internal systems and functions, and of corporate bodies and their cooperation. The purpose of the Principles is to enhance corporate governance in financial institutions and transparency of their operations, which is designed to promote public confidence in the Polish financial market. Bank Handlowy w Warszawie S.A. performs a regular assessment of the application of the Principles of Corporate Governance for Supervised Institutions.

On 21 January 2025, the Management Board of Bank Handlowy w Warszawie S.A. approved the "2024 Report – Assessment of the Application of the Principles of Corporate Governance for Supervised Institutions issued by the Polish Financial Supervision Authority at Bank Handlowy w Warszawie S.A." prepared by the Regulations and Cooperations with Regulatory Institutions' Compliance Department including an independent assessment of application at the Bank of the "Principles of Corporate Governance for Supervised Institutions" for 2024 made by Compliance Department. The Management Board of the Bank submitted to the Audit Committee of the Supervisory Board and, next, to the Supervisory Board of the Bank a Report of the Compliance Department in order to enable the Audit Committee of the Supervisory Board and the Supervisory Board to make their own assessments of application of the "Principles of Corporate Governance for Supervised Institutions" for 2024.

On 19 March 2025 the Audit Committee, pursuant to the provision of Article 3.1 (c) of the Regulations of the Audit Committee, after becoming familiar with the "2024 Report – Assessment of Application of the Principles of Corporate Governance for Supervised Institutions issued by the Polish Financial Supervision Authority at Bank Handlowy w Warszawie S.A." prepared by the Compliance Department, recommended that the Supervisory Board ought to assess that in 2024 the Bank applied rules stemming from the Principles of Corporate Governance for Financial Institutions, with the exception of those principles that the Bank decided not to apply.

The Supervisory Board of the Bank performs a periodic, annual, independent assessment of the application of the Principles at the Bank.

On 20 March 2025 The Supervisory Board of Bank Handlowy w Warszawie S.A. became familiar with the "2024 Report – Assessment of Application of the Principles of Corporate Governance for Supervised Institutions issued by the Polish Financial Supervision Authority at Bank Handlowy w Warszawie S.A." prepared by the Regulations and Cooperations with Regulatory Institutions' Compliance Department and containing an independent assessment of the application of the Principles of Corporate Governance for Supervised Institutions.

On the basis of the above Report of the Compliance Department containing an independent assessment of the application of the "Principles of Corporate Governance for Supervised Institutions" and taking into consideration a positive recommendation issued by the Audit Committee of the Supervisory Board, the Supervisory Board assessed independently and found that in 2024 Bank Handlowy w Warszawie S.A. applied the rules resulting from the "Principles of Corporate Governance for Supervised Institutions", with the exception of principles § 11.2, § 16.1 that the Bank decided not to apply.

With respect to the principle specified in § 8.4 (electronic General Meeting) of the ZŁK, in 2024 the principle was applied, with the Bank's Management Board each time deciding on the method of shareholder participation in the Bank's General Meeting before each General Meeting. The resolution was adopted unanimously.

The Annual General Meeting of Bank Handlowy w Warszawie S.A.by Resolution No. 14/2025 of 27 June 2025, considered and approved the Report of the Supervisory Board of Bank Handlowy w Warszawie SA on the operations of the Supervisory Board in the period from the date of the Annual General Meeting of the Bank in 2024 to the date of the Annual General Meeting of the Bank in 2025, containing: the Report and an assessment specified in the Principles of Corporate Governance for Supervised Institutions, adopted by the Bank for application.

With regard to three Principles, the decision not to apply them was upheld:

1) Article 8.4 (electronic General Meeting) – currently available IT solutions do not guarantee a secure and efficient electronic form of holding a General Meeting. However, the Management Board does see the importance of such form of shareholders' participation in the Bank's General Meeting, and therefore a separate decision on that matter shall be made before each General Meeting.

2) Article 11.2 (transactions with related parties) – this principle shall not be used with respect to contracts tied to day-to-day operations, in particular to contracts tied to liquidity, due to the nature of transactions and the number of contracts being concluded and in the scope of transactions carried out on the basis of a brokerage agreement for the execution of orders with the Client: CGML and CGME, because these transactions are carried out on market principles.

3) Article 16.1 (meetings of the Management Board of the Bank held in the Polish language) – meetings of the Management Board attended by foreigners, and especially foreigners who are members of the Management Board and do not speak Polish, are held in the English language. Simultaneously, any motions submitted to the Management Board, any materials and minutes of meetings are prepared and kept in Polish and in English.

Pursuant to the requirements of the Principles of Corporate Governance for Supervised Institutions and the information policy adopted by the Bank, after the Supervisory Board of Bank Handlowy S.A. performed an independent assessment of the application of the Principles of Corporate Governance for Supervised Institutions, the Bank makes available on its website the information on the application of the Principles, and on the non-application of specific Principles.

3. Description of main features of internal control and operational risk management systems implemented in the Bank with respect to the process of preparation of financial statements and consolidated financial statements

Financial statements of the Bank are prepared by the Financial Reporting, Control and Tax Department, which is a separate organizational unit in the structure of the Finance Management Sector and reports directly to the Chief Financial Officer of the Bank, who is also a Vice President of the Bank's Management Board. The process of preparation of financial statements is covered by an internal control system, which is to ensure: effective and efficient activities of the Bank, reliability of financial reporting, compliance with the principles of risk management at the Bank and compliance of the Bank's activities with laws, internal regulations and market standards. The internal control system includes controls, risk oversight mechanisms embedded in the Bank's processes related to the process of preparing financial statements, audits of the Bank's compliance in this regard with the law and internal regulations, and internal audit. The internal control system consists of the control function, including controls in the processes functioning at the Bank, performed by positions, groups of people or organizational units within the Financial Management Sector (responsible for compliance with controls) and independent monitoring of compliance with these controls, performed by dedicated independent persons.

The internal control system and risk management system operating at the Bank are organized on three independent levels:

- Level 1, i.e. organizational units responsible for the activity which results in taking risks and responsible for risk management in the Bank's operational activity, as well as for risk identification and reporting to the second-line units,
- Level 2, i.e. risk management at organizational units, regardless of the first-line risk management, and the activity of the compliance unit – units or persons responsible for setting risk management standards in identifying, measuring or assessing, limiting, controlling, monitoring and reporting and for supervising control mechanisms applied by other organizational units of the Bank to mitigate risk – organizational units of the Risk Management Sector, Compliance Division, Finance Management Sector, Legal Division, Human Resources Division as well as the Office of Supervision and Internal Control of the Brokerage Department;
- Level 3, i.e. Audit Department which ensures independent assessment of both risk management processes and internal control system.

Internal control is exercised by each and every employee and, in addition, by their direct manager and persons cooperating with him/her as well as by managers of organizational units of the Bank. Risk management is carried out via internal mechanism for risk identification, assessment, mitigation, control, monitoring and reporting performed and supervised by units of the first level of risk management (first line of defense) and specialized organizational units of the second line of defense. Within the internal control functions, there is a separate financial control function, which is performed by a dedicated unit of the Finance Management Sector. Financial control in the Finance Management Sector covers the areas of accounting policy and financial reporting.

As part of the process of identification, prevention, control, monitoring and reporting of operational risk exposures, the Bank has implemented effective mechanisms that mitigate risks affecting the security of technology systems. The IT systems used in the process of preparation of financial reporting are covered by the continuity of business plan of the Bank in case they are lost.

A horizontal monitoring has been implemented in the Bank. It is a Self-Assessment is a process used to verify and assess the effectiveness of control processes and to proactively and effectively manage any significant risk categories which are inherent in the process of preparation of financial statements. The process of Self-Assessment is one of the key tools used to monitor the level of exposure to operational risk and changes in the financial reporting environment, identify emerging risks, verify the effectiveness of controls and implement remedial plans.

In order to ensure the adequacy and effectiveness of the control system, a range of control mechanisms, in addition to horizontal monitoring, are subject to independent vertical monitoring.

Vertical monitoring is a first-line, second-line defense test that examines the effectiveness of key controls for the significant processes that make up the Bank's Significant Processes Matrix. The summary of vertical monitoring results includes an assessment of compliance with key controls and includes - in addition to non-significant irregularities - a summary of significant and critical irregularities detected.

At the Bank, in the compliance unit – the Compliance Division – the primary goal is to ensure compliance of the Bank's operations with generally applicable laws and supervisory regulations applicable to the Bank's activities or the financial services provided by the Bank, the Bank's internal normative acts and practices and standards available on the market.

The Compliance Division operates in accordance with the "Compliance Policy at Bank Handlowy w Warszawie S.A., the Policy specifying the principles of cooperation between the Bank's compliance unit and the corresponding unit of entities belonging to the Bank's capital group" (the "Compliance Policy"), which contains the basic principles of operation of the Bank's employees and explains the main processes identifying compliance risk and enabling compliance risk management at all levels of the Bank's organization, and the "Regulations for the Operation of the Compliance Division".

Internal audit activities at the Bank are carried out by the Internal Audit Department. The Internal Audit Department is responsible for independent and objective assessments of adequacy and effectiveness of the internal control system and the effectiveness of management of risks connected with activities of the Bank. The Internal Audit Department carries out internal checks, assesses activities initiated by organizational units of the Bank and carries out audits in subsidiaries of the Bank in connection with supervision exercised by the Bank over risks connected with operations of its subsidiaries with respect to their compliance with internal regulations, applicable laws and regulatory requirements and the effectiveness and reasonableness of controls. The Internal Audit Department is a separate organizational unit in the structure of the Bank, reporting directly to the President of the Bank's Management Board.

The Bank's Management Board takes measures to ensure the continuity and effectiveness of the internal control mechanisms, which will contribute to ensuring that the objectives of the internal control system are met, in particular by guaranteeing the prudent and stable conduct of the Bank's business through the appropriate identification and mitigation of risks occurring in banking operations, the reliability of the financial and non-financial information provided – both internally and externally to the Bank, ensuring that the organizational structure is adapted to the size and profile of the risks incurred and allows for the effective performance of tasks, making necessary adjustments and improvements to the management system in the event of changes in the size of the risk profile in the Bank's business, factors of the economic environment, detection of irregularities in the functioning of the internal control system, and ensuring compliance of the Bank's operations with the provisions of law, internal regulations and requirements resulting from supervisory regulations.

The Bank's Management Board is responsible for designing, implementing, and ensuring the operation of a coherent and comprehensive system of internal control at the Bank.

The operation of the internal control system and the Internal Audit Department is overseen by the Supervisory Board of the Bank. The Supervisory Board carries out its function with help of the Audit Committee, which - as part of its supervisory tasks - verifies, jointly with the Management Board and the statutory auditor, the accuracy of prepared financial statements and the correctness of functioning of processes connected with their preparation, and submits recommendations concerning approval of annual and interim financial statements by the Supervisory Board of the Bank.

The Head of the Internal Audit Department informs the Management Board of the Bank and the Audit Committee of the Supervisory Board of the Bank of results of completed audits and periodically, and at least once in a year, provides the Supervisory Board with a summary report on identified irregularities and conclusions arising from the completed internal audits, and corrective actions initiated to remedy those irregularities. The Head of the Internal Audit Department is authorized to participate in meetings of the Management Board and Supervisory Board at which issues relating to the functioning of the internal control systems at the Bank are to be discussed.

4. Significant shareholdings

The Bank's shareholder holding a significant block of shares in the Bank is Citibank Europe PLC based in Ireland – an entity from the Citi group, which holds 97,994,700 shares, accounting for 75% of the Bank's share capital. The number of votes held by Citibank Europe PLC from those shares is 97,994,700, i.e. 75% of total votes at the General Meeting of Shareholders of the Bank.

In 2025, the number of the Bank's shares held by Citibank Europe PLC presented above did not change compared to the end of 2024.

5. Holders of all securities with special control rights together with a description of those rights

The Bank has not issued any securities that would give its shareholders any special control rights.

6. Restrictions on the exercise of voting rights

No restrictions on the exercise of voting rights have been provided for at the Bank.

7. Restrictions on the transfer of ownership of the securities

No restrictions on the transfer of ownership of the securities issued by the Bank have been introduced at the Bank.

8. Rules governing the appointment and dismissal of Members of the Management Board and their powers

The Management Board of the Bank consists of five to nine members. The Management Board consists of: President of the Company's Management Board, Vice Presidents of the Company's Management Board and other Members of the Management Board. At least half of all members of the Management Board should be Polish citizens. The members of the Management Board of the Bank are appointed by the Supervisory Board for an individual term of four years. The term of office is calculated in financial years, with the first financial year of the term of office being each time the financial year in which the function was taken up, even if it did not take place at the beginning of that financial year. The President of the Management Board and the Member of the Board supervising the significant risk management at the Bank, require consent of the Polish Financial Supervision Authority to be appointed.

The mandate of a member of the Management Board expires:

1) on the day on which the General Meeting is held to approve the report of the Management Board on the activities of the Bank and the financial statements for the last full financial year in which the member performed his or her function;
2) upon death of the Management Board member;
3) on the day the Management Board member is recalled;
4) on the day a resignation in writing or in electronic form is submitted to the Chairman of the Supervisory Board.

By way of resolution, the Management Board makes decisions in the Company's affairs, except for matters that - under the law or Articles of association - are within the powers of other bodies of the Company, and in particular it:

1) determines the strategy of the Company;
2) establishes and dissolves committees of the Company and determines their competences;
3) adopts its rules and submits them to the Supervisory Board for approval;
4) adopts the rules of management of special funds created from net profit and submits them to the Supervisory Board for approval;
5) determines dividend payouts, on dates fixed by the General Meeting;
6) appoints general proxies (*prokurenci*) and general attorneys and general attorneys having a substitution right;
7) makes decisions in matters set out in the rules of the Management Board;
8) makes decisions in matters submitted by the President, a Vice President or a Member of the Management Board;
9) passes a resolution to adopt the annual financial plan of the Company, adopts investment plans and accepts reports on their performance;
10) accepts reports on activities of the Company and its financial statements;
11) prepares recommendations concerning appropriation of profits and losses;
12) approves the human resources management policy and the legal principles for the Company's activities;

13) approves the principles of management of the Company's capital;

14) approves the employment structure;

15) determines and presents to the Supervisory Board for approval the general organizational structure of the Bank reflecting the size and profile of incurred risks and appoints and removes Heads of Sectors and Heads of Divisions, and determines their competence;

16) determines the inspection plan for the Company and accepts reports on completed checks;

17) makes decisions in other matters which according to the Articles of Association are to be submitted to the Supervisory Board or General Meeting;

18) makes decisions to incur liabilities or dispose of assets if their total value with respect to a single entity exceeds 5% of the Company's equity or grants powers of attorney to designated persons to make such decision, however in case of matters within the powers of Committees established at the Company, such decisions must be first consulted with the competent Committee;

Persons authorized to submit matters to the Management Board include:

1) President of the Management Board;

2) other members of the Management Board;

3) heads of other organizational units - in matters within the scope of operations of those units, upon consent of the member of the Management Board in charge or the President of the Management Board.

Provided that decisions concerning matters relating to the basic organizational structure of the Bank and appointments or dismissals of Sector Heads or Division Head and to determine their competences are initiated or must be agreed with the President of the Management Board.

The Management Board determines, in a resolution, the internal division of powers between members of the Bank's Management Board and submits it to the Supervisory Board for approval.

Within the framework of the internal division of powers in the Management Board of the Bank:

1) there is a separate function of the member of the Management Board responsible for supervision over the management of risks significant to activities of the Bank;

2) the Internal Audit Department reports directly to the President of the Management Board

3) the President of the Management Board may not be appointed as member of the Management Board responsible for supervision over the management of risks significant to activities of the Bank;

4) the president of the Management Board must not be entrusted with supervision over those areas of the Bank's activities which create a significant risk to activities of the Bank;

5) the member of the Management Board who is responsible for supervision over the management of risks significant to activities of the Bank must not be entrusted with supervision over those areas of activities of the Bank that generate the risks the management of which is supervised by that member;

6) a designated member or members of the Management Board are entrusted with supervision over the area of management of non-compliance and the area of financial accounting and reporting.

9. Amendments to the Articles of Association

The Articles of Association of the Bank may only be amended by the General Meeting of Shareholders. An amendment to the Articles of Association must be recorded in the register of entrepreneurs of the National Court Register. Pursuant to Article 34(2) of the Act of 29 August 1997 - Banking Law, an amendment to the Articles of Association of the Bank requires approval by the Polish Financial Supervision Authority (*KNF*).

10. General Meeting procedure, description of its fundamental powers as well as shareholder rights and methods of exercising them

10.1 General Meeting procedure

The General Meeting at the Bank operates in accordance with the General Meeting Regulations, the Articles of Association and provisions of law. The General Meeting of the Bank (General Meeting) has Regulations, specifying detailed rules for conducting meetings and adopting resolutions.

According to the practice adopted by the Company, the General Meeting is held at the registered office of the Company in Warsaw. The Annual General Meeting is convened by the Management Board. It should be held within six months of the end of each financial year. The Supervisory Board has the right to convene the Annual General Meeting if the Management Board fails to do so within the time limit specified in the Articles of Association, and the Extraordinary General Meeting, whenever deemed necessary. The Management Board convenes the Extraordinary General Meeting at its own initiative and at the request of a shareholder or shareholders representing at least one-twentieth of the

share capital. A request to convent the Extraordinary General Meeting must be submitted to the Management Board in writing or electronically. If the Extraordinary General Meeting is not convened within two weeks after a request is made to the Management Board, the registry court may, by way of a ruling, authorize the shareholders or shareholders who submitted the request to convene the Extraordinary General Meeting. The shareholder or shareholders so authorized by the registry court must invoke the registry court's ruling referred to in the preceding sentence in the notice convening the Extraordinary General Meeting. The registry court appoints the chairman of that Extraordinary General Meeting. The Extraordinary General Meeting may also be convened by shareholders representing at least half of the Bank's share capital or at least half of the total number of votes at the Bank. The chairman of the Meeting is appointed by shareholders. The General Meeting is convened by an announcement placed on the Bank's website and in the manner prescribed for making current disclosures by public companies, provided that the announcement should be made at least twenty-six days before the date of the General Meeting. The shareholders entitled to request that a specific matter be placed on the agenda of the General Meeting, in order to exercise that right to complete the agenda, should submit a written or electronic motion to the Bank's Management Board, together with reasons and a draft resolution on the proposed agenda item, by no later than twenty-one days before the set date of the General Meeting. The Management Board places the item requested on the agenda of the next General Meeting immediately but no later than eighteen days before the set date of the General Meeting. The General Meeting may only be cancelled if it becomes unnecessary or in the event of an extraordinary hindrance to its holding. Cancellation and rescheduling of the General Meeting is made in the same manner as its convocation, provided that the twenty-six day advance notice does not apply. Cancellation and rescheduling of the General Meeting should be made in a manner which is least prejudicial to the Bank and shareholders. The General Meeting may adopt a resolution on refraining from considering a matter placed on the agenda or on changing the order of agenda items. However, taking an item off the agenda or refraining from consideration of an item placed on the agenda at the request of shareholders is subject to a prior consent of all the present shareholders who submitted the request, with 80% of General Meeting votes in favor. Requests on above matters should state detailed reasons.

A full text of the documentation to be presented during the General Meeting together with draft resolutions (if no resolution is envisaged on a matter - remarks of the Management Board) is published on the Bank's website as of the date of convening the General Meeting, together with other information regarding the General Meeting. Materials for the General Meeting are also made available at the Bank's office at the time when the Bank announces the notice convening the General Meeting. Notwithstanding the foregoing, the Bank performs all the information obligations arising from generally applicable regulations regarding convocation of General Meetings.

The General Meeting is opened by the Supervisory Board Chairman and, in his absence, successively, by the Deputy Chairman or one member of the Supervisory Board. According to the practice of holding General Meetings, as adopted by the Company, immediately after opening of the General Meeting, election of its Chairman is ordered. Prior to election of the Chairman, the General Meeting does not make any decisions.

The Bank's Management Board, each time through the person opening the General Meeting, provides the Chairman of the General Meeting with instructions on how to serve in that capacity in a manner that ensures compliance with generally applicable laws, corporate governance, the Articles of Association and other internal Bank regulations. The General Meeting should be attended by members of the Management Board and the Supervisory Board as well as the Bank's statutory auditor if financial matters are the subject of the General Meeting.

Voting at the General Meeting shall be open. Secret voting shall be ordered on elections or on motions to recall or hold accountable members of Company authorities or its liquidators, and on personal matters. In addition, secret voting shall be ordered at the request of at least one of the shareholders present or represented at the General Meeting.

The General Meeting shall be valid regardless of the number of shares represented, save as provided for by law. Resolutions of the General Meeting are adopted by an absolute majority of votes present unless provisions of law or the Articles of Association provide otherwise.

Voting in practice is done with the help of a computer system for casting and counting votes, which ensures that the number of votes cast corresponds to the number of shares held, as well as prevents - in the case of secret voting - tracing the votes cast to individual shareholders.

The Chairman of the General Meeting should phrase resolutions in such a way that any authorized person who disagrees with the merits of the decision being made in the resolution could challenge it. The Chairman of the General Meeting is responsible for ensuring that resolutions are worded in a clear and transparent manner. The Management Board of the Company also allows the Chairman to obtain the assistance of the Company's legal services.

Resolutions of the General Meeting are recorded by a notary public. The minutes are prepared in accordance with the relevant provisions of the Commercial Companies Code.

General Meetings may be attended by representatives of the media.

10.2 Fundamental powers of the General Meeting

The Annual General Meeting should be convened for the purpose of:

1) consideration and approval of the Management Board report on Company operations and its financial statements for the previous accounting year, as well as the consolidated financial statements of the Company's Group;
2) adoption of a resolution on profit distribution or coverage of losses,
3) acknowledgment of the fulfillment of duties by members of Company authorities.

In addition to matters provided for in mandatory provisions of law, the General Meeting has the authority over the following matters in particular:

1) sale or lease of the enterprise or its organized portion, and establishment of limited property rights thereon;
2) amendments to the Articles of Association;
3) increasing and reducing the share capital of the Company;
4) determination of the date of pre-emptive rights to new shares;
5) determination of the dividend day for the previous accounting year and dividend payment dates;
6) creation and release of special funds set up from profit;
7) appointment and recall of Supervisory Board members;
8) determination of the remuneration of Supervisory Board members;
9) merger or winding up of the Company;
10) appointment and recall of liquidators;
11) cancellation of Company shares;
12) use of supplementary and reserve capital, including the reserve capital (fund) established in order to accumulate undistributed profit (not intended for dividends in a given accounting year) and the banking risk fund.

The General Meeting decides on profit distribution, specifying the amounts of accruals for:

1) supplementary capital accrued annually from profit at the minimum of 8% of the profit for the accounting year until that capital reaches at least one third of the share capital. The General Meeting may adopt a resolution requiring further accruals;
2) reserve capital;
3) general risk fund;
4) dividend;
5) special funds;
6) other purposes.

In the event of winding up of the Company, the General Meeting appoints one or more liquidators at the request of the Supervisory Board and determines the method of winding up.

10.3 Shareholders' rights and their exercise methods

Company's shares are bearer shares and are transferable. Shareholders have the right to share in the profit reported in the financial statements audited by a statutory auditor if that profit has been allocated by the General Meeting to payments to shareholders. Profit is distributed in proportion to the number of shares held.

Only those who are the Bank's shareholders sixteen days before the date of the General Meeting (Date of Registration for participation in the General Meeting) are entitled to participate in the General Meeting of the Bank as a public company. A shareholder participating in the General Meeting has the right to vote, put forward motions and raise objections, as well as provide a brief explanation of his/her position.

Draft resolutions proposed for adoption by the General Meeting and other relevant materials should be presented to shareholders together with the reasons and opinion of the Supervisory Board prior to the General Meeting, allowing sufficient time for their review and assessment.

A shareholder may participate in the General Meeting and exercise their voting rights in person or through a proxy.

Each shareholder has the right to run for Chairman of the General Meeting as well as propose a candidate for Chairman of the General Meeting for the record.

Whenever any item of the agenda is being considered each shareholder has the right to speak and respond.

The Management Board is required to provide the shareholder, at the latter's request, with information about the company if it is necessary to assess a matter on the agenda. The Management Board should refuse to provide such information if this may be detrimental to the Company, its affiliated company or its subsidiary company, in particular as a result of disclosure of technical, commercial or organizational company secrets.

A member of the Management Board may refuse to provide information if providing the information could expose a Management Board member to criminal, civil or administrative liability.

In justified cases, the Management Board may provide the information in writing by not later than 2 (two) weeks of the date of adjournment of the General Meeting.

Company authorities do not limit information but at the same time they adhere to the Act on Public Offering and Conditions Governing the Introduction of Financial Instruments to Organized Trading and on Public Companies, the Act on Trading in Financial Instruments, Regulation of the European Parliament and Council (EU) No 596/2014 of 16 April 2014 on Market Abuse, the Regulation on current and periodic information provided by issuers of securities and conditions for recognizing as equivalent information required by the laws of a non-member state, as well as provisions of the Code of Commercial Companies.

A shareholder has the right to object to the wording of a resolution of the General Meeting and, when objecting, may present arguments and justify the objection.

Each shareholder has the right to propose amendments and additions to draft resolutions placed on the agenda of the General Meeting, until discussion on the agenda item ends with a draft resolution on that proposal. Such proposals together with a brief justification should be submitted in writing.

A shareholder at the General Meeting may submit motions on procedural matters. Motions on procedural matters are considered to be motions regarding the method of proceeding or voting.

Shareholders have the right to propose their candidates to the Supervisory Board of the Bank in writing to the attention of the Chairman of the General Meeting or verbally for the record, in both cases the proposals must be accompanied by a brief justification. When proposing candidates for members of the Supervisory Board, shareholders submit documents necessary to assess whether the candidates meet the requirements of Article 22aa of the Banking Law, following in this regard the guidelines set out in the "Qualification assessment policy for members of the Supervisory Board at Bank Handlowy w Warszawie S.A." If candidates are proposed in the course of the General Meeting, the Chairman orders a procedural break to allow shareholders to review the candidate profile and submitted documents as required by the above Policy.

Shareholders have the right to view the book of minutes, as well as to request copies of resolutions certified by the Management Board.

The shareholder who voted against a resolution of the General Meeting, and after its adoption, requested that his/her dissension be recorded, the shareholder who was unreasonably not allowed to participate in the General Meeting and the shareholders who were not present at the General Meeting, provided only that the General Meeting was convened defectively or if a resolution was adopted on a matter not included in the agenda, will have the right to bring a lawsuit seeking to repeal the resolution of the General Meeting.

To the extent provided for by generally applicable provisions of law, shareholders also have the right to bring a lawsuit against the Company to have an unlawful resolution of the General Meeting declared invalid.

Shares may be cancelled with the shareholder's consent by way of their purchase by the Company (voluntary redemption). Shares cancellation requires a resolution of the General Meeting and the prior consent of the Polish Financial Supervision Authority. The resolution should specify, in particular, the legal basis for the cancellation, the amount of compensation payable to the shareholder of the cancelled share or the justification for shares cancellation without compensation and the method of decreasing the share capital.

The Bank ensures adequate protection of minority rights within the limits allowed by the Bank's capital nature and the resulting primacy of the majority over the minority. In particular, to ensure equal treatment of shareholders, the Bank applies, inter alia, the following practices:

- General Meetings of the Bank are always held at the registered office of the Bank, which is located in Warsaw;
- media representatives are allowed to be present at General Meetings;
- all relevant materials for the General Meeting, including draft resolutions with justifications and opinions of the Supervisory Board, are made available to shareholders inter alia on Bank's website;
- the General Meeting of the Bank has a Regulations, specifying detailed rules of procedure and adoption of resolutions;
- the General Meeting is attended by members of the Supervisory Board and the Management Board, who, within their respective authority, provide explanations and information about the Bank to participants of the Meeting;
- participants of the General Meeting who object to a resolution are allowed to justify their objection. In addition, each participant of the Meeting has the option to submit his/her written statement for the record.

11. Composition of and changes to the Management Board and the Supervisory Board of the Bank in 2025, rules of procedure of the Bank's managing and supervisory bodies

11.1 Management Board

The Management Board of the Bank consists of five to nine members. The Management Board consists of: President of the Management Board, Vice Presidents of the Management Board and Members of the Management Board. At least half of all members of the Management Board should be Polish citizens. . The members of the Management Board of the Bank are appointed by the Supervisory Board for an individual term of four years. The term of office is calculated in financial years, with the first financial year of the term of office being each time the financial year in which the function was taken up, even if it did not take place at the beginning of that financial year.

As at 31 December 2025, the Management Board consisted of:

Member of the Management Board	Scope of responsibility
Elżbieta Światopełk-Czetwertyńska President of the Management Board	The President of the Management Board: • manages the work of the Management Board, including appointing from among the members of the Management Board a person to replace the President of the Management Board, during his absence, and determines the procedure of substitution for members of the Management Board who are absent, • calls and chairs meetings of the Management Board, • presents the position of the Management Board to other bodies of the Bank, central and local government and the general public, • submits motions to the Supervisory Board concerning appointments and dismissals of Vice Presidents and other Members of the Management Board and determination of their remuneration, • issues internal regulations applicable to activities of the Bank and may authorize other Members of the Management Board or other employees to issue such regulations, • decides how internal audit results are to be used and notifies such decision to the audited entity, • exercises other authorizations resulting from appropriate rules adopted by the Supervisory Board, • supervises the formulation and implementation of the strategy of the Bank, , including a sustainable development strategy covering environmental, social and corporate governance (ESG) issues, • is the officer to which the internal audit department is subordinated, • supervises the risk of non-compliance of the Bank with respect to the law, internal regulations and market standards, is responsible for implementing the obligations specified in the Act of 1 March 2018 on Counteracting Money Laundering and Terrorism Financing, • supervises human resources policy, • is responsible for activities to control how the Bank is perceived, • ensures a consistent organizational structure of the Bank, • supervises activities to ensure appropriate corporate governance, • supervises legal services, • supervises the area of security at the Bank with respect to protection of persons and property, • ensures the implementation of risk management principles in supervised divisions and units outside the organizational structure of a division with respect to operational risk connected with their activities, • as part of the external matrix structure, it covers the external functional bond of designated persons from subsidiary entities of the Bank responsible for the area corresponding to the scope of the competence of the President of the Management Board.
	Experience
	Ms. Elżbieta Światopełk-Czetwertyńska has many years of experience in

Member of the Management Board	Scope of responsibility
	the banking industry on 6 European markets and both Americas. She joined Citibank in July 1994 in Ecuador as Relationship Manger in the Corporate Bank. During 1999-2003, she worked in the Dominican Republic as the Head of Transaction Services, Asset Based Finance and the small and medium enterprises client segment. Later, she moved to the United States for one year, to work in audit area overseeing corporate loans in Latin America. In 2004, Ms. Elżbieta Światopełk-Czetwertyńska joined Bank Handlowy w Warszawie S.A. in Risk Management and in 2005 was appointed Senior Credit Officer. After three years, Elzbieta took the responsibility for the Central-East Region in Poland. In October 2009, she was appointed country Head for the Commercial Bank and she held this position until 2013, when she moved to Colombia. In Colombia Ms. Elżbieta Światopełk-Czetwertyńska was responsible for running the Treasury and Trade Solutions business, where she successfully developed and executed a dynamic growth strategy. As part of the Senior Management Team of Colombia and the Latam Treasury and Trade Solutions Executive Committee, Ms. Elżbieta Światopełk-Czetwertyńska was involved in shaping the strategy of the franchise and the TTS business in the Region. In November 1, 2015, Ms. Elżbieta Światopełk-Czetwertyńska was appointed Citi Country Officer and Corporate Investment Banking Head for Ecuador. In March 2019 she returned to Europe as Citi Country Officer for Switzerland, Monaco and Liechtenstein. Ms. Elżbieta Światopełk-Czetwertyńska graduated from University of Reading, England, U.K. as Bachelor of Science in Food Science, Food Economics & Marketing. She was Awarded First Class Honors Degree.

Member of the Management Board	Scope of responsibility
Patrycjusz Wójcik *Vice President of the Management Board*	Vice President responsible for Finance: • supervises the areas of accounting and financial reporting, including financial control, • supervises the area of sustainability reporting (ESG), • management accounting, • bookkeeping, • preparation of accounting policies, • coordination of activities connected with implementation at the Bank of requirements resulting from laws and regulations, as well as resolutions and recommendations of the financial supervision authority, with respect to capital adequacy, • is responsible for preparing a recovery plan and for planning the restructuring and orderly liquidation of the Bank and the Bank's capital group, • ensures the implementation of risk management principles in supervised organizational units with respect to operational risk connected with their activities, • as part of the external matrix structure, it covers the external functional bond of designated persons from Bank's subsidiaries responsible for the area corresponding to the scope of competence of the Vice President of the Management Board responsible for Finance.
	Experience
	Mr. Patrycjusz Wójcik has been the Vice President of the Management Board of Bank Handlowy w Warszawie S.A. since February 1, 2024. Patrycjusz has extensive experience in the area of banking and finance. Since 2014 he has been holding the role of Head of Strategy and Development Department within Financial Markets in the Bank being responsible for operational, financial and administrational support of all business lines within Markets. Since 2018, has been President of the Management Board of Dom Maklerski Banku Handlowego S.A.

Member of the Management Board	Scope of responsibility
	(„Brokerage House"). In this role he was responsible for business and financial supervision, coordinated and supervised the process of merging the Brokerage House with the Bank. From August 2022 to January 2024 Mr. Patrycjusz Wójcik was holding the role of CEO for the Handlowy Financial Services sp. z o.o. supervising the company liquidation process and regulatory reporting and financial statements. He started his professional career in KPMG, where he was engaged in audit and advisory projects for biggest financial institutions in Poland. Mr. Patrycjusz Wójcik is ACCA certified accountant, a certified financial markets dealer and a licensed broker. He graduated from the Warsaw School of Economics, Quantitative Methods and Information Systems and he is a scholarship holder of the Humboldt University in Berlin.

Member of the Management Board	Scope of responsibility
Maciej Kropidłowski *Vice President of the Management Board*	Vice President responsible for Financial Markets and Corporate Banking: • responsible for financial market operations, including money market transactions as well as FX market, securities and derivative transactions, • responsible for activities related to securitization, • responsible for activities related to organizing financing for investment plans, mergers and acquisitions in the scope of: – syndicated loans, – bridge financing, – debt securities, – project finance; – off-balance sheet financing, • ensures the implementation of risk management principles in supervised organizational units with respect to operational risk connected with their activities, • responsible for ongoing cooperation with and supervision over corporate bank and commercial bank, including supervision over services provided to clients from the financial institution sector, • supervises the brokerage activities, also is responsible for the current functioning of the procedures of anonymous reporting of violations at the Brokerage Department of Bank Handlowy and accepting anonymous reports of violation of law or violation of procedures and ethical standards in the Brokerage Department, • within the external matrix structure, includes external functional ties to designated persons from entities associated with the Bank responsible for the area corresponding to the scope of competences of the Vice President of the Management Board responsible for financial markets and corporate banking.
	Experience
	Mr. Maciej Kropidłowski has been the Vice President of the Management Board of Bank Handlowy w Warszawie S.A. since March 19, 2014. Mr. Maciej Kropidłowski is a graduate of the University of Lodz, the Faculty of Management. Mr. Maciej Kropidłowski has been the Financial Markets Sub-Sector Head at Bank Handlowy w Warszawie S.A. since January 2014. In February 2014 he was appointed Member of the Supervisory Board of Dom Maklerski Banku Handlowego S.A. (Brokerage House of Bank Handlowy S.A.). At Bank Handlowy w Warszawie S.A. he is responsible for Treasury operations in the area of financing of the Bank's assets, money market financial services, FX services, trading in securities and derivatives. Mr. Maciej Kropidłowski started his career in 1995 in Citibank (Poland) S.A. in the Corporate Bank. Four years later he became an RM in the International Corporate Clients unit at Citibank N.A. in Switzerland. In 2001 he returned to Poland and joined Bank Handlowy w Warszawie S.A. as Head

Member of the Management Board	Scope of responsibility
	of Treasury Sales. In his new role he was responsible for managing the Structuring and Treasury Products Sales Unit. In 2008 he was appointed Head of Treasury Sales for Central and Eastern Europe, Middle East and Africa at Citibank N.A. in London and he was responsible for Treasury products sales to corporate clients. He also played an important role in developing the best e-Commerce platform for corporate clients and a global CRM system for Global Markets.

Member of the Management Board	Scope of responsibility
Andrzej Wilk *Vice President of the Management Board*	Vice President responsible for Consumer Banking: • responsible for consumer banking, including the quality standard of banking services in supervised organizational units, • ensures that principles of their business-related operational risk management are implemented in such supervised organizational units, • as part of the matrix structure, it supervises brokerage activities implemented in relation to individual clients to the extent specified in the organizational regulations of the bank's relevant organizational units to perform such activities.
	Experience
	Mr. Andrzej Wilk has been the Vice President of the Management Board of Bank Handlowy w Warszawie S.A. since July 1, 2022. Mr. Andrzej Wilk has an extensive professional experience in banking. Mr. Andrzej Wilk joined Bank Handlowy w Warszawie S.A. in 1997 as Planning and Business Analysis Specialist. Then, he held a number of managerial roles, including the CFO of Citifinancial Central Europe, supervising the development of over 200 branches and points of sale. He was also the Head of Retail Bank in Hungary, the Czech Republic and Romania. Between 2014 and 2018 he worked outside of Citi, at Moneygram Polska as the Company CEO. Then, Mr. Andrzej Wilk returned to Citi and from 2019 he served as the Head of Retail Products, Brokerage Services, Segments and Branch Network Management Division. Mr. Andrzej holds a Master's degree in Management and Marketing from the Wrocław University of Science and Technology.

Member of the Management Board	Scope of responsibility
Barbara Sobala *Vice President of the Management Board*	Vice President responsible for of significant risks management: • supervises management of risks significant to activities of the bank credit policy of the Bank, • responsible for risk management system including: – credit policy, – quality of the Bank's credit portfolio, – credit risk, – market risk, – operational risk, – ESG risks, • responsible for coordination of activities connected with implementation at the Bank of requirements resulting from risk management regulations, including recommendations issued by supervisory authorities, • responsible for supervision of risk management at second level, by employees in specially appointed positions or organizational units, • provides the Bank's Management Board and Supervisory Board with comprehensive information on risk,

Member of the Management Board	Scope of responsibility
	• responsible for adjustments of the organizational structure of the Bank to the amount and profile of risks to which the Bank is exposed, • accepts anonymous reports of infringements of law or procedures and ethical standards applicable at the Bank, • responsible for the ongoing functioning of the anonymous infringement reporting procedures, including for reporting to the Supervisory Board, at least semi-annually, any substantial ethical issues arising at the Bank, • within the external matrix structure, includes external functional ties to designated persons from entities associated with the Bank responsible for the area corresponding to the scope of competences of the Vice President of the Management Board responsible for material risk management.
	Experience
	Ms. Barbara Sobala assumed the position of Vice President of the Management Board of Bank Handlowy w Warszawie S.A. on October 15, 2013. Ms. Barbara Sobala has a university degree. She graduated from the Cracow University of Economics. She has extensive (over twenty years) experience in banking, especially in risk management and corporate restructuring. She joined Bank Handlowy in 2005 as Head of IRM. In the years 2012-2015 she was the Head of Risk for the Institutional and Corporate Bank. She is the Chairperson of the Risk and Capital Management Committee, Vice Chairperson of the Equity Investments Committee and a member of the Assets and Liabilities Management Committee (ALCO) in the Bank. Before joining Bank Handlowy's team, she served 13 years for Bank BPH where she held various roles including Head of the Restructuring Department Head. She was also a member of the Bank's Credit Committee.
Member of the Management Board	**Scope of responsibility**
Sebastian Perczak *Member of The Management Board*	Member responsible for transaction service,. • responsible for: – finance management products; – trade finance products; – cash products; – liquidity management products; – custody activities; • responsible for supervision of EU programmes • responsible for supervision within the internal functional relationship over services for the public sector; • ensures the implementation of risk management principles in supervised organizational units with respect to operational risk connected with their activities; • as part of the external matrix structure, it covers the external functional bond of designated persons from Bank's subsidiaries responsible for the area corresponding to the scope of competence of a member of the management board responsible for transactional banking.
	Experience
	Mr. Sebastian Perczak has been the Member of the Management Board of Bank Handlowy w Warszawie S.A. since December 1, 2025. Mr. Sebastian Perczak is a senior banking executive with over 25 years of experience across Poland, Europe, and the United States. Since 2019 he

Member of the Management Board	Scope of responsibility
	serves as the Head of Commercial (CCB), where he is responsible for the Commercial Banking business for institutional and public sector clients. Mr. Sebastian Perczak leads a team of more than 100 professionals delivering strategic growth for the Bank. In the years 2005-2018, as CCB Regional Corporate Center Head and Senior Banker/Director in the Corporate Bank at Citi Handlowy, Mr. Sebastian Perczak managed relationships with key corporate clients, originated and executed complex financing and investment banking transactions, and co-led portfolio and risk management initiatives. He began his banking career in 1998 at Citigroup in New York as a Syndicate Desk Analyst, later joining Citi in Poland as a Relationship Manager serving our international clients. In the meantime, he also worked at Bank Zachodni WBK S.A. as a Transactor and at Capital One Bank in New York as an Assistant Vice President in the Specialized Loans Department, responsible for structured lending and credit risk analysis. Mr. Sebastian Perczak brings extensive expertise in corporate banking, structured finance, credit portfolio management, and business development. He is a Citi Senior Credit Officer (SCO). He is combining a strong international background with in-depth knowledge of Central and Eastern European markets. Mr. Sebastian Perczak graduated with honors with a bachelor's degree in Business Administration from the City University of New York, Baruch College, majoring in Business Administration, specializing in finance and investments.

Member of the Management Board	Scope of responsibility
Tomasz Dziurzyński *Member of the Management Board*	Member responsible for Operation and Technology. • responsible for operations and technology, • responsible for real estate management, • responsible for administration, • supervises the field of occupational health and safety, • ensures the implementation of risk management principles in supervised organizational units with respect to operational risk connected with their activities, • within the matrix structure, supervises the operations located in the organizational unit operating in the Brokerage Department of Bank Handlowy, • within the external matrix structure, includes external functional ties to designated persons from entities associated with the Bank responsible for the area corresponding to the scope of competences of the Member of the Management Board responsible for operations and technology.
	Experience
	Mr. Tomasz Dziurzyński has been the Member of the Management Board of Bank Handlowy w Warszawie S.A. since June 1, 2025. Mr. Tomasz Dziurzyński has extensive experience in the area of banking and finance and has been working at Citi for 19 years. He started his career in the area of risk and control for Citi's technology infrastructure organization in the EMEA Region. In 2012-2013, Mr. Tomasz Dziurzyński was the Outsourcing Coordinator at Citi Handlowy. He led a project to build a new framework for managing banking outsourcing and solve key business challenges. For the next 3 years, he was the Chief Risk and Control Officer at Citibank Europe PLC, Poland. He was responsible for defining an adequate control and management supervision environment supporting the strategy of dynamic development of Citi Service Center in Poland. From 2016, Mr. Tomasz Dziurzyński was the Manager of the Information Security Management Division in the Operations and Technology sector at Citi Handlowy. He was responsible i.a. for the preparation and implementation of the Bank's Digital Resilience Strategy and the overall coordination of risk mitigation activities in the area of operations and technology. He organized

Member of the Management Board	Scope of responsibility
	comprehensive transformation projects of the Bank supporting the implementation of the strategy. Mr. Tomasz Dziurzyński is active in the Polish Bank Association as Vice-Chairman of the Presidium of the Bank Cybersecurity Committee. Mr. Tomasz Dziurzyński is a Certified Information Systems Auditor (CISA) and a Certified Information Security Manager (CISM), he is also a Certified Information Systems Security Professional (CISSP). Mr. Tomasz Dziurzyński is a graduate of the Poznań University of Technology, majoring in Computer Science at the Faculty of Computer Science and Management.

Changes in the composition of the Management Board in 2025

On April 9, 2025, the Bank received notice of the resignation of Ms. Katarzyna Majewska from the position of Vice President of the Management Board, effective May 31, 2025, due to her intention to pursue new challenges outside the Bank's structure. Consequently, on May 29, 2025, the Bank's Supervisory Board appointed Mr. Tomasz Dziurzyński to the Management Board, effective June 1, 2025.

Furthermore, on August 21, 2025, the Bank received notice of the resignation of Mr. Ivan Vhrel from the position of Member of the Management Board, effective November 30, 2025, due to his acceptance of the offer to assume the position of Treasury and Trade Solutions & Commercial, Corporate and Public Sector Head for the Sub-Saharan Africa and South Africa sub-cluster. Consequently, on November 3, 2025, the Bank's Supervisory Board appointed Mr. Sebastian Perczak to the Management Board, effective December 1, 2025.

The Management Board operates in particulat on the basis of generally applicable laws, the Articles of Association and the Management Board Regulations. The Management Board Regulations define the scope and mode of operations of the Management Board as well as the procedure for adopting resolutions.

During 2025, the following committees consisting of Management Board Members were active:

1) Risk and Capital Management Committee,
2) Assets & Liabilities Committee (ALCO) of the Bank,
3) Business Risk, Control System and Compliance Committee for Bank Handlowy w Warszawie S.A.;
4) New Products Committee,

President of the Management Board convenes and chairs meetings of the Management Board. President of the Management Board may set fixed dates for holding meetings.

Work organization at the Management Board is ensured by the Corporate Services Office.

Management Board members have an obligation to attend Management Board meetings. An anticipated absence of a Management Board member at a meeting should be reported to the Corporate Services Office and must be excused.

In 2025, there were no long-term absences of the Management Board members.

In addition to members, meetings of the Management Board are attended by: Director of the Corporate Services Office or his designee, Head of the Compliance Division, Head of the Legal Division, Director of the Audit Department.

Resolutions of the Committee are valid provided that at least one half of the permanent members of the Committee are present. Resolutions of the Management are adopted by an absolute majority of votes.

The Management Board adopts resolutions in an open vote. Chairman of the meeting may order voting by ballot at his own initiative or at the request of a Board member. Member of the Management Board who disagrees with the wording of the adopted resolution may present a different position to be recorded in the minutes. A resolution of the Management Board is effective as of the date of its adoption unless it provides for a different effective date.

In justified cases, a resolution of the Management Board may be adopted through circulation (in writing) based on a decision of the President of the Management Board or the member substituting for the Management Board President. Draft resolutions to be adopted through circulation are submitted for approval to all members of the Management Board and become legally binding after being signed by an absolute majority of Management Board members, including the President of the Management Board or the member substituting for the Management Board President. The effective date of a resolution is the date it is signed by the Management Board member who signs the resolution already signed by at least half of all members of the Management Board. If even one of the Management Board members raises an objection to adoption of a resolution through circulation, the draft resolution should be presented at the next Management Board meeting. A resolution may be adopted through circulation provided that all members of the Management Board have been given a notice of its adoption. Resolutions adopted through circulation shall be added to the minutes of the next meeting of the Management Board.

With the consent of the President of the Management Board, members of the Management Board who are absent may

participate in the meeting and vote through means of direct remote communication in a manner which enables simultaneous real-time communication and mutual identification among all Management Board members participating in the meeting or voting (e.g. videoconference, teleconference).

Minutes are drafted of each Management Board meeting. Drafting of the minutes is the responsibility of the Corporate Services Office. The minutes include elements indicated in the Regulations of the Management Board.

The minutes must be signed by at least the Member of the Management Board chairing the meeting or ordering the voting.

The Management Board provides the Supervisory Board with the following financial information:

1) quarterly financial information with its comparison to the budget adopted in the annual plan and to the previous year data,
2) immediately upon compilation but no later than 120 (one hundred and twenty) days after the end of each accounting year, standalone and consolidated annual financial statements prepared in accordance with International Accounting Standards and International Financial Reporting Standards, audited by the Bank's auditor;
3) immediately upon compilation but in any case no later than before the end of each year, a draft annual plan for the next accounting year, and
4) immediately, other available financial data related to the Bank's operations and its financial condition, as well as the operations and financial condition of the Bank's subsidiaries, which a member of the Supervisory Board may reasonably request.

11.2 Supervisory Board

The Supervisory Board consists of five to twelve members, each appointed by the General Meeting for a four-year joint term. The term of office is calculated in financial years, with the first financial year of the term of office being the financial year in which the term of office began, even if it did not begin at the beginning of that financial year. By Resolution No. 31 of 17 June 2021, the Ordinary General Meeting of the Bank, on the basis of Article 14.2 of the Articles of Association, established the number of Supervisory Board members to a maximum of 8. In addition, at least half of the Supervisory Board members, including its Chairman, must be Polish citizens. The Supervisory Board consists of independent members.

As at the December 31, 2025, the Company's Supervisory Board consisted of:

Member of Supervisory Board	Professional experience
Sławomir Sikora *Chairman of the Supervisory Board*	Mr. Sławomir Sikora has many years of professional experience in banking industry. He was Chief Executive Officer of Bank Handlowy w Warszawie S.A. from 2003 to 2021. In 2005-2008 he was a Member of Citigroup Management Committee in New York. In the years 2001-2003 he was President of the Management Board of America Bank in Poland S.A. From 1994 to 2001 he was Corporate and Investment Banking Head at PBK Bank in Warsaw in the rank of Vice President of the Management Board. Between 1989-1994 he held senior positions at the Ministry of Finance in Poland (incl. Head of the Banking and Financial Institutions). Mr. Sławomir Sikora is a graduate of the Warsaw School of Economics (SGH)
Ignacio Gutierrez-Orrantia Vice-*Chairman of Supervisory Board*	Mr. Ignacio Gutierrez - Orrantia serve as CEO and Executive Director on the Board of Citibank Europe Plc (CEP), Citi's bank chain legal vehicle headquartered in Dublin, Ireland. Mr. Ignacio Gutierrez-Orrantia is also Citi's Banking and Cluster Head for Europe, responsible for leading Citi's businesses across 24 countries on the Continent. Mr. Gutierrez-Orrantia has been in the banking industry for close to 30 years. He joined Citi in 2004 and was most recently co-head of Investment Banking for Europe, the UK and Middle East. In 2021, he was appointed as Head of Banking, Capital Markets and Advisory (BCMA) for Europe, Middle East and Africa. He has extensive investment banking experience, having served as Chairman for Continental Europe (2018 – 2021) and Chairman for Spain and Portugal (2009-2021). He started his career in Goldman Sachs' Mergers & Acquisitions division.

Member of Supervisory Board	Professional experience
	Mr. Ignacio Gutierrez-Orrantia holds Business Management Degree from Universidad Comercial Deusto.
Natalia Bożek Member of Supervisory Board	Ms. Natalia Bożek has extensive experience in the area of banking and finance, presently she serves as an Executive Director on the Board of Citibank Europe Plc (CEP), Citi's bank chain legal vehicle headquartered in Dublin, Ireland. In the years 1999-2014 she worked at Bank Handlowy w Warszawie S.A., first as Business Planning and Analysis Expert for the Consumer Bank and then as Financial Planning and Analysis Head for Bank Handlowy w Warszawie S.A., covering both Consumer and Corporate Bank. From 2014-2017 Ms. Bożek pursued her career within Citi Group in the Polish branch of Citibank Europe plc as Financial Planning and Analysis Head for Europe. In September 2017 she returned to Bank Handlowy w Warszawie S.A. as Director for Financial Planning Process Coordination and Strategic Projects supporting CFO of the Bank. Subsequently, Ms. Bożek served as Vice President of the Management Board of Bank Handlowy w Warszawie S.A. responsible for finance from March 21, 2018 to January 31, 2024. In February 2024, Ms. Bożek took on the role of Europe Cluster Chief Financial Officer (CFO) for Citi. Ms. Natalia Bożek holds a Master's degree from the Business and Administration University in Warsaw.
Fabio Lisanti Member of Supervisory Board	Mr. Fabio Lisanti serves as a Board Member of Citibank Europe Plc (CEP), Citi's bank chain legal vehicle headquartered in Dublin, Ireland. From 1995 - 2016 Mr. Lisanti was associated with UBS Investment Bank where his career focused on Debt Capital Markets, Institutional & Corporate Solutions Sales, and Fixed Income Structuring. He served among other as Global Head of Debt Capital Markets and Client Solutions and Member of Global Banking & Foreign Exchange, Rates and Credit Executive Committees. Then from January to November 2016 he joined to BSI Bank (Banca della Svizzera Italiana) as Senior Advisor to the CEO. Since 2016 he has been associated with Citigroup as Head of Markets Europe in Citigroup. Mr. Lisanti has been a Board Member of the International Capital Markets Association and currently represents Citi on the Board of the Association for Financial Markets in Europe. Mr. Fabio Lisanti has a Bachelor's degree in Science in Industrial and Business Economics at the London School of Economics and a master's in International Economics and Management as the SDA Bocconi in Milan.
Marek Kapuściński *Member of Supervisory Board (an independent member within the meaning of § 14 section 4 of the Bank's Articles of Association)*	Mr. Marek Kapuściński graduated from the Faculty of Foreign Trade at the Main School of Planning and Statistics in Warsaw (currently, the Warsaw School of Economics) and completed postgraduate studies at SEHNAP / Stern School of Business at New York University. He had been associated with the Procter & Gamble company for 25 years till September 2016. He is co-creator of company's success on the Polish and Central European market, including numerous standards of the way the Polish market has functioned since the time of transformation. They encompass standards for the cosmetics industry, business ethics, social responsibility, or self-regulation in the field of advertising. Since July 2011, he has performed the function of General Director and Vice President (i.e. CEO) for 9 Central Europe markets which are of key importance for P&G, and since January 2007 for Poland and the Baltic States. He is the first Pole and a person from Central Europe at the managerial level in this global corporation, as well as an active member of the company's regional management and its Global Business Leadership Council, which unites all 250 top executive managers. An experienced CEO and leader, an expert in strategy, innovation and management, an active creator of standards constantly adapting to the new challenges of brand management, a shopper of marketing, sales and communication in the age of digitization and omni-channel. The first Pole and Central European to be promoted at P&G to the positions of Brand Manager, Marketing Manager and Marketing Director; also for 5 years,

Member of Supervisory Board	Professional experience
	responsible for developing a number of brands in the Region of Central and Eastern Europe, Middle East and Africa. Co-author of the strategy and leading market position of numerous well-known brands in the P&G portfolio. . In recognition of his contribution to building brands and Polish advertising standards and practices, he was awarded the title of "20 Year Marketer" by Media Marketing Polska. Lecturer and speaker, juror, participant of discussion panels. Currently, he sits on Supervisory Boards of companies and public benefit organizations, and advises their managements. Privately, he invests in start-ups and donates for the development of young Polish culture and art. Since 29 September 2016, he has served as a member of the Supervisory Board of Bank Handlowy w Warszawie S.A.
Andras Reiniger *Member of Supervisory Board*	Mr. Andras Reiniger is the new Chief Operating Officer (COO) for Legacy Franchises. Mr. Reiniger will partner closely with the Legacy Franchises Management Team to lead day-to-day business operations for the organization. He will be responsible for Business Management including Business Planning, Strategic Planning, Financial Management and Risk Management, playing an integral role in the execution of Citi Legacy Franchises divestiture strategy and strategic priorities. Most recently, Andras served as Head of Corporate Mergers & Acquisitions (M&A) for Citi, overseeing the team responsible for executing strategic acquisitions and divestitures for the firm globally. Since joining the team in 2008, Andras has led M&A activities for Citigroup's exits from international consumer businesses, as well as selected acquisitions. Most recently, he led the divestiture efforts across Legacy Franchises working closely with our local, regional and global management teams. In the years 2008-2012 as Senior Transactor in Corporate M&A he managed the Citi Holdings divestiture programme across the regions, including the Nordics, Portugal, Italy, Spain, Benelux, UK. In 2009 he was promoted to EMEA M&A Head, and then to Managing Director in 2010. On the buy-side, he involved in smaller acquisitions in Russia, CEE, as well as selected partner card portfolios in the US. Prior to joining Citi he worked for Schroders in UK M&A and then moved to European Financial Institutions Group in 1999 where he was involved in a broad range of transactions in the UK & EMEA across banking, asset management and insurance. He started his professional career as analyst at NatWest Markets, working within the M&A team, focused primarily on transactions in the UK. Mr. Andras Reiniger has a BA (Hons) (Cantab) in Economics from Trinity College, Cambridge. Since 24 June 2022, he has served as a member of the Supervisory Board of Bank Handlowy w Warszawie S.A.
Anna Rulkiewicz *Member of Supervisory Board (an independent member within the meaning of § 14 section 4 of the Bank's Articles of Association)*	Since 2007, Ms. Anna Rulkiewicz has been the President of the Management Board of the LUX MED Group, which she joined in 2002 as a Member of the Management Board and Sales and Marketing Director. Since the end of 2011 she has also performed duties of the Managing Director of LMG Försäkrings AB, whose branch operates in Poland under the business name LUX MED Ubezpieczenia (Insurance). Since 2011, Ms. Anna Rulkiewicz has been the President of Private Medicine Employers (Pracodawcy Medycyny Prywatnej) and since 2016 she has been the Vice President of Employers of Poland (Pracodawcy RP). Ms. Anna Rulkiewicz gained professional experience by, among others, managing the Sales and Marketing Department at Credit Suisse Life & Pensions Towarzystwo Ubezpieczeń na Życie S.A. and at Powszechne Towarzystwo Emerytalne (General Pension Company)/Winterthur in the years 2001-2002, where she supervised the departments of internal and external sales, group insurance, marketing and communication. In the years 1998-2001, Ms. Rulkiewicz worked for Zurich Towarzystwo

Member of Supervisory Board	Professional experience
	Ubezpieczeń na Życie S.A. and Zurich Powszechne Towarzystwo Emerytalne S.A. In her capacity as the Group Insurance and Training Director, she was responsible for, i.a. the group insurance segment, including development of services, recruitment system and training management. After becoming the Corporate Client Segment Head and being appointed a member of the Management Board of Zurich Towarzystwo Ubezpieczeń na Życie S.A., she was responsible for the Small Business and Corporate Client Segment. Between 1995-1998, she worked for Commercial Union Towarzystwo Ubezpieczeń na Życie S.A., where she was responsible, among others, for developing sales of group and individual insurance under bancassurance. Ms. Anna Rulkiewicz is a graduate of Nicolaus Copernicus University in Toruń (Uniwersytet Mikołaja Kopernika w Toruniu), where in 1994 she was awarded a Master's degree. Ms. Rulkiewicz is also a graduate of the University of Hamburg. In 1998, she completed postgraduate studies at the Polish and French Institute of Insurance (Polsko-Francuski Instytut Ubezpieczeń) and a range of training courses in, among other fields, management, sales, communication, and marketing organized under the certified insurance industry program LIMRA "Marketing Strategies for Executive Advancement" (LIMRA Executive Development Group). In 2018, she also completed the Stanford Executive Program at the Stanford University's Graduate School of Business. Between 2013-2017, Ms. Rulkiewicz was also a member of the Supervisory Board of Bank Handlowy w Warszawie S.A., and was again appointed to the Supervisory Board on June 5, 2019.
Barbara Smalska *Member of Supervisory Board (an independent member within the meaning of § 14 section 4 of the Bank's Articles of Association)*	In the years 2015-2017, Ms. Barbara Smalska held the function of the Vice President of the Management Board of Alior Bank S.A., responsible for strategy, mergers (specifically for legal and operational integration with separated operations of Bank BPH S.A. and for merger-related synergies), remote channels (online sales and online and mobile banking development), and for other development and IT projects. Since 2008 she has worked for PZU Group: as the Director of the Product Management Office (2008-2010) and the Managing Director for Mass Market (2010-2012), she was in charge of various aspects of PZU Group's individual client and SME segment management, notably she has been responsible for product management, marketing and sales, and for analytical CRM. In the years 2013-2014, as a member of PZU SA and PZU Życie SA Management Board, she was responsible for PZU Group's individual client and SME segment as a whole. As the Chairperson, and then as an independent member of Link4 TU S.A.'s Supervisory Board (2014-2016), she was in charge of the supervision of the process of incorporating Link4 to PZU Group. Ms. Barbara Smalska also joined PTE PZU SA's Supervisory Board (2013-2014). Ms. Barbara Smalska began her professional career in 2002 at the Boston Consulting Group's Warsaw Office. As Associate, Senior Associate, and Consultant in the years 2002-2006, she was involved in many projects conducted for financial and telecommunications sectors in Poland and in Central and Eastern Europe in, among other fields, business strategy, operational model, sales network organization and activation, costs reorganization and optimization. In the years 2006-2008, as the Project Leader and next as the Principal, she managed strategic projects for the largest Polish banks, insurance companies and telecom companies, mainly in business strategy and distribution strategy in the retail client segment. Ms. Barbara Smalska is a graduate of the University of Warsaw (Uniwersytet Warszawski), where in 1997 she was awarded a Master's degree in physics and in 2001 a PhD's degree in high energy experimental physics. Since 05 June 2019, he has served as a member of the Supervisory Board of Bank Handlowy w Warszawie S.A.

Changes in the composition of the Supervisory Board in 2025

In 2025 there were no changes in the Supervisory Board of the Bank.

The Supervisory Board operates in particular on the basis of generally applicable laws, the Articles of Association and the Supervisory Board Regulations.

As at the date of signing this Report on activity the powers of the Supervisory Board, in addition to the rights and obligations provided for by law, include resolutions on the following matters:

1) appointing and recalling the President of the Management Board in secret voting,
2) appointing and removing, in secret voting, Vice Presidents and other members of the Management Board of the Bank."
3) setting the terms of contracts governing employment relationships or other legal relationships between Management Board members and the Bank,
4) authorization for opening or closing branch offices abroad,
5) adoption of the Supervisory Board Regulations and approval of the following documents drafted by the Management Board:
    a. regulations of the Management Board of the Bank,
    b. rules for managing special funds set up with net profits,
6) prior authorization for transactions disposing of the Bank's fixed assets worth more than 1/10 of the Bank's share capital,
7) selection of an audit firm to audit or review financial statements,
8) authorization for recruitment and dismissal (after prior hearing) of the person heading the Audit Department and the person heading the compliance unit, at the request of the Bank's Management Board,
9) authorization for the Bank to enter into a material contract with a shareholder holding at least 5% of the total votes at the Bank or a related party of the Bank. Before granting its consent, the Supervisory Board must assess the impact of such a transaction on the Bank's interests, as well as whether there is a need to first seek the opinion of an external entity, which will prepare a valuation of the transaction and an analysis of its economic effects,
10) supervision over implementation of the Bank's management system and assessment of the adequacy and effectiveness of that system, including supervision over adoption of the risk management system and annual assessment of the adequacy and effectiveness of that system, and supervision over adoption of the internal control system and annual assessment of the adequacy and effectiveness of that system, including assessment of the adequacy and effectiveness of the control function, compliance unit and the Audit Department, and assessment of the effectiveness of compliance risk management at the Bank,
11) approval of the Bank's strategy as well as the rules of prudent and stable management of the Bank,
12) approval of the basic organizational structure of the Bank, aligned with the size and profile of the risk involved, and determined by the Bank's Management Board,
13) approval of the acceptable general risk level of the Bank,
14) approval of the Bank's compliance policy,
15) approval of the Bank's internal procedures for internal capital assessment, capital management and capital planning,
16) approval of the Bank's information policy,
17) approval of the internal control procedure,
18) approval of the remuneration policy,
19) approval of the risk management strategy and determination of the rules for reporting to the Supervisory Board on the types and volumes of risk in Bank's operations,
20) approval of the regulations for the compliance unit and the Audit Department,
21) approval of the criteria developed by the Management Board for assessing adequacy and effectiveness of internal control,
22) approval of the rules for classifying irregularities detected by internal control,
23) approval of the compliance unit's annual action plan,
24) approval of the principles of cooperation between the compliance unit and the Audit Department with corresponding units at the parent entity and subsidiaries,

25) approval of the rules for the annual reporting by the compliance unit on the fulfillment of its tasks to the Bank's Management Board and the Supervisory Board,

26) approval of the rules of cooperation between the Audit Department and the statutory auditor,

27) approval of the Audit Department's business strategy,

28) approval of the audit rules prepared by the Head of the Audit Department, which ensure objective performance of responsibilities by the Audit Department, and the rules for transferring employees from other organizational units to the Audit Department, improving qualifications, identifying the number of internal auditors with professional certification and periodic performance assessment of internal auditors,

29) approval of the remuneration of the Head of the Audit Department,

30) approval of the strategic (long-term) and operational (annual) audit plans and their revisions,

31) approval of the remuneration of the Head of the Compliance Department, the authority which may be assigned, by a resolution, to the Audit Committee,

32) authorization for every cooperation in audits between the Audit Department with the corresponding unit at the parent entity, the authority which may be assigned, by a resolution, to the Audit Committee,

33) approval of the rules for reporting by the Audit Department to the Management Board and the Supervisory Board,

34) approving the general rules for introducing changes to the organizational structure adopted by the Management Board,

35) approving the policy of identifying key functions in the Bank developed by the Management Board including the rules of appointment and dismissal of persons performing these functions,

36) approving the ethical principles adopted by the Management Board, defining norms and ethical standards of conduct of members of bodies and employees of the Bank, as well as other persons through whom the Bank conducts its business,

37) approving the conflict of interest management policy developed by the Management Board,

38) approving the principles of remuneration in the Bank developed by the Management Board,

39) approving the dividend policy of the Bank developed by the Management Board and specifying the conditions enabling the payment of dividends from the profit generated by the Bank within a specified period of time, taking into account the maintenance of capital at a level adequate to the risk incurred,

40) approving the risk culture principles developed by the Management Board, unless they are included in the risk management strategy, covering the whole Bank, based on a full understanding of the risk which the Bank is exposed to and the method of managing this risk, taking into account the adopted risk appetite,

41) approving a new product approval policy, developed by the Management Board, covering the development of new products, services and markets, and significant changes to the existing products, services and markets.

Based on the Banking Law Act, the Supervisory Board approves the internal division of responsibilities within the Management Board as well as the remuneration policy in effect at the Company.

The Supervisory Board also has the authority to suspend, for important reasons, individual or all members of the Management Board, as well as second Supervisory Board members to serve, temporarily for not more than three months, in the capacity of those Management Board members who have been recalled, submitted resignation or for other reasons are unable to serve.

Members of the Supervisory Board carry out their responsibilities in person. The Supervisory Board carries out its activities collegially, with each member of the Supervisory Board being entitled to receive information necessary to perform his/her responsibilities from the Management Board. The meetings of the Supervisory Board are held on a quarterly basis, as a minimum. The meetings of the Supervisory Board are convened by the Chairman of the Supervisory Board or, in his/her absence, by Vice Chairman of the Supervisory Board, on his own initiative or at a request of another Supervisory Board member or at a request of the Management Board of the Company. The Chairman of the Supervisory Board may set fixed dates for holding meetings of the Supervisory Board. The notice convening a meeting of the Supervisory Board (or its Committee), containing the date, time and place of the meeting, the agenda and materials to be discussed, as well as the method of using means of direct remote communication during the meeting, is sent by the Secretary to the Supervisory Board to its members (or members of the Board's Committees) by encrypted email or by courier or by registered mail, return receipt requested, at least 7 (seven) days before the date of the meeting.

The Supervisory Board annually adopts a resolution on the report on the activities of the Board, which includes in particular the elements indicated in Art. 382 § 3 (1) of the Act of 15 September 2000 – the Commercial Companies Code.

Members of the Supervisory Board may participate in the adoption of resolutions by casting their votes in writing through another member of the Supervisory Board. The Supervisory Board may adopt resolutions in writing or by means of direct remote communication.

Meetings of the Supervisory Board are chaired by its Chairman, and in his absence, the Vice Chairmen of the Supervisory Board, and in the absence of both, the Supervisory Board member elected by the other members.

Resolutions of the Supervisory Board are valid provided that at least one half of the members of the Supervisory Board are present at the meeting. Resolutions of the Supervisory Board are adopted by an absolute majority of votes. Without the consent of the majority of independent Supervisory Board members, no resolutions may be adopted on the following matters:

1) authorization for the Company to enter into any significant agreement with a shareholder holding at least 5% of the total number of votes in the Company or an entity related to the Company,

2) selection of an auditor company to audit or review the Company's financial statements.

Each member of the Supervisory Board has an obligation to immediately advise the remaining members of any existing conflict of interests and to refrain from taking part in a discussion and voting on a resolution on the matter involving such conflict.

The Supervisory Board adopts resolutions in an open vote, with the exception of appointment and recall, by a secret ballot, of the President of the Management Board, and appointment and recall, by a secret ballot, of Vice Presidents and other members of the Company Management Board. Chairman of the meeting may order voting by ballot on other matters, at his own initiative or at the request of a Supervisory Board member.

A resolution of the Supervisory Board is effective as of the date of its adoption unless it provides for a different effective date.

Minutes of Supervisory Board meetings will be drawn up, containing the elements indicated in the Regulations of the Supervisory Board. A list of Supervisory Board members present at the meeting and other persons participating in the meeting forms an attachment to the minutes. The minutes are signed by at least a Member of the Supervisory Board conducting the meeting or voting manager. Minutes of Supervisory Board meetings for the duration of its term are collected in a separate folder kept by the Company.

Supervisory Board meetings, except for those directly related to the Management Board, are attended by members of the Management Board. At the request of Supervisory Board Chairman or at the request of the Management Board of the Company, meetings may be attended by Company employees or persons from outside the Company relevant to the issue considered. During the Supervisory Board's consideration of issues related to the operation of internal control at the Company, the person heading the Audit Department may also take part in Supervisory Board meetings. In particularly justified circumstances, the Chairman of the Supervisory Board may order a meeting without the participation of persons who are not members of the Supervisory Board, even if the above provisions allow otherwise.

The independence criteria for members of the Supervisory Board indicated in § 14 sec. 4 of the Bank's Articles of Association, i.e. the independent Supervisory Board member shall be deemed the Supervisory Board member who:

1) is not the member of management board of the Bank, the Bank's dominant company or associated company with the Bank or with the Bank's dominant company with the meaning of the Commercial Companies Code (hereinafter: an associated company), and has not been in such a position for the previous five years;

2) is not an employee of the Bank or an associated company, and has not been in such a position for the previous three years;

3) is nor receiving any additional remuneration in a significant amount from the Bank or an associated company, apart from the remuneration received as a member of the Supervisory Board.

4) is not a shareholder holding a controlling interest in the Bank's parent company or does not represent the parent company in any way.

5) does not have, or has not had within the last twelve months, a significant business relationship with the Bank or an associated company, either directly or as a partner, shareholder, director or senior employee of a body having such a relationship. Business relationships include the situation of a significant supplier of goods or services (including financial, legal, advisory or consulting services), of a significant customer, and of organizations that receive significant contributions from the Bank or its group;

6) is not, or has not been within the last three years, a partner or employee of the present or former entity authorized to audit financial statements of the Bank or an associated company;

7) is not a member of the management board in another company in which the Management Board member of the Bank is a management board member or supervisory board member, and does not have other significant links with the Management Board members of the Bank through involvement in other companies or bodies;

8) has not served on the Supervisory Board for more than 12 years however, this period shall be calculated no earlier than from January 1, 2008;

9) is not a close family member of the Management Board member, or of persons in the situations referred to in points (1) to (8).

Three of out of eight members of the Supervisory Board meet the above-mentioned certain criteria of independence. Independence is confirmed on the basis of submitted statements.

In 2025, 9 meetings of the Supervisory Board were held. The following attendance was recorded at the meetings:
1) January 14, 2025 - 100%,
2) January 17, 2025 - 100%,
3) January 31, 2025 - 100%,
4) March 11-20, 2025 - 100%,
5) May 20, 2025 - 100%
6) May 29, 2025 – 87.6% (Mrs. Anna Rulkiewicz was absent),
7) September 18, 2025 - 100%,
8) October 30, 2025 - 100%,
9) December 3, 2025 - 100%.

Supervisory Board Committees

Supervisory Board Permanent Committees are:

1) Audit Committee;

2) Nomination and Remuneration Committee;

3) Risk and Capital Committee.

The Supervisory Board has the right to adopt a resolution on the appointment of committees other than those specified above and composed exclusively of members of the Supervisory Board.

In 2003 the Supervisory Board appointed the **Strategy and Management Committee** responsible mainly for ongoing analyses of all issues related to the activities performed by the Bank's governing bodies as well as the streamlining of their functioning. As at the December 31, 2025 the Committee was composed of: Sławomir S. Sikora acting as Chair, Marek Kapuściński acting as Vice-Chair, Natalia Bożek, Fabio Lisanti, Andras Reiniger, Anna Rulkiewicz and Barbara Smalska acting as Committee members. In accordance with the adopted Regulations the competences of the Committee include the following matters:

1) conducting ongoing analysis of issues related to the work of the Bank's bodies and the improvement of their functioning,

2) submitting recommendations to the Supervisory Board in the area of the Bank's operating strategy, including the analysis of events and circumstances relevant to the assessment of the Bank's situation and management of the Bank,

3) periodic monitoring of the implementation of the Bank's operating strategy (at least once a year) and the most important related issues,

4) monitoring whether the Bank's operating strategy is implemented in a coherent manner, and the achievement of strategic goals is in line with the Bank's long-term financial interest, including the need to meet prudential requirements in terms of own funds and liquidity,

5) indicating the areas of the Bank's operations, the monitoring of which will be of particular interest to the Committee,

6) supervising the implementation of the adopted strategy of the Bank's operations and recommending to the Management Board of the Bank the directions of activities aimed at its implementation in the event of any deviations from the adopted strategy of the Bank's operations,

7) recommending approval or refusal to approve the Bank's operating strategy by the Supervisory Board or presenting proposals to amend the binding strategy,

8) analysis of the assumptions for the financial plan and getting acquainted with periodic information on the implementation of the financial plan.

In 2025, 2 meetings of the Committee were held. The following attendance was recorded at the meetings:
1) March 19, 2025 – 100%,
2) September 17,2025 – 85.7% (Mr. Fabio Lisanti was absent).

Audit Committee

As at December 31, 2025, the Audit Committee was composed of the following members:

1) Barbara Smalska - Chairman of the Committee;
2) Natalia Bożek – Vice Chairman of the Committee;
3) Anna Rulkiewicz – Member of the Committee;

The Audit Committee is a permanent committee of the Supervisory Board. In 2025,4 meetings of the Committee were held. The following attendance was recorded at the meetings:
1) March 11-20, 2025 – 100%,
2) May 25, 2025 – 100%,
3) September 16, 2025 – 100%
4) December 3,2025 – 100%.

The authority and responsibilities of the Audit Committee in 2024 included among others monitoring of financial reporting and sustainability reporting process, monitoring of the effectiveness of: internal control and risk management systems and internal audit, monitoring of audit activities and controlling and monitoring of the independence of the statutory auditor and the entity authorized to audit financial statements.

The Audit Committee acted in accordance with the "Policy for selection an audit company to conduct the audit of the financial statements and to conduct the assurance of the sustainability reporting of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A.", "Policy governing provision by the audit company auditing annual financial statements or assuring of sustainability reporting, entities affiliated with that audit company and by any member of the audit company's network of permitted services other than audit or assurance of sustainability reporting of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A." and the "Procedure for selection of an audit company to conduct the audit of the financial statements and to conduct the limited assurance of the sustainability reporting of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A.". The Audit Committee also presented to the Supervisory Board recommendations indicating the audit company to which it proposes to entrust the audit and review of the financial statements and limited assurance of sustainability reporting in accordance with the policies referred to above.

In exercising its powers and duties, the Committee also follows the guidelines contained in the "Recommendations on the functioning of the Audit Committee" issued by the Office of the Polish Financial Supervision Authority.

In 2025 the competences of the Committee in the scope of monitoring the performance of financial audit activities, in particular the audit and review of the financial statements and assurance of sustainability reporting by the audit firm, taking into account all conclusions and findings of the Polish Audit Oversight Agency resulting from the control carried out in the audit firm, included in particular:

1) recommending the Supervisory Board of the audit company to audit and review the Bank's financial statements,
2) recommending the Supervisory Board of the audit company to provide limited assurance of sustainability reporting,
3) monitoring the independence of the audit firm and the independence of the statutory auditor performing financial audit activities, as well as confirming with the management of the Bank (the Management Board, Audit Department or Compliance Division) that no information has been identified that would indicate the lack of independence of the audit firm, the key statutory auditor and persons participating in in a research,
4) recommending the termination of the contract with the audit firm, in situations justified by extraordinary circumstances, as well as examining the issues that constitute the reason for resignation from the services of the audit firm (statutory auditor).

Additionally, Regulations of the Audit Committee were supplemented on January 2, 2025 with tasks in the area of sustainability reporting resulting from the Act of 6 December 2024 amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision and certain other acts („Act").

Members of the Committee exercise their powers on the basis of Article 390(1) § 1 section 2 of the Code of Commercial Companies and Act of statutory auditors, audit firms and public supervision dated 11 May 2017. The Committee submits annual reports on its activities to the Supervisory Board. A report for each successive calendar year is submitted by the end of the first quarter of the following year. The reports are made available to shareholders through publication on the Bank's website. At the next following meeting of the Supervisory Board, the Committee reports to the Supervisory Board on each of the Committee meetings and the Committee's recommendations discussed at its meetings.

The Audit Committee is composed of three or more Supervisory Board members appointed by the Supervisory Board. The majority of members of the Audit Committee, including its Chairman, are independent within the meaning of Article 129(3) of the Act of May 11, 2017 on auditors, audit firms and public supervision. The Chairman of the Audit Committee also meets independence criteria set out in § 14(4) of the Charter. Members of the Audit Committee have knowledge and skills related to the financial sector. This condition is considered met if at least one member of the

Audit Committee has knowledge and skills related to that sector or particular members have knowledge and skills related to that sector in determined scopes. At least one member of the Audit Committee has knowledge and skills related to accounting or audit of financial statements.

Members of the Audit Committee who meet the statutory independence criteria are: Barbara Smalska and Anna Rulkiewicz.

The following members of the Audit Committee have knowledge and skills related to accounting or audit of financial statements:

1) Barbara Smalska – has practical professional experience gained over many years at managerial positions in the PZU Group, including: Vice President of the Management Board of Alior Bank S.A., Chairperson, and previously an independent member of the Supervisory Board of Link4 TU S.A., a Member of the Supervisory Board of PTE PZU S.A., a Member of the Management Board of PZU S.A. and PZU Życie S.A. and recently a Principal at The Boston Consulting Group's Warsaw offices,
2) Natalia Bożek - has many years of practical professional experience gained in various managerial positions. Among other things, she held the position of Vice President of the Management Board of Bank Handlowy S.A. responsible for supervising the Financial Management Sector. Ms. Natalia Bożek holds a Master's degree from the Business and Administration University in Warsaw.
3) Anna Rulkiewicz - completed the Stanford Executive Program at the Stanford University's Graduate School of Business.

The following members of the Audit Committee have the knowledge and skills in the field of banking and finance, i.e. sector e in which the Company operates:

1) Barbara Smalska – due to her practical professional experience gained over many years at managerial positions in the PZU Group, including: Vice President of the Management Board of Alior Bank S.A., Chairperson, and previously an independent member of the Supervisory Board of Link4 TU S.A., a Member of the Supervisory Board of PTE PZU S.A., a Member of the Management Board of PZU S.A. and PZU Życie S.A. and recently a Principal at The Boston Consulting Group's Warsaw offices,
2) Natalia Bożek - due to her education and many years of practical professional experience gathered in managerial positions;
3) Anna Rulkiewicz – due to her educational training and practical professional experience gained over many years at managerial positions at the Lux Med Group, where she began as a Member of the Management Board, Sales and Marketing Director, and in 2007 she was appointed as the President of the LUX MED Group, and at her position as the Managing Director of LMG Försäkrings AB, whose branch operates in Poland under the name LUX MED Ubezpieczenia (insurance), and President of the Management Board of the Association of Private Medicine Employers (Związek Pracodawców Medycyny Prywatnej).

Meetings of the Audit Committee are convened by the Committee Chairman at his own initiative, at the request of a Committee member or Supervisory Board Chairman. If for any reason the Committee Chairman is unable to convene a meeting, it will be convened by the Deputy Chairman. Meetings are also convened at the request of a Committee member or the Supervisory Board Chairman.

A notice convening a meeting, setting out the agenda and materials for the meeting, are sent to members of the Audit Committee by the Committee Secretary who is the Secretary of the Supervisory Board. Meetings of the Audit Committee are held at least four times a year, on the dates set by the Chairman in consultation with the Deputy Chairman of the Committee.

The Audit Committee meets:

1) with the Head of the Audit Department without participation of the Company's management;
2) with the certified auditor of the Company without participation of the Company's management;

The Audit Committee may also meet:

1) by its own.
2) at its discretion, with individual members of the Company's management.

The agenda of the Audit Committee's meeting includes fixed items as well as matters considered on request. The list of fixed items considered at Committee meetings is determined by a resolution of the Committee. The Supervisory Board and individual members of the Committee and other members of the Supervisory Board, Management Board of the Company and Members of the Management Board of the Company have the right to put forward matters at Committee meetings.

The Secretary of the Audit Committee, on the basis of materials received, prepares a draft agenda of the meeting together with a list of invitees, and forwards it to the Committee Chairman and Deputy Chairman for approval. The draft agenda accepted by the Committee Chairman and Deputy Chairman is then forwarded, along with the materials, to Committee members.

All members of the Audit Committee are obliged to participate in the meeting of the Committee. The Committee member who is unable to attend a meeting should notify the Committee Secretary seven days before the fixed date of the meeting. The Committee may seek the advice of advisers and invite Company employees or other persons to its

meetings to discuss or examine matters raised by the Committee. Persons invited by the Committee Chairman and, in particular, the persons who refer individual items on the agenda take part in the Committee meeting or its relevant part When issues related to the internal control system are the subject of the meeting, the Head of the Compliance Unit and the Head of the Audit Department shall participate.

The Chairman of the Audit Committee chairs Committee meetings. If the Chairman of the Committee is not present, the meeting is chaired by the Deputy Chairman of the Committee. The Committee Chairman may, in consultation with the Deputy Chairman, decide to remove an item from the agenda, in particular in order to rectify a motion or to obtain an opinion.

Resolutions of the Audit Committee are adopted by the absolute majority of votes of the members of the Committee present at the meeting.

The Chairman of the Audit Committee may, in consultation with the Deputy Chairman, decide to consider a matter in writing.

Nomination and Remuneration Committee

As at December 31, 2025 The Nomination and Remuneration Committee was composed of:

1) Anna Rulkiewicz – Chairman of the Committee;
2) Natalia Bożek – Vice Chairperson of the Committee;
3) Marek Kapuściński - Member of the Committee;
4) Sławomir S. Sikora – Member of the Committee;
5) Barbara Smalska – Member of the Committee.

The Nomination and Remuneration Committee is a permanent committee of the Supervisory Board.

In 2025,7 meetings of the Committee were held. The following attendance was recorded at the meetings:

1) January 11, 2025 – 100%
2) March 19, 2025 - 80% (Mr. Marek Kapuściński was absent)
3) May 29, 2025 - 80% (Mrs. Anna Rulkiewicz was absent)
4) August 28, 2025 - 80% (Mrs. Natalia Bożek was absent)
5) September 17, 2025 – 100%
6) October 30, 2025 – 100%
7) December 3, 2025 – 100%

The Nomination and Remuneration Committee is the Supervisory Board’s advisory body, and its members exercise their authority on the basis of Article 390(1) § 1 section 2 of the Code of Commercial Companies, Articles 9cb and 9cd of the Act of 29 August 1997 – Banking Law and Regulation of the Minister of Finance of 7 May 2018 on the specific scope of tasks of the nomination committee at significant banks. The Committee submits annual reports on its activities to the Supervisory Board. A report for each successive calendar year is submitted by the end of the first quarter of the following year. The reports are made available to shareholders through publication on the Bank's website. At the next following meeting of the Supervisory Board, the Committee reports to the Supervisory Board on each of the Committee meetings and the Committee's recommendations discussed at its meetings.

The Nomination and Remuneration Committee has, among others, the authority to:

1) review and monitor the remuneration policies adopted at the Bank and support the Bank authorities in supervising, shaping and implementing those policies, their validity, consistency with the practice and processes in place at the Bank and their impact on the Bank's risk profile,
2) assess the mechanisms and systems in place at the Bank in order to ensure that the remuneration policy adopted at the Bank takes into account all types of risk, and liquidity and capital levels, complies with the principles of, and supports sound and effective risk management, and is consistent with the Bank's strategy, objectives, corporate culture and values as well as long-term interests of the Bank, including assessment of the need to adjust remunerations for ex-post risk,
3) analyze possible scenarios to examine how the remuneration policies adopted at the Bank and the remuneration practice respond to external and internal events, and perform back-testing of the criteria used to determine remuneration levels and to adjust remunerations for ex-ante risk on the basis of actual risk-based results,
4) recommend candidates for the Management Board, taking into account the necessary knowledge, competence and experience of the Management Board as a whole, that are necessary to manage the Bank, and ensuring diversity on the Management Board,

5) identify the scope of duties for a candidate to the Management Board, as well as the requirements in terms of knowledge and competence, and the expected time commitment necessary to serve in that capacity,

6) identify the target representation of the gender underrepresented on the Management Board and develop a policy of diversity on the Management Board with the aim of achieving that target,

7) make periodic evaluation, at least once a year, of the structure, size, composition and effectiveness of the Management Board and recommend changes in that regard to the Supervisory Board,

8) make periodic evaluation, at least once a year, of the knowledge, competence and experience of the Management Board as a whole and of individual Management Board members, and inform the Management Board of the evaluation results,

9) review periodically the Management Board's policy on selection and appointment of Bank managers and present recommendations in that regard to the Management Board,

10) assess, based on market conditions, the remunerations received by members of the Management Board,

11) assess the remuneration paid to members of the Bank's Management Board as compared to their duties and performance;

12) submit recommendations for remuneration of Management Board members to the Supervisory Board, each time prior to its determination or revision,

13) review and monitor variable remuneration components of the persons whose professional activities have a significant impact on the Bank's risk profile, including in particular those responsible for risk management, management of the compliance unit, management of the internal audit unit, and key persons, as identified in the Employee Remuneration Policy of Bank Handlowy w Warszawie S.A.,

14) make a preliminary assessment of the qualifications of candidates for members of the Supervisory Board selected from among a sufficiently wide group of potential candidates, taking into account diversity in the composition of the Supervisory Board, the necessary knowledge, competences and experience of individual candidates and the Supervisory Board as a whole, and prepare recommendations for their selection,

15) perform a preliminary assessment of the qualifications of members of the Supervisory Board taking into account diversity in the composition of the Supervisory Board, the necessary knowledge, competences and experience of individual Supervisory Board members and the Supervisory Board as a whole, and make recommendations when a reassessment is required. The Committee adopts the Management Board diversity policy, taking into account a wide range of characteristics and competences required from persons serving as members of the Management Board.

The Committee adopts the Management Board diversity policy, taking into account a wide range of characteristics and competences required from persons serving as members of the Management Board.

The Committee consists of at least three members of the Supervisory Board. Most members of the Committee, including its Chairman, meet the independence criterion set out in § 14(4) of the Articles of Association of Bank Handlowy w Warszawie S.A.

Meetings of the Nomination and Remuneration Committee are convened by the Committee Chairman at his own initiative or, if the Committee Chairman is unable to do so for any reason, by the Deputy Chairman. Meetings are also convened at the request of a Committee member or the Supervisory Board Chairman. Committee meetings are held at least twice a year, on the dates set by the Committee Chairman. The agenda of the Nomination and Remuneration Committee's meeting includes fixed items as well as matters considered on request.

The Secretary of the Nomination and Remuneration Committee, on the basis of materials received, prepares a draft agenda of the meeting together with a list of invitees, and forwards it to the Committee Chairman for approval.

Meetings of the Nomination and Remuneration Committee must be attended by all its members. The Committee member who is unable to attend a meeting should notify the Committee Secretary seven days before the fixed date of the meeting. The Committee may make use of external experts. In case of cooperation with an external expert, the Committee shall review the appointment of such experts. A meeting of the Committee or an appropriate part of a meeting is attended by persons invited by the Chairman of the Committee and especially persons who are to present particular matters.

Resolutions of the Nomination and Remuneration Committee are adopted by the absolute majority of votes of the members of the Committee present at the meeting.

The Chairman of the Nomination and Remuneration Committee may decide that a given matter will be resolved in circulation mode.

A member of the Nomination and Remuneration Committee who votes against may request that his dissension be recorded in the minutes.

Minutes are taken of meetings of the Nomination and Remuneration Committee. The minutes of the meeting of the Committee is approved by the members of the Committee at the next meeting of the Committee.

Risk and Capital Committee

The Risk and Capital Committee is composed of:

1) Marek Kapuściński– Chairman of the Committee;
2) Andras Reiniger – Vice Chairman of the Committee;
3) Barbara Smalska - Member of the Committee;

The Risk and Capital Committee is a permanent committee of the Supervisory Board.

In 2025, 4 meetings of the Committee were held. The following attendance was recorded at the meetings:

1) March 19, 2025 – 66.7%, Mr. Marek Kapuściński was absent
2) May 28, 2025 - 100%
3) September 16, 2025 – 100%
4) December 2, 2025 – 100%

Members of the Committee have the powers as set out in the Regulations under Article 390(1) § 1 section 2 of the Code of Commercial Companies and Article 9cb of the Banking Law Act of 29 August 1997. The Committee submits annual reports on its activities to the Supervisory Board. A report for each successive calendar year is submitted by the end of the first quarter of the following year. The reports are made available to shareholders through publication on the Bank's website and at the Bank's office. At the next following meeting of the Supervisory Board, the Committee reports to the Supervisory Board on each of the Committee meetings and the Committee's recommendations discussed at its meetings. The Committee's Regulations are made available on the Bank's website and at the Bank's office.

The Committee has the authority to ongoing monitoring of the risk management system and to supervise the process of estimating internal capital and capital management.

The Risk and Capital Committee consists of at least three Supervisory Board members, one of whom acts as the Committee's Chairperson. Most members of the Committee, including its Chairman, meet the independence criterion set out in § 14(4) of the Articles of Association of Bank Handlowy w Warszawie S.A. In order for the Committee's resolutions to be valid, at least three of its members must attend the meeting.

Committee meetings are convened by the Committee Chairman at his own initiative or at the request of a Committee member. If for any reason the Committee Chairman is unable to convene a meeting, it will be convened by the Deputy Chairman. Meetings are also convened at the request of the Supervisory Board Chairman.

Committee meetings are held at least every six months, on the dates set by the Chairman in consultation with the Deputy Chairman of the Committee.

A notice convening a meeting, setting out the agenda and materials for the meeting, are sent to members of the Committee by the Committee Secretary who is the Secretary of the Supervisory Board. Notice should include the agenda and materials on the topics to be discussed at the meeting. The agenda of the Committee's meeting includes fixed items as well as matters considered on request. The Supervisory Board and individual members of the Committee and other members of the Supervisory Board have the right to put forward matters at Committee meetings.

All members of the Committee are obliged to participate in the meeting of the Committee.

The Committee may seek the advice of advisers and invite Bank employees or other persons to its meetings to discuss or examine matters raised by the Committee.

Persons invited by the Committee Chairman or Deputy Chairman take part in the Committee meeting or its relevant part.

The Committee Chairman chairs Committee meetings. If the Chairman of the Committee is not present, the meeting is chaired by the Deputy Chairman of the Committee.

Resolutions of the Committee are adopted by the absolute majority of votes of the members of the Committee present at the meeting. The Committee Chairman may, in consultation with the Deputy Chairman, decide to consider a matter in writing.

The minutes of a meeting of the Committee shall be prepared.

12. Diversity Policy

In its operations, Bank Handlowy w Warszawie S.A. applies solutions based on diversity which is the hallmark of Citi's corporate culture and its philosophy.

The strategy of Bank Handlowy w Warszawie S.A. for diversity integration consists in promoting a culture which attracts the best of the best, in which people are promoted for their competencies and skills, in which other people are appreciated and mutual respect is expected, and in which development opportunities are available to everyone - regardless of differences.

Our diversity initiatives apply to three levels:

- To individuals - the Bank creates space for employees and encourages to take responsibility for their own careers and personal development to achieve their full potential regardless of gender, religion, race, ethnicity, nationality or sexual orientation.
- To teams - the Bank strives to ensure an atmosphere of respect in which diverse teams utilize a wide range of perspectives, skills, experiences and approaches.
- To the organization - embracing everything that employees have to offer, the diversity strategy positions the Bank as an employer of choice.

Utilizing various perspectives and enabling employees to develop their skills, Bank focuses on growth and innovation for its clients and employees, following the principle that each individual contributes to the value of whatever we develop together.

In its employment policy, the Bank strongly supports diversity, and being committed to talent development it takes on career and development of female employees who manage vital organizational units in Citi Handlowy. As a result of internal and external recruitment, the Bank employed a total of 61% women compared to 39% men in 2025. A good practice used by the Bank in recruitment processes for senior specialist and managerial positions is to ensure diversity among the candidates considered.

The Bank's business variety and specific needs determine directions and requirements concerning professional knowledge necessary to preserve best quality services for, be it, an internal or external client.

The Bank ensures support for employee initiatives and commitment to others and to our organization. An example of such support are organizations which bring together the Bank's employees involved in different types of activities. In 2024, CitiWomen, CitiPride and Families Matter were very active at the Bank. The Bank also has CitiClub and CitiDisability.

In 2020, the Bank's Management Board decided to introduce additional 2 weeks of paternity leave. From January 2021, Bank Handlowy employees are entitled to four weeks of paternity leave, subject to the laws and legal requirements in force in Poland. We believe that this new minimum standard of paternity leave will bring greater benefits than the current labor market standards and will allow our employees to find time to adapt to their role and build a bond with the new family member. From January 2021, all eligible biological and adoptive fathers are entitled to paternity leave.

When building its remuneration policy, the Bank hinges it on the best market practices taking into consideration corporate governance requirements, market trends and the organization's standing and potential.

When defining remuneration the Bank refers to experience and competence required for a given job position, performance, present remuneration, and position juxtaposed with a new group of employees on the market. Based on such information a new level of remuneration is defined.

Levels of remuneration are reviewed on a regular basis annually, taking into account the employee's annual assessment, his or her skills and scope of responsibilities juxtaposed with data obtained from market research concerning the level of remuneration in the industry.

Women and men in equivalent positions are remunerated in accordance with their competences, at a comparable level - the remuneration of women employed at Citi Handlowy is comparable to the remuneration* of men. The gender pay gap in adjusted terms (i.e. at the same grade level, location and job family) in 2025 was:

- 1.72% for total remuneration (i.e. women's average remuneration was 98.28% of men's average remuneration),
- 1.80% for base salary (i.e. women's average remuneration was 98.20% of men's remuneration).

The pay gap for total remuneration between women and men in unadjusted terms (i.e. arithmetic mean for women vs. arithmetic mean for men, regardless of place in the organizational structure) was in 2025: 35.92% (i.e. women's average remuneration was 64.08% of men's average remuneration).

*total remuneration for 2025 understood as the annualized average income of employees for 2025 employed as of 31/12/2025, converted to full-time equivalent, excluding employees employed after 1 October 2025 (i.e. persons recruited three months before the end of the year for which variable remuneration was awarded), persons employed for <0.2 full-time positions (so-called technical positions) and employees not working for at least three consecutive months in 2025 with an absence lasting as of December 31, 2025. The basic remuneration for 2025 was determined by annulling the December remuneration of employees, previously adjusted to the full-time equivalent level.

Concerned about the life situation of its employees, Citi Handlowy provides a wide range of additional benefits, which make up one of the richest offer on the market.

The Bank strives to be a company which draws the best talent, hires and promotes employees based on performance and makes growth opportunities widely available. The aim is to create a workplace where responsible finance is practiced, where employees treat each other with due respect and dignity, and may count on support to preserve a balance between work and private life. The Bank adheres to the principles of equality in recruitment and respects the provisions of law on fair employment practices and anti-discrimination.

The Bank takes preventive actions to counteract discrimination, consisting of a range of educational activities aimed at raising awareness as regards discrimination, unequal treatment, mobbing and actions which can bring about proper organizational climate favorable to the fair play principle at work place (primary prevention).

A dialogue with employees is an important part of the Group's activity. Every employee has access to an internal intranet network, where he or she can find the latest information concerning all the Bank's areas of operation. The most crucial information concerning the Bank and changes which take place in the organization is sent directly to the employees' inboxes.

Senior management organizes special meetings with employees called Town Halls. At such meetings the most crucial information is provided concerning particular business areas, the Bank's financial results as well as information on new products or organizational changes. Every employee can ask directly the hosting Member of the Management Board and invited guests questions. Town hall meetings are held in a hybrid form, giving the opportunity for direct contact, meeting and conversation over coffee at the Bank's locations and enabling remote participation of those employees who work outside the office on that day.

2025 Bank continued building organizational culture focused on the employees and their development. The goal of the people-oriented strategy is to strengthen employee engagement and improve their working conditions by taking actions and implementing projects facilitating their work and communication. In January 2025, the Bank implemented the "Talent Cohort" project, which aimed to strengthen the leadership competencies and develop a dozen employees selected from among the Bank's talent pool. Sponsored by the Bank's CEO, the project engaged employees in strategically important business projects. Employees implemented projects outside their core competencies, under the guidance of experienced top management from the bank, developing their professional competencies, building a network of contacts within the global Citi organization, and gaining exposure to Citi's top management.

2025 was a very active year for development activities and communication with Consumer Banking employees, following the decision to sell the retail business announced in May 2025. Activities for Consumer Banking employees focused on:

- supporting managers in the change management process and developing their leadership skills
- communication with employees through regular Town Halls, Q&A sessions, and dedicated meetings with managers and HR.

X. Other information about the authorities of Bank Handlowy w Warszawie S.A. and corporate governance rules

1. Information regarding the remuneration policy

The Bank Handlowy Group has in place “Remuneration Policy for Members of the Management Board and Members of the Supervisory Board of Bank Handlowy w Warszawie S.A.”, “Employee Remuneration Policy of Bank Handlowy w Warszawie S.A.” (adopted on 22 December 2017, as amended) and the and "Transaction Award Policy" (adopted on 16 June 2021, as amended), hereinafter referred to as the “Remuneration Policy”, and also the “Remuneration policy for persons whose professional activity significantly influences the risk profile of Bank Handlowy w Warszawie S.A.” (adopted on 22 December 2017, as amended), hereinafter referred to as the “Authorized Persons Remuneration Policy”, which replaced previous policies in this area.

Remuneration policy for Members of the Management Board and Members of the Supervisory Board of Bank Handlowy w Warszawie S.A. defines the rules of remunerating Members of the Management Board and Supervisory Board of the Bank, supporting implementation of the Bank's strategy, effective risk management, long-term interests and stability of the Bank. The Remuneration Policy lays down the rules adopted at the Bank for remunerating other employees, including Key Personnel, and is intended, among other things, to combine remuneration practices, structures and decisions with the interests of shareholders and to effectively manage risk by encouraging prudent decision-making. The Group’s philosophy of remunerating assumes differentiation of the remuneration of individual employees based on financial or non-financial criteria, such as risk-taking approach and compliance with regulations, in order to reflect their input and to complement effective risk control mechanisms by containing the incentive to take unreasonable risks to the Group and its operations, and by rewarding thoughtful balance between risks and returns.

According to that philosophy, the variable remuneration of people covered by the “Authorized Persons Remuneration Policy" depends on both short-term and long-term assessment of individual performance and financial results of the Bank or DMBH or the relevant organizational unit, respectively, while the persons serving in control roles are not evaluated for the performance of their supervised units. Work performance assessment in the Bank is made on the basis of data for three financial years, which encompasses economic cycles and risks involved in the business activity pursued by the Group.

Eligibility for individual payments of deferred variable remuneration must be each time approved by the Supervisory Board - in relation to the Management Board and by the Management Board - in relation to other employees. At least 50% of variable remuneration should be awarded in the form of non-monetary instruments the value of which depends strictly on the financial performance of the Bank. Until 2022 this condition was met by the phantom shares adopted by the Group, whose value will fluctuate depending on the market value of the Bank's shares. The remaining portion of the variable remuneration is a monetary bonus, with interest accruing on the deferred portion of the bonus for the period between granting and payment of that remuneration component. The Bank has made changes to the structure of deferred variable remuneration. From the 2022 annual award onwards, all deferred variable remuneration is conditionally awarded in a financial instrument.

In 2022, the Remuneration Policy and the Eligible Persons Remuneration Policy were amended to include the possibility to pay the remuneration granted in a financial instrument in the form of existing shares in the Bank's share capital to the persons indicated in the aforementioned documents. The assumption for the amended Remuneration Policies is that the Bank transfers to the Eligible Persons its own shares previously purchased by the Bank.

On 7 November 2022, the Bank's Management Board amended the remuneration policies by way of a resolution and, subsequently, on 14 November 2022, those amendments were approved by the Bank's Supervisory Board. On 16 December 2022, the Extraordinary General Meeting of Shareholders decided to implement incentive programs based on the Bank's shares and authorized the Management Board of the Bank to purchase the Bank's own shares over a period of 3 years (from December 16, 2022), a total of no more than 850,000 shares of the Bank, representing a total of no more than 0.65% of the total number of votes at the General Meeting of the Bank. The Extraordinary General Meeting also established a reserve capital to finance the purchase of own shares in the amount of PLN 50 million.

On February 14, 2025, the Bank received the decision of the Polish Financial Supervision Authority dated February 13, 2025, in which the Authority granted the Bank a permit referred to in Art. 77 and art. 78 section 1 of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No. 648/2012, covering the acquisition of own shares by the Bank. The above-mentioned authorization from the Polish Financial Supervision Authority allowed the Bank to continue purchasing its own shares for the purpose of offering them to employees in 2025. On June 27, 2025, the Annual General Meeting decided to launch another round of the Bank's share-based incentive programs.

In the event that the Bank is unable to transfer a sufficient number of own shares in relation to the number necessary to be issued to Eligible Persons, the adopted amendments to the Policies allow for the continued remuneration of certain Eligible Persons based on phantom shares or, depending on the situation and the Bank's decision, based on phantom shares and shares in the Bank's share capital.

The right to each tranche of a deferred award will vest depending on the Bank's results in the calendar year immediately preceding the vesting date for that tranche and other conditions specified in the Eligible Persons Remuneration Policy.

An Authorized Persons Remuneration Policy is described in more detail in the Report on capital adequacy, risk and remuneration policy of the Bank Handlowy w Warszawie S.A. Group as of 31 December 2025.

In 2025 The Supervisory Board of the Bank positively assessed functioning of the Remuneration Policy applied in Bank Handlowy w Warszawie S.A.

2. Salaries and awards, including bonuses from profit, paid to persons managing and supervising the Bank

The tables below present fixed and variable remuneration: cash and capital for members of the Bank's Management Board, as well as total remuneration for the Bank's Supervisory Board paid in 2025.

The table below presents the amount of fixed remuneration components (in PLN thousand) paid to the members of the Bank's Management Board in 2025.

		Base salary	Other benefits
Elżbieta Światopełk-Czetwertyńska		2,784	291
Maciej Kropidłowski		2,750	316
Barbara Sobala		1,035	91
Patrycjusz Wójcik		1,035	113
Andrzej Wilk		1,440	169
Tomasz Dziurzyński	- from 01.06.2025	604	51
Sebastian Perczak	- from 01.12.2025	106	10
Former members of the Management Board			
Ivan Vrhel	- to 30.11.2025	1,018	583
Katarzyna Majewska	- to 31.05.2025	431	449
Natalia Bożek	- to 31.01.2024	0	26
Dennis Hussey	- to 30.06.2022	0	0
James Foley	- to 28.02.2022	0	0
Sławomir S. Sikora	- to 17.06.2021	0	41
		11,203	**2,140**

The table below presents the amount of fixed remuneration components (in PLN thousand) paid to the members of the Bank's Management Board in 2024.

		Base salary	Other benefits
Elżbieta Światopełk-Czetwertyńska		2,784	326
Maciej Kropidłowski		2,750	457
Barbara Sobala		1,035	156
Patrycjusz Wójcik	- from 1.02.2024	949	98
Katarzyna Majewska		1,035	142
Ivan Vrhel		1,110	450
Andrzej Wilk		1,440	166
Former members of the Management Board			
Natalia Bożek	- to 31.01.2024	86	49
Dennis Hussey	- to 30.06.2022	0	0
James Foley	- to 28.02.2022	0	0
Sławomir S. Sikora	- to 17.06.2021	0	56
		11,189	**1,899**

The table below presents the amount of variable remuneration components in the form of cash awards (in PLN thousand) paid in 2025 to the members of the Bank's Management Board.

		Cash awards for years:					
		2024	2023	2022	2021	2020	2019
Elżbieta Światopełk-Czetwertyńska		628	0	0	36	0	0
Maciej Kropidłowski		854	0	0	234	0	0
Barbara Sobala		211	0	0	29	0	0
Patrycjusz Wójcik		120	0	0	13	0	0
Andrzej Wilk		510	0	0	13	0	0
Tomasz Dziurzyński		0	0	0	0	0	0
Sebastian Perczak		0	0	0	0	0	0
Former members of the Management Board							
Ivan Vrhel	- to 30.11.2025	231	0	0	0	0	0
Katarzyna Majewska	- to 31.05.2025	183	0	0	26	0	0
Natalia Bożek	- to 30.01.2024	90	0	0	20	0	0
Dennis Hussey	- to 30.06.2022	0	0	0	86	0	0
James Foley	- to 28.02.2022	0	0	0	49	0	0
Sławomir S. Sikora	- to 17.06.2021	0	0	0	0	161	159
		2,828	**0**	**0**	**506**	**161**	**159**

The table below presents the amount of variable remuneration components in the form of cash awards (in PLN thousand) paid in 2024 to the members of the Bank's Management Board.

		Cash awards for years:					
		2023	2022	2021	2020	2019	2018
Elżbieta Światopełk-Czetwertyńska		598	0	35	0	0	0
Maciej Kropidłowski		1,019	0	229	277	0	0
Barbara Sobala		197	0	28	40	0	0
Patrycjusz Wójcik		0	0	13	17	0	0
Katarzyna Majewska		171	0	25	33	0	0
Andrzej Wilk		450	0	13	16	0	0
Ivan Vrhel		210	0	0	0	0	0
Former members of the Management Board							
Natalia Bożek	- to 30.01.2024	137	0	20	26	0	0
Dennis Hussey	- to 30.06.2022	0	0	85	99	0	0
James Foley	- to 28.02.2022	0	0	48	81	0	0
Sławomir S. Sikora	- to 17.06.2021	0	0	0	158	156	162
		2,783	**0**	**496**	**746**	**156**	**162**

The table below presents the amount of the variable remuneration components in the form of capital awards (in PLN thousand) paid in 2025 to the members of the Bank's Management Board.

		Capital rewards for the years:					
		2023	2022	2021	2020	2019	2018
Elżbieta Światopełk-Czetwertyńska		620	452	63	0	0	0
Maciej Kropidłowski		1,056	761	410	0	0	0
Barbara Sobala		202	78	54	0	0	0
Patrycjusz Wójcik		27	40	24	0	0	0
Andrzej Wilk		466	106	19	0	0	0
Tomasz Dziurzyński		0	0	0	0	0	0
Sebastian Perczak		0	0	0	0	0	0
Former members of the Management Board							
Ivan Vrhel	- to 30.11.2025	218	0	0	0	0	0
Katarzyna Majewska	- to 31.05.2025	178	71	48	0	0	0
Natalia Bożek	- to 30.01.2024	153	63	38	0	0	0
Dennis Hussey	- to 30.06.2022	0	0	162	0	0	0
James Foley	- to 28.02.2022	0	0	92	0	0	0
Sławomir S. Sikora	- to 17.06.2021	0	0	0	419	261	188
		2,919	**1,571**	**911**	**419**	**261**	**188**

The table below presents the amount of the variable remuneration components in the form of capital awards (in PLN thousand) paid in 2024 to the members of the Bank's Management Board.

		Capital rewards for the years:					
		2023	2022	2021	2020	2019	2018
Elżbieta Światopełk-Czetwertyńska		0	782	60	0	0	0
Maciej Kropidłowski		0	1,319	395	927	0	0
Barbara Sobala		0	310	49	133	0	0
Patrycjusz Wójcik		73	36	24	57	0	0
Katarzyna Majewska		0	278	43	110	0	0
Andrzej Wilk		0	426	25	52	0	0
Ivan Vrhel		0	0	0	0	0	0
Former members of the Management Board							
Natalia Bożek	- to 30.01.2024	0	227	35	87	0	0
Dennis Hussey	- to 30.06.2022	0	0	146	328	0	0
James Foley	- to 28.02.2022	0	0	83	268	0	0
Sławomir S. Sikora	- to 17.06.2021	0	0	0	532	332	246
		73	**3,378**	**859**	**2,495**	**332**	**246**

The table below presents the amount of total remuneration (in PLN thousand) paid to members of the Bank's Supervisory Board in 2025.

		Remuneration for the function performed	Reimbursement of social security contributions	Reimbursement of social security contributions
Marek Kapuściński		144	210	4
Anna Rulkiewicz		144	210	6
Sławomir S. Sikora		288	150	0
Barbara Smalska		144	270	0
Andras Reiniger		0	0	0
Natalia Bożek	- from 19.06.2024	0	0	0
Fabio Lisanti	- from 19.06.2024	0	0	0
Ignacio Gutierrez-Orrantia	- from 19.06.2024	0	0	0
		720	**840**	**10**

The table below presents the amount of total remuneration (in PLN thousand) paid to members of the Bank's Supervisory Board in 2024.

		Remuneration for the function performed	Reimbursement of social security contributions	Reimbursement of social security contributions
Marek Kapuściński		118	210	4
Anna Rulkiewicz		118	210	5
Sławomir S. Sikora		235	150	0
Barbara Smalska		118	270	0
Andras Reiniger		0	0	0
Natalia Bożek	- from 19.06.2024	0	0	0
Fabio Lisanti	- from 19.06.2024	0	0	0
Ignacio Gutierrez-Orrantia	- from 19.06.2024	0	0	0
Former Supervisory Board Members				
Silvia Carpitella	- to 19.06.2024	0	0	0
Helen Hale	- to 19.06.2024	0	0	0
		588	**840**	**9**

3. Total number and nominal value of the Bank's shares and shares in affiliated companies of the Bank held by members of the Management Board and the Supervisory Board

The total number and nominal value of the Bank's shares and shares in affiliated companies of the Bank held by members of the Management Board and the Supervisory Board as at 31 December 2025 is presented in the table below:

	Shares of Bank Handlowy w Warszawie S.A.		Shares of Citigroup Inc.	
	Number of shares (units)	Nominal value (PLN)	Number of shares (units)	Nominal value (PLN)
Management Board				
Elżbieta Światopełk-Czetwertyńska	75	300	5,711	206
Andrzej Wilk	9,751	39,004	-	-
Sebastian Perczak	987	3 948	-	-
Supervisory Board				
Sławomir Sikora	20,117	89,468		
Andras Reiniger	-	-	8,578	309
Fabio Lisanti	-	-	45,750	1,648
Natalia Bożek	-	-	416	15
Ignacio Gutierrez-Orrantia	-	-	30,336	1,093

The total number and nominal value of the Bank's shares and shares in affiliated companies of the Bank held by members of the Management Board and the Supervisory Board as at 31 December 2024 is presented in the table below:

	Shares of Bank Handlowy w Warszawie S.A.		Shares of Citigroup Inc.	
	Number of shares (units)	Nominal value (PLN)	Number of shares (units)	Nominal value (PLN)
Management Board				
Elżbieta Światopełk-Czetwertyńska	-	-	5,125	210
Andrzej Wilk	4,283	17,132	-	-
Patrycjusz Wójcik	1 670	6 680		
Katarzyna Majewska	-	-	29	1
Supervisory Board				
Sławomir Sikora	11,199	44,796	13,204	542
Andras Reiniger	-	-	5,270	216
Fabio Lisanti	-	-	32,651	1,339
Ignacio Gutierrez-Orrantia	-	-	17,035	699

As at 31 December 2025 and 31 December 2024, no member of the Management Board and the Supervisory Board was a shareholder of a subsidiary of the Bank.

4. Agreements between the Bank and members of the Management Board that provide for compensation in case of their resignation or dismissal without reason or as a result of the Bank's takeover

Among all employment contracts between the Bank and the members of the Management Board of the Bank, there is no contract that provides for financial compensation in the case of termination with prior notice or for reasons specified in Article 53 of the Labour Code.

Each of the Management Board Members signed a separate non-competition agreement with the Bank. A relevant paragraph in each of these agreements specifies that the Management Board Member must refrain from conducting business activities competitive to the Bank in the period of 12 months (6 months in case of one of the Management Board Members) following termination of the employment agreement with the Bank and that the Bank will pay relevant compensation to the Management Board Member.

5. Management policy

The management policy of the Bank did not change in 2025. The policy is described in the Note to the Annual Consolidated Financial Statements of the Capital Group of the Bank.

XI. Information on pending court proceedings

In 2025 there was no single proceeding regarding receivables and liabilities of the Bank or its subsidiary, pending in court, public administration authority or an arbitration authority, the value of which would be significant. A detailed description of pending court proceedings is provided in Note 40 to the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended December 31, 2025.

XII.Agreements concluded with the registered audit company

On 11 March 2025 the Supervisory Board of the Bank appointed the auditor: KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa [KPMG Audyt limited liability partnership] with its registered office in Warsaw, operating at the following address: ul. Inflancka 4A, 00-189 Warszawa entered into the list of entities authorized to audit financial statements under No. 3546, to conduct an audit and a review of the annual and the interim financial statements of the Bank and the Capital Group of the Bank for years 2025 - 2026. KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa was selected in compliance with the applicable laws and auditing standards.

The Bank used the services of KPMG Audit Spółka z ograniczoną odpowiedzialnością sp. k. with respect to auditing and reviewing stand-alone and consolidated financial statements also for 2022-2024 and for previous years.

The Management Board of the Bank declares that the auditing company authorized to audit financial statements, auditing the Annual Consolidated Financial Statements of the Capital Group of Bank Handlowy S.A. for the financial year ended December 31, 2025 and the Stand-alone Annual Financial Statements of Bank Handlowy w Warszawie S.A. for the financial year ended December 31, 2025, it was selected in accordance with the law. In accordance with the best knowledge of the Management Board, the audit firm and members of the audit team met the conditions for drawing up an impartial and independent report on the audit of the annual consolidated and stand-alone financial statements in accordance with the applicable regulations, professional standards and professional ethics rules.

In order to meet the requirements contained in Article 130 section 1 of the Act on statutory auditors, audit firms and public supervision (Journal of Laws of 2024, item 1035, hereinafter referred to as the "Act"), the Bank, as a public interest entity, has implemented for application on the basis of resolutions of the Supervisory Board of the Bank:

- Policy for selecting an audit firm to audit financial statements of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. and
- Policy for the service by the audit firm, by entities affiliated to that audit firm and by a member of the audit firm's network of permitted non-audit services of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A.

The auditor's net fees under the agreements (paid or payable) for the years 2025 and 2024 are presented in the table below:

For the year	2025	2024
PLN'000		
Bank (the parent company) audit fees	1,008	792
Bank (the parent company) review fees	312	281
Subsidiary companies audit fees	162	132
Other assurance fees	1,220	394
	2,702	**1,600**

**Amounts based on agreements, net of VAR and audit supervision authority charges."*

XIII. Subsequent events

On February 27, 2026 Bank received a letter from the Polish Financial Supervision Authority with an individual dividend recommendation for the Bank. The PFSA confirmed that the Bank fulfils the criteria for the payment of dividend up to 75% of the profit for 2025, however the maximum payout amount cannot exceed the amount of annual net profit reduced by the profit earned in 2025 and already included in own funds. The PFSA also recommended not undertaking, without prior consultation with the supervisory authority, any actions outside the scope of the current business and operating activities, which could result in a reduction of the Bank's own funds, including possible dividend payments from undistributed profit from previous years as well as share buybacks and buyouts.

On March 2, 2026, the Bank received a decision of the Polish Financial Supervision Authority dated February 27, 2026, in which the PFSA granted the Bank permission to buy-back own shares for the purpose of offering them by the Bank to eligible employees under the incentive program. Under the above permission issued for the period until February 27, 2026, the Bank may acquire a maximum of 285,000 own shares, and the price of the own shares purchased by the Bank may not exceed PLN 30,000,000 in total.

After 31 December 2025 there were no other major events undisclosed in these report on activities, that could have a significant influence on the net result of the Group.

XIV.Statement of the Bank's Management Board

Accuracy and fairness of the statements presented

To the best knowledge of the Bank's Management Board, composed of: Ms. Elżbieta Światopełk-Czetwertyńska, President of the Management Board; Ms. Patrycjusz Wójcik, Vice-President of the Management Board; Mr. Maciej Kropidłowski, Vice-President of the Management Board; Mr. Andrzej Wilk, Vice-President of the Management Board; Ms. Barbara Sobala, Vice-President of the Management Board; Mr. Tomasz Dziurzyński, Member of the Management Board and Mr. Sebastian Perczak, Member of the Management Board, "Annual stand-alone financial statements of Bank Handlowy w Warszawie S.A. for the financial year ended on 31 December 2025" (hereinafter referred to as the Annual Report), "Annual consolidated financial statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the financial year ended on 31 December 2025" and the comparative data were prepared in accordance with the accounting standards in force and reflect the accurate, true and fair view of the assets and financial position of Bank Handlowy w Warszawie S.A. (hereinafter referred to as the Bank) and the Bank's capital group (hereinafter referred to as the Bank Group) and their financial result.

The Annual Report on the Activities of Bank Handlowy w Warszawie S.A and the Capital Group of Bank Handlowy w Warszawie S.A. for 2025 provides a fair view of the development and profitability of the Group's business and situation in 2025, including a description of the main risks and uncertainties. The "Report on the Activities of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. in 2025" was prepared in accordance with the requirements of Article 49 of the Accounting Act, and the "Sustainability Statement" that is part of this Report was prepared in accordance with the Accounting Act, the ESRB and Article 8 of Regulation 2020/852 and delegated acts issued under Article 8(4) of that Regulation.

ESRS means the standards defined by the European Commission by means of delegated acts issued pursuant to Article 29b(1) 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.

Other information required by the Regulation of the Minister of Finance of 6 June 2025 on current and periodical reporting by issuers of securities and on the conditions under which the legally required information originating in a non-member state can be deemed equivalent thereof (Journal of Laws No. from 2025 item 755), in particular transactions with related companies and guarantees and sureties granted are included in the Annual Consolidated Financial Statements of the Capital Group of the Bank Handlowy w Warszawie S.A. for the financial year ended on 31 December 2025.

Signatures of Management Board Members

16.03.2026	Elżbieta Światopełk-Czetwertyńska	President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Patrycjusz Wójcik	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Andrzej Wilk	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Maciej Kropidłowski	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Barbara Sobala	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Tomasz Dziurzyński	Member of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Sebastian Perczak	Member of the Management Board
.....	.....	.....
Date	Name	Position/function

The Supervisory Board's Statement, in connection with § 72.1.8 and § 73.1.8 of the Regulation of the Minister of Finance of 6 June 2025 on the Current and Periodic Information Provided by Issuers of Securities and the Conditions for Recognizing the Information Required by Legal Regulations of a Non-Member State as Equivalent

The Supervisory Board, in connection with § 72.1.8 and § 73.1.8 of the Regulation of the Minister of Finance of 6 June 2025 on the Current and Periodic Information Provided by Issuers of Securities and the Conditions for Recognizing the Information Required by Legal Regulations of a Non-Member State as Equivalent, hereby states as follows:

a) The provisions regarding the appointment, composition and operation of the Audit Committee of the Bank's Supervisory Board have been complied with, including those regarding the fulfillment of independence criteria and the requirements as to knowledge and skills in the field of finance, accounting or audit of financial statements by its members;

b) The Audit Committee of the Bank's Supervisory Board has fulfilled the audit committee tasks as provided for in the applicable regulations, including tasks in the field of sustainable development reporting and the attestation of such reporting.

On behalf of the Supervisory Board

Sławomir S. Sikora
Chairman of the Supervisory Board of Bank Handlowy w Warszawie SA

Warsaw, 16 March 2026

Assessment of the Supervisory Board
with justification
concerning the Management's Report on activities and Financial statements
for 2025

The Supervisory Board of Bank Handlowy w Warszawie SA (further referred to as "Supervisory Board") on the basis of Article 382 §3 sec. 1 of the commercial code with § 72 sec. 1 pt. 16 as well as § 73 sec. 1 pt. 14 of the "Ordinance of the Minister of Finance of June 6, 2025 regarding current and periodic information published by issuers of securities and conditions for recognizing information required by non-Member states as equivalent", positively assessed the documents:

1. the Annual financial statements of Bank Handlowy w Warszawie S.A. for the year ended 31 December 2025
2. the Annual consolidated financial statements of the Capital Group of Bank Handlowy w Warszawie S.A. for the year ended 31 December 2025
3. the Management's Report on activities of the Capital Group of Bank Handlowy w Warszawie S.A. in the year 2025 including Report on activities of Bank Handlowy w Warszawie S.A. and including Sustainability Statement of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. for the year 2025.

as consistent with the books and documents as well as with the factual status.

The opinion of the Supervisory Board has been based on the content of the aforementioned reports presented by the Management Board of Bank Handlowy w Warszawie SA, reports of the independent auditor from the audit of standalone and consolidated financial statements and of the attestation of sustainability statement of the Bank and of the Capital Group of the Bank as well as the recommendation of the Audit Committee.

Audit of the financial statements have been conducted by KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa, with its seat in Warsaw, which has been elected by the Supervisory Board to conduct:

1. the audit of standalone financial statements of Bank Handlowy w Warszawie SA and consolidated financial statements of the Group of Bank Handlowy w Warszawie SA for the year ended 31 December 2025.
2. attestation service regarding the sustainability reporting of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. for the year 2025.

According to the statutory auditor's opinion both standalone, and consolidated financial statements give true and fair view of the financial results and operations of the Bank and the Bank Group as of 31 December 2025, financial results of activities and cash flows for the year ended on that date and have been prepared in accordance with the International Financial Reporting Standards endorsed by the European Union and the accounting policies. Moreover standalone and consolidated financial statements are compliant, in all material aspects, as to the form and content with the applicable laws and the Statute of Bank Handlowy w Warszawie SA.

Additionally in the opinion of the independent auditor, the Management Board's Report on activities of the Group of Bank Handlowy w Warszawie S.A. for 2025 prepared together with the Report on activities of Bank Handlowy w Warszawie SA (excluding Sustainability Statement of Bank Handlowy w Warszawie S.A.

and the Capital Group of Bank Handlowy w Warszawie S.A. for the year 2025) have been prepared, in all material aspects, in accordance with applicable laws and is consistent with information included in the consolidated financial statements. In relation to the sustainability reporting, in the opinion of the independent auditor nothing has come to the attention to cause to believe that the Groups of Bank Handlowy w Warszawie S.A. Sustainability Statement as of and for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with the applicable laws and regulations.

On behalf of the Supervisory Board

Sławomir S. Sikora
Chairman of the Supervisory Board of Bank Handlowy w Warszawie SA

Warsaw, 16 March 2026

Information of the Management Board of Bank Handlowy w Warszawie S.A. on the selection of the audit firm to audit annual financial statements of the Bank and the Capital Group of the Bank

The Management Board of Bank Handlowy w Warszawie S.A., in connection with § 72.1.6 and § 73.1.6 of the Regulation of the Minister of Finance of 6 June 2025 on the Current and Periodic Information Provided by Issuers of Securities and the Conditions for Recognizing the Information Required by Legal Regulations of a Non-Member State as Equivalent, The Supervisory Board of Bank Handlowy w Warszawie S.A. (hereinafter referred to as the Supervisory Board), based on the Statement of the Supervisory Board dated 16 March 2026 on the selection of the audit firm to audit annual financial statements of the Bank and the Capital Group of the Bank, hereby resolves as follows:

a) The selection of KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa as an audit firm to audit annual financial statements of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. for 2025, was duly carried out in compliance with the regulations, including those governing the audit firm selection and selection procedure;

b) KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa and the members of the audit team have satisfied the conditions to issue an impartial and independent report from audit of annual financial statements in accordance with the applicable regulations, auditing standards and principles of professional ethics;

c) The regulations on rotation of audit firm and key auditor as well as mandatory breaks in audit engagements have been complied with;

d) Bank Handlowy w Warszawie S.A. has the audit firm selection policy and the policy regarding the provision of additional non-audit services for Bank Handlowy w Warszawie S.A. by the audit firm, its affiliate or member of the audit firm's network, including any services that are conditionally exempted from the ban on provision by the audit firm.

Signatures of Management Board Members

16.03.2026	Elżbieta Światopełk-Czetwertyńska	President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Maciej Kropidłowski	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function

16.03.2026	Tomasz Dziurzyński	Member of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Barbara Sobala	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Andrzej Wilk	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Patrycjusz Wójcik	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Sebastian Perczak	Member of the Management Board
.....	.....	.....
Date	Name	Position/function

Information of the Management Board of Bank Handlowy w Warszawie S.A. on the selection of the audit firm to provide attestation of sustainability reporting

The Management Board of Bank Handlowy w Warszawie S.A., in connection with § 72.1.7 and § 73.1.7 of the Regulation of the Minister of Finance of 6 June 2025 on the Current and Periodic Information Provided by Issuers of Securities and the Conditions for Recognizing the Information Required by Legal Regulations of a Non-Member State as Equivalent, The Supervisory Board of Bank Handlowy w Warszawie S.A. (hereinafter referred to as the Supervisory Board), based on the Statement of the Supervisory Board dated 16 March 2026 on the selection of the audit firm to audit annual financial statements of the Bank and the Capital Group of the Bank, hereby resolves as follows:

a) The selection of KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa as an audit firm to provide attestation of sustainability reporting of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. for 2025, was duly carried out in compliance with the regulations, including those governing the audit firm selection and selection procedure;

b) KPMG Audyt Spółka z ograniczoną odpowiedzialnością spółka komandytowa and the members of the audit team providng the attestation of sustainability reporting have satisfied the conditions to issue an impartial and independent report on sustainability reporting in accordance with the applicable regulations, auditing standards and principles of professional ethics;

c) Bank Handlowy w Warszawie S.A. has the audit firm selection policy to provide attestation of sustainability reporting and a policy of performing for Bank Handlowy w Warszawie S.A. the attestation of sustainability reporting by the audit firm, its affiliate or member of the audit firm's network, including any services that are conditionally exempted from the ban on provision by the audit firm.

Signatures of Management Board Members

16.03.2026	Elżbieta Światopełk-Czetwertyńska	President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Maciej Kropidłowski	Vice-President of the Management Board
.....	.....	.....

Date	Name	Position/function
16.03.2026	Tomasz Dziurzyński	Member of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Barbara Sobala	Vice-President of the Management Board
.....	.....	.....
Date	Name	Position/function
16.03.2026	Andrzej Wilk	Vice-President of the Management Board
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16.03.2026	Patrycjusz Wójcik	Vice-President of the Management Board
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Date	Name	Position/function