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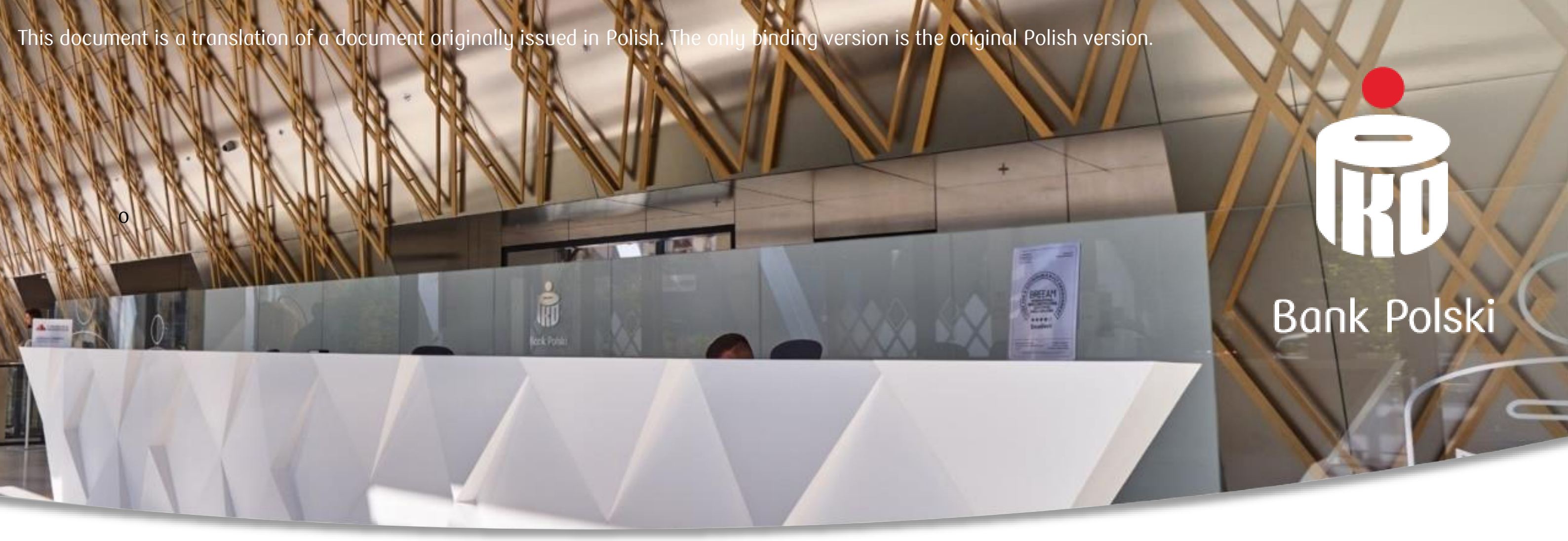

# Capital Adequacy and Other Information of the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Group Subject to Disclosure as at 31 December 2024

Disclosure

Quarterly

Semi-annual

Annual

# INTRODUCTION

The report 'Capital Adequacy and Other Information of the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Group Subject to Disclosure as at 31 December 2024', hereinafter referred to as the 'Report', was prepared in accordance with:

- Article 111a of the Act of 29 August 1997 – Banking Law[1], hereinafter referred to as the 'Banking Law',
- Article 99a(6) of the Act of 10 June 2016 on the Bank Guarantee Fund, Deposit Guarantee Scheme and Resolution, hereinafter referred to as the 'BGF Act',
- Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms, hereinafter referred to as the 'CRR', taking into account acts amending the CRR (including 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 relating to credit risk, credit valuation adjustment risk, operational risk, market risk and the minimum capital threshold (hereinafter referred to as the 'CRR3 Regulation'), insofar as it is in force from 2024 onwards),,
- Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No. 575/2013 of the European Parliament and of the Council (hereinafter 'Regulation 2021/637'), taking into account acts amending Regulation No. 2021/637,
- Commission Implementing Regulation (EU) 2021/763 of 23 April 2021 laying down implementing technical standards for the application of Regulation (EU) No. 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council with regard to the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities,
- Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022, amending the implementing technical standards referred to in Implementing Regulation (EU) 2021/637 as regards disclosure of information on environmental, social and corporate governance risks,

and in accordance with the guidelines of the European Banking Authority (EBA) and the recommendations issued by the Polish Financial Supervision Authority, hereinafter referred to as the 'PFSA', in particular:

- Recommendation M on operational risk management,
- Recommendation P concerning the management of financial liquidity risk of banks,
- Recommendation R on the principles of classification of credit exposures, estimation and recognition of expected credit losses and credit risk management,
- Recommendation Z on internal governance principles and in accordance with the requirements contained in the following guidelines of the European Banking Authority,
- Guidelines EBA/GL/2020/12 amending Guidelines EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) on the transitional period for mitigating the impact of the introduction of IFRS 9 on Own Funds to ensure compliance with the CRR 'quick fix' in response to the COVID-19 pandemic,
- Guidelines EBA/GL/2017/06 on credit institutions' credit risk management practices and accounting for expected credit losses.


Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna, hereinafter referred to as 'PKO Bank Polski S.A.' or the 'Bank', meeting the definition of a large institution within the meaning of Article 4(1)(146) of the CRR, in accordance with Article 13(1) and Article 433a of the CRR, announces information on capital adequacy referred to in Part Eight of the CRR on an annual, semi-annual and quarterly basis in a separate document.

This Report has been prepared in accordance with the Bank's internal regulations concerning the information policy of PKO Bank Polski S.A. regarding capital adequacy and other information subject to disclosure (hereinafter: 'The information policy') which, in accordance with Article 431(1) of the CRR Regulation, are made available on the Bank's website (www.pkobp.pl).

Pursuant to the Commission Delegated Regulation (EU) No. 183/2014, the capital adequacy account reflects the credit risk adjustments recognized in the income statement, relating to the periods included in Tier 1 capital. In view of the above, the Bank took into account specific credit risk adjustments as at 30 June 2024, appropriate adjustments were also taken into account at the level of the Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna Group.

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

The Report has been prepared taking into account all data available as at 31 December 2024. The Report addresses the requirements of the regulations described above insofar as they relate to the Bank and the Bank's Group. Lack of a reference to a particular article means that the related disclosures are not applicable. This Report was subject to an internal verification by the Bank's Internal Audit Department.

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# 1 INFORMATION ABOUT THE BANK AND THE BANK'S GROUP

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

In accordance with the CRR, for the purposes of prudential consolidation, the Group consists of following entities: PKO Bank Polski S.A., PKO Leasing S.A. Group, PKO BP BANKOWY PTE S.A., PKO Towarzystwo Funduszy Inwestycyjnych S.A., KREDOBANK S.A. Group, PKO Finance AB, PKO BP Finat sp. z o.o., PKO Bank Hipoteczny S.A., and Bankowe Towarzystwo Kapitałowe S.A. Group.

Non-financial and insurance entities are excluded from the prudential consolidation. Tables 1.1-1.3 present the differences in the scope of consolidation of the Bank's Group for the purposes of accounting and prudence regulations as at 31 December 2024.

The Bank's Group does not identify any subsidiaries which are not covered by prudential consolidation and whose own funds are lower than required. Furthermore, the Group does not apply the derogation mentioned in Article 7 of the CRR or the individual consolidation method defined in Article 9 of the CRR.

Table 1.1 Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories [Template EU LI1]

| | | 31.12.2024 | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g |
| | | | | Carrying values of items | | | | |
| | | Carrying values as reported in published financial statements | Carrying values under scope of prudential consolidation | Subject to the credit risk framework | Subject to the CCR framework | Subject to the securitisation framework | Subject to the market risk framework | Not subject to own funds requirements or subject to deduction from own funds |
| **Breakdown by asset clases according to the balance sheet in the published financial statements** | | | | | | | | |
| 1 | Cash and balances with the Central Bank | 23 494 | 23 494 | 23 494 | - | - | - | - |
| 2 | Amounts due from banks | 5 089 | 4 972 | 4 972 | 1 334 | - | - | - |
| 3 | Hedging derivatives | 120 | 120 | 120 | 1 069 | - | | - |
| 4 | Other derivative instruments | 1 999 | 1 999 | 1 999 | 5 111 | - | 4 349 | - |
| 5 | Securities | 210 531 | 207 994 | 205 705 | - | - | 2 289 | - |
| 6 | Reverse repo transactions | 892 | 892 | 892 | - | - | - | - |
| 7 | Loans and advances to customers | 266 158 | 265 585 | 265 585 | - | - | - | - |
| 8 | Receivables in respect of insurance activities | 105 | - | - | - | - | - | - |
| 9 | Property, plant and equipment transferred under operating lease | 2 653 | 2 653 | 2 653 | - | - | - | - |
| 10 | Property, plant and equipment | 3 320 | 3 149 | 3 149 | - | - | - | - |
| 11 | Non-current assets held for sale | 11 | 11 | 11 | - | - | - | - |
| 12 | Intangible assets | 4 153 | 3 913 | 1 295 | - | - | - | 2 618 |
| 13 | Investments in associates and joint ventures | 291 | 1 894 | 1 894 | - | - | - | - |
| 14 | Current income tax receivables | 6 | 6 | 6 | - | - | - | - |
| 15 | Deferred income tax assets | 3 056 | 2 342 | 2 342 | - | - | - | - |
| 16 | Other assets | 3 347 | 3 353 | 3 353 | - | - | - | - |
| **TOTAL ASSETS** | | **525 225** | **522 377** | **517 470** | **7 514** | **-** | **6 638** | **2 618** |
| **Breakdown by liability classes according to the balance sheet in the published financial statements** | | | | | | | | |
| 1 | Amounts due to the Central Bank | 11 | 11 | - | - | - | - | 42 |
| 2 | Amounts due to banks | 2 373 | 2 373 | - | - | - | - | 2 373 |
| 3 | Hedging derivatives | 285 | 285 | - | 285 | - | | - |
| 4 | Other derivative instruments | 2 396 | 2 396 | - | 2 396 | - | 2 396 | - |
| 5 | Amounts due to customers | 419 778 | 419 754 | - | - | - | - | 419 754 |
| 6 | Repo transactions | - | - | - | - | - | - | - |
| 7 | Liabilities in respect of insurance activities | 2 449 | - | - | - | - | - | - |
| 8 | Loans and advances received | 1 268 | 1 268 | - | - | - | - | 1 268 |
| 9 | Debt securities in issue | 23 457 | 23 805 | - | - | - | - | 23 805 |
| 10 | Subordinated liabilities | 4 291 | 4 291 | - | - | - | - | 4 291 |
| 11 | Other liabilities | 8 188 | 8 158 | - | - | - | - | 8 127 |
| 12 | Current income tax liabilities | 899 | 891 | - | - | - | - | 891 |
| 13 | Deferred income tax provision | 809 | 36 | - | - | - | - | 36 |
| 14 | Provisions | 6 651 | 6 649 | - | - | - | - | 6 649 |
| **TOTAL LIABILITIES** | | **472 855** | **469 917** | **-** | **2 681** | **-** | **2 396** | **467 236** |

The carrying values shown under the regulatory model differ from the values recognized in the published financial statements as at and for the year ended 31 December 2024 due to the application of different scopes of consolidation.

Assets and liabilities subject to more than one type of risk listed in Part Three of the CRR are mainly derivatives, which are subject to both capital requirements for counterparty credit risk, CVA for selected entities, and market risk in the case of the trading book.

Table 1.1 Main sources of differences between regulatory exposure amounts and carrying values in financial statements [Template EU LI2]

| | 31.12.2024 | | | | |
|---|---|---|---|---|---|
| | a | b | c | d | e |
| | Total | Items subject to | | | |
| | | Credit risk framework | Securitisation framework | CCR framework | Market risk framework |
| Assets carrying value amount under the scope of regulatory consolidation (as per template LI1) | 524 515 | 522 226 | - | 7 514 | 6 638 |
| Liabilities carrying value amount under the regulatory scope of consolidation (as per template LI1) | 7 018 | - | - | 7 018 | 5 316 |
| Total net amount under the regulatory scope of consolidation | 517 497 | 522 226 | - | 496 | 1 322 |
| Off-balance-sheet amounts | 102 254 | 33 705 | - | - | |
| Differences in valuations | - | - | - | - | |
| Differences due to different netting rules, other than those already included in row 2 | 14 878 | 2 460 | - | 5 759 | |
| Differences due to consideration of provisions | 1 283 | 1 283 | - | - | |
| Differences due to the use of credit risk mitigation techniques (CRMs) | - 2 457 | - 1 656 | - | - 801 | |
| Differences due to credit conversion factors | - 68 548 | - | - | - | |
| Differences due to Securitisation with risk transfer | - | - | - | - | |
| Other differences | 1 631 | 1 631 | - | - | |
| Transitional adjustment for MSSF9 in RWA | 1 631 | 1 631 | - | - | |
| deduction of funds according to art.. 48 CRR | - | - | - | - | |
| Balance sheet - exclusion of CCPs (in the main note in valuation differences) | - | - | - | - | |
| **Exposure amounts considered for regulatory purposes** | **566 537** | **559 649** | **-** | **5 454** | **1 434** |

Table 1.3 Outline of the differences in the scopes of consolidation (entity by entity) [Template EU LI3]

| | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | a | b | c | d | e | f | g | h |
| No.[1] | Name of the entity | Method of accounting consolidation | Method of prudential consolidation | | | | | Description of the entity |
| | | | Full consolidation | Proportional consolidation | Equity method | Neither consolidated nor deducted | Deducted[2] | |
| **1** | **PKO Bank Polski S.A.** | | | **Parent company** | | | | **Banking activities.** |
| 2 | PKO Bank Hipoteczny S.A. | Full consolidation | X | | | | | Banking activities. |
| 3 | PKO Towarzystwo Funduszy Inwestycyjnych S.A, | Full consolidation | X | | | | | Creation and management of Open-and and Clodes-end Investment Funds and management of trading book. |
| 4 | PKO BP BANKOWY PTE S.A. | Full consolidation | X | | | | | Management of an open and voluntary pension fund. |
| 5 | PKO Leasing S.A. | Full consolidation | X | | | | | Leasing and provifing bank loans. |
| | PKO Agencja Ubezpieczeniowa sp. z o.o. | Full consolidation | X | | | | | Insurance brokerage. |
| | PKO Leasing Finanse sp. z o.o. | Full consolidation | X | | | | | Support services for the sale of post-leasing items. |
| | PKO Leasing Sverige AB | Full consolidation | X | | | | | Leasing. |
| | Prime Car Management S.A. | Full consolidation | X | | | | | Leasing and fleet management services. |
| | Futura Leasing S.A. | Full consolidation | X | | | | | Selling post-Leasing items. |
| | Masterlease sp. z o.o. | Full consolidation | X | | | | | Leasing. |
| | MasterRent24 sp. z o.o. | Full consolidation | X | | | | | Short-term rental of vehicles. |
| | Polish Lease Prime 1 DAC[3] | Full consolidation | X | | | | | A special-purpose vehicles set up for the purpose of leasing receivables. |
| | PKO Faktoring S.A. | Full consolidation | X | | | | | Factoring. |
| 6 | PKO BP Finat sp. z o.o. | Full consolidation | X | | | | | Service activities, including transfer agent services and outsourcing of IT specialists. On the basis of the KNF authorization - services as a national payment institution. |
| 7 | PKO Życie Towarzystwo Ubezpieczeń S.A. | Full consolidation | | | X | | X | Life insurance. |
| | Ubezpieczeniowe Usługi Finansowe sp. z o.o. | Full consolidation | | | X | | | Service activities. |
| 8 | PKO Towarzystwo Ubezpieczeń S.A. | Full consolidation | | | X | | X | Other personal insurance and property insurance. |
| 9 | PKO Finance AB | Full consolidation | X | | | | | Financial services |

| No.[1] | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | a | b | c | d | e | f | g | h |
| | Name of the entity | Method of accounting consolidation | Method of prudential consolidation | | | | | Description of the entity |
| | | | Full consolidation | Proportional consolidation | Equity method | Neither consolidated nor deducted | Deducted[2] | |
| 10 | KREDOBANK S.A. | Full consolidation | X | | | | | Banking activities. |
| | „KREDOLEASING" sp. z o.o. | Full consolidation | X | | | | | Leasing. |
| 11 | NEPTUN - fizan | Full consolidation | | | X | | | Placing funds collected from fund participants. |
| | „Zarząd Majątkiem Górczewska" sp. z o.o. | Full consolidation | | | X | | | Real estate management. |
| | Molina sp. z o.o. w likwidacji | Full consolidation | | | X | | | A general partner in limited joint-stock partnerships of the fund. |
| | Molina spółka z ograniczoną odpowiedzialnością w likwidacji 1 S.K.A. w likwidacji | Full consolidation | | | X | | | Buying and selling real estate for own account. Real estate management. |
| | Molina spółka z ograniczoną odpowiedzialnością 2 S.K.A.4 | Full consolidation | | | X | | | |
| | Molina spółka z ograniczoną odpowiedzialnością 4 S.K.A.4 | Full consolidation | | | X | | | |
| | Bankowe Towarzystwo Kapitałowe S.A. | Full consolidation | X | | | | | |
| | „Inter-Risk Ukraina" spółka z dodatkową odpowiedzialnością | Full consolidation | X | | | | | Debt collection. |
| | Finansowa Kompania „Prywatne Inwestycje" sp. z o.o. | Full consolidation | X | | | | | Financial services |
| | Finansowa Kompania „Idea Kapitał" sp. z o.o. | Full consolidation | X | | | | | Legal service of acquired monetary claims under credit agreements |
| | Qualia sp. z o.o. | Full consolidation | | | X | | | After-sales service for development products. |
| | Sarnia Dolina sp. z o.o. w likwidacji | Full consolidation | | | X | | | Developement activities. |
| | „Sopot Zdrój" sp. z o.o. | Full consolidation | | | X | | | Property management. |
| 12 | PKO VC - fizan | Full consolidation | | | X | | | Investment of funds collected from fund participants. |

[1] The 'numbered' entities other than PKO Bank Polski S.A. – the direct subsidiaries of PKO Bank Polski S.A.; other entities – indirect subsidiaries
[2] The item 'deducted' indicates the Bank's capital exposures (other than the entities subject to prudential consolidation) taken into account in calculating deductions from the own funds of the Bank's Group. In view of the fact that the total exposures to the Common Equity Tier 1 instruments of financial sector entities did not exceed the thresholds defined in the CRR, the Common Equity Tier 1 capital of the Bank's Group for prudential consolidation as at 31 December 2024 was not reduced by the aforementioned exposures. These exposures, in accordance with the CRR requirements, were included in risk-weighted assets with a risk weight of 250%. The Bank's Group does not have any exposures constituting deductions from Tier 2 capital, either.
[3] In accordance with IFRS 10, PKO Leasing S.A. controls the aforementioned company even though it does not have a capital investment in it.

Table 1.4 Prudent valuation adjustments (PVA) [Template EU PV1]

| | | 31.12.2024 | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | EU e1 | EU e2 | f | g | h |
| | Category level AVA | Risk category | | | | | Category level AVA - Valuation uncertainty | | Total category level post-diversification | | |
| | | Equity | Interest Rates | Foreign exchange | Credit | Commodities | Unearned credit spreads AVA | Investment and funding costs AVA | | Of which: Total core approach in the trading book | Of which: Total core approach in the banking book |
| 1 | Market price uncertainty | 0 | 6 | 0 | - | 0 | 3 | - | 9 | 0 | 9 |
| 2 | Not applicable | | | | | | | | | | |
| 3 | Close-out cost | 0 | 7 | 0 | - | 0 | 3 | - | 11 | 0 | 10 |
| 4 | Concentrated positions | 36 | 153 | - | - | - | Not applicable | Not applicable | 189 | 89 | 100 |
| 5 | Early termination | - | - | - | - | - | Not applicable | Not applicable | - | - | - |
| 6 | Model risk | - | - | 1 | - | - | 1 | 2 | 4 | 1 | 3 |
| 7 | Operational risk | - | - | - | - | - | Not applicable | Not applicable | - | - | - |
| 8 | Not applicable | | | | | | | | | | |
| 9 | Not applicable | | | | | | | | | | |
| 10 | Future administrative costs | 0 | 2 | 0 | - | 0 | Not applicable | Not applicable | 2 | 0 | 2 |
| 11 | Not applicable | | | | | | | | | | |
| 12 | **Total Additional Valuation Adjustments (AVAs)** | | | | | | | | **214** | **90** | **124** |

In 2024, the following events took place in the structure of the Bank's Capital Group.

- In January 2024, the investment funds NEPTUN - fizan (acquiring fund) and Merkury – fizan (fund being acquired) merged through the transfer of the assets of the fund being acquired to the existing acquiring fund and the allocation of investment certificates of the acquiring fund to the participant of the fund being acquired in exchange for the investment certificates of the acquired fund.
  Merkury – fizan was deleted from the list of subsidiaries of Bank PKO BP S.A. The companies of the Merkury - fizan fund were transferred to the NEPTUN fizan fund.
- In May 2024, the National Court Register registered the liquidation of Molina spółka z ograniczoną odpowiedzialnością and Molina spółka z ograniczoną odpowiedzialnością 1 S.K.A. (entities from the NEPTUN fizan portfolio). The companies changed their names to: Molina spółka z ograniczoną odpowiedzialnością w likwidacji (limited liability company in liquidation) and Molina spółka z ograniczoną odpowiedzialnością w likwidacji 1 S.K.A. (limited liability company in liquidation 1 S.K.A. in liquidation).
- In July 2024, the National Court Register registered the liquidation of Sarnia Dolina sp. z o.o. (an entity from the NEPTUN fizan portfolio). The company name was changed to: Sarnia Dolina sp. z o.o. w likwidacji (Sarnia Dolina sp. z o.o. in liquidation).
- In September, an entry dated 8 August 2024 was disclosed in the National Court Register regarding the validation of the deletion of the company Molina spółka z ograniczoną odpowiedzialnością 2 S.K.A. w likwidacji (an entity from the NEPTUN fizan portfolio) from the Register of Entrepreneurs. The company ceased to be part of the PKO Bank Polski S.A. Capital Group.

The Parent Company of the Bank's Group is PKO Bank Polski S.A. whose share in the consolidated total assets amounts to 90%[1].

PKO Bank Hipoteczny S.A. is a specialist bank operating on the basis of the Act of 29 August 1997 on Mortgage Covered Bonds and Mortgage Banks. The Bank specialises in granting residential mortgage loans for individuals. The Bank also acquires receivables in respect of such loans from PKO Bank Polski S.A. PKO Bank Hipoteczny S.A. issues mortgage covered bonds which constitute one of the main sources of long-term financing for loans secured with real estate. The company operates in the territory of the Republic of Poland, with mortgage covered bonds being issued in Poland and on the European market.

The PKO Leasing S.A. Group (i.e., PKO Leasing S.A. and its subsidiaries) mainly provides leasing, factoring, fleet management and vehicle rental services. The companies in the aforementioned Group operate mainly in the territory of the Republic of Poland and in Sweden (PKO Leasing Sverige AB) and Ireland (Polish Lease Prime 1 DAC).

KREDOBANK S.A. carries out banking activities in the territory of Ukraine and is subject to Ukrainian banking supervision. KREDOBANK S.A. is a universal bank which services customers mainly in the western part of Ukraine and in Kyiv. As at the end of 2024, the Company's head office was in Lviv; there were 65 branches, 11 of which are located in regions most affected by warfare. The company offers services in the following areas, among others: maintaining accounts for natural persons and businesses, collecting deposits, granting loans, sureties and guarantees, leases, foreign exchange market operations, and securities market operations. Under martial law, KREDOBANK S.A.'s priority is to ensure the safety of its employees and maintain uninterrupted operations servicing customers on an on-going basis.

'KREDOLEASING' sp. z o.o. - a subsidiary of KREDOBANK S.A. with its registered office in Lviv, started leasing activities - it commenced operational activities to a limited extent due to the war situation.

The other entities listed in Table 1.3, which form part of the Bank's Group (under prudential consolidation), operate mainly in the territory of the Republic of Poland and in Ukraine (Finansowa Kompania 'Prywatne Inwestycje' sp. z o.o., Finansowa Kompania 'Idea Kapitał' sp. z o.o. and 'Inter-Risk Ukraina' spółka z dodatkową odpowiedzialnością [an additional liability company]) and in Sweden (PKO Finance AB).

Through its foreign branches, PKO Bank Polski S.A. also operates in the Federal Republic of Germany (PKO Bank Polski S.A. Niederlassung Deutschland), the Czech Republic (PKO BP S.A., the Czech Branch), the Slovak Republic (PKO BP S.A., pobočka zahraničnej banky) and in Romania (PKO Bank Polski S.A. Varșovia, Sucursala București).

Information about all of the Bank's subsidiaries, including the Bank's interests in the share capitals of the individual entities, is provided in the consolidated financial statements of the Bank's Group as at and for the year ended 31 December 2024, which were published on 13 March 2025 (Note 1 Activities of the Group).

Within the Bank's Group, there are certain restrictions (described below) on early repayment of liabilities by the subsidiaries[2] and with regard to the transfer of funds in the form of dividends:

1) according to the Decision of the National Bank of Ukraine, due to the ongoing war Ukrainian banks, including KREDOBANK S.A., may not effect: early repayment of (term) deposits to the bank's related persons, dividend payments and distribution of capital in a form other than allocation of profits to increase the share capital, creation of general reserves and funds of the bank within regulatory capital and coverage of losses from previous years,
2) KREDOBANK S.A. also applies a moratorium to dividend payment introduced by resolution of the Extraordinary General Meeting of Shareholders in 2009,

Furthermore, in making decisions on dividend payments or early repayment of liabilities, PKO Bank Polski S.A. and its subsidiaries follow the legal regulations (including the regulations regarding the amount of own funds and capital adequacy ratios) and the PFSA recommendations. The supervisory expectations regarding capital adequacy measures are described in more detail in the following chapter: '3. Capital adequacy' of this Report.

[1] The share was calculated in relation to the consolidated total assets of the companies subject to prudential consolidation before consolidation adjustments and exemptions as at 31 December 2024.

[2] Other than the redemption of bonds or mortgage covered bonds at the request of the issuer before the maturity date.

# 2 MANAGEMENT SYSTEM

## 2.1 Risk management

Risk management is one of the key internal processes, both in PKO Bank Polski S.A., including its foreign branches, and in the other entities of the Bank's Group. Risk management is aimed at ensuring the profitability of business activities while ensuring control over the risk level and maintaining it under the risk tolerance framework and the limits system adopted by the Bank and the Bank's Group in the changing macroeconomic and legal environment. The expected level of risk plays an important role in the planning process.

The objective of the risk management is to strive to maintain the level of risk within the accepted tolerances in order to:
1) protect the value of shareholders' capital and protection of customer deposits with the simultaneous support for the Bank's Group in conducting efficient operations,
2) provide the fullest possible information on risk in decision-making,
3) improve the processes and effectively establish risk management within the organisational culture of the Bank's Group.

Risk management in the Bank's Group is based, in particular, on the following principles:
1) the Bank's Group manages all identified types of risk,
2) the risk management process is adequate to the scale of operations and materiality, level, and complexity of a given risk, and it is tailored to new risk factors and sources of risk on an ongoing basis,
3) the risk management methods (especially models and their assumptions) and risk measurement or assessment systems are tailored to the level and complexity of the risks, the current and planned operations and the operating environment, and are periodically verified or validated,
4) ESG risk is managed at the Bank as part of the management of other risks. Due to its specific nature, the ESG risk is a comprehensive risk affecting the individual risks that occur at the Bank rather than a separate type of risk; the ESG risk management takes into account the effect of ESG factors on the Bank's operations, its financial result and development and the effect of the Bank's operations on the society and the environment – the information on the approach to ESG risk management is provided in Chapter 4,
5) organisational independence of the risk management division from business operations is maintained,
6) risk management is integrated with planning and controlling systems,
7) the risk level (including ESG risk levels) is monitored and controlled on an ongoing basis,
8) the risk management process supports the implementation of the Bank's strategy and is consistent with the risk management strategy, in particular in terms of the level of risk tolerance.

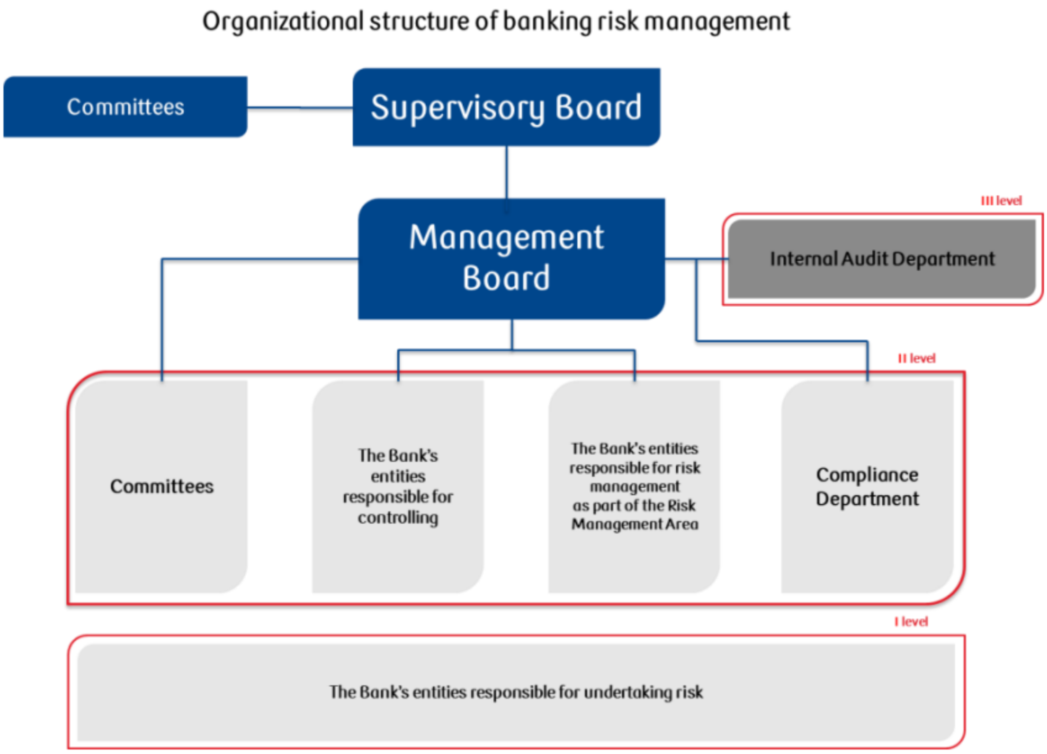
The risk culture is described in Bank's risk management strategy along with the types of risk managed by the Bank and the risk appetite (strategic tolerance levels). The Bank's risk management strategy and internal procedures containing guidelines for handling irregularities and instances of exceeding risk thresholds are available to all employees in the internal regulations database and on the Bank's intranet portals addressing the management of the individual risks. Furthermore, the information on updates of these procedures is communicated regularly to the Bank's employees and appropriate training is provided in the case of the risks that affect all employees.

The process of risk management in the Bank's Group consists of the following stages:
1) risk identification - which involves the identification of current and potential sources of risk and estimating the materiality of its potential impact on the Bank's and the Bank's Group's operations. As part of risk identification, the risks considered to be material in the operations of the Bank, the entities of the Bank's Group and at the Bank's Group as a whole are identified. The assessment of risk materiality and the analysis of the impact of individual risks on the business operations of the Bank and the Bank's Group entities are carried out at least once a year. In the event of new risk types arising, significant changes in the strategy and action plans of the Bank or the Bank's Group or in the external environment, a materiality assessment may be carried out more frequently. A materiality assessment is carried out by determining the degree of occurrence of individual factors affecting a given risk, determining whether the analysed risk is a material risk that has a material impact on profitability and the capital necessary to cover it, or whether it is subject to monitoring. As far as prudential consolidation is concerned, the following risks are considered material in the Bank's Group: credit risk, risk of mortgage loans in foreign currencies for households, foreign exchange risk, interest rate risk, liquidity risk (including financing risk), operational risk, business risk, risk of macroeconomic changes and model risk. For the risk types which have been recognized as material, the method of estimating internal capital is determined at the next stage. For the risk types recognized as being subject to monitoring at the Bank and the Bank's Group entities, the current values of materiality ratios are compared with the respective thresholds on a semi-annual and annual basis. The entities of the Bank's Group may consider other risks to be material for them, taking into account the specific nature and scale of their operations and the market on which a specific entity operates. The Bank verifies the materiality of such risks at the Bank's Group level. The entities of the Bank's Group participate in the assessment of materiality of the risks initiated by the Parent Company and assessed at the Bank's Group level;
2) risk measurement and assessment – risk measurement that includes determining risk measures adequate to the type and materiality of a risk, data availability, and the quantitative measurement of the risk by means of defined measures, as well as a risk assessment that consists of determining the volume or scope of the risk from the perspective of achieving risk management objectives. Risk measurement involves carrying out tasks related to measuring risks for pricing policy purposes as well as stress tests and reverse stress tests which are elements of reliable risk assessment. Stress tests are carried out to determine the expected impact of assumed events on the results of the Bank and the Bank's Group (e.g., profits or capital, etc.). On the other hand, a reverse stress test is a rigorous test of the ability of the Bank and the Bank's Group to survive. Moreover, the Bank also performs comprehensive stress tests (CSTs), which include analysing the impact of changes in the Bank's environment and functioning on the financial position of the Bank and the Bank's Group;
3) risk control – which consists of defining the tools used to diagnose or mitigate risk levels in the individual areas of activity of the Bank and the Bank's Group. Risk control involves determining risk controls tailored to the scale and complexity of the operations of the Bank and the Bank's Group, in particular in the form of monitored strategic tolerance limits for individual risk types, and if such limits are exceeded, management activity is undertaken;
4) risk forecasting and monitoring – which consists of preparing risk level forecasts on a regular basis and monitoring deviations of the actual values from the forecasts or the assumed benchmarks (e.g., limits, thresholds, plans, prior period measurements, recommendations and guidance issued by an external supervisory and control authority), as well as conducting specific, reverse and comprehensive stress tests. Risk level forecasts are verified. Risk is monitored at a frequency adequate to the materiality of a given risk type and its volatility;

5) risk reporting – which consists of informing the Bank's bodies regularly of the risk profile, the results of risk identification, risk measurement or risk assessment, the causes of change and potential threats, actions taken and recommendations for action. The scope, frequency and the form of reporting are adjusted to the management level of the recipients. In the event of the Bank's potential liquidity problems, the Supervisory Board is informed immediately of the Bank's liquidity level, threats and the corrective measures being undertaken, as well as situations which require launching capital emergency actions and a recovery plan for the Bank or the Bank's Group and in the case of occurrence of material operational events or ICT security incidents;
6) management activities – which consist, in particular, of issuing internal regulations that determine the process of managing individual risk types, define risk tolerance levels, establish limits and thresholds, issuing recommendations, making decisions, including decisions regarding the use of tools supporting risk management. The objective of management activities is to shape the risk management process and the risk levels.

Risk management in the Bank takes place on all levels of the Bank's organisational structure.

Chart 2.1. Bank's risk management organisation




The risk management process is supervised and assessed by the Supervisory Board, which regularly receives information on the Bank's and the Bank's Group's risk profile and the most important actions taken in the area of risk management.

The Supervisory Board is supported by the following committees:
1) Appointments and Remuneration Committee (SBARC),
2) Risk Committee (SBRC),
3) Audit Committee (SBAC).

The tasks of the SBARC include expressing opinions and monitoring the remuneration rules set out in the Remuneration Policy adopted by the Bank on an ongoing basis and supporting the Bank's authorities in developing and implementing this policy. 'Remuneration Policy' means the principles of remuneration in the Bank and Group companies as set out in the Remuneration Policy for employees of the Bank and the PKO BP S.A. Group.

There were 15 SBARC meetings in 2024. The SBARC is described in more detail in Chapter '6. Remuneration policy' of this Report.

The Risk Committee of the Supervisory Board supports the Supervisory Board by, among other things, formulating opinions on the Bank's overall, current and future readiness to take risks, taking into account the risk profile of the Bank's Group entities, as expressed, in particular, in the strategic limits of tolerance for individual risk types, formulating opinions on solutions related to mitigating the operational risk, supporting the Supervisory Board in supervising the implementation of the risk management system in the Bank by the Management Board, in assessing the adequacy and effectiveness of the risk management system, as well as in supervising the implementation of the risk management strategy.

The Audit Committee of the Supervisory Board supports the Supervisory Board, in particular, by monitoring the financial reporting process and performing financial audit activities, as well as controlling the independence of the registered auditor and the audit firm. The SBAC also supports the Supervisory Board by monitoring the adequacy and effectiveness of the internal audit system, including the adequacy and effectiveness of the control function, the compliance unit and the internal audit unit, as well as monitoring the effectiveness of the risk management system, in particular by analysing the information received from the Risk Committee.

9 meetings of the SBRC and 13 meetings of the SBAC were held in 2024.

In terms of risk management, the Management Board is responsible for strategic risk management, including supervision and monitoring of actions undertaken by the Bank regarding risk management, as well as the volume and profile of the risk associated with the operations of the Bank's Group entities. The Management Board makes major decisions affecting the risk profile of the Bank and adopts internal regulations concerning risk management.

In its risk management activities, the Management Board is supported by the following committees:
1) Risk Committee (RC),
2) Asset and Liability Management Committee (ALCO),
3) Bank's Credit Committee (BCC),
4) Operational Risk Committee (ORC);
5) Sustainable Development Committee (SDC).

The Risk Committee monitors the integrity, adequacy and effectiveness of the risk management system, capital adequacy and the implementation of the risk management policies in compliance with the Bank's strategy, it also analyses and evaluates the application of the strategic risk tolerance limits defined in the Risk Management Strategy of PKO Bank Polski S.A. and the Bank's Group. The Risk Committee supports the Management Board in the risk management process by formulating recommendations and issuing opinions on capital adequacy and the effectiveness of the risk control system.

11 meetings of the Risk Committee were held in 2024.

The ALCO manages the Bank's assets and liabilities by influencing the structure of the Bank's balance sheet and its off-balance sheet items in a manner conducive to achieving the optimum financial result. The Committee supports the Management Board in the activities of the Bank and the Bank's Group, related to shaping the balance sheet structure, capital adequacy management, profitability management, taking into account the specific nature of the operations and the generated risk, financial risk management, including market risk and liquidity risk, business risk and credit risk (both settlement and pre-settlement) of wholesale market transactions.

In 2024, the ALCO made decisions using the electronic means and at 25 meetings.

The BCC issues opinions and makes credit decisions in respect of individual, quantitatively material credit exposures or issues recommendations in this respect for the Management Board, issues recommendations and makes decisions regarding the management of non-performing receivables, as well as decisions related to the approval of credit risk models and parameters and the results of validation of such models and accepts credit risk reports.

In 2024, the Bank's Credit Committee made decisions using the electronic means and at 85 meetings.

The ORC supports the Management Board in operational risk management by making decisions, in particular, concerning the *AMA* approach and operational risk management tools used in the Bank, as well as issuing recommendations and guidance regarding the activities related to operational risk management. The ORC formulates opinions and recommendations regarding operational risk management in the entities of the Bank's Group, which are forwarded as part of the Bank's corporate governance of those entities.

In 2024, the ORC made decisions using the electronic means and at 14 meetings.

The ALCO, BCC, ORC, RC, the Management Board, SBRC, SBAC and the Supervisory Board receive periodical reports concerning individual risk types and capital adequacy.

The Sustainable Development Committee supports the Management Board in setting priorities, directions of action and objectives in the field of sustainable development and energy transformation. It supervises the implementation of objectives and initiatives as well as the shaping of the sustainable development management system and energy transition in the Bank's Capital Group. The Committee also supervises the implementation, updating and application of the Bank's internal regulations on sustainable financing, including the Green Bond Framework. In 2024, there were 7 meetings of the SDC.

The risk management process is carried out at three independent but complementary levels:
1) the first level – is formed of organizational structures responsible for product management, selling products and servicing customers, and of other structures which perform operational tasks that generate risk, which function based on internal regulations. This function is performed by all of the Bank's and the Bank's Group's units. The Bank's units implement appropriate risk controls, including in particular limits, designed by them and located at the second level. They also ensure that they are met by means of appropriate controls. At the same time, the entities of the Bank's Group are obliged to comply with the principles of consistency and comparability of risk assessment and control in the Bank and the Bank's Group entities, taking into account the specific nature of an entity's business and the market in which it operates,
2) the second level – covers compliance units and involves the identification, measurement, evaluation or control, monitoring and reporting of significant types of risks, and of the threats and irregularities identified; the tasks are performed by dedicated organizational structures acting on the basis of the applicable internal regulations of the Bank; the objective of these structures is to ensure that the tasks performed as part of the first level are properly designed in the internal regulations of the Bank and that they effectively limit the risk, support risk measurement, assessment and analysis and contribute to operational effectiveness. The second level supports actions undertaken in order to eliminate unfavourable deviations from the financial plan which affect the quantitative strategic risk tolerance limits. The function is performed in particular by the Risk Management Division, the Compliance Department, the Bank's units responsible for controlling and the relevant committees,
3) the third level - comprises the internal audit, which performs independent audits of elements of the Bank's management system, including the risk management system, as well as the internal audit system. The internal audit operates separately from the first and second levels. The function is executed in accordance with the Bank's internal regulations governing the functioning of the internal audit system.

The independence of the levels consists of ensuring organisational separation at the following levels:
1) the second level function regarding the creation of system solutions is independent of the first level functions,
2) the function of the third level is independent of the functions of the first and second levels.
3) the function of compliance risk management reports to the President of the Management Board.

In 2024, the Bank's units responsible for managing material risk and other risks identified in the Bank's operations, within the scope of their respective competences, were situated in particular in: The Banking Risk Division, Corporate Receivables Department, Restructuring and Debt Collection Centre, Outsourcing and Sale of Receivables and Isolated Receivables Department, Retail Customer Credit Risk Centre and Corporate Customer Credit Risk Centre, which are supervised by the Vice-President of the Management Board responsible for the Risk Management Division, and in the Compliance Department supervised by the President of the Management Board.

The objective of the Banking Risk Division is to develop and implement systemic solutions for managing risks that have been identified as material, to manage capital adequacy, and to initiate and coordinate integrating activities in relation to risk management in the Bank's Group.

As far as risk management is concerned, the Banking Risk Division is responsible for, in particular:
1) identification of risk factors and sources,
2) measuring, assessing, monitoring and reporting risk levels on a regular basis,
3) coordinating Strategy-related activities,
4) measuring and assessing capital adequacy,
5) preparing recommendations for the Management Board or the committees on the acceptable risk level,

6) developing and formulating opinions on the Bank's internal regulations concerning risk and capital adequacy management,
7) developing IT systems and applications dedicated to support risk and capital adequacy management,
8) coordinating the implementation of consistent risk management standards in the Bank's Group,
9) validating models used in risk management[3].

The Corporate Debt Department is responsible for, in particular:
1) management of acquired difficult debts, including actions aimed at restoring the creditworthiness of clients
2) in order to continue the cooperation on market terms,
3) determining and implementing the optimal method of debt recovery,
4) diagnosing and monitoring the economic and financial situation of clients and the risks associated with their activities,
5) identifying bad debts and seeking optimal opportunities for their sale,
6) taking over assets as a result of debt recovery, reviewing and classifying bad debts and off-balance sheet liabilities granted and determining the level of write-offs for expected credit losses.

The Restructuring and Debt Collection Centre is responsible for, in particular:
1) managing the taken-up debt claims, including taking effective steps to recover the receivables,
2) creating system solutions in order to recover difficult receivables,
3) acquiring and managing the assets taken over as a result of enforcement of the receivables,
4) monitoring the Bank's business in the area of difficult receivable operations and providing information for the management of these receivables,
5) conducting investigations and conducting early monitoring of delays in debt repayment.

The Outsourcing and Sale of Receivables and Isolated Receivables Department is responsible for, in particular:
1) participating in identifying non-performing receivables which can be sold or outsource,
2) preparing proposals for taking measures related to the sale and outsourcing of non-performing receivables and monitoring the execution of related agreements,
3) transferring selected difficult receivables to outsourcing,
4) sales of selected difficult receivables.

The Retail Customer Credit Risk Division is responsible for, in particular:
1) designing and developing the effective system of credit risk assessment connected with financing of retail banking customers and corporate and business banking customers, including the Bank's internal regulations on credit risk assessment principles (policies) and methodologies and tools to support the processes,
2) assessing and taking credit risk within the powers granted, and monitoring the customer and transaction credit risk.

The Corporate Customer Credit Risk Division is responsible for, in particular:
1) designing and developing the effective system of credit risk assessment connected with financing of corporate market customers, including the Bank's internal rules laying down the principles (policies, including industry policies) and methodologies of credit risk assessment and the tools supporting processes,
2) assessing and taking credit risk within the powers granted, and monitoring the customer and transaction credit risk,
3) operationally managing the Bank's exposure concentration risk.

As far as risk management is concerned, the Compliance Department is responsible for, in particular:
1) managing compliance risk,
2) managing conduct risk,
3) managing reputation risk,
4) organising and monitoring control function.

The Bank's controlling and finance units are responsible, in particular, for taking management measures concerning the level and structure of own funds, including the issue of instruments classified as own funds, carrying out securitisation transactions and preparing the long-term external financing plan, and for ensuring that the situation of the Bank and the Bank's Group is correctly and fairly reflected in the internal financial information, in particular by developing and monitoring periodic financial targets and the financial plan.

The Internal Audit Department (IAD), in the area of risk management, is responsible for performing audits that include an examination of the adequacy and effectiveness of the risk management system, including risk controls.

The Bank supervises the functioning of individual entities in the Bank's Group. As part of its supervisory role, the Bank supervises the risk management systems and supports their development. In addition, the Bank takes into account the level of risk of the operations of the individual entities for the purposes of the risk monitoring and reporting system at the Bank's Group level.

The principles and methods for assessing the specific risks of the Bank's Group entities are defined in the internal regulations implemented by these entities. The Bank's Group entities create and update internal regulations concerning the management of specific risks in consultation with the Bank and taking into account the recommendations issued by the Bank and the Risk Management Strategy of PKO Bank Polski S.A. and the Bank's Group. The internal risk management regulations of the Bank's Group entities take account of:
1) the principle of consistency and comparability of methods of assessing individual risks at the Bank and entities of the Bank's Group,
2) the structure of and the relationships between the Bank's Group entities,
3) specificity and scale of operations of the Bank's Group and the market in which it operates,
4) the risks managed in the Bank's Group entities resulting from the specific nature of their activities.

At least once a year, the units of the Banking Risk Division and the Compliance Department review the Risk Management Strategy of PKO Bank Polski S.A. and the Bank's Group, including, in particular, the strategic risk tolerance limits, in order to tailor them to the current and forecast market conditions and the needs of the Bank and the Bank's Group. In justified cases resulting from significant changes in macroeconomic conditions or the results of the stress tests performed, a review may be conducted more frequently than once a year. Moreover, the risk management methods and the risk measurement or assessment systems are tailored to the scale and complexity of risk, the Bank's current and planned operations and its environment, and they are verified and validated periodically.

[3] The validation of models is under the direct supervision of the Vice-President of the Management Board responsible for the Risk Management Division.

In the Bank's Group entities, risk management is supervised by the Bank's Group's units in the Risk Management Area or the relevant committees operating within the Bank, in particular through involvement in the review of transactions of the Bank's Group entities, in accordance with separate internal regulations of the Bank. The list of key entities of the Bank's Group that have a significant impact on the risk profile of the Bank's Group is determined by the Vice-President overseeing the Risk Management Division at least once a year on the basis of a recommendation from the Bank's competent unit located in the Banking Risk Division. Units of the Risk Management Area and the Compliance Department, formulate an approach to minimum quantitative strategic tolerance limits for risks specific to the Bank's Group's key entities and the manner in which they are reported.

The priority of the Bank's Group is to maintain its strong capital position, which includes effective capital adequacy management, supporting Polish enterprises, ensuring customer satisfaction, innovations, involvement in creating new market standards and counteracting cyber threats, while maintaining the priorities with regard to business effectiveness and effective cost control, an adequate level of own funds, and an appropriate assessment and level of risk.

The Bank is in the process of the systemic resolution of the problem of Swiss franc (CHF) housing loans by offering settlements to its retail Customers who had active loans in CHF, which were intended for satisfying their own housing needs. This solution is based on the proposal of the President of the Polish Financial Supervision Authority and consists of conversion of a CHF loan to a PLN loan on the terms that would apply had the loan been initially granted in PLN with interest based on WIBOR plus a historical margin applicable to such loans. By 31 December 2024, 65.0 thousand mediation applications were registered, 40,716 mediations concluded with a positive outcome, 15,014 mediations concluded with a negative outcome. The total number of settlements concluded as at 31 December 2024 was 47,7572, of which 40,812 were concluded in mediation proceedings and 6,945 in court proceedings.

The transactions conducted in 2024 within the Bank's Group with related entities and related parties of the Bank's Group did not have a significant effect on the Bank's risk profile.

## 2.2 Comprehensive stress tests and reverse stress tests

Comprehensive stress tests are complementary to stress tests specific to individual risks, and they take into account collectively identified risks, in particular the risks considered material from the perspective of the Bank or the Bank's Group. They include analysing the impact of changes in the macroeconomic environment or the functioning of the Bank's Group on the financial position of the Bank's Group, in particular: the income statement, the statement of financial position, own funds, capital adequacy (including own funds requirements), internal capital, capital adequacy measures, credit portfolio quality, and selected liquidity measures and indicators initiating the Recovery Plan. Calculations are performed using the Bank's internal models, taking into account the macroeconomic assumptions adopted. The data is analysed with a high degree of detail, taking into account the segmentation into portfolios and product types.

Comprehensive stress tests include periodical tests and supervisory tests. Periodical tests are performed on an annual basis, over a 2-year time horizon, in order to assess the risk of macroeconomic changes and to update the Recovery Plan. The stress scenarios used to assess the level of risk of macroeconomic changes assume a shock weakening of the economy compared with the baseline scenario, reflecting the historical cases of global financial crises. The stress scenarios for the purposes of the Recovery Plan, in accordance with the regulations of the Banking Law, are used to estimate the impact of harsh changes in the macroeconomic environment or the functioning of the Bank and the Bank's Group on the position of the Bank and the Bank's Group in crisis conditions and to verify the effectiveness of recovery measures.

Supervisory tests are conducted at the request of external supervisory authorities, over a time horizon set by the supervisory body, based on the macroeconomic and financial variables contained in the scenarios given by the supervisory authorities.

Comprehensive stress tests collectively cover the following risks:
1) credit and concentration risk,
2) market risk,
3) liquidity risk,
4) operational risk,
5) business risk,
6) risk of excessive leverage.

Reverse stress tests (RSTs) complement the results of the comprehensive stress tests and are intended to assess the Bank's resilience to macroeconomic changes. As regards the risk of macroeconomic changes, RSTs are conducted in the form of a sensitivity analysis and consist of formulating potential, negative scenarios related to the Bank's liquidity or capital adequacy, and then finding events contributing to their materialisation.

## 2.3 Internal audit and risk management system

The Bank has an internal audit system in place, which forms part of the Bank's management system. The Bank's Management Board is responsible for the design, implementation and functioning of an adequate and effective internal audit system. The Supervisory Board supervises the implementation and functioning of an adequate and effective internal audit system and evaluates its adequacy and effectiveness, including the adequacy and effectiveness of the control function, the compliance unit, and the internal audit unit. The internal audit system is evaluated on the basis of specific criteria, taking into account the information provided by the Bank's Management Board, the Audit Committee of the Supervisory Board, the compliance unit, and the internal audit unit, findings of the registered auditor and those resulting from the supervisory activities of the competent institutions, as well as other information and documents which are relevant to the adequacy and effectiveness of the internal audit system. In this respect, the Supervisory Board is supported by the Supervisory Board Audit Committee which is responsible, in particular, for monitoring the effectiveness of the internal audit system.

The purpose of the internal control system is to ensure:
1) efficiency and effectiveness of the Bank's operations,
2) reliability of the financial reporting,
3) compliance with the risk management principles at the Bank,
4) compliance of the Bank's activities with the generally binding legal regulations, internal regulations of the Bank, supervisory recommendations and market standards adopted Bank.

The internal control system is arranged at the Bank on three independent levels:

1) the first level consists of the Bank's organisational structures conducting operating activities, including in particular the sales of products and customer service, and the Bank's other organisational structures carrying out risk-generating operating tasks and functioning on the basis of the Bank's separate internal regulations,

2) the second level comprises the activities of:
    - the compliance unit,
    - the specialised organisational structures of the Bank responsible for identification, measurement, control, monitoring and reporting of risks, threats and irregularities in order to ensure that the activities implemented at the first level are properly designed and the second level structures effectively manage the risks and support the effectiveness of the Bank's operations,
3) the third level comprises the activities of the internal audit unit, which performs independent audits of elements of the Bank's management system, including the risk management system and the internal audit system.

The said levels are independent, which means that:
1) the second level is independent of the first level as regards the creation of system solutions,
2) the third level is independent of the first and second level.

The internal audit system at the Bank comprises:
1) the control function,
2) the compliance unit – the Compliance Department,
3) the internal audit unit – the Internal Audit Department.

The control function ensures compliance with controls relating, in particular, to risk management at the Bank, this function covers all of the Bank's units and the organisational positions in these units responsible for the performance of tasks allocated to the specific function.

The control function comprises:
1) control mechanisms,
2) independent monitoring of compliance with control mechanisms,
3) reporting as part of the control function.

The Bank determines and the Management Board approves the list of material processes which have a material impact on the achievement of the internal audit system objectives and business objectives of the Bank and ensures periodical reviews of the processes in place at the Bank from the perspective of their materiality.

Controls are embedded in the processes taking place at the Bank and in the systems or applications which support these processes. These controls are tailored to the objectives of the internal audit system, which are related to the processes in place at the Bank and their complexity, the risk of irregularities and the specific nature of the Bank's operations, and take into account the resources available to the Bank. These controls are subject to independent monitoring at all levels of the internal audit system. Such independent monitoring of compliance with controls is performed:
1) horizontally – by a Bank's unit within that unit or within another unit at the same level,
2) vertically – by the Bank's units at the second level as regards to the first level units.

The Bank's units are responsible for performing specific activities associated with horizontal or vertical monitoring within the scope of their tasks and powers. Independent monitoring includes current verification or testing of the controls.

The compliance unit is an organisationally separate, independent unit which plays the key role in ensuring compliance and managing compliance risk understood as the risk of suffering legal sanctions, financial losses or reputation loss as a result of non-compliance on the part of the Bank, the Bank's employees or the entities acting on its behalf with the generally applicable laws, the Bank's internal regulations and the market standards adopted by the Bank.

The compliance unit is responsible for developing solutions aimed at ensuring compliance and compliance risk management, as well as identification, assessment, control, monitoring and reporting of this risk at the Bank.

Internal audit is an independent and objective assurance and advisory function which performs systematic and organised assessments of the individual areas of the Bank's activity and suggests steps to be taken to increase the quality and effectiveness of the Bank's operations.

The objective of the audit unit is:
1) as part of its assurance activities – to evaluate the adequacy and effectiveness of the risk management system and the internal audit system at the first and second levels of the internal audit system, taking into account the adequacy and effectiveness of the risk controls and control mechanisms selected for auditing,
2) as part of its advisory activities – adding value to and improving the processes in the Bank.

The Bank operates the following mechanisms to ensure independence of the compliance unit and the internal audit unit:
1) approval of the Audit Charter and the rules for ensuring compliance and managing compliance risk by the Management Board of the Supervisory Board,
2) subordination of the compliance unit to the President of the Management Board,
3) functional subordination of the internal audit unit to the Audit Committee of the Supervisory Board and its administrative subordination to the President of the Management Board,
4) the internal audit unit, as a third level unit, not being subject to independent monitoring by the Bank's organisational units situated at the second level of the internal audit system,
5) ensuring direct access to members of the Management Board and the Supervisory Board to directors of the said units,
6) participation of the directors of the said units in the meetings of the Management Board,
7) participation of the directors of the said units in the meetings of the Supervisory Board and the relevant Committees when their agenda includes issues relating to the internal audit system or risk management,
8) appointment and dismissal of internal audit unit director and the compliance unit director require prior approval of the Supervisory Board,
9) approval of the amount of remuneration of the internal audit unit director by the Supervisory Board or its competent committee, respectively,
10) approval of the amount of remuneration (including bonuses) of the compliance unit director by the Audit Committee of the Supervisory Board, taking into account the principle that the said remuneration may not differ from the remuneration of other persons performing key functions at the Bank and that it should not be directly dependent on the Bank's financial results,
11) notifying the PFSA of any changes of directors of the said units, including the reasons for those changes,
12) providing the employees of the aforementioned units with access to all necessary information (including confidential and sensitive information), rooms and IT systems (without the possibility of interference with the system's resources), as well as communication with the Bank's employees, to the extent they deem necessary to perform their tasks,
13) non-participation of the employees of the said units in the execution of day-to-day business tasks,

14) providing solutions for controlling the remuneration of the employees of the aforementioned units which guarantee their independence and objectivity in the performance of their tasks and which enable employing people with appropriate qualifications, experience and skills,
15) protecting employees of the said units from unjustified termination of their employment,
16) organisational separation of the aforementioned units and preventing the employees of these units from performing any duties other than those assigned to them;
17) ensuring financial resources necessary for the effective performance of duties and continuous improvement of the skills and qualifications of the employees of the said units;

Information on irregularities, results of assessments and other material issues identified by the individual components of the internal audit system are presented in periodical reports addressed to the Management Board, the Supervisory Board Audit Committee, the Supervisory Board Risk Committee, or the Supervisory Board.

On the Bank's website (www.pkobp.pl→PKO Bank Polski and the Group→Investor relations→Corporate governance), the Bank has placed a description of the internal audit system which takes into consideration, in particular, a description of: the objectives of the internal audit system; the roles of the Management Board, the Supervisory Board and the Audit Committee of the Supervisory Board; the three independent levels on which the internal audit system is organised; the individual elements of the internal audit system, i.e., the control function, the compliance unit, and the internal audit unit.

The entities belonging to the Bank's Group have internal audit systems adapted to the specific nature of their operations. These entities develop and implement internal regulations defining, in particular, tasks relating to the control activities carried out within the internal audit system and the division of responsibility for these tasks. The operation of the internal audit systems in the companies depends on the size and scope of operations of the entities belonging to the Bank's Group. In most entities, there are separate organisational units or positions performing these functions, reporting directly to the Management Board of the given company or to the Supervisory Board. In the cases justified by an entity's operating profile and its organisational structure (small entities with a limited range of activities), control activities are performed by their managers, without a structurally separated internal audit function or unit. The Bank takes into account the role of the Bank's Group entities in identifying the material processes with regard to their contribution to ensuring the achievement of the objectives of the Bank's internal audit system.

## 2.4 Assessment of the members of the Management Board and the Supervisory Board, information on the recruitment policy and the suitability assessment

The members of the Management Board and the Supervisory Board are subject to a suitability assessment in accordance with the regulations in place at the Bank, i.e.:
1. The Policy on the suitability of the members of the Management Board and key officers of the Bank and a suitability assessment in the Bank's Group companies (and the Principles and methods for suitability assessment of candidates for Management Board members and members of the Bank's Management Board).
2. the Policy on assessing the suitability of candidates for members and members of the Bank's Supervisory Board.

The above-mentioned policies define the directions of actions taken as regards to the selection, appointment and succession planning of members of the Management Board the and Supervisory Board and define the principles for assessing the suitability of these bodies. Based on the provisions introduced, the Supervisory Board (with the participation of the Supervisory Board Appointments and Remuneration Committee, hereinafter: SBARC) makes decisions regarding the selection and suitability assessment of the candidates and members of the Management Board, and the General Shareholders' Meeting (hereinafter: GSM) makes decisions regarding the selection and suitability assessment of the candidates and members of the Supervisory Board.

The suitability assessment of the members of the Management Board is carried out by the SBARC, by accepting a relevant assessment report, which is then approved by the Supervisory Board. The sources of data for the report include the information and documents submitted by candidates for members of the Management Board or persons already appointed to these positions. In making the assessment, the SBARC may be assisted by the Bank's unit responsible for human resources or an external consultant and use other sources of information. The report is forwarded to the Supervisory Board which, if it is required by the regulations and guidelines of the supervisory authorities, informs the PFSA of the results of the suitability assessments made.

Verification of suitability of the members and candidates for members of the Management Board takes the form of an individual and collective assessment. Such assessment is carried out as a preliminary assessment during the qualification procedure in connection with the appointment of a Management Board member, and as a periodical assessment carried out once a year for persons already holding these positions. In other justified cases, in particular in the event of the occurrence of any circumstances affecting the individual or collective suitability assessment performed to date, an additional suitability assessment may be performed.

The GSM performs the individual suitability assessment of the individual candidates to and members of the Supervisory Board and the collective assessment of the whole Supervisory Board each time a new Supervisory Board member is appointed and once a year as part of the periodical assessment. The GSM may also perform an additional suitability assessment in other, justified situations, which affect the requirements addressed to the Supervisory Board or its individual members. Such additional assessments shall be initiated by the Bank.

The suitability assessment takes into account the criteria arising from the respective guidelines issued by a national or European supervisory authority and the requirements set out in the generally applicable laws, while focusing primarily on the assessment of qualifications understood as knowledge, experience and skills in the field of the relevant position, as well as in the field of supervision (the Supervisory Board), management (the Management Board), the structure of the Bank's Group and the related potential conflicts of interest, as well as sufficiently impeccable reputation. Additionally, the assessment involves the evaluation of integrity and adherence to ethical rules, the ability to formulate independent judgments and the possibility to dedicate a sufficient amount of time to performing the relevant duties, while taking into account the limitations on undertaking other activities and the ability to discharge duties in periods requiring particularly increased activity, including, but not limited to, those arising from restructuring, transfer of institutions, acquisitions, mergers, acquisitions or crisis situations.

The assessment of collective suitability, in addition to the guidelines and requirements set out in the generally applicable laws, is focused primarily on ensuring an appropriate 'collective' level of knowledge, skills and experience in the context of the nature and scope of the Bank's operations and the material risks of such operations and in terms of the ability of the Management Board as a whole to manage the Bank and the Supervisory Board as a whole to supervise the Bank's operations.

The selection of Supervisory Board members also takes into account the fact that the Bank is obliged to have a sufficient number of independent Supervisory Board members who satisfy the independence criteria applicable to audit committee members, as specified in the Act on registered auditors, audit firm and public oversight.

In selecting the members of the Management Board and the Supervisory Board, the principle of diversity of the members and the principles of succession management are taken into account. These principles are aimed at ensuring the continuity of decision-making and an appropriate selection of the Management Board and the Supervisory Board members in order to obtain a wide range of powers, knowledge and skills adequate to the position, which guarantee that the members of the Management Board and the Supervisory Board will, individually and collectively, issue and make high quality independent opinions and decisions relating to the entire range of the Bank's operations.

While respecting the outcome of the suitability assessment, the Supervisory Board and the GSM strive to achieve a balance in terms of gender representation in the composition of these bodies, and at least to achieve a minimum gender minority participation of 30%. The target of at least the minimum level of gender diversity in the composition of each Management Board and Supervisory Board should be achieved starting from the appointment of these bodies for a new term after 31 December 2025. Objectives regarding the diversity of the composition of the Management Board and Supervisory Board, including gender and age, are taken into account in the selection only to the extent that it does not adversely affect the functioning and adequacy of these bodies. More information on diversity can be found in the Management Board Report on the Activities of the PKO Bank Polski S.A. Capital Group for 2024, prepared together with the Management Board Report on the operations of PKO Bank Polski S.A. for 2024, (11. Corporate governance, point 11.2.10 Diversity policy in the composition of the Bank's Management Board and Supervisory Board).

In the course of the Management Board and the Supervisory Board members carrying out their functions, pursuant to Article 395(2)(3) of the Commercial Companies Code, the Annual General Shareholders' Meeting acknowledges the fulfilment of duties by each member of the Management Board and the Supervisory Board once a year. The acknowledgement of the fulfilment of duties represents a positive assessment of these persons' work, irrespective of the approval of the Directors' Report by the Annual General Shareholders' Meeting, whereas the absence of such acknowledgement represents a negative assessment of a Management Board or Supervisory Board member's work and, in consequence, may lead to their dismissal.

Due to the changes in the composition of the Management Board in 2024 (11. Corporate Governance, item 11.2.9, The Management Board of PKO Bank Polski – composition, c powers and principles of functioning in the Directors' Report of the PKO Bank Polski S.A. Group for 2024) and the related changes in the internal division of powers within the Management Board of the Management Board, the SBARC conducted:

- preliminary individual suitability assessments - related to the delegation of three members of the Supervisory Board to temporarily perform the duties of the Vice-President of the Management Board, and then the appointment of new members to the Management Board for a new, joint term of office,
- additional individual suitability assessments – related to the change in the division of competences in the Management Board and the assumption of additional functions by the Management Board members, collective suitability assessment of the Management Board – taking into account the personnel changes and changes in the internal division of competences in the Management Board.

As a result of the assessments performed, the SBARC confirmed the individual suitability of the delegated and newly appointed members of the Management Board, as well as the collective suitability of the Management Board. In individual cases, the SBARC recommended that a Management Board member be given the opportunity to supplement their knowledge in individual aspects of their respective competences; this recommendation was implemented as part of the Management Board member's induction programme. The above suitability assessments were approved by the Supervisory Board.

As at 31 December 2024, there were 7 members of the Management Board. In accordance with the assessments made, all members of the Management Board met the requirements set out in Article 22aa of the Banking Law.

The Management Board members collectively hold 6[4] positions in supervisory bodies (boards) of other entities belonging to the PKO Bank Polski Capital Group, associated entities and companies in which the Bank has a direct shareholding, in the bodies of which the Bank has a representative. The number of positions held by individual members of the Management Board is in accordance with the requirements set out in Article 22aa clauses 3-5 of the Banking Law Act.

The General Meeting confirmed the individual suitability of each member of the Supervisory Board and the collective suitability of the entire body (taking into account subsequent personnel changes in the composition of the body) as part of the suitability assessments carried out in February, June and December 2024.

As at 31 December 2024, the Supervisory Board consisted of 8 people, and as of that date, all members of the Supervisory Board met the requirements set out in Article 22aa of the Banking Law Act. As of 31 December 2024, the members of the Supervisory Board held a total of 7[5] positions in the management (Management Board) and supervisory (Supervisory Board) bodies of other entities, most of which are positions in supervisory bodies. The number of positions held by individual members of the Supervisory Board complies with the requirements set out in Article 22aa clauses 3-5 of the Banking Law Act.

## 2.5 Credit risk, including counterparty credit risk

### 2.5.1 Introduction

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

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

The Bank and its subsidiaries forming the Bank's Group are mainly guided by the following principles of credit risk management:

1) every loan transaction is subject to comprehensive credit risk assessment, which is reflected in an internal rating or credit scoring,
2) credit risk relating to lending transactions is measured at the stage of examining a loan application and on a regular basis, as part of the monitoring process, taking into consideration changes in external conditions and in the financial standing of the borrowers,
3) the credit risk of exposures which are material due to their risk level or value is assessed by credit risk assessment units which are independent of the business units,
4) terms and conditions of a loan transactions offered to a customer depend on the assessment of credit risk level generated by the transaction,
5) credit decisions may be taken only by authorised persons,
6) credit risk is diversified, in particular, in terms of geographical areas, industries, products and customers,

[4] In the case of several functions on the supervisory boards of entities belonging to the same capital group, these functions have been listed as one, in accordance with Article 22aa (3) (4) of the Banking Law Act.
[5] In the case of several functions on the Management Boards or Supervisory Boards of entities belonging to the same capital group, these functions have been listed as one, in accordance with Article 22aa (3) (4) of the Banking Law Act.

7) depending on the credit risk level, appropriate collateral is taken by the Bank to minimise potential future losses.

In the Bank's Group, as part of credit risk, the risk of foreign currency mortgage loans to households is identified. This risk is understood as the risk of incurring losses as a result of a customer defaulting on their liabilities to the Bank in respect of a foreign currency mortgage loan. This risk is considered material at the Bank.

### 2.5.2 Risk identification

The identification of credit risk consists of recognising current and potential sources and factors affecting the credit risk level in the current and planned lending activities of the Bank's Group.

Credit risk identification involves determining the factors which have a significant impact on the level of credit risk in the operations of the Bank's Group and estimating their potential impact on the operations of the Bank's Group

Credit risk identification addresses both the existing and planned loan products offered to the customers of the Bank's Group, the processes of implementation of such products, using IT tools and databases.

### 2.5.3 Credit risk measurement, estimation and assessment

Credit risk measurement, estimation and assessment take place at customer level, individual lending transaction level and at the level of the loan portfolios of the Bank's Group. The measurement or estimation of credit risk involves carrying out stress tests of the risk related to credit exposures in foreign currencies and in PLN. The assumptions for conducting stress tests ensure a reliable measurement/ estimation of credit risk in the Bank's Group.

The measurement, estimation and assessment of portfolio credit risk includes periodical assessment of such risk taking into account all credit exposures of customers, as well as various aspects of the portfolio, such as customer groups or groups of loan products, as well as by homogeneous portfolios sharing common credit risk characteristics.

### 2.5.4 Credit risk measurement methods

Various measures are used to measure and assess portfolio credit risk, in particular:
1) probability of default (PD),
2) loss given default (LGD),
3) credit conversion factor (CCF),
4) Expected credit loss (EL),
5) credit value at risk (CVaR),
6) share and structure of impaired credit exposures,
7) coverage ratio of impaired loans,
8) cost of credit risk,
9) stress testing.

PKO Bank Polski S.A. gradually improves the scope of its credit risk parameters, taking into account the IRB approach and expands the scope of application of risk measures so as to fully cover the Bank's loan portfolio with this approach.

The results of portfolio credit risk measurement are taken into account, in particular, in determining the profitability and pricing terms of new or modified loan products, the optimum threshold values conditioning the customer's access to financing by the Bank, determining allowances for expected credit losses and establishing bonus rules.

The credit risk assessment process at the Bank's Group takes into account the requirements of the Polish Financial Supervision Authority as laid down in the PFSA Recommendations. The Bank conducts analyses and stress tests, taking into account, in particular, the PFSA's Recommendations S, T, C, and R. The Bank sets limits which constitute an internal tool determining the appetite for credit risk and concentration risk These limits are a tool which supports the management of these risks. The stress tests and analyses concern the impact of potential changes in the macroeconomic environment on the quality of the Bank's Group's loan portfolio, and their results are presented in the reports for the Bank's bodies. The above information makes it possible to identify and take measures to reduce the negative effects of the impact of unfavourable market situations on the Bank's Group's performance.

### 2.5.5 Rating and scoring methods

The Bank assesses the risk of individual lending transactions using the scoring and rating methods which are created, developed and supervised by the Risk Management Division. The functioning of these methods is supported by specialist IT applications. The assessment method is defined in the Bank's internal regulations whose main purpose is to ensure a uniform and objective credit risk assessment in the lending process.

The credit risk assessment process at the Bank takes into account the requirements of the PFSA as defined in Recommendation S concerning best practices for the management of mortgage-secured credit exposures and Recommendation T concerning good practices for the management of retail credit exposures.

The Bank assesses the credit risk of retail customers from two perspectives: credit standing in terms of quantity and quality. The assessment of credit standing in terms of quantity consists of examining a customer's financial position, whereas the assessment of credit standing in terms of quality (the assessment of creditworthiness) covers credit scoring and the assessment of information about the customer's credit record, obtained from the Bank's internal databases and external databases.

In the case of companies and enterprises owned solely by natural persons, farmers or housing associations, the Bank assesses credit risk using the scoring method. Such assessment refers to low-value, non-complex loan transactions and it is performed in two dimensions: a customer's borrowing capacity and his creditworthiness. The assessment of credit standing consists of examining the customer's ability to settle their liabilities, whereas the assessment of the customer's creditworthiness covers credit scoring and the assessment of the past and present conduct of an enterprise and its owners (natural persons) in their lending dealings with banks. In other cases, the credit rating method is used.

The assessment of credit risk related to financing institutional customers is performed in two perspectives: the customer and the transaction. The assessment measures comprise assessing the customer's credibility, i.e., credit rating, and assessing the transaction, i.e., the ability to repay the liability in a specific amount and within a specified time limit. The rating models for institutional customers are developed using the Bank's internal data, thus ensuring that they are tailored to the risk profiles of the Bank's customers. The models are based on a statistical analysis of the relationship between default and a customer's risk scoring. The customer's risk assessment is dependent on the size of the enterprise for which the analysis is conducted and the industry in which the customer conducts business activities. In addition, the Bank uses a model for the assessment of enterprises credited using a specialist financing formula which makes it possible to adequately assess the credit risk of large projects consisting of financing real estate (e.g., office space, retail space, storage space) and infrastructure projects (e.g., telecommunications, industrial, and public utility infrastructure).

Risk assessment models are subject to monitoring at least once a quarter in accordance with the Bank's internal regulations regarding periodical verification of credit risk models. They are also subject to regular independent validation conducted by the Validation Department.

The rating and scoring information is widely used at the Bank in credit risk management within the system of competences to make lending decisions and within the system for credit risk measurement and reporting.

### 2.5.6 Control of the credit risk

The control of the credit risk consists of defining tools for diagnosing the credit risk level, applying credit risk controls to reduce the level of that risk and complying with the controls as part of credit risk management, both in lending processes and at portfolio level.

The Bank and the Bank's Group use, in particular, the following risk control tools and mechanisms to manage credit risk:
1) strategic limits of concentration risk tolerance,
2) internal limits of tolerance to credit risk or concentration risk:
   - limits determining the level of tolerance to portfolio credit risk and concentration risk,
   - industry limits,
   - competence limits,
3) verification of the quality of the lending processes,
4) a branch's rating,
5) threshold amounts which trigger involvement of risk analysts in the credit risk assessment.

The Bank and the Bank's Group set internal limits of tolerance for portfolio credit risk, in particular, with regard to:
1) industry segments,
2) exposures arising from credit exposures secured by mortgage and retail exposures,
3) credit portfolio quality,
4) portfolio structure in terms of product/segment/currency/distribution channels,
5) the maximum and individual ratios of the expenditures related to servicing loan and financial liabilities to retail customers' income,
6) loan duration,
7) exposures resulting from leveraged transactions.

The Bank controls the level of its credit exposure to its customers or groups of related customers within the meaning of the Banking Law by setting the maximum level of powers required to make lending decisions concerning lending transactions, including changes in their terms and conditions, and the maximum limits of the competences for these levels, as referred to in the Bank's internal regulations concerning the segregation of competences to make lending decisions. As part of monitoring the competence limits, the Bank verifies, in particular, the level of the lending competences of the authorised persons and the validity of the lending competence certificates awarded to these persons.

The Bank and the entities in the Bank's Group monitor and control the utilisation of strategic credit risk tolerance limits and internal limits on a monthly and quarterly basis. The results of the monitoring are presented in the monthly information for the members of the Risk Committee and in the quarterly or monthly report on credit risk at PKO Bank Polski S.A., respectively. Where the level of utilisation of a strategic limit exceeds the set threshold, the Bank initiates measures to prevent the set level from being exceeded.

### 2.5.7 Credit risk forecasting and monitoring

Forecasting credit risk and concentration risk consists of predicting the future level of credit risk and concentration risk, taking into account the assumed projection of the development of lending activities and external and internal events. Monitoring credit risk consists of monitoring deviations of the actual values from the forecasts or the assumed points of reference (e.g., limits, thresholds, plans, prior period measurements, recommendations and guidance issued by an external supervisory and control authority), as well as conducting specific and comprehensive stress tests.
Risk level forecasting is subject to back testing.

Credit risk is monitored for individual lending transactions and for portfolios.

Credit risk monitoring for individual lending transactions is defined, in particular, in the Bank's internal regulations concerning:
1) the assessment of the Bank's credit risk related to financing its customers,
2) customer assessment methodologies or methods,
3) identification of groups of related entities,
4) evaluation of collateral and inspection of real estate and investment projects,
5) recognition of allowances for expected credit losses,
6) the Early Warning System (EWS),
7) operating activities within the lending process.

In order to reduce the time of response to the observed warning signals indicating an increase in the credit risk level, the Bank uses an EWS IT application as well as scoring models used for behavioural assessment.

### 2.5.8 Risk concentration

The objective of concentration risk management is to ensure a safe loan portfolio structure by mitigating the risks arising from excessive concentrations of exposures which have the potential to generate losses large enough to threaten the financial standing of the Bank's Group or its ability to carry on its core operations or lead to a significant change in the risk profile of the Bank's Group.
The Bank's Group identifies concentration at portfolio level and concentration at entity level.

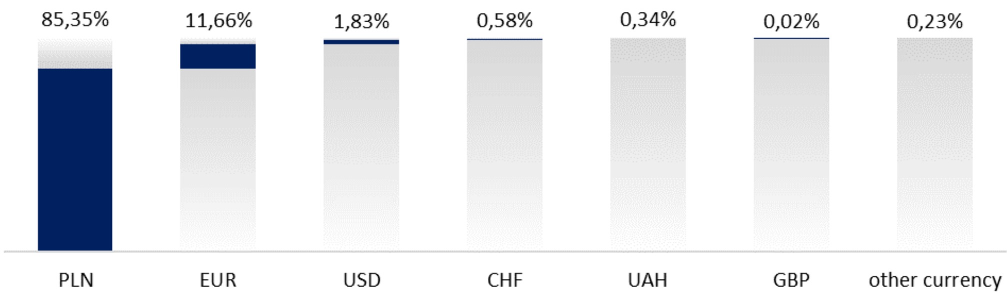
The Bank's Group monitors exposure concentration risk in relation to:
1) exposures to individual customers and groups of related customers, including large exposures,
2) exposures to groups of customers or credit portfolios exposed to one risk factor.

The risk of concentration of exposures to individual clients and groups of related clients is monitored in accordance with EU Regulation No. 575/2013, which applies to the Bank's Capital Group. The Capital Group does not assume exposure to a client or a group of related clients, the value of which, after taking into account the effect of credit risk mitigation in accordance with Articles 399-403 of the CRR, exceeds 25% of the consolidated Tier 1 capital.

In the process of monitoring the concentration of exposures at entity level, the Bank takes into account:
1) daily monitoring of the concentration level of large exposures within the meaning of Article 392 of the CRR,
2) a monthly check of the utilisation of the limits arising from Article 395(1) of the CRR and from Article 79a(4) of the Banking Law,
3) a quarterly check of internal limits on the risk of concentration at entity level,
4) identification of warning signals and initiating measures aimed at preventing limits from being exceeded,
5) performing stress tests for concentration risk (including scenarios which are the input for comprehensive stress tests that make it possible to assess the impact of correlated factors of credit risk, interest rate risk, currency risk, operational risk and liquidity risk on the level of the Bank's expected credit loss).

Moreover, the Bank's Group analyses concentration risk for:
1) geographical areas,
2) currencies,
3) industries,
4) exposures secured by mortgage,
5) largest entities or groups of related customers.

Chart 2.1. Group credit portfolio currency structure (balance and off-balance)




EUR-denominated exposures constitute the largest part of the foreign currency exposure of the Bank's Group, and they relate to the Bank's loan portfolio. The share of these loans in the foreign currency portfolio amounted to 79.54% as at the end of 2024, which represents a 3.38 p.p. increase compared with the end of 2023. Another group of foreign currency loans are loans in USD which represented 12.51% of the Bank's Group's foreign currency portfolio as at the end of 2024, which represents a 1.82 p.p. increase compared with the end of 2023.

As at 31 December 2024 and 31 December 2023, concentration limits were not exceeded. As at 31 December 2024, the largest exposure of the Bank's Group to a single entity accounted for 12.8% of the consolidated Tier 1 capital.

Table 2.1 Exposures towards the 10 biggest clients*

| No. | 31.12.2024 | | 31.12.2023 | |
|---|---|---|---|---|
| | Value* | Own funds percentage | Value* | Own funds percentage |
| 1 | 5 675 | 12,8 | 3 360 | 8,1 |
| 2 | 3 151 | 7,1 | 3 151 | 7,6 |
| 3 | 2 436 | 5,5 | 3 023 | 7,2 |
| 4 | 2 422 | 5,5 | 2 061 | 4,9 |
| 5 | 2 395 | 5,4 | 1 927 | 4,6 |
| 6 | 2 213 | 5,0 | 1 826 | 4,4 |
| 7 | 2 129 | 4,8 | 1 605 | 3,8 |
| 8 | 1 782 | 4,0 | 1 501 | 3,6 |
| 9 | 1 501 | 3,4 | 1 492 | 3,6 |
| 10 | 1 427 | 3,2 | 1 435 | 3,4 |
| **Total** | **25 131** | **56,8** | **21 380** | **51,2** |

* Total exposure (on- and off-balance sheet) to customers that are not a central bank or another bank or a central government after taking into account the effect of credit risk mitigation in accordance with Articles 399-403 of EU Regulation No. 575/2013 (without deducting write-offs).

As at 31 December 2024, the largest concentration of the exposure of the Bank's Group to a group of related customers within the meaning of the Banking Law accounted for 12.9% of the consolidated Tier 1 capital.

Table 2.2 Exposures towards the 5 largest groups of related customers*

| No. | 31.12.2024 | | 31.12.2023 | |
|---|---|---|---|---|
| | Value | Own funds percentage | Value | Own funds percentage |
| 1 | 5 698 | 12,9 | 4 033 | 9,7 |
| 2 | 3 447 | 7,8 | 3 415 | 8,2 |
| 3 | 3 235 | 7,3 | 3 341 | 8,0 |
| 4 | 3 151 | 7,1 | 3 029 | 7,3 |
| 5 | 2 786 | 6,3 | 2 759 | 6,6 |
| Total | 18 317 | 41,4 | 16 578 | 39,7 |

* Total exposure (on- and off-balance sheet) to affiliated groups of clients that are not a central bank, another bank or a central government after taking into account the effect of credit risk mitigation in accordance with Articles 399-403 of EU Regulation No. 575/2013 (without deducting write-offs). Exposure to groups in which the State Treasury exercises control does not include exposure to the State Treasury.

Table 2.3 Maturity of exposures [Template EU CR1-A]

| | | 31.12.2024 | | | | |
|---|---|---|---|---|---|---|
| | | a b | c | d | e | f |
| | | Net exposure value | | | | |
| | | On demand and <= 1 year | > 1 year <= 5 years | > 5 years | No stated maturity | Total |
| 1 | Loans and advances | 64 558 | 88 222 | 112 657 | 5 134 | 270 571 |
| 2 | Debt securities | 52 072 | 104 137 | 51 112 | - | 207 321 |
| 3 | Total | 116 629 | 192 359 | 163 769 | 5 134 | 477 892 |

## 2.5.9 Impairment of credit exposures

In the area of impairment, the Bank's Group applies IFRS 9 which is based on the concept of expected losses.
The impairment model is applicable to financial assets that are not measured at fair value through profit or loss, comprising:
1) debt financial instruments comprising credit exposures and securities,
2) lease receivables,
3) off-balance sheet financial and guarantee liabilities.

In accordance with IFRS 9, no expected credit losses are recognized for equity investments.

The impairment of credit exposures is measured as 12-month or lifetime expected credit losses on an asset. The horizon of measuring the expected loss depends on whether from the time of initial recognition of the asset the credit risk has significantly increased. Due to this criterion, financial assets are allocated to 3 Stages:
1) Stage 1 – assets, for which credit risk is not significantly higher from credit risk from the date of their initial recognition and impairment is not recognized,
2) Stage 2 – assets, for which credit risk is significantly higher from credit risk from the date of their initial recognition, but evidence of impairment is not recognized,
3) Stage 3 – assets in respect of which evidence of impairment is recognized.

Additional category comprises assets granted or purchases with the Purchased or Originated Credit Impaired (POCI) recognized (on the date of granting or purchase).

In order to assess a significant increase in credit risk for mortgage exposures and other retail exposures, the Bank's Group uses a model based on calculating the marginal PD, i.e., the probability of default in a specified month calculated from the date of origination of an exposure. The Bank identifies an indication of significant increase in risk for a given exposure by comparing the curves of the probability of default over the horizon when the exposure persists, as of the date of initial recognition and the reporting date.

In order to assess a significant increase in credit risk for institutional customers, the Bank's Group uses a model based on Markov chains. The calculation of the curve of maximum acceptable deterioration of the loan quality in time, which is not identified as a significant increase in credit risk, takes place on the basis of the probabilities of default estimated on the basis of migrations of customers between individual rating and scoring classes.

In order to identify other indications of significant increase in credit risk the full available qualitative and quantitative information is used, including:
1) marking a credit exposure as POCI without any indication of impairment,
2) restructuring measures introducing forbearance for a debtor in financial difficulties,
3) delinquency in the repayment of a material amount of principal or interest of more than 30 calendar days, with the exception of credit exposures in respect of interbank deposits, debt securities held by the Group, guarantees for debt security issues, receivables in respect of purchase of securities with a repurchase clause or in respect of 'old book' housing loans, in the case of which such delinquency is not an indication of impairment,
4) a material increase in the probability of insolvency compared with the probability of insolvency on the date of initial recognition of a credit exposure,
5) classification of a credit exposure or customer to the Watch List in a given customer segment,
6) the identified early warning signals within the monitoring process indicating the significant increase in credit risk,
7) significant increase in the LTV ratio (for individual mortgage loans),
8) the assessment by an analyst within the tailor-made analysis.

The indications of default and impairment of a credit exposure include, in particular:
1) delinquency in the repayment of a material amount of principal or interest of more than 90 consecutive calendar days,
2) deterioration in the debtor's economic and financial position or a threat to the completion of the investment project financed during the loan term, expressed by putting the debtor into a rating class or risk class indicating a significant threat to debt repayment,

3) the conclusion of a forbearance agreement or the application of relief in the settlement of a receivable due to economic or legal reasons resulting from a customer's distress (until the receivable is recognized as healed),
4) filing a petition for bankruptcy of the debtor, putting the debtor into liquidation or commencing enforcement proceedings against the debtor,
5) declaration of consumer bankruptcy by any of the joint borrowers,
6) information on the death of all borrowers who are natural persons or entrepreneurs running individual business activity or a civil partnership (unless such business activity is continued by a successor).

Changes in the terms and conditions of an agreement, agreed with a debtor or an issuer, forced by their distress (forbearance measures introducing concessions which otherwise would not be granted) are considered forbearance and an indication of impairment. The objective of forbearance is to restore a debtor's or an issuer's ability to fulfil their obligations to the Bank's Group and to maximize the effectiveness of non-performing loan management, i.e., obtaining the highest recoveries possible while minimizing the related costs.

Forbearance changes in repayment terms may consist of:
1) dividing the debt due into instalments,
2) changing the repayment scheme (annuity payments, degressive payments),
3) extending the loan term,
4) changing the interest rate,
5) changing the margin,
6) reducing the debt.

Granting concessions recognized as indications of impairment as part of forbearance results in the recognition of a default event and the classification of a credit exposure in the non-performing exposure portfolio. The inclusion of such exposures in the portfolio of performing exposures (discontinuing recognition of the forbearance agreement as an impairment trigger) takes place at least 12 months after the introduction of forbearance, provided that all payments in arrears and at least six scheduled payments have been made by the customer and, in the Bank's Group's opinion, the current situation of the customer does not pose a threat to their compliance with the terms of the restructuring agreement (this does not apply if the forbearance involves a reduction of the receivables (principal, interest or fees) by more than 1%)).

Exposures subject to forced forbearance cease to meet the criteria for exposures under forbearance status no earlier than after 24 months from the time this status ceases to be recognized as an indication of impairment, provided that the customer has repaid at least 12 instalments in the target amount and has no debt past due by more than 30 days as at the end of that period.

Information concerning forbearance at the Bank's Group level is described in the consolidated financial statements of the PKO Bank Polski S.A. Group as at and for the year ended 31 December 2024 (Note 54).

In the portfolio method, the expected loss is calculated as the product of credit risk parameters: probability of default (PD), loss given default (LGD) and exposure at default (EAD), each of these parameters is a vector representing the number of months covering the expected credit loss horizon. In the case of exposures classified to the Stage 1 the Bank applies maximally 12-month horizon of estimating the expected loss. In the case of exposures classified as Stages 2 or 3, the expected loss is estimated over the horizon up to the maturity of an exposure or its renewal. With regard to retail exposures without a repayment schedule, the Bank determines such horizon based on behavioural data arising from past observations. The loss expected both in the entire duration of the exposure and in a period of 12 months is the sum of expected losses in the individual periods discounted using the effective interest rate. The Bank adjusts the parameter specifying the level of exposure at the time of default by the future repayments arising from the schedule and potential overpayments and underpayments to specify the value of the asset at the time of default in a given period.

In the calculation of expected credit losses, estimates of future macroeconomic conditions are taken into account. In the portfolio analysis, the impact of macroeconomic scenarios is included in the amount of individual risk parameters. The methodology for calculating risk parameters includes an examination of the dependence of these parameters on macroeconomic conditions based on historical data. Three macroeconomic scenarios based on our own forecasts – a baseline scenario and two alternative scenarios – are used to calculate the expected loss. The range of forecast indicators includes the GDP growth rate, the unemployment rate, the 3M WIBOR rate, the SARON 3M rate, the CHF/PLN exchange rate, the real estate price index and the NBP reference rate. The final loss is expected to be the probability-weighted average of expected loss scenarios corresponding to individual scenarios. The Bank's Capital Group ensures that the macroeconomic scenarios used to calculate risk parameters are consistent with the macroeconomic scenarios used in credit risk budgeting processes.

In case of identifying an impairment of individually significant exposures, the expected credit loss on exposures shall be measured using the tailor-made approach, as a difference between its gross carrying value (for off-balance sheet credit exposure – the value of its balance-sheet equivalent) and the current value of expected future cash flows determined with taking into account the possible scenarios relating to performance of the agreement and credit exposure management, weighted with the probability of their realisation. The likelihood of the materialisation of the contract servicing and receivables management scenarios defined in the individualised assessment of credit exposures is determined by taking into account the current assessment and projections of the customer's economic and financial standing, the assessment of the correct implementation of the contractual provisions (with particular regard to the timeliness of repayments), the stage reached in the efforts to conclude a restructuring agreement and the impact of macroeconomic factors. The range of the forecast indicators includes the GDP growth rate, unemployment rate, WIBOR 3M, SARON 3M, property price index and the NBP reference rate.

The tailor-made approach to the measurement of the expected loss is also applied to individually significant exposures without impairment, in the case of which the application of portfolio parameters in such calculations would be unjustified due to the specifics of the case.

Both the process of assessing a significant increase in credit risk and the process of calculating the expected loss are conducted monthly at the level of individual exposures. They use a computing environment which makes it possible to distribute the results to the Bank's Group's internal units.

The indications for classifying credit exposures as non-performing items (at risk of default) are consistent with the indications of default and impairment.

Past due exposures include credit exposures in the case of which there is delinquency in principal or interest payments, concerning amounts exceeding the quantitative thresholds taken into account when recognising the past due status as impairment.

As far as a specific credit risk adjustment is concerned, the Bank's Group uses the impairment loss on assets which was included in the Bank's Tier 1 funds, in accordance with the CRR and the CRR implementing rules.

In 2024, the macroeconomic model takes into account factors that are expected to reflect current national and international developments - the impact of the current macroeconomic situation (relatively high interest rates persisting for a long time) on the ability of clients to pay their bills, as well as the tense geopolitical situation in connection with Russia's invasion of Ukraine and its impact on fuel prices and, consequently, on the condition of companies.

Additional factors in the model include:

- taking into account high energy prices on the condition of enterprises, using the historically observed dependence,
- taking into account exchange rate volatility on the quality of the portfolio of foreign currency housing loans, as a result of the escalation of hostilities in Ukraine.

In addition, due to the significant influx of refugees following Russia's invasion of Ukraine and the uncertainty of its impact on the labour market, the model in all portfolios does not take into account a decrease in unemployment as a factor improving the quality of the loan portfolio.

The applied approach to the impact of macroeconomic forecasts on risk parameters describes the situation simultaneously in all branches of the economy and may not take into account the problems of individual industries, which is why the Bank has conducted additional analyses of the loan portfolio. These analyses, carried out by risk experts, mainly included an assessment of the impact of specific macroeconomic conditions not taken into account in the portfolio approach and helped identify clients and industries particularly affected by the current economic situation. This is case in, among others, the construction, automotive, office and retail rental sectors, organic fertiliser production and energy-intensive industries. Exposures with highest PD values (D rating or worse) belonging to identified industries were marked with the indication of ‘significant increase in credit risk’ and covered by increased write-downs (based on PDs for the worst rating class). In 2024, the Bank decreased the write-downs for expected credit losses on this account by approx. PLN 80 million, which represents approx. 6% of the value of write-downs on the entire portfolio of corporate loans classified as Stage 2.

Table 2.4 Homogenous exposures portfolio: Corporate portfolio

| | 31.12.2024 | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| | Scale PD | Oryginal gross carrying amount | Off-balance sheet exposures | EAD after credit risk mitigation and application of the credit conversion factor | Average PD in % | Number of exposures | Average LGD in % | Average maturity | Expected Credit Loss (ECL) |
| Stage 1 | from 0,00 to <0,15% | 1 790 | 1 903 | 2 655 | 0,61% | 5 129 | 42,34% | 4 | 10 |
| | from 0,15% to <0,25% | 2 919 | 3 342 | 3 733 | 0,45% | 7 098 | 45,27% | 5 | 13 |
| | from 0,25% to <0,50% | 6 978 | 5 165 | 7 732 | 0,54% | 27 851 | 36,47% | 3 | 26 |
| | from 0,5% to <0,75% | 5 945 | 6 768 | 7 389 | 0,90% | 22 024 | 39,68% | 4 | 35 |
| | from 0,75% to <2,50% | 26 147 | 19 563 | 27 036 | 1,69% | 82 946 | 32,22% | 3 | 206 |
| | from 2,50% to <10,00% | 25 912 | 13 340 | 24 843 | 4,14% | 101 679 | 32,65% | 4 | 373 |
| | from 10,00% to <45,00% | 2 185 | 135 | 1 283 | 8,77% | 17 556 | 32,01% | 5 | 57 |
| | from 45,00% to <100,00% | - | - | - | - | - | - | - | - |
| Stage 2 | from 0,00 to <0,15% | 178 | 366 | 215 | 1,77% | 1 381 | 35,30% | 2 | 5 |
| | from 0,15% to <0,25% | 439 | 410 | 462 | 4,28% | 1 379 | 33,60% | 6 | 24 |
| | from 0,25% to <0,50% | 1 510 | 463 | 1 057 | 4,03% | 8 985 | 37,69% | 5 | 68 |
| | from 0,5% to <0,75% | 3 141 | 1 502 | 3 163 | 2,33% | 8 776 | 30,16% | 4 | 67 |
| | from 0,75% to <2,50% | 8 183 | 3 980 | 6 388 | 4,97% | 43 431 | 31,61% | 4 | 536 |
| | from 2,50% to <10,00% | 9 645 | 2 183 | 7 853 | 7,40% | 55 347 | 33,45% | 3 | 1 026 |
| | from 10,00% to <45,00% | 1 712 | 940 | 1 462 | 21,89% | 10 106 | 34,41% | 4 | 215 |
| | from 45,00% to <100,00% | - | - | - | - | - | - | - | - |

| | 31.12.2024 | a | b | c | d |
|---|---|---|---|---|---|
| | Time in default | EAD after credit risk mitigation and application of the credit conversion factor | Number of exposures | Average LGD in % | Expected Credit Loss (ECL) |
| Stage 3 | to 12 months | 3 670 | 16 309 | 32,47% | 1 330 |
| | from 13 to 24 months | 735 | 8 746 | 41,56% | 271 |
| | from 25 to 36 months | 343 | 4 399 | 55,24% | 157 |
| | from 37 to 48 months | 192 | 2 315 | 56,18% | 78 |
| | from 49 to 60 months | 293 | 1 170 | 41,92% | 85 |
| | from 61 to 84 months | 363 | 1 571 | 60,24% | 158 |
| | over 84 months | 1 095 | 2 454 | 72,59% | 610 |
| POCI | to 12 months | 448 | 767 | 14,14% | 17 |
| | from 13 to 24 months | 70 | 565 | 41,23% | 5 |
| | from 25 to 36 months | 43 | 361 | 57,27% | 3 |
| | from 37 to 48 months | 19 | 118 | 60,44% | 3 |
| | from 49 to 60 months | 42 | 39 | 17,19% | 4 |
| | from 61 to 84 months | 64 | 37 | 17,02% | 2 |
| | over 84 months | 26 | 84 | 16,15% | 3 |

Table 2.5 Homogenous exposures portfolio: Retail portfolio

| 31.12.2024 | | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| | Scale PD | Oryginal gross carrying amount | Off-balance sheet exposures | EAD after credit risk mitigation and application of the credit conversion factor | Average PD in % | Number of exposures | Average LGD in % | Average maturity | Expected Credit Loss (ECL) |
| Stage 1 | from 0,00 to <0,15% | 965 | 705 | 1 219 | 0,09% | 105 | 38,40% | 11 | 2 |
| | from 0,15% to <0,25% | 935 | 1 043 | 1 343 | 0,18% | 148 | 46,19% | 7 | 3 |
| | from 0,25% to <0,50% | 3 688 | 2 118 | 4 675 | 0,31% | 392 | 48,29% | 6 | 16 |
| | from 0,5% to <0,75% | 3 859 | 804 | 4 286 | 0,52% | 282 | 48,56% | 6 | 24 |
| | from 0,75% to <2,50% | 13 840 | 1 406 | 14 641 | 1,21% | 887 | 49,61% | 6 | 192 |
| | from 2,50% to <10,00% | 7 627 | 243 | 7 788 | 3,41% | 519 | 49,16% | 6 | 250 |
| | from 10,00% to <45,00% | 631 | 17 | 642 | 7,50% | 63 | 46,42% | 6 | 36 |
| | from 45,00% to <100,00% | - | - | - | - | - | - | - | - |
| Stage 2 | from 0,00 to <0,15% | 108 | 3 | 110 | 1,64% | 2 | 30,55% | 12 | 5 |
| | from 0,15% to <0,25% | 62 | 8 | 67 | 5,02% | 4 | 40,23% | 8 | 6 |
| | from 0,25% to <0,50% | 245 | 35 | 264 | 5,65% | 19 | 43,75% | 7 | 26 |
| | from 0,5% to <0,75% | 280 | 33 | 299 | 7,45% | 24 | 46,73% | 6 | 36 |
| | from 0,75% to <2,50% | 1 286 | 164 | 1 372 | 12,93% | 106 | 47,63% | 7 | 254 |
| | from 2,50% to <10,00% | 996 | 79 | 1 044 | 25,34% | 84 | 46,90% | 7 | 302 |
| | from 10,00% to <45,00% | 318 | 21 | 331 | 31,96% | 33 | 44,45% | 9 | 116 |
| | from 45,00% to <100,00% | - | - | - | - | - | - | - | - |

| 31.12.2024 | | a | b | c | d |
|---|---|---|---|---|---|
| | Time in default | EAD after credit risk mitigation and application of the credit conversion factor | Number of exposures | Average LGD in % | Expected Credit Loss (ECL) |
| Stage 3 | to 12 months | 1 075 | 83 337 | 59,33% | 547 |
| | from 13 to 24 months | 517 | 44 055 | 68,10% | 260 |
| | from 25 to 36 months | 271 | 21 658 | 70,78% | 126 |
| | from 37 to 48 months | 172 | 10 747 | 77,01% | 81 |
| | from 49 to 60 months | 102 | 7 035 | 89,63% | 56 |
| | from 61 to 84 months | 60 | 5 536 | 100,00% | 34 |
| | over 84 months | 126 | 23 600 | 98,33% | 66 |
| POCI | to 12 months | 112 | 6 945 | 41,48% | - 30 |
| | from 13 to 24 months | 72 | 4 030 | 46,97% | - 16 |
| | from 25 to 36 months | 41 | 2 325 | 55,14% | - 9 |
| | from 37 to 48 months | 14 | 1 609 | 57,40% | - 2 |
| | from 49 to 60 months | 12 | 1 283 | 78,89% | 1 |
| | from 61 to 84 months | 6 | 561 | 100,00% | 1 |
| | over 84 months | 26 | 84 | 59,79% | 6 |

Table 2.6 Homogenous exposures portfolio: Mortgage portfolio

| 31.12.2024 | | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| | Scale PD | Oryginal gross carrying amount | Off-balance sheet exposures | EAD after credit risk mitigation and application of the credit conversion factor | Average PD in % | Number of exposures | Average LGD in % | Average maturity | Expected Credit Loss (ECL) |
| Stage 1 | from 0,00 to <0,15% | 63 707 | 3 708 | 67 415 | 0,06% | 249 396 | 33,72% | 23 | 27 769 |
| | from 0,15% to <0,25% | 10 114 | 229 | 10 343 | 0,10% | 61 413 | 32,11% | 21 | 5 938 |
| | from 0,25% to <0,50% | 8 114 | 41 | 8 155 | 0,13% | 54 277 | 31,46% | 19 | 5 726 |
| | from 0,5% to <0,75% | 3 891 | 176 | 3 995 | 0,16% | 23 143 | 32,36% | 17 | 4 201 |
| | from 0,75% to <2,50% | 5 733 | 1 154 | 6 504 | 0,37% | 32 820 | 32,49% | 16 | 14 374 |
| | from 2,50% to <10,00% | 2 381 | 893 | 3 080 | 1,53% | 13 255 | 32,63% | 13 | 15 100 |
| | from 10,00% to <45,00% | - | - | - | 0,00% | - | 0,00% | - | - |
| | from 45,00% to <100,00% | - | - | - | 0,00% | - | 0,00% | - | - |
| Stage 2 | from 0,00 to <0,15% | 3 293 | 45 | 3 338 | 1,68% | 15 805 | 33,52% | 21 | 248 281 |
| | from 0,15% to <0,25% | 1 198 | 19 | 1 219 | 3,01% | 8 145 | 34,09% | 19 | 134 878 |
| | from 0,25% to <0,50% | 1 236 | 10 | 1 249 | 3,48% | 9 417 | 34,90% | 18 | 153 924 |
| | from 0,5% to <0,75% | 943 | 16 | 962 | 2,73% | 8 133 | 34,59% | 16 | 89 992 |
| | from 0,75% to <2,50% | 1 664 | 28 | 1 697 | 3,80% | 9 708 | 36,53% | 17 | 218 416 |
| | from 2,50% to <10,00% | 683 | 23 | 714 | 7,29% | 4 881 | 36,51% | 15 | 125 008 |
| | from 10,00% to <45,00% | - | - | - | - | - | - | - | - |
| | from 45,00% to <100,00% | - | - | - | - | - | - | - | - |

| 31.12.2024 | | a | b | c | d |
|---|---|---|---|---|---|
| | Time in default | EAD after credit risk mitigation and application of the credit conversion factor | Number of exposures | Average LGD in % | Expected Credit Loss (ECL) |
| Stage 3 | to 12 months | 388 | 1 914 | 47,12% | 159 |
| | from 13 to 24 months | 264 | 1 277 | 56,20% | 106 |
| | from 25 to 36 months | 175 | 784 | 63,28% | 62 |
| | from 37 to 48 months | 154 | 1 023 | 74,49% | 60 |
| | from 49 to 60 months | 134 | 915 | 88,57% | 61 |
| | from 61 to 84 months | 284 | 1 149 | 95,82% | 131 |
| | over 84 months | 602 | 1 440 | 96,04% | 248 |
| POCI | to 12 months | 65 | 305 | 38,79% | - 25 |
| | from 13 to 24 months | 9 | 63 | 46,46% | - 2 |
| | from 25 to 36 months | 15 | 49 | 33,87% | - 0 |
| | from 37 to 48 months | 7 | 35 | 72,31% | - 0 |
| | from 49 to 60 months | 3 | 19 | 79,28% | 1 |
| | from 61 to 84 months | 7 | 21 | 92,58% | 1 |
| | over 84 months | 67 | 66 | 100,00% | 23 |

### 2.5.10 Credit risk reporting

Credit risk reporting includes periodical reporting of the loan portfolio risk exposure.

The Bank prepares monthly and quarterly reports on credit risk. In addition to the information concerning the Bank, the reports also contain information on the credit risk level of the entities in the Bank's Group in which a material credit risk level has been identified (among other things, in the KREDOBANK S.A. Group, PKO Leasing S.A. Group, and PKO Bank Hipoteczny S.A.). The scope of reporting takes into account recommendations addressed to the Bank by the regulators.

Moreover, the Bank prepares daily, weekly, monthly and quarterly reports on credit exposures in respect of transactions in derivative instruments, concluded with financial institutions and non-financial institutional entities. The reports contain information on credit exposures in respect of derivative instruments concluded with financial institutions and non-financial institutional entities as well as information on the utilisation of limits. The reports are addressed mainly to: The Bank's Credit Committee, ALCO, Risk Committee, the Management Board, and the Supervisory Board.

### 2.5.11 Management activities relating to credit risk

The objective of management activities is to shape and optimize the credit risk management system and the level of credit risk in the Bank's Group.

The credit risk management activities include particularly:
1) issuing internal regulations governing the credit risk management system in the Bank and the Bank's Group,
2) issuing recommendations, guidelines on conduct, clarifications and interpretations of the internal regulations of the Bank and the Bank's Group,
3) taking decisions regarding the acceptable level of credit risk, including in particular lending decisions,
4) designing and improving credit risk control tools and mechanisms which enable the credit risk level to be maintained within the limits accepted by the Bank and the Bank's Group,
5) designing, implementing, monitoring and amending the functioning of controls in credit risk management,
6) developing and improving credit risk assessment methods and models,
7) developing and improving IT tools used in credit risk management,
8) planning actions and issuing recommendations.

### 2.5.12 Use of credit risk mitigation techniques

The main credit risk mitigating techniques include an adequate assessment of customer and transaction risk, a system of limits (as described in the sections above) and collateral for lending transactions.

The collateral policy plays a special role in determining the conditions of the credit transaction. The collateral policy pursued by the Bank and the entities of the Bank Group is aimed at duly securing the credit risk to which the Bank Group is exposed, including, above all, the establishment of the most liquid collateral. Collateral can be considered liquid if it can be sold without significantly reducing its price and within a time frame that does not expose the Bank to a change in the value of the collateral due to price fluctuations relevant to a given collateral. The Bank Group strives to diversify collateral (in terms of form and subject). The Bank Group assesses collateral in terms of the actual possibility of using it as a possible source of pursuing its claims.

The collateral policy of the PKO Bank Polski S.A. Group defines the rules for establishing and remeasuring collateral as well as the procedures for amending their value during the credit exposure's lifetime.

The basis for the valuation of real estate, tangible collateral or rights – objects constituting collateral for claims – is the market value. The market value of the collateral is determined on the basis of:

1) the Bank's internal estimate,

2) a current valuation prepared by an independent expert - in the case of movable property of significant value, the market value determined by the expert is subject to depreciation according to the assumptions adopted by the Bank.

or

3) in the case of real estate, based on a valuation prepared by an independent expert and verified by specialised organisational units of the Bank.

The collateralised real estate should be insured against the range of insurance risks typical for the subject in question, and the property rights arising from the insurance policy should be assigned to the Bank.

When assessing collateral, the Group takes into account the following factors:
1) the economic, financial and economic or social and financial position of entities which provide personal guarantees,
2) the condition and market value of the assets accepted as collateral and their vulnerability to depreciation in the period of maintaining the collateral (the impact of the technological wear and tear of a collateralised asset on its value),
3) the condition and market value of real estate and data adequate to the type of real estate which make it possible to estimate the level of risk related to the portfolio of a given type of collateral effectively and to manage such risk,
4) the potential economic benefits arising from a specific method of securing receivables, including, in particular, the possibility to reduce impairment losses,
5) the method of establishing collateral, including the typical duration and complexity of formalities, as well as the necessary costs (the costs of holding collateral and enforcement against the collateral), using the internal regulations concerning the assessment of collateral,
6) complexity, duration as well as the economic and legal conditions for the effective enforcement against collateral, in the context of enforcement limitations and the existing rules of distribution of the amounts obtained from individual enforcement or in the course of bankruptcy proceedings, debt seniority.

Taking specific types of collateral is dependent on the product and the customer segment. If it is not possible to establish the target collateral promptly, a transitional security in other form may be accepted until it is effectively established (depending on the type of transaction and its amount).

When granting loans intended to finance housing and commercial funding properties, a mortgage is an obligatory type of collateral.

With regard to consumer loans, usually personal guarantees (a civil law surety/guarantee, a bill of exchange) are used or collateral is established on the customer's bank account, car or securities.

Collateral for loans for financing companies and enterprises as well as corporate customers is established, among other things, on business receivables, bank accounts, movables, real estate or securities or in the form of a guarantee (commonly used in the case of companies and enterprises).

In calculating the own funds requirement for credit risk, the Bank's Group, as at the end of 2024, does not use any credit derivatives as collateral for risk in accordance with the CRR (Article 453 d).

The State Treasury is the main type of guarantor and therefore, the source of concentration, accounting from more than 95% of all proceeds from guarantees. The value of financial collateral is determined using the financial collateral comprehensive method referred to in Article 223 of the CRR. The principles for recognising the provider and forms of collateral comply with Part Three, Title II, Chapter 4 of the CRR.)

Table 2.7 CRM techniques overview [Template EU CR3]

| | | 31.12.2024 | | | | |
|---|---|---|---|---|---|---|
| | | Unsecured carrying amount | Secured carrying amount | | | |
| | | | | Of which secured by collateral | Of which secured by financial guarantees | |
| | | | | | | Of which secured by credit derivatives |
| | | a | b | c | d | e |
| 1 | Loans and advances | 122 690 | 169 090 | 168 879 | 211 | - |
| 2 | Debt securities | 207 321 | - | - | - | |
| 3 | Total | 330 011 | 169 090 | 168 879 | 211 | - |
| 4 | Of which non-performing exposures | 2 923 | 2 996 | 2 970 | 26 | - |
| EU-5 | Of which defaulted | | | | | |

## 2.5.13 Information on the use of standardised method

The use of external credit assessment institutions (ECAI)

In the process of calculating own funds requirements, the Bank uses the credit assessments assigned by the following external credit assessment institutions (ECAI):
1. Moody's Investors Service,
2. Standard and Poor's Ratings Services,
3. Fitch Ratings.

The Bank's Group does not use the assessments of export credit agencies in the process of calculating own funds requirements.

Credit assessments used to determine risk weights for exposures to counterparties in the following categories:
- central governments or central banks,
- institutions,
- enterprises,
- regional governments or local authorities.

The principles of applying external ratings and the process of applying an assessment of an issuer and the issues to the non-trading book items for the purposes of calculating own funds requirements is in line with the provisions of Part Three, Title II, Chapter 2 of the CRR and the regulation issued pursuant to Article 136 of the CRR on the mapping of credit assessments of external credit assessment institutions for credit risk (2016/1799).

Table 2.8 Standardized approach – Credit risk exposure and CRM effects [Template EU CR4]

| | | 31.12.2024 | | | | | |
|---|---|---|---|---|---|---|---|
| | Exposure classes | Exposures before CCF and before CRM | | Exposures post CCF and post CRM | | RWAs and RWAs density | |
| | | On-balance-sheet exposures | Off-balance-sheet exposures | On-balance-sheet exposures | Off-balance-sheet amount | RWEA | RWEA density (%) |
| | | a | b | c | d | e | f |
| 1 | Central governments or central banks | 184 873 | 0 | 213 434 | 352 | 7 539 | 3,5% |
| 2 | Regional government or local authorities | 19 448 | 2 738 | 19 801 | 1 278 | 4 216 | 20,0% |
| 3 | Public sector entities | 629 | 3 560 | 434 | 1 686 | 1 059 | 50,0% |
| 4 | Multilateral development banks | 11 614 | - | 11 614 | - | - | 0,0% |
| 5 | International organisations | - | - | - | - | - | - |
| 6 | Institutions | 4 794 | 11 462 | 4 794 | 5 788 | 3 269 | 30,9% |
| 7 | Corporates | 78 707 | 59 462 | 55 344 | 17 451 | 70 679 | 97,1% |
| 8 | Retail | 88 496 | 20 283 | 83 338 | 5 859 | 62 178 | 69,7% |
| 9 | Secured by mortgages on immovable property | 104 236 | 2 358 | 103 686 | 608 | 42 622 | 40,9% |
| 10 | Exposures in default | 6 324 | 246 | 5 394 | 88 | 7 218 | 131,7% |
| 11 | Exposures associated with particularly high risk | 660 | 2 075 | 660 | 186 | 1 270 | 150,0% |
| 12 | Covered bonds | - | - | - | - | - | - |
| 13 | Institutions and corporates with a short-term credit assessment | - | - | - | - | - | - |
| 14 | Collective investment undertakings | 452 | - | 452 | - | 714 | 158,1% |
| 15 | Equity | 1 374 | - | 1 374 | - | 3 403 | 247,6% |
| 16 | Other items | 25 992 | 68 | 25 992 | 34 | 11 213 | 43,1% |
| 17 | TOTAL | 527 600 | 102 254 | 526 319 | 33 330 | 215 381 | 38,5% |

Table 2.9 Standardized approach [Template EU CR5]

| | Exposure classes | 31.12.2024 | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Risk weight | | | | | | | | | | | | | | | Total | Of which unrated |
| | | 0% | 2% | 4% | 10% | 20% | 35% | 50% | 70% | 75% | 100% | 150% | 250% | 370% | 1250% | Other | | |
| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p | q |
| 1 | Central governments or central banks | 210 171 | - | 64 | - | - | - | - | - | - | - | 1 343 | 2 209 | - | - | - | 213 786 | - |
| 2 | Regional government or local authorities | - | - | - | - | 21 079 | - | - | - | - | - | - | - | - | - | - | 21 079 | 16 901 |
| 3 | Public sector entities | - | - | - | - | 2 | - | 2 118 | - | - | - | - | - | - | - | - | 2 120 | 2 120 |
| 4 | Multilateral development banks | 11 614 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 11 614 | 11 614 |
| 5 | International organisations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | Institutions | - | 918 | - | - | 7 857 | - | 256 | - | - | 1 551 | 1 | - | - | - | - | 10 582 | 2 486 |
| 7 | Corporates | - | - | - | - | 171 | - | 1 005 | - | - | 71 619 | - | - | - | - | - | 72 795 | 67 080 |
| 8 | Retail | - | - | - | - | - | - | - | - | 89 198 | - | - | - | - | - | - | 89 198 | 89 198 |
| 9 | Secured by mortgages on immovable property | - | - | - | - | - | 90 198 | 6 174 | - | 1 409 | 4 683 | 1 831 | - | - | - | - | 104 294 | 104 294 |
| 10 | Exposures in default | - | - | - | - | - | - | - | - | - | 2 009 | 3 473 | - | - | - | - | 5 482 | 5 482 |
| 11 | Exposures associated with particularly high risk | - | - | - | - | - | - | - | - | - | - | 846 | - | - | - | - | 846 | 846 |
| 12 | Covered bonds | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Institutions and corporates with a short-term credit assessment | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 14 | Unit or shares in collective investment undertakings | - | - | - | - | - | - | - | - | - | - | 415 | 36 | - | - | - | 452 | 452 |
| 15 | Equity | - | - | - | - | - | - | - | - | - | 22 | - | 1 352 | - | - | - | 1 374 | 1 374 |
| 16 | Other items | 12 836 | - | - | - | 2 469 | - | 2 | - | - | 10 719 | - | - | - | - | - | 26 026 | 26 026 |
| 17 | **Total** | **234 622** | **918** | **64** | **-** | **31 578** | **90 198** | **9 556** | **-** | **90 606** | **90 603** | **7 909** | **3 597** | **-** | **-** | **-** | **559 649** | **327 874** |

The table above presents the total exposure amount of the on-balance sheet and off-balance sheet items of the Bank's Group of PLN 559,649 million, which represents the total exposure net of specific credit risk adjustments and impairment losses and after applying the relevant conversion factors for off-balance sheet exposures, i.e., after multiplying the exposure amounts of off-balance sheet items by the corresponding factors of 0%, 20%, 50% or 100%.

As at 31 December 2024, the Bank did not use on- and off-balance sheet netting pursuant to Article 205 of the CRR, therefore, Article 453(a) of the CRR, regarding the disclosure of information about the policies and processes for on- and off-balance sheet netting and the extent to which a given entity makes use of such netting is not applicable.

As at 31 December 2024, the Bank used the effect of contractual netting agreements for the purposes of determining the balance sheet equivalent for derivative transactions, in accordance with Article 298 of the CRR. Such agreements are concluded primarily with institutional counterparties. They enable the settlement, also in the event of the insolvency of one of the parties, of all transactions covered by a given agreement with one amount being the total of the market values of individual transactions. The contractual netting agreements used meet the requirements of Articles 295-297 of the CRR.

Exposures to the counterparty credit risk

On the wholesale market, PKO Bank Polski S.A. cooperates with financial institutions whose registered offices are located in 64 countries. The Bank may enter, within the set limits, into transactions with 531 counterparties, including domestic and foreign banks, insurance companies, pension funds, investment funds, and stock exchanges.

The Bank has access to two clearing houses – CCP (in one clearing house – as an indirect participant, and in the other one – as a direct participant) through which it clears the interest rate derivative transactions specified in the EMIR,[6] concluded with selected domestic and foreign counterparties. In addition, the Bank plays the role of a clearing broker in one of the clearing houses – it acts as an intermediary in the central clearing of the aforementioned derivative transactions concluded by the Bank's customers. The Bank determines limits within which it manages exposures to central counterparties.

In order to limit the credit risk in respect of derivative transactions and securities transactions, the Bank concludes with its counterparties framework agreements (under the PBA, ISDA and ICMA standards). They enable the offsetting of the parties' mutual due obligations (a reduction in settlement risk) and undue obligations (a reduction in pre-settlement risk) arising from transactions, as well as the use of close-out netting at the time of termination of the framework agreement as a result of a breach or justification for the termination in relation to one or two parties to the agreement.

Moreover, the Bank concludes with its counterparties collateral agreements (CSA – Credit Support Annex under the ISDA standard, or a Collateral Agreement under the PBA standard), under which each party undertakes, upon meeting the premises stipulated therein, to establish appropriate collateral together with the right to offset. Exemptions include derivative transactions concluded between members of the Group: PKO Bank Polski S.A. and PKO Bank Hipoteczny S.A., which were exempted from obligations to exchange collateral pursuant to Article 4(2) of the EMIR Regulation. Under CSA collateral agreements, the Bank only accepts or provides solely cash and cash equivalents, which reduces its exposure to the risk of excessive or negative correlation with the counterparty's exposure or financial condition.

In connection with the obligation to exchange initial margin (IM) deposits as regards to derivative transactions not settled at a CCP, the Bank agreed with domestic and foreign counterparties (which were subject to this obligation) to meet the requirements of the EMIR Regulation. Some of the counterparties of the Bank agreed to an approach consisting of monitoring the utilisation of the threshold value of the so-called threshold, up to which IM is not required, while with the remaining ones, the Bank signs IM agreements according to the ISDA standard. The Bank uses the services of a single depositary, consisting of the storage and settlement of assets submitted under IM.

For lending transactions with financial institutions which have their registered offices outside the Republic of Poland, the international standards on loan agreements of the Loan Market Association are used.

Entering into a framework agreement with a counterparty forms the basis for verifying the internal limit per counterparty and the periods of the Bank's exposures to forward transactions or securities repurchase agreements.

The Bank monitors the financial standing of its counterparties on an ongoing basis and establishes exposure limits adequate to the risk incurred for pre-settlement and settlement exposures of individual counterparties. The Bank sets credit and settlement limits. A credit limit defines the Bank's maximum exposure to a specific counterparty or country in respect of wholesale market operations. A settlement limit defines the maximum acceptable amount of proceeds from a single counterparty or country within one day.

According to the methodology in place at the Bank, the amounts of limits for financial institutions are dependent on, among other things, a counterparty's rating and the level of own funds of the Bank and of the counterparty, and in the case of non-financial institutions also on a treasury survey which determines a customer's demand for hedging transactions. The expected gain on the transaction is taken into account when setting the limits.

The Bank manages the risk of adjustment to the valuation of derivatives for counterparty credit risk as part of credit risk management. The assessment of counterparty credit risk forms a basis for the estimation of CVA and DVA adjustments.

The amount of internal capital for the credit risk of the insolvency of counterparties which are a financial institution, a country or a central bank is determined on the basis of the balance-sheet equivalent of on-balance sheet and off-balance sheet transactions. Depending on the rating, exposures are included in the individual credit quality steps and assigned the relevant risk weight calculated using internal methods. Monitoring and reporting internal capital levels for counterparty risk constitutes one of the elements of managing that risk.

As at 31 December 2024, the Bank had CSA collateral agreements with its counterparties, in which the amount of collateral is linked to the Bank's rating. If the Bank's rating should be lowered below the level defined in a given agreement, the amount of the collateral posted by the Bank on a daily basis may be modified according to the methodology described in the agreement or additional initial margin collateral may be required. As at the date of this Report, the outflow in respect of posting additional collateral if the Bank's rating should be lowered by 3 notches would amount to approx. PLN 128 million.

As at 31 December 2024, the positive gross fair value of derivative instruments concluded with financial institutions amounted to PLN 1,688 million. This amount was calculated by adding up the positive market values for all open transactions. The net credit exposure, after taking into account the netting of transactions for counterparties with framework agreements, was PLN 755 million (excluding centrally cleared transactions). The benefits of the netting amounted to PLN 576 million. The value of the collateral taken from the counterparties under the CSA agreements and the PBA collateral agreements was PLN 445 million.

As at 31 December 2024, the Bank took into account adjustments for credit valuation in the valuation of derivative financial instruments. In the adjustment, the Bank took into account the market value of credit risk from the Bank's perspective. The analysis covered all exposures. In particular, the adjustment took into account the risk of non-performance of the agreements concluded with a counterparty based on, among other things, an analysis of the economic and financial standing of the entities, the probability of repayment of the individual contracts, and the recoverable amount of collateral.

The financial institutions with which the Bank enters into transactions on the interbank market have various external ratings between AAA and B (Table 2.10).

[6] EMIR (European Market Infrastructure Regulation) – Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012on OTC derivatives, central counterparties and trade repositories, which entered into force on 16 August 2012.

Table 2.10 Quality of exposures* to financial institutions

| Rating | PKO Bank Polski SA | |
|---|---|---|
| | 31.12.2024 | 31.12.2023 |
| AAA | 33,2% | 24,0% |
| AA | 3,1% | 9,4% |
| A | 62,0% | 62,7% |
| BBB | 0,7% | 2,0% |
| BB | 0,0% | 0,0% |
| B | 0,0% | 0,0% |
| No rating | 1,0% | 1,8% |
| **Total** | **100%** | **100%** |

* Exposure is the total exposure of the Bank to the non-wholesale and wholesale market, including exposures in respect of deposits, NOSTRO, LORO accounts and securities and the total valuations of derivative instruments after their netting for the counterparties with which there are effective framework netting agreements. The exposures in respect of derivative instruments presented in this table do not include the collateral posted by the counterparties, which reduce this exposure.

The above list is based on external ratings assigned by Moody's, Standard and Poor's Ratings Services and Fitch, mapped to a uniform rating scale.

The value of exposures to counterparty risk is calculated using the standardised method according to Part Three, Title II, Chapter 6, Section 3 of the CRR. In order to determine the current replacement cost of all contracts with positive values, the Bank attaches the current market values to the contracts.

As at the end of 2024, neither the Bank's Group nor the Bank held any credit derivatives used to reduce capital requirements. Consequently, table EU CCR6 has not been presented.

Table 2.11 Analysis of CCR exposure by approach [Template EU CCR1]

| | | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g | h |
| | | Replacement cost (RC) | Potential future exposure (PFE) | EEPE | Alpha used for computing regulatory exposure value | Exposure value pre-CRM | Exposure value post-CRM | Exposure value | RWEA |
| EU1 | EU - Original Exposure Method (for derivatives) | - | - | | 1,4 | - | - | - | - |
| EU2 | EU - Simplified SA-CCR (for derivatives) | - | - | | 1,4 | - | - | - | - |
| 1 | SA-CCR (for derivatives) | 785 | 3 137 | | 1,4 | 6 376 | 5 491 | 5 218 | 3 877 |
| 2 | IMM (for derivatives and SFTs) | | | - | - | - | - | - | - |
| 2a | Of which securities financing transactions netting sets | | | - | | - | - | - | - |
| 2b | Of which derivatives and long settlement transactions netting sets | | | - | | - | - | - | - |
| 2c | Of which from contractual cross-product netting sets | | | - | | - | - | - | - |
| 3 | Financial collateral simple method (for SFTs) | | | | | - | - | - | - |
| 4 | Financial collateral comprehensive method (for SFTs) | | | | | 892 | 8 | 8 | 8 |
| 5 | VaR for SFTs | | | | | - | - | - | - |
| 6 | **Total** | | | | | **7 269** | **5 499** | **5 226** | **3 885** |

The table below presents the value and amount of exposure to the risk for transactions which are subject to the own fund requirement for credit valuation adjustment risk of derivative instruments in the counterparty credit risk.

Table 2.12 Transactions subject to own funds requirements for CVA risk [Template EU CCR2]

| | | 31.12.2024 | |
|---|---|---|---|
| | | a | b |
| | | Exposure value | RWEA |
| 1 | Total transactions subject to the Advanced method | - | - |
| 2 | (i) VaR component (including the 3× multiplier) | | - |
| 3 | (ii) stressed VaR component (including the 3× multiplier) | | - |
| 4 | Transactions subject to the Standardised method | 3 066 | 408 |
| EU4 | Transactions subject to the Alternative approach (Based on the Original Exposure Method) | - | - |
| 5 | **Total transactions subject to own funds requirements for CVA risk** | **-** | **408** |

The table below presents exposures to counterparty credit risk by exposure classes and risk weights applied to calculate the own fund requirement for counterparty credit risk using the standardised method.

Table 2.13 Standardised approach – CCR exposures by regulatory exposure class and risk weights [Template EU CCR3]

| | Exposure classes | 31.12.2024 | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Risk weight | | | | | | | | | | | |
| | | a | b | c | d | e | f | g | h | i | j | k | l |
| | | 0% | 2% | 4% | 10% | 20% | 50% | 70% | 75% | 100% | 150% | Other | Total exposure value |
| 1 | Central governments or central banks | 47 | - | - | - | - | - | - | - | - | - | - | 47 |
| 2 | Regional government or local authorities | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 | Public sector entities | - | - | - | - | 0 | 0 | - | - | - | - | - | 0 |
| 4 | Multilateral development banks | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 | International organisations | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | Institutions | - | 228 | - | - | 326 | 2 148 | - | - | 0 | - | - | 2 701 |
| 7 | Corporates | - | - | - | - | - | 11 | - | - | 2 602 | 0 | - | 2 614 |
| 8 | Retail | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Institutions and corporates with a short-term credit assessment | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Other items | - | - | - | - | - | - | - | - | - | 92 | - | 92 |
| 11 | Total exposure value | 47 | 228 | - | - | 326 | 2 159 | - | - | 2 602 | 92 | - | 5 454 |

Table 2.14 Composition of collateral for CCR exposures [Template EU CCR5]

| | Collateral type | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g | h |
| | | Collateral used in derivative transactions | | | | Collateral used in SFTs | | | |
| | | Fair value of collateral received | | Fair value of posted collateral | | Fair value of collateral received | | Fair value of posted collateral | |
| | | Segregated | Unsegregated | Segregated | Unsegregated | Segregated | Unsegregated | Segregated | Unsegregated |
| 1 | Cash – domestic currency | 289 | 18 | 915 | 160 | - | - | - | - |
| 2 | Cash – other currencies | 130 | 399 | 2 | 257 | - | - | - | - |
| 3 | Domestic sovereign debt | - | - | - | - | - | - | - | - |
| 4 | Other sovereign debt | - | - | - | - | - | - | - | - |
| 5 | Government agency debt | - | - | - | - | - | - | - | - |
| 6 | Corporate bonds | - | - | - | - | - | - | - | - |
| 7 | Equity securities | - | - | - | - | - | - | - | - |
| 8 | Other collateral | - | - | - | - | - | - | - | - |
| 9 | Total | 419 | 417 | 916 | 417 | - | - | - | - |

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

Table 2.15 Exposures of central counterparties (CCPs) [Template EU CCR8]

| | | 31.12.2024 | |
|---|---|---|---|
| | | a | b |
| | | Exposure value | RWEA |
| 1 | **Exposures to QCCPs (total)** | | - |
| 2 | Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which | 228 | 5 |
| 3 | (i) OTC derivatives | 217 | 4 |
| 4 | (ii) Exchange-traded derivatives | 10 | 0 |
| 5 | (iii) SFTs | - | - |
| 6 | (iv) Netting sets where cross-product netting has been approved | - | - |
| 7 | Segregated initial margin | 221 | |
| 8 | Non-segregated initial margin | - | - |
| 9 | Prefunded default fund contributions | 113 | 2 |
| 10 | Unfunded default fund contributions | - | - |
| 11 | Exposures to non-QCCPs (total) | | - |
| 12 | Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which | - | - |
| 13 | (i) OTC derivatives | - | - |
| 14 | (ii) Exchange-traded derivatives | - | - |
| 15 | (iii) SFTs | - | - |
| 16 | (iv) Netting sets where cross-product netting has been approved | - | - |
| 17 | Segregated initial margin | - | |
| 18 | Non-segregated initial margin | - | - |
| 19 | Prefunded default fund contributions | - | - |
| 20 | Unfunded default fund contributions | - | - |

## 2.5.14 Non-performing and forborne exposures

The[7] Group's gross NPL ratio amounted to 3.59% as at 31.12.2024. Therefore, in accordance with Regulation 2021/637, the following tables: EU CR2a, EU CQ2, EU CQ6, EU CQ8, EU CQ4 are not presented.

Tables below containing quantitative information on unsupported and restructured exposures are presented below.

[7] The NPL ratio is the ratio of gross carrying amount of loans and advances covered by the provisions of Article 47(a)(3) of EU Regulation no. 575/2013 to gross carrying amount of loans and advances covered by the provisions of Article 47(a)(1) of EU Regulation no. 575/2013.

Table 2.16 Credit quality of performing and non-performing exposures by past due days [Template EU CQ3]

| | | 31.12.2024 | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g | h | i | j | k | l |
| | | Gross carrying amount/nominal amount | | | | | | | | | | | |
| | | Performing exposures | | | Non-performing exposures | | | | | | | | |
| | | | Not past due or past due ≤ 30 days | Past due > 30 days ≤ 90 days | | Unlikely to pay that are not past due or are past due ≤ 90 days | Past due > 90 days ≤ 180 days | Past due > 180 days ≤ 1 year | Past due > 1 year ≤ 2 years | Past due > 2 years ≤ 5 years | Past due > 5 years ≤ 7 years | Past due > 7 years | Of which defaulted |
| 005 | Cash balances at central banks and other demand deposits | 21 209 | 21 209 | - | - | - | - | - | - | - | - | - | - |
| 010 | Loans and advances | 269 138 | 268 176 | 962 | 10 630 | 5 928 | 560 | 823 | 1 039 | 1 011 | 340 | 928 | 10 471 |
| 020 | Central banks | 1 043 | 1 043 | - | - | - | - | - | - | - | - | - | - |
| 030 | General governments | 5 988 | 5 988 | 0 | 47 | 47 | 0 | - | - | 0 | - | - | 47 |
| 040 | Credit institutions | 3 049 | 3 049 | - | - | - | - | - | - | - | - | - | - |
| 050 | Other financial corporations | 5 442 | 5 440 | 2 | 20 | 12 | 2 | 0 | 2 | 2 | 0 | 1 | 20 |
| 060 | Non-financial corporations | 88 902 | 88 511 | 391 | 6 235 | 4 713 | 206 | 242 | 269 | 266 | 102 | 437 | 6 113 |
| 070 | Of which SMEs | 40 098 | 39 882 | 216 | 2 545 | 1 407 | 168 | 178 | 209 | 252 | 87 | 245 | 2 511 |
| 080 | Households | 164 713 | 164 144 | 569 | 4 329 | 1 156 | 351 | 581 | 769 | 744 | 238 | 489 | 4 291 |
| 090 | Debt securities | 207 486 | 207 486 | - | 10 | 10 | - | - | - | - | - | - | 10 |
| 100 | Central banks | 7 996 | 7 996 | - | - | - | - | - | - | - | - | - | - |
| 110 | General governments | 161 589 | 161 589 | - | - | - | - | - | - | - | - | - | - |
| 120 | Credit institutions | 9 453 | 9 453 | - | - | - | - | - | - | - | - | - | - |
| 130 | Other financial corporations | 24 518 | 24 518 | - | - | - | - | - | - | - | - | - | - |
| 140 | Non-financial corporations | 3 930 | 3 930 | - | 10 | 10 | - | - | - | - | - | - | 10 |
| 150 | Off-balance-sheet exposures | 102 731 | | | 415 | | | | | | | | 372 |
| 160 | Central banks | - | | | - | | | | | | | | - |
| 170 | General governments | 8 345 | | | 2 | | | | | | | | 2 |
| 180 | Credit institutions | 11 542 | | | - | | | | | | | | - |
| 190 | Other financial corporations | 2 796 | | | 0 | | | | | | | | 0 |
| 200 | Non-financial corporations | 62 040 | | | 387 | | | | | | | | 346 |
| 210 | Households | 18 008 | | | 25 | | | | | | | | 25 |
| 220 | **Total** | **600 564** | **496 871** | **962** | **11 055** | **5 938** | **560** | **823** | **1 039** | **1 011** | **340** | **928** | **10 853** |

## Table 2.17 Performing and non-performing exposures related provisions [Template EU CR1]

| | | 31.12.2024 | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
| | | Gross carrying amount/nominal amount | | | | | | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | | | | | Accumulated partial write-off | Collaterals and financial guarantees received | |
| | | Performing exposures | | | Non-performing exposures | | | Performing exposures - Accumulated impairment and provisions | | | Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | | | On performing exposures | On non-performing exposures |
| | | | of which: stage 1 | of which: stage 2 | | of which: stage 1 | of which: stage 2 | | of which: stage 1 | of which: stage 2 | | of which: stage 2 | of which: stage 3 | | | |
| 005 | Cash balances at central banks and other demand deposits | 21 209 | 21 209 | - | - | - | - | - 0 | - 0 | - | - | - | - | - | - | - |
| 010 | **Loans and advances** | **269 138** | **228 386** | **38 612** | **10 630** | **42** | **9 980** | **- 4 476** | **- 1 175** | **- 3 385** | **- 4 721** | **- 13** | **- 4 712** | **- 2 024** | **166 094** | **2 996** |
| 020 | Central banks | 1 043 | 1 043 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 030 | General governments | 5 988 | 4 894 | 1 081 | 47 | - | 47 | - 80 | - 23 | - 57 | - 1 | - | - 1 | - 1 | 1 042 | 40 |
| 040 | Credit institutions | 3 049 | 3 049 | - | - | - | - | - 2 | - 2 | - | - | - | - | - | - | - |
| 050 | Other financial corporations | 5 442 | 5 078 | 363 | 20 | - | 20 | - 25 | - 18 | - 8 | - 12 | - | - 12 | - 4 | 2 274 | 4 |
| 060 | Non-financial corporations | 88 902 | 66 033 | 22 848 | 6 235 | 8 | 5 892 | - 1 972 | - 501 | - 1 476 | - 2 292 | - 1 | - 2 267 | - 593 | 46 817 | 2 117 |
| 070 | Of which: SMEs | 40 098 | 27 926 | 12 152 | 2 545 | 5 | 2 425 | - 1 119 | - 261 | - 864 | - 1 210 | - 1 | - 1 200 | - 378 | 30 073 | 1 123 |
| 080 | Households | 164 713 | 148 288 | 14 320 | 4 329 | 34 | 4 021 | - 2 397 | - 631 | - 1 845 | - 2 415 | - 12 | - 2 432 | - 1 426 | 115 961 | 835 |
| 090 | **Debt Securities** | **207 486** | **205 442** | **1 645** | **10** | **-** | **10** | **- 175** | **- 147** | **- 28** | **-** | **-** | **-** | **- 4** | **-** | **-** |
| 100 | Central banks | 7 996 | 7 996 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 110 | General governments | 161 589 | 160 278 | 1 023 | - | - | - | - 141 | - 125 | - 15 | - | - | - | - | - | - |
| 120 | Credit institutions | 9 453 | 9 453 | - | - | - | - | - 0 | - 0 | - | - | - | - | - | - | - |
| 130 | Other financial corporations | 24 518 | 24 518 | - | - | - | - | - 9 | - 9 | - | - | - | - | - | - | - |
| 140 | Non-financial corporations | 3 930 | 3 197 | 622 | 10 | - | 10 | - 26 | - 13 | - 13 | - | - | - | - 4 | - | - |
| 150 | **Off-balance sheet exposures** | **102 731** | **90 780** | **11 611** | **415** | **1** | **413** | **543** | **176** | **365** | **90** | **0** | **89** | | **-** | **-** |
| 160 | Central banks | - | - | - | - | - | - | - | - | - | - | - | - | | - | - |
| 170 | General governments | 8 345 | 8 028 | 317 | 2 | - | 2 | 28 | 19 | 9 | 0 | - | 0 | | - | - |
| 180 | Credit institutions | 11 542 | 11 527 | 15 | - | - | - | 0 | 0 | - | - | - | - | | - | - |
| 190 | Other financial corporations | 2 796 | 2 715 | 80 | 0 | - | 0 | 4 | 4 | 0 | 0 | - | 0 | | - | - |
| 200 | Non-financial corporations | 62 040 | 52 299 | 9 404 | 387 | 0 | 387 | 368 | 115 | 252 | 81 | 0 | 81 | | - | - |
| 210 | Households | 18 008 | 16 212 | 1 794 | 25 | 1 | 24 | 142 | 38 | 105 | 9 | 0 | 9 | | - | - |
| 220 | **Total** | **600 564** | **545 817** | **51 868** | **11 055** | **42** | **10 403** | **- 5 195** | **- 1 498** | **- 3 779** | **- 4 811** | **- 13** | **- 4 801** | **- 2 028** | **166 094** | **2 996** |

Table 2.18 Transactions subject to own funds requirements for CVA risk [Template EU CR2]

| | | 31.12.2024 |
|---|---|---|
| | | a |
| | | Gross carrying amount |
| **010** | **Initial stock of non-performing loans and advances** | 9 402 |
| 020 | Inflows to non-performing portfolios | 7 072 |
| 030 | Outflows from non-performing portfolios | - 5 859 |
| 040 | Outflows due to write-offs | - 1 928 |
| 050 | Outflow due to other situations | - 3 931 |
| **060** | **Final stock of non-performing loans and advances** | 10 615 |

Table 2.19 Credit quality of forborne exposures [Template EU CQ1]

| | | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g | h |
| | | Gross carrying amount/ Nominal amount of exposures with forbearance measures | | | | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | Collaterals received and financial guarantees received on forborne exposures | |
| | | Performing forborne | Non-performing forborne | Of which defaulted | Of which impaired | On performing forborne exposures | On non-performing forborne exposures | | Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures |
| 005 | Cash balances at central banks and other demand deposits | - | - | - | - | - | - | - | - |
| 010 | Loans and advances | 1 105 | 3 363 | 3 313 | 3 312 | - 10 | - 951 | 2 423 | 1 542 |
| 020 | Central banks | - | - | - | - | - | - | - | - |
| 030 | General governments | - | - | - | - | - | - | - | - |
| 040 | Credit institutions | - | - | - | - | - | - | - | - |
| 050 | Other financial corporations | 2 | 1 | 1 | 1 | - 0 | - 1 | 2 | 0 |
| 060 | Non-financial corporations | 617 | 2 861 | 2 854 | 2 854 | - 18 | - 783 | 1 972 | 1 384 |
| 070 | Households | 487 | 501 | 458 | 457 | 8 | - 167 | 449 | 158 |
| 080 | Debt Securities | 100 | 10 | 10 | 10 | - | - | - | - |
| 090 | Loan commitments given | 56 | 215 | 214 | 214 | 0 | 43 | - | - |
| 100 | Total | 1 261 | 3 588 | 3 537 | 3 536 | - 11 | - 993 | 2 423 | 1 542 |

Table 2.20 Credit quality of loans and advances to non-financial corporations by industry [Template EU CQ5]

| | | 31.12.2024 | | | | | |
|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f |
| | | Gross carrying amount | | | | Accumulated impairment | Accumulated negative changes in fair value due to credit risk on non-performing exposures |
| | | | of which: non-performing | | of which: loans and advances subject to impairment | | |
| | | | | of which: defaulted | | | |
| 10 | Agriculture, forestry and fishing | 2 114 | 99 | 96 | 2 114 | - 141 | - |
| 20 | Mining and quarrying | 1 072 | 13 | 10 | 1 072 | - 12 | - |
| 30 | Manufacturing | 26 684 | 2 956 | 2 879 | 26 681 | - 1 615 | - 2 |
| 40 | Electricity, gas, steam and air conditioning supply | 5 176 | 12 | 12 | 5 176 | - 77 | - |
| 50 | Water supply | 1 437 | 17 | 16 | 1 437 | - 48 | - |
| 60 | Construction | 5 421 | 364 | 354 | 5 420 | - 358 | - |
| 70 | Wholesale and retail trade | 16 649 | 801 | 782 | 16 647 | - 683 | - |
| 80 | Transport and storage | 11 490 | 1 081 | 1 075 | 11 489 | - 435 | - |
| 90 | Accommodation and food service activities | 1 562 | 390 | 390 | 1 562 | - 168 | - |
| 100 | Information and communication | 5 616 | 29 | 29 | 5 616 | - 50 | - |
| 110 | Financial and insurance actvities | 870 | 2 | 0 | 870 | - 7 | - |
| 120 | Real estate activities | 7 112 | 233 | 233 | 7 112 | - 377 | - |
| 130 | Professional, scientific and technical activities | 3 676 | 79 | 78 | 3 675 | - 111 | - |
| 140 | Administrative and support service activities | 3 787 | 70 | 70 | 3 787 | - 76 | - |
| 150 | Public administration and defense, compulsory social security | 2 | 0 | 0 | 2 | - 0 | - |
| 160 | Education | 292 | 22 | 22 | 291 | - 13 | - |
| 170 | Human health services and social work activities | 1 414 | 24 | 23 | 1 413 | - 28 | - |
| 180 | Arts, entertainment and recreation | 580 | 20 | 20 | 580 | - 32 | - |
| 190 | Other services | 182 | 23 | 22 | 182 | - 30 | - |
| 200 | **Total** | **95 137** | **6 235** | **6 113** | **95 125** | **- 4 262** | **- 2** |

Table 2.21 Collateral obtained by taking possession and execution processes [Template EU CQ7]

| | | 31.12.2024 | |
|---|---|---|---|
| | | a | b |
| | | Collateral obtained by taking possession accumulated | |
| | | Value at initial recognition | Accumulated negative changes |
| 10 | **Property Plant and Equipment (PP&E)** | - | - |
| 20 | **Other than Property Plant and Equipment** | 60 | - 33 |
| 30 | Residential immovable property | 26 | - 25 |
| 40 | Commercial Immovable property | 34 | - 7 |
| 50 | Movable property (auto, shipping, etc.) | 1 | - |
| 60 | Equity and debt instruments | - | - |
| 70 | Other | - | - |
| 80 | Total | 60 | - 33 |

## 2.5.15 Exposure to securitisation positions, crypto assets and related activities

As at 31 December 2024, the Group had no receivables subject to securitisation transactions.

As at 31 December 2024, the Group had no exposure to crypto assets.

## 2.5.16 Exposures in non-trading book equity securities

PKO Bank Polski S.A. and its subsidiaries subject to prudential consolidation have equity exposures[8] in other entities which are classified in the non-trading book.

The exposures in the non-trading book as at 31 December 2024, due to the type of investment and the purpose of the acquisition, are broken down into the following groups:

1) investments in subsidiaries not subject to prudential consolidation – this group includes companies which complement the Bank's basic offer with insurance services, as well as closed-end investment funds set up to support entities (including start-ups) offering technological innovations mainly for the financial sector and to optimize management and sales activities related to supervised asset portfolios,
2) investments in associates and joint ventures – investments in companies which provide financial and technological services; this group includes, among others, System Ochrony Banków Komercyjnych S.A., which manages the protection system referred to in Chapter 10a of the Banking Law, and Centrum Elektronicznych Usług Płatniczych eService sp. z o.o., together with which PKO Bank Polski S.A. offers comprehensive services consisting of setting up POS terminals and accounting for transactions carried out with payment instruments, using these terminals,
3) other exposures, including:
   - the Bank's investments in companies which provide financial services or which contribute to the development of financial markets, including those which create the infrastructure of financial markets,
   - participation units investment certificates in investment funds – mainly the investments of PKO Towarzystwo Funduszy Inwestycyjnych S.A. (PKO TFI S.A.) in the participation units of the new investment funds it manages; the assets are acquired to provide the funds required to establish a fund,
   - the Bank's investments and the investments of the subsidiaries subject to prudential consolidation, mostly held for sale; this group includes, among other things, shares acquired as part of forbearance of loan receivables, including repossessed collateral.

Table 2.22 Non-trading book equity exposures

| | 31.12.2024 | | 31.12.2023 | |
|---|---|---|---|---|
| | Carrying amount | Fair value* | Carrying amount | Fair value* |
| Investments valued under the equity method(equity investments in subsidiaries not subject to prudential consolidation, jointventures and associated entities) | 1 894 | 1 894 | 1 908 | 1 927 |
| Shares in other entities, this includes also equity investments in entities revealed as fixed assets items for sale | 155 | 155 | 139 | 139 |
| Equity securities | 171 | 171 | 198 | 198 |
| Shares in entities listed on regulated market | 21 | 21 | 24 | 24 |
| Shares in entities not listed on regulated market** | 150 | 150 | 173 | 173 |
| Participation units in PKO TFI SA investment funds | - | - | 2 | 2 |
| **Total** | **2 220** | **2 220** | **2 247** | **2 266** |

* Estimated Fair Value, including for shares admitted to trading on a regulated market – market value.
** This item also includes shares not admitted to trading on the regulated market of public companies.

The equity exposures presented in the above table are subject to periodic valuation.

Investments in subsidiaries not subject to prudential consolidation, joint ventures and associates are measured using the equity method. The share of the Bank's Group in the financial results of the aforementioned entities as from the date of acquisition is recognized in profit or loss, whereas its share in changes in other comprehensive income as from the date of acquisition – in other comprehensive income. The carrying amount of the investments is adjusted for total changes in individual equity items as from the date of acquisition.

[8] This information concerns equity exposures in the form of shares, participation units and investment certificates. The Bank classifies the following in the non-trading book under prudential consolidation: subsidiaries not subject to prudential consolidation, associates, joint ventures and the aforementioned securities and equity securities which constitute financial assets not held for trading.

The value in use of an investment is determined based on the current estimated value of expected future cash flows from the continued use of these assets, using models dedicated individually for each unit. These flows are discounted at a discount rate based on the cost of equity estimated individually for each investment. The fair value of an investment is the current bid that an entity will receive for the investment or the value that can be estimated using valuation techniques commonly used by market participants (including valuations prepared by a specialised external entity).

If the carrying amount of an asset exceeds its recoverable amount, the Group recognises an impairment loss in the income statement.

Shares in other companies are valued at fair value, which is determined according to the market value for companies for which there is an active market or based on internal valuation models for companies for which there is no active market. The effects of changes in the fair value of shares are recognized in the income statement. Participation units and investment certificates in investment funds are measured at fair value, with the effect being recognized in profit or loss.

The fair value of equity exposures, determined on the basis of internal valuation models, is described in the Bank's and the Bank Group's financial statements for 2024 (note 45 Fair value hierarchy).

In 2024, the Bank's Group (according to prudential consolidation) realised an accumulated profit before tax on the sale of securities constituting equity exposures in the non-trading book (calculated as the selling price minus acquisition price) of PLN 38.6 million. The unrealised profits before tax of the Bank's Group on the revaluation of the equity exposures in the non-trading book totalled PLN 1,060.8 million as at the end of 2024. The aforementioned amount includes the unrealised gain of the Bank's Group of PLN 178.5 million on the remeasurement of the cost of purchase of shares in one of the companies to fair value.

In 2024, PKO Bank Polski S.A. received a gross dividend totalling PLN 284.7 million in respect of shares constituting equity exposures in the non-trading book.

The aim of the Bank's involvement in investment activities is to generate income while maintaining an acceptable level of risk. The Bank manages investment risk in accordance with its risk appetite, measures individual investment risk and sets investment limits. The Investment Strategy, which is implemented through the Investment Policy, forms part of the Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group. The aforementioned regulations govern the objective and principles of the Bank's exposure to specific equity investments. At least once a year, the Bank evaluates the adopted Investment Policy from the perspective of the investment method, effectiveness of the achievement of investment objectives, the correctness of the activities carried out and the reliability of the information submitted. Moreover, in order to reduce volatility of the results associated with VISA's C series preference shares, the Bank is using Total Return Swaps.

## 2.6 Interest rate risk

### 2.6.1 Introduction

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

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

- the non-trading book – comprises balance sheet and off-balance sheet items not included in the trading book, in particular items resulting from the Bank's core activities, transactions concluded for investment and liquidity purposes and their hedging transactions,
- the trading book – comprises transactions concluded on financial instruments as part of activities conducted on own account and on behalf of the customers.

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

The objective of management of interest rate risk is to reduce possible losses due to changes in market interest rates to the acceptable level by appropriate shaping of the structure of balance-sheet and off-balance sheet items.

The interest rate risk management process is supervised by the Supervisory Board, which approves the risk management strategy, accepts the risk tolerance level (expressed in the form of strategic tolerance limits) and assesses the risk management process, including approving reports confirming compliance between the interest rate risk profile and the tolerance for interest rate risk determined at the level of the Bank and the Bank's Group. The Supervisory Board regularly receives information on the risk profile of the Bank and the Bank's Group as well as information on the key measures taken in the area of interest rate risk management.

The Management Board is responsible for managing the Bank's interest rate risk, including ensuring compliance of the Bank's internal regulations with the risk management strategy, as well as supervising and monitoring the measures taken by the Bank to manage interest rate risk. The Management Board adopts internal regulations on interest rate risk management.

The management of interest rate risk is supported by the Asset and Liability Management Committee, which, among others, issues recommendations and advice with regard to shaping the structure of balance sheet and off-balance sheet items, the risks generated and the management of financial risk, including interest rate risk in the non-trading book.

### 2.6.2 Identification of interest rate risk

The identification of interest rate risk consists of identifying its current and potential sources and estimating the materiality of its potential impact on the activities of the Bank and the Bank's Group.

The process and the organisation of interest rate risk management in the Bank's Group are in compliance with the principles described in section 2.1.

### 2.6.3 Monitoring the interest rate risk

The Bank's interest rate risk is monitored on a daily basis, whereas that of the Bank's Group is monitored on a monthly basis. In 2024, the interest rate risk of the Bank's Group was determined mainly by the mismatch of the repricing dates of assets and liabilities.

## 2.6.4 Non-trading book

The Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group defines an acceptable level of interest rate risk both in the Bank and the Bank's Group and lays down the principles for interest rate risk management in the Bank's Group. Additionally, the Strategy for managing interest rate risk in the non-trading book of PKO Bank Polski S.A. defines the approach to managing interest rate risk in this portfolio.

The assignment of transactions to business models according to IFRS 9 and the division into the trading book and the non-trading book are determined by the Bank's Investment Policy relating to financial instruments.

The Bank supervises the functioning of interest rate risk management in the individual subsidiaries in the Bank's Group. As part of the supervision, the Bank influences the interest rate risk management methods in these entities and supports their development. The Bank also takes into account the level of interest rate risk in the operations of the individual entities as part of the interest rate risk monitoring and reporting system at the Bank's Group level.

The interest rate risk generated by the Bank's core activities is transferred using a transfer pricing system in order to manage this risk in a centralised manner. The Bank's business model assumes managing interest rate risk in an active manner by shaping its product mix appropriately and using the available financial instruments within the limits and thresholds for interest rate risk adopted at the Bank.

In order to control and mitigate the interest rate risk of the non-trading book, the Bank's Group uses limits and thresholds, as well as risk mitigation transactions based on information on the level of risk (using a measure of sensitivity of interest income, a measure of sensitivity of economic value, shock analyses and repricing gap) and planned business development. In order to hedge the level of future cash flows and the volatility of fair value arising from interest rate risk, hedging strategies approved by the Bank's Management Board are applied using IRS/CIRS transactions.

The main interest rate risks identified by the Group are:
1) the risk of revaluation date mismatch;
2) the yield curve risk;
3) the basis risk;
4) the customer option risk; and
5) credit spread risk in the non-trading book (CSRBB).

The customer's option risk is monitored for products where this risk has been identified as significant, in particular for loans with periodic fixed interest rates, taking into account historical developments of the prepayment ratio.

The Bank also analyses the impact of various behaviour of interest rate indices (base risk) on interest rate risk measures and, according to the latest analyses, it considers such impact to be immaterial.

Credit Spread Risk in the Non-trading book (CSRBB) is monitored for products where a risk has been identified arising from a changing instrument spread assuming the same level of creditworthiness. CSRBB is measured using economic value sensitivity and interest income sensitivity measures.

Risk measures used to measure the interest rate risk of the non-trading book in the Group are primarily:
1) The sensitivity of economic value of capital that reflects the net present value of balance sheet and off-balance sheet instruments as a result of the parallel shift of yield curves over the remaining life of instruments sensitive to changes in interest rates or credit spreads, i.e., until all positions mature. The Bank calculates the sensitivity of economic value of capital on a daily basis. As part of the calculation of the sensitivity of economic value measure, the Bank uses assumptions that were specified in the EBA Guidelines (EBA/GL/2022/14), whereas for internal scenarios of the Bank, no lower limits as to the level of interest rates are assumed. Such a restriction applies to EBA scenarios, the results of which are presented in table EU IRRBB1.
2) The sensitivity of interest income to sudden shifts in the yield curve, which is determined by a potential financial effect of such a shift reflected in an estimated changed amount of interest income in a given time horizon. The change results from the mismatch between revaluation dates of assets, liabilities and off-balance sheet liabilities granted and received (in particular derivative instruments) sensitive to changes in interest rates or credit spreads (for those items for which credit spread risk has been identified). The Bank calculates the sensitivity of interest income on a daily basis. The assumptions for the measurement for the calculation of the sensitivity of interest income are identical to the measure of the sensitivity of economic value, and it is assumed that current accounts of retail customers are not flexible and negative interest rates for retail customers cannot be drawn.
3) IR VaR, which determines the potential loss value that may occur in normal market conditions at a certain time (i.e., horizon), and with an assumed level of probability for changes in interest rate curves (taking into account unequal changes and correlations between interest rate volatility in the yield curves). For market risk management purposes, VaR is calculated with a 99% confidence level and 10-day position holding. Interest rate risk is managed using, among other things, VaR determined for individual financial instruments and for the Bank's portfolios, and by type of business activities of the Bank. The Bank calculates VaR on a daily basis.
4) Shock analyses (stress tests, crash tests) used to estimate potential losses resulting from the maintained structure of the balance sheet and off-balance sheet items, where a market situation occurs which is not described in a standard manner, using statistical measures. Additionally, the Bank uses shock analyses in the form of reverse stress tests of interest rate risk, the purpose of which is to determine the factor or set of risk activities whose change determines a specific level of loss. The Bank calculates the results of shock analyses with daily sensitivity (in the case of reverse stress tests on a monthly basis).
5) The repricing gap representing the difference between the value of assets and liabilities and active/past off-balance sheet items, whose revaluation dates fall within specified time intervals. The Bank calculates the interest rate gap on a daily basis.

The Bank uses the following types of scenarios to estimate the sensitivity of economic value:
1) hypothetical stress tests – in which interest rate fluctuations are assumed arbitrarily: a parallel shift of the interest rate curves for the individual currencies by +/-50 bps, +/-100 bps, +/-200 bps, values over 200 bps and nonparallel deflection of yield curves scenarios,
2) historical stress tests – in which interest rate fluctuations are assumed on the basis of movements in interest rates observed in the past, including: the biggest historical change, deflection of the yield curve, taking into account portfolio positions, the biggest historical nonparallel shift of interest rate curves for securities and for derivatives hedging those securities,
3) crash tests – in which interest rate fluctuations are assumed on the basis of movements in interest rates observed in the past in such a manner as to maximise the Bank's potential loss,
4) reverse stress tests – which are aimed at finding such scenarios relating to:
   - the shift of yield curves,
   - a change in the average repricing date of individuals' current accounts, and
   - an increase in the frequency of termination of deposits bearing fixed interest rates subject to a strategy for hedging against interest rate fluctuations,

   which cause a certain change in the Bank's result,
5) Supervisory tests based on draft regulations for regulatory technical standards defining supervisory shock scenarios are presented in table EU IRRBB1.

Scenarios used to calculate the sensitivity of interest income measure include a change of rates by: +/-25 bps, +/-100 bps, +/-200 bps and +/-400 bps. Sensitivity of interest income is calculated in the following horizons: 1 year, 2 years and 3 years.

Given the specific objective of interest rate risk management, the Bank's Group limits both the sensitivity of interest income and the sensitivity of economic value to an acceptable level, defined in the form of strategic tolerance limits (risk appetite). In order to secure itself against the interest rate risk of the non-trading book, the Bank regularly forecasts balance sheet and risk measures taking into account changes in the market and regulatory environment as well as the development of business activity. As part of the above process, IRS / CIRS hedging transactions are planned in accordance with the strategies approved by the Management Board of the Bank to hedge future cash flows or changes in fair value, taking into account the accepted risk appetite and the possible impact on individual result lines. The financial effects of using hedging transactions depend on the development of the yield curve and thus on the interest rates at which IRS / CIRS transactions are concluded.

Sensitivity of interest income in the non-trading book of the Bank's Group to the abrupt shift in the yield curve of 100 bp down in a one-year horizon in all currencies is shown in the table below:

Table 2.23 The sensitivity of interest income in the Group's non-trading book

| MEASURE NAME | 31.12.2024 | 31.12.2023 |
|---|---|---|
| Sensitivity of interest income (PLN million) | - 545 | - 1 011 |

Sensitivity of economic value reflects the fair value changes of items in the portfolio arising from the parallel shift of the yield curves by 100 bps up or down (the most unfavourable of the scenarios mentioned).

The table below presents the sensitivity of economic value measure (stress-test) of the non-trading book of the Bank's Group in all currencies as at 31 December 2024 and 31 December 2023:

Table 2.24 The sensitivity of economic value measure of the Bank's Group's non-trading book

| MEASURE NAME | 31.12.2024 | 31.12.2023 |
|---|---|---|
| Sensitivity of economic value (in PLN million) | - 1 627 | - 1 543 |

Table 2.25 Qualitative information on interest rate risk of non-trading book activities [Template EU IRRBB1]

| Supervisory shock scenarios[1] | 31.12.2024 | 31.12.2023 | 31.12.2024 | 31.12.2023 |
|---|---|---|---|---|
| | Changes of the economic value of equity | | Changes of the net interest income | |
| Parallel up | - 4 180 | - 3 788 | - 167 | 890 |
| Parallel down | 2 310 | 2 190 | - 1 588 | - 2 409 |
| Steepener | 1 571 | 589 | | |
| Flattener | - 3 932 | - 1 884 | | |
| Short rates up | - 5 114 | - 3 099 | | |
| Short rates down' | 2 708 | 1 653 | | |

[1] The results of the stress test are only presented for currencies with a share of more than 5% in the assets or liabilities on the balance sheet. Stress tests are presented in accordance with the EBA Guidelines on IRRBB and Commission Delegated Regulation (EU) 2024/856 of 1 December 2023 on regulatory technical standards specifying supervisory stress test scenarios.

The main application of estimated adverse changes in the sensitivity of economic value and the net interest income is the determination of the potential impact of interest rate changes on the Bank's capital and the realised interest income. The results of the said scenarios show that the Bank's interest income is sensitive to the drop of interest rates, while the economic value of capital would decrease, with the assumed increase in interest rates.

As at the end of 2024, for the purposes of modelling the average repricing dates of deposits with undetermined maturity, the Bank used an internal methodology for determining portfolios that replicate interest rate risk, based on the aggregation of products taking into account, among other things, product type and their interest rate strategy. The structure of the flows of the individual aggregates assumed a split into a volatile part and a stable part.

In order to estimate the percentage of early repaid loans, the Bank, as at the end of 2024, used historical data on the percentage of customer overpayments recorded.

At the end of 2024, the Group recorded a higher value of both economic value sensitivity and lower interest income sensitivity relative to the end of 2023. The higher economic value sensitivity is primarily due to the decision to increase the interest rate risk buffer (in a scenario of falling interest rates) due to the new supervisory limit for interest rate sensitivity in the event of a shock change in interest rates relative to Tier 1 capital. To this end, fixed-rate government bonds were purchased, interest rate swaps were concluded to hedge interest rate sensitivity, and the range of fixed and periodically fixed-rate loans was expanded.

Table 2.26 Average and longest repricing maturity assigned to non-maturity deposits.

| Product | 31.12.2024 | |
|---|---|---|
| | Average maturity (in years) | Maximum maturity (in years) |
| Current accounts of retail customers | 3,35 | 10 |
| Saving accounts of retail customers | 0,83 | 10 |
| Current accounts of corporate clients | 0,96 | 5 |
| SME current accounts | 0,36 | 5 |

### 2.6.5 Trading book

In order to monitor the interest rate risk in the trading book the Bank applies the value-at-risk (VaR) measure.

The IR VaR in the Bank's trading book is shown in the table below:

Table 2.27 VaR measure in the Bank's trading book

| Measure name | 31.12.2024 | 31.12.2023 |
|---|---|---|
| 10-day VaR with a 99% confidence level (PLN million)[1] | | |
| Average value | 7 | 59 |
| Maximum value | 15 | 133 |
| Value at the end of the year | 5 | 42 |

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

### 2.6.6 Interest rate risk reporting

The Bank prepares daily, weekly, monthly and quarterly interest rate risk reports, with the monthly and quarterly reports concerning also the Bank's Group. The reports contain information on interest rate risk exposure and on the risk limits utilization. The Bank's exposure to interest rate risk is measured on a daily basis and the scope of reports is tailored to the frequency and recipients of the reports. The reports are addressed mainly to: ALCO, RC, the Management Board, the Risk Committee and the Supervisory Board.

### 2.6.7 Management activities related to interest rate risk

The main interest rate risk management tools used in the Bank's Group include:
1) interest rate risk management procedures,
2) currency risk limits and thresholds,
3) defining the characteristics and the level of exposure of individual products to interest rate risk,
4) defining the acceptable types of transactions based on interest rates.

The Bank's Group has established limits and thresholds for interest rate risk, among other things, for sensitivity of interest income, sensitivity of economic value as well as limits and thresholds for losses, and limits for instruments sensitive to interest rate fluctuations.

The methods of interest rate risk management in the entities in the Bank's Group are defined in the internal regulations implemented by those entities for which interest rate risk is material. Such regulations are developed after consulting the Bank and taking into account the Bank's recommendations.

The acceptable level of risk at the level of both the Bank and the Bank's Group is determined as part of the Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group.

At least once a year, the Bank reviews the risk management process in order to verify the consistency of the interest rate risk management process with the process of managing other risks, the regulatory requirements and the degree of alignment with the scale and complexity of the interest rate risk to which the Bank is exposed, which ensures the continued effectiveness of hedging instruments and risk mitigation measures. Additionally, the effectiveness of the risk management process is constantly monitored as part of the reports specified in this chapter.

The Bank operates a Validation Department, which is responsible for periodical model validation in order to independently assess the degree of meeting the business needs through the model, and the Internal Audit Department, whose purpose is to assess the adequacy and effectiveness of the risk management system and the internal audit system. The frequency and method of conducting the validation and audits are determined by relevant internal regulations.

## 2.7 Foreign exchange risk

### 2.7.1 Introduction

Foreign exchange risk is the risk of incurring losses due to exchange rate fluctuations, generated by maintaining open currency positions.

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

The overall structure of the management of risk, including foreign exchange risk, is contained in chapter 2.1 of this Report. According to the Foreign Exchange Risk Management Principles in place at the Bank, implemented by the Management Board, the currency position generated by banking operations (e.g., the repayment of a foreign currency loan in PLN by a customer, loan currency conversion) is transferred to the Treasury Department on a daily basis. This means that the Bank's currency position as at the end of a day may consist only of an open position in banking operations generated on that day and a limited currency position derived from trading activities, as a result of which the Bank's exposure to foreign exchange risk is moderate, i.e. the lowest according to the risk assessment scale used by the Bank.

### 2.7.2 Identification, measurement and assessment of foreign exchange risk

The identification of foreign exchange risk consists of identifying its current and potential sources and estimating the materiality of its potential impact on the activities of the Bank and the Bank's Group.

The process and the organisation of foreign exchange risk management in the Bank's Group are in compliance with the principles described in chapter 2.1 of this Report.

The foreign exchange risk management process is supervised by the Supervisory Board which regularly receives information on the risk profile of the Bank and the Bank's Group as well as information on the key measures taken to manage that risk. The Supervisory Board also approves reports confirming the compatibility of the foreign exchange risk profile with the tolerance for foreign exchange risk specified at the level of the Bank and the Bank's Group. The Management Board is responsible for managing the Bank's foreign exchange risk, including supervising and monitoring the measures taken by the Bank to manage foreign exchange risk. The Management Board adopts internal regulations on foreign exchange risk management.

The Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group defines an acceptable level of foreign exchange risk both in the Bank and the Bank's Group and lays down the principles of foreign exchange risk management in the Bank's Group.

The Bank supervises the functioning of foreign exchange risk management in the individual subsidiaries in the Bank's Group. As part of the supervision, the Bank influences the foreign exchange risk management methods in these entities and supports their development. The Bank also takes into account the level of foreign exchange risk in the operations of the individual entities as part of the foreign exchange risk monitoring and reporting system at the Bank's Group level.

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

Shock analyses (stress tests and crash tests) for foreign exchange risk are used to estimate potential losses on the currency positions taken, where an extraordinary situation occurs on the foreign exchange market, which is not described in a standard manner, using statistical measures. Additionally, the Bank uses shock analyses in the form of a reverse stress test for foreign exchange risk.

The Bank carries out stress test analyses, crash test analyses and reverse stress test analyses, using the following scenarios relating to exchange rate fluctuations:
1) hypothetical scenarios – in which the hypothetical appreciation or depreciation of foreign exchange rates (10 percent for stress tests and 30 percent for crash tests) is assumed,
2) historical scenarios – based on the behaviour of FX rates observed in the past,
3) reverse stress tests – which examine potential exchange rate fluctuations resulting in the Bank's losses at the specified level of the Bank's own funds.

### 2.7.3 Control of the foreign exchange risk

The main tools for controlling foreign exchange risk at the level of both the Bank and the Bank's Group are the set strategic limits of tolerance for foreign exchange risk and the limits imposed by the ALCO, defining the acceptable exposure of the Bank's individual portfolios to foreign exchange risk.

The Bank's Group has established limits and thresholds for foreign exchange risk, among other things, for foreign currency positions, 10-day value-at-risk and losses on the foreign exchange market.

### 2.7.4 Monitoring of the foreign exchange risk

In 2024, the foreign exchange risk of the Bank's Group was moderate, i.e. the lowest according to the risk assessment scale used by the Bank, because the Bank, as a rule, follows the policy of limiting its positions in the main currencies, i.e. EUR, USD, CHF, and GBP.

The VaR and stress test analysis of the financial assets of the Bank and the Bank's Group (in total for all currencies) exposed to foreign exchange risk were as follows as at 31 December 2024 and as at 31 December 2023:

Table 2.28 Sensitivity of financial assets exposed to foreign exchange risk1

| Measure name[1] | 31.12.2024 | 31.12.2023 |
|---|---|---|
| 10-day VaR with a 99% confidence level (PLN million)[2] | 3 | 3 |
| Change in CHF/PLN exchange rate by 10% (stress-test)[3] | - 12 | - 2 |
| Change in EUR/PLN exchange rate by 10% (stress-test)[3] | 48 | 32 |
| Change in all foreign exchange rates against PLN by 10% (stress test) | 69 | - 8 |

[1] The positions do not include structural positions in UAH (PLN 678.5 million), for which the Bank obtained approval from the PFSA to exclude them from the calculation of the currency positions, not affecting the Bank's profit or loss.
[2] Due to the nature of the activities of the Bank's Group companies, the value-at-risk measure is presented for the Bank.
[3] Stress test scenarios assume the appreciation or depreciation of PLN against individual foreign currencies; depending on which change generates a bigger loss.

As in the case of interest rate risk, given the nature of the activities of the other entities in the Bank's Group which generate a material foreign exchange risk and the specific nature of the market in which they operate, the Bank does not calculate a consolidated *VaR* sensitivity measure. These entities use their own risk measures to manage foreign exchange risk. A 10-day *VaR* measure is used by KREDOBANK S.A., it amounted to PLN 0.3 million as at 31 December 2024 and PLN 0.3 million as at 31 December 2023.

### 2.7.5 Foreign exchange risk reporting

The Bank prepares daily, weekly, monthly and quarterly foreign exchange risk reports, with the monthly and quarterly reports concerning also the Bank's Group. The reports gather the information on foreign exchange risk exposure and updates on the use of limits for that risk. The reports are addressed mainly to: ALCO, RC, the Management Board, the Risk Committee and the Supervisory Board.

### 2.7.6 Management activities related to foreign exchange risk

The main foreign exchange risk management tools used in the Bank's Group include:
1) currency risk management procedures,
2) currency risk limits and thresholds,
3) defining the acceptable types of foreign exchange transactions and the foreign exchange rates used in such transactions.

The methods of foreign exchange risk management in the entities in the Bank's Group are defined in the internal regulations implemented by those entities for which foreign exchange risk is material. Such regulations are developed after consulting the Bank and taking into account the Bank's recommendations.

The acceptable level of foreign exchange risk at the level of both the Bank and the Bank's Group is determined as part of the Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group.

At least once a year, the Bank reviews the risk management process in order to verify the consistency of the foreign exchange risk management process with the process of managing other risks, the regulatory requirements and the degree of alignment with the scale and complexity of the foreign exchange risk to which the Bank is exposed, which ensures the continued effectiveness of hedging instruments and risk mitigation measures. Additionally, the effectiveness of the risk management process is constantly monitored as part of the reports specified in chapter 2.7.5 of this Report.

## 2.8 Liquidity risk including financing risk

### 2.8.1 Introduction

Liquidity risk is the risk of the inability to settle liabilities as they become due because of the absence of liquid assets. Lack of liquidity may arise from inappropriate structure of the statement of financial position, misfit of cash flows, not received payments from counterparties, sudden withdrawal of cash by customers or other market events.

The purpose of liquidity risk management is to ensure the necessary level of funds needed to settle current and future liabilities (also potential ones), taking into account the nature of the activities conducted and the needs which may arise due to changes in the market environment, by appropriately shaping the structure of the balance sheet and off-balance sheet liabilities.

As part of liquidity risk management, the Bank also manages:
1) financing risk which takes into account the risk of losing the existing sources of financing and inability to renew the required means of financing or the loss of access to new sources of financing.
2) product liquidity risk, for the estimation of which the cost of sale of liquid securities is assessed, which is then used in the main liquidity risk measures, stress testing and within the internal transfer pricing system in the Bank.

The process and the organisation of liquidity risk management in the Bank's Group are in compliance with the principles described in chapter 2.1 of this Report.

The liquidity risk management process is supervised by the Supervisory Board which regularly receives information on the risk profile of the Bank and the Bank's Group as well as information on the key measures taken to manage liquidity risk. The Supervisory Board also approves reports confirming the compatibility of the liquidity risk profile with the tolerance for liquidity risk defined at the level of the Bank and the Bank's Group. The Management Board is responsible for managing the Bank's liquidity risk, including supervising and monitoring the measures taken by the Bank to manage liquidity risk. The Management Board adopts internal regulations on liquidity risk management.

As part of its liquidity risk management, the Bank develops multi-level action plans to maintain liquidity. They include the development of Liquidity Contingency Plans, which set out a multidimensional process for dealing with adverse events that lead to the launch of corrective measures (including the possibility of obtaining financial support from the National Bank of Poland under available refinancing loans). The scope and procedure of the actions taken is controlled by the relevant Management Group, whose objective is to restore the liquidity level above the thresholds set by the Bank. The process is carried out under the control of the relevant members of the Management Board, and the Bank's Supervisory Board and the Office of the Polish Financial Supervision Authority are informed of all work since the launch of the Liquidity Contingency Plans. Actions and procedures are reviewed on a regular basis for their effectiveness and feasibility.

The Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group defines an acceptable level of liquidity risk both in the Bank and the Bank's Group and lays down the principles of liquidity risk management in the Bank's Group.

The Bank supervises the functioning of liquidity risk management in the individual subsidiaries in the Bank's Group. As part of the supervision, the Bank influences the liquidity risk management methods in these entities and supports their development. The Bank also takes into account the level of liquidity risk in the operations of the individual entities as part of the liquidity risk monitoring and reporting system at the Bank's Group level.

The Bank's treasury and liquidity risk management functions are segregated between the Strategic Customer and Investment Banking Area and the Risk Management Division, whereas within the individual entities in the Bank's Group they are centralised. The internal transfer of liquidity within the Bank's Group is restricted to the level of the financing needs being reported and the limits granted. The Bank also sells a selected part of its housing loan portfolio to PKO Bank Hipoteczny, as part of which PKO Bank Hipoteczny issues long-term mortgage covered bonds in PLN and EUR which are secured with the aforementioned receivables.

The Bank's Group has different types of long-term sources of external financing which include loans obtained from international financial institutions, bond issues under the Own Bond Issue Programme of PKO Bank Polski S.A. on the domestic market and the Euro Medium Term Notes (EMTN) programme on the foreign market, as well as covered mortgage bond issues by PKO Bank Hipoteczny S.A.

### 2.8.2 Identification, measurement and assessment of liquidity risk

The identification of liquidity risk consists of identifying its current and potential sources and estimating the materiality of its potential impact on the activities of the Bank and the Bank's Group.

The liquidity policy of the Bank's Group is based on maintaining an adequate level of a liquidity surplus as well as supervisory and internal measures of liquidity and financing risk, by increasing the liquid securities portfolio and stable sources of financing (in particular, a stable deposit base). In liquidity risk management money market instruments, including NBP open market operations are also used.

The Bank's Group uses, among other things, the following liquidity risk measures:

1) contractual liquidity gap – a listing of all balance sheet items by contractual maturity,
2) adjusted liquidity gap – a listing of individual balance sheet categories by adjusted maturity,
3) Liquidity Coverage Ratio (LCR) – a measure which defines the relationship of high quality liquid assets to net outflows in a 30-day horizon in stress conditions (a supervisory measure defined in the CRR),
4) Net Stable Funding Ratio (NSFR) – a measure which defines the relationship of items providing stable funding to items requiring stable funding,
5) liquidity surplus – a measure defining the Bank's ability to maintain liquidity on each day during the period called a 'survival horizon', in stress conditions, taking into account scenarios of various severity and probability,
6) liquidity reserve – the difference between the most liquid assets and the expected and potential liabilities which mature in a given period,
7) stable financing to non-liquid assets ratio – the relationship of a stable deposit base, own funds and stable market sources of financing to loans, non-current assets and non-liquid securities,
8) concentration of long-term market sources of financing – the relationship of long-term sources of financing, grouped collectively according to a defined maturity, to a deposit base and all long-term sources of financing,
9) measures of stability of the deposit and loan portfolios,
10) early warning indicators – monitored in order to detect early unfavourable developments which may have a negative impact on the Bank's or the financial sector's liquidity position (when exceeded, early warning indicators trigger liquidity contingency plans).
11) liquidity stress tests.

The main objective of the stress tests performed as part of liquidity risk management is to identify and determine the factors constituting the greatest risk to the Bank's liquidity and to assess their impact on the Bank's liquidity, should they materialise.

The following types of scenarios are used to measure liquidity risk in the Bank:
1) scenario of the Bank's survival horizon in stress conditions,
2) scenarios of mass withdrawal of deposits by non-financial customers,
3) scenarios of sensitivity of in- and outflows to changing market conditions,
4) scenarios of the impact of stress market conditions on the expected losses on the housing loan portfolio,
5) scenarios of forecasted liquidity risk in shock conditions,
6) scenarios of additional collateral for derivative instruments concluded in the event of the Bank's credit rating being lowered,
7) stress tests for intraday liquidity,
8) reverse stress tests.

The results of stress tests are used, in particular, in:
1) monitoring the Bank's exposure to liquidity risk in stress conditions,
2) establishing limits and thresholds imposed on liquidity risk measures,
3) controlling the maintenance of a liquidity surplus on each day during the period called a 'survival horizon',
4) the financial planning process at the Bank,
5) defining symptoms triggering liquidity contingency plans of the Bank,
6) defining the levels of ratios which will trigger the Recovery Plan.

### 2.8.3 Control of the liquidity risk

The control of the liquidity risk covers determining the strategic limits of tolerance for liquidity risk, limits and thresholds which define an acceptable level of the exposure of the entities in the Bank's Group to the risk of short-, mid- and long-term liquidity, tailored to the scale and complexity of the Bank and the Bank's Group.

### 2.8.4 Monitoring the liquidity risk

The adjusted liquidity gaps presented below include a list of maturing assets and liabilities and, in addition, they have been adjusted for certain on-balance sheet and off-balance sheet items to properly present the liquidity position of the Bank and the entities in the Bank's Group.

The key adjustments concern the following:
1) the core deposits (excluding the interbank market) and their maturities – customers' deposits (current accounts, savings accounts and fixed term deposits) have been classified into respective tenors according to their stability (the maintenance of an appropriate balance or revolving after the maturity date),
2) overdraft facilities and credit cards and their maturities – the expected cash flows relating to the repayment of overdraft facilities and credit card loans and the discharge of the off-balance sheet liabilities relating to these products have been classified into respective tenors, taking into account whether these loans are repayable and the possibility of their revolving,
3) instalment loans – expected cash flows due to loan prepayments were classified to appropriate time buckets,
4) liquid securities and their maturities – the expected cash flows have been classified into respective tenors, according to the possible dates of their liquidation (pledging, sale),
5) hedging transactions placed in connection with the performance of CSA agreements – the expected cash inflows or outflows have been classified into respective tenors, according to the estimated value of deposits to be placed by the Bank or deposits payable to the Bank,
6) market sources of financing – the expected cash flows have been classified into respective tenors, according to the planned revolving of the maturing market sources of financing,
7) off-balance sheet liabilities granted and received – the expected cash flows have been classified into respective tenors, according to the estimated dates and degrees of utilisation of off-balance sheet liabilities (in particular, loans granted).

The tables below present data concerning a periodic gap and a cumulative periodic gap of the Bank and the entities in the Bank's Group as at 31 December 2024 and 31 December 2023, respectively.

Table 2.29 Adjusted liquidity gap* – assets and liabilities

| 31.12.2024 | a'vista | 0-1 month | 1-3 months | 3-6 months | 6-12 months | 1-2 years | 2-5 years | over 5 years |
|---|---|---|---|---|---|---|---|---|
| **PKO Bank Polski SA** | | | | | | | | |
| Periodic gap | 18 164 | 124 128 | - 15 197 | - 2 130 | - 9 643 | 19 991 | 27 326 | - 162 639 |
| Cummulative gap | 18 164 | 142 292 | 127 095 | 124 965 | 115 322 | 135 313 | 162 639 | - |
| **Bank subsidiaries** | | | | | | | | |
| Periodic gap | 1 471 | 6 493 | 2 429 | - 2 513 | - 5 923 | 1 465 | 3 422 | - 6 845 |
| Cumulative gap | 1 471 | 7 964 | 10 393 | 7 881 | 1 957 | 3 423 | 6 845 | - |
| **Total - Periodic gap** | **19 635** | **130 620** | **- 12 768** | **- 4 643** | **- 15 566** | **21 456** | **30 748** | **- 169 483** |
| **Total - Cumulative gap** | **19 635** | **150 256** | **137 488** | **132 845** | **117 279** | **138 736** | **169 483** | **-** |

| 31.12.2023 | a'vista | 0-1 month | 1-3 months | 3-6 months | 6-12 months | 1-2 years | 2-5 years | over 5 years |
|---|---|---|---|---|---|---|---|---|
| **PKO Bank Polski SA** | | | | | | | | |
| Periodic gap | 7 347 | 126 453 | - 17 528 | 2 600 | - 11 930 | 12 305 | 25 610 | - 144 857 |
| Cummulative gap | 7 347 | 133 800 | 116 272 | 118 872 | 106 943 | 119 248 | 144 857 | - |
| **Bank subsidiaries** | | | | | | | | |
| Periodic gap | 1 118 | 1 809 | 2 251 | - 275 | - 3 202 | 979 | 151 | - 2 832 |
| Cumulative gap | 1 118 | 2 927 | 5 178 | 4 904 | 1 701 | 2 680 | 2 832 | - |
| **Total - Periodic gap** | **8 465** | **128 262** | **- 15 277** | **2 326** | **- 15 132** | **13 284** | **25 761** | **- 147 689** |
| **Total - Cumulative gap** | **8 465** | **136 727** | **121 450** | **123 776** | **108 644** | **121 928** | **147 689** | **-** |

* Calculated as the total of the adjusted liquidity gap of PKO Bank Polski S.A., PKO Bank Hipoteczny, PKO Leasing S.A., PKO Życie Towarzystwo Ubezpieczeń SA and KREDOBANK and the contractual liquidity gap of the other companies in the Bank's Group.

In all tenors, the adjusted cumulative liquidity gap of the Bank's Group was positive. This means a cumulative surplus of the maturing assets over the maturing liabilities.

The table below presents the Bank's liquidity surplus as at 31 December 2024 and as at 31 December 2023.

Table 2.30 Bank's liquidity surplus

| SENSITIVITY MEASURE | 31.12.2024 | 31.12.2023 |
|---|---|---|
| Liquidity surplus in 30-day horizon | 41 906 | 55 972 |

The Bank maintains a high and safe level of high quality unencumbered liquid assets which constitute a hedge in case extreme liquidity scenarios (a liquidity surplus) materialise. Easily disposable assets include: cash (less the minimum balance maintained at the ATMs and in the Bank's branches), funds in the Bank's nostro accounts (excluding the average level of the mandatory reserve), interbank deposits placed with other banks and liquid securities.

Table 2.31 Liquidity surplus items related to liquid assets of the Bank

| CATEGORY | 31.12.2024 | 31.12.2023 |
|---|---|---|
| Cash | 3 379 | 4 219 |
| Nostro accounts and deposits | 1 045 | 6 552 |
| Treasury bills and bonds | 125 805 | 103 207 |
| Monetary bills | 7 996 | 28 974 |
| Other liquid secur ities | 29 607 | 29 369 |

The table below shows the regulatory liquidity ratios of the Bank's Group as at 31 December 2024 and as at 31 December 2023.

Table 2.32 Regulatory liquidity ratios

| Measure | 31.12.2024 | 31.12.2023 |
|---|---|---|
| LCR | 245,1% | 243,4% |
| NSFR | 156,1% | 156,7% |

In the period from 31 December 2023 to 31 December 2024, the values of the supervisory measures remained above the supervisory limits.

The structure of the Bank's sources of financing was described in the Bank's annual financial statements as at and for the year ended 31 December 2024 (Note 58. Liquidity risk management). The Bank follows a strategy which consists of using the stable part of the deposit base as the basic source of financing in all currencies. Issues of bonds denominated in EUR and PLN as well as covered bonds denominated in EUR and PLN also constitute a significant part of financing for the Bank and the Bank's Group (especially in the case of foreign currencies). Surplus funds obtained on the market in a given currency (issues of securities) are used to manage the Bank's foreign currency liquidity needs, using derivative transactions (mainly CIRS and FX swaps).

Table 2.33 Quantitative information on the liquidity coverage ratio [Template EU LIQ1]

| | | a | b | c | d | e | f | g | h |
|---|---|---|---|---|---|---|---|---|---|
| | | Total unweighted value (avg) | | | | Total weighted value (avg) | | | |
| EU 1a | Quarter ending on | 31.12.2024 | 30.09.2024 | 30.06.2024 | 31.03.2024 | 31.12.2024 | 30.09.2024 | 30.06.2024 | 31.03.2024 |
| EU 1b | Number of data points used in the calculation of averages | 12 | 12 | 12 | 12 | 12 | 12 | 12 | 12 |
| HIGH-QUALITY LIQUID ASSETS | | | | | | | | | |
| 1 | Total high-quality liquid assets (HQLA) | | | | | 165 252 | 161 759 | 154 453 | 147 216 |
| CASH - OUTFLOWS | | | | | | | | | |
| 2 | Retail deposits and deposits from small business customers, of which: | 297 712 | 293 580 | 287 853 | 281 541 | 22 343 | 22 069 | 21 702 | 21 352 |
| 3 | Stable deposits | 215 562 | 211 769 | 206 734 | 200 583 | 10 778 | 10 588 | 10 337 | 10 029 |
| 4 | Less stable deposits | 82 124 | 81 786 | 81 094 | 80 933 | 11 539 | 11 455 | 11 341 | 11 298 |
| 5 | Unsecured wholesale funding | 107 545 | 105 881 | 102 817 | 99 617 | 37 416 | 36 920 | 35 551 | 34 449 |
| 6 | Operational deposits (all counterparties) and deposits in networks of cooperative banks | 30 103 | 30 091 | 29 679 | 28 596 | 7 181 | 7 187 | 7 093 | 6 833 |
| 7 | Non-operational deposits (all counterparties) | 75 924 | 74 273 | 71 915 | 69 895 | 28 716 | 28 217 | 27 235 | 26 491 |
| 8 | Unsecured debt | 1 518 | 1 516 | 1 224 | 1 125 | 1 518 | 1 516 | 1 224 | 1 125 |
| 9 | Secured wholesale funding | | | | | - | - | - | - |
| 10 | Additional requirements | 92 835 | 91 179 | 89 945 | 88 311 | 15 283 | 15 646 | 16 137 | 16 299 |
| 11 | Outflows related to derivative exposures and other collateral requirements | 3 684 | 4 397 | 5 177 | 5 722 | 3 684 | 4 397 | 5 177 | 5 722 |
| 12 | Outflows related to loss of funding on debt products | - | - | - | - | - | - | - | - |
| 13 | Credit and liquidity facilities | 89 152 | 86 782 | 84 767 | 82 588 | 11 599 | 11 249 | 10 960 | 10 577 |
| 14 | Other contractual funding obligations | 3 007 | 3 160 | 3 080 | 3 773 | 1 973 | 2 191 | 2 158 | 2 906 |
| 15 | Other contingent funding obligations | 7 372 | 7 231 | 7 064 | 6 872 | 2 858 | 2 850 | 2 835 | 2 816 |
| 16 | TOTAL CASH OUTFLOWS | | | | | 79 871 | 79 676 | 78 384 | 77 823 |
| CASH-INFLOWS | | | | | | | | | |
| 17 | Secured lending (e.g. reverse repos) | 612 | 508 | 451 | 1 140 | 30 | 20 | 15 | 61 |
| 18 | Inflows from fully performing exposures | 12 978 | 13 125 | 13 818 | 13 990 | 11 188 | 11 420 | 12 134 | 12 409 |
| 19 | Other cash inflows | 1 782 | 2 055 | 1 995 | 1 848 | 1 782 | 2 055 | 1 995 | 1 848 |
| EU-19a | (Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies) | | | | | - | - | - | - |
| EU-19b | (Excess inflows from a related specialised credit institution) | | | | | - | - | - | - |
| 20 | TOTAL CASH INFLOWS | 15 372 | 15 688 | 16 263 | 16 978 | 13 001 | 13 496 | 14 144 | 14 318 |
| EU-20a | Fully exempt inflows | - | - | - | - | - | - | - | - |
| EU-20b | Inflows subject to 90% cap | - | - | - | - | - | - | - | - |
| EU-20c | Inflows subject to 75% cap | 15 372 | 15 688 | 16 263 | 16 978 | 13 001 | 13 496 | 14 144 | 14 318 |
| TOTAL ADJUSTED VALUE | | | | | | | | | |
| EU-21 | LIQUIDITY BUFFER | | | | | 165 252 | 161 759 | 154 453 | 147 216 |
| 22 | TOTAL NET CASH OUTFLOWS | | | | | 66 870 | 66 180 | 64 240 | 63 504 |
| 23 | LIQUIDITY COVERAGE RATIO | | | | | 247,3% | 244,5% | 240,3% | 231,7% |

A liquidity coverage ratio is determined individually by each entity in the Bank's Group which is required to determine this ratio and on a consolidated basis for the Bank's Group as a whole.

As at 31 December 2024, the LCR has remained significantly above the supervisory limit and internal limits and thresholds. Compared to 31 December 2023, the ratio increased by approximately 1.7 p.p., mainly as a result of an increase in retail deposits by approximately PLN 16.1 billion, corporate deposits by approximately PLN 4.5 billion and the issue of own bonds in EUR and PLN in the amount respectively of EUR 1.0 billion and PLN 2.5 billion, while gross loans increased by approximately PLN 22.0 billion. During this period, the Group's liquid assets increased by ca. PLN 10.3 billion.

As at the end of December 2024, the outflows in respect of derivative instruments calculated in accordance with the CRR amounted to approx. PLN 1.4 billion, whereas the impact of the unfavourable market conditions scenario on derivative instruments, financing transactions and other agreements accounted for approx. 0.3% of the total unweighted outflows recognized in the liquidity coverage ratio.

As at the end of December 2024, the Bank's Group had 2 currencies for which the ratio of the value of liabilities in a given currency to the total value of liabilities in all currencies amounted to at least 5%: PLN and EUR. The Bank's Group had an LCR above 100% for all currencies in total and for PLN.

Table 2.34 Net Stable Funding Ratio [Template EU LIQ2]

| | | 31.12.2024 | | | | |
|---|---|---|---|---|---|---|
| | | a | b | c | d | e |
| | | Unweighted value by residual maturity | | | | Weighted value |
| | | No maturity | < 6 months | 6 months to < 1 year | ≥ 1 year | |
| **Available stable funding (ASF) Items** | | | | | | |
| 1 | Capital items and instruments | 48 420 | - | - | 3 039 | 51 459 |
| 2 | Own funds | 48 420 | - | - | 3 039 | 51 459 |
| 3 | Other capital instruments | | - | - | - | - |
| 4 | Retail deposits | | 305 521 | - | - | 286 061 |
| 5 | Stable deposits | | 221 849 | - | - | 210 757 |
| 6 | Less stable deposits | | 83 671 | - | - | 75 304 |
| 7 | Wholesale funding: | | 124 556 | 654 | 17 738 | 74 593 |
| 8 | Operational deposits | | 40 376 | - | - | 20 188 |
| 9 | Other wholesale funding | | 84 180 | 654 | 17 738 | 54 404 |
| 10 | Interdependent liabilities | | - | - | - | - |
| 11 | Other liabilities: | - | 2 243 | 835 | 16 680 | 17 097 |
| 12 | NSFR derivative liabilities | - | | | | |
| 13 | All other liabilities and capital instruments not included in the above categories | | 2 243 | 835 | 16 680 | 17 097 |
| 14 | Total available stable funding (ASF) | | | | | 429 210 |
| **Required stable funding (RSF) Items** | | | | | | |
| 15 | Total high-quality liquid assets (HQLA) | | | | | 1 942 |
| EU-15a | Assets encumbered for more than 12m in cover pool | | 99 | 79 | 4 384 | 3 877 |
| 16 | Deposits held at other financial institutions for operational purposes | | - | - | - | - |
| 17 | Performing loans and securities: | | 25 126 | 14 686 | 247 981 | 244 909 |
| 18 | Performing securities financing transactions with financial customerscollateralised by Level 1 HQLA subject to 0% haircut | | - | - | - | - |
| 19 | Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions | | 2 623 | 11 | 1 085 | 1 353 |
| 20 | Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which: | | 18 356 | 10 584 | 133 748 | 145 942 |
| 21 | With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk | | 33 | 20 | 13 254 | 9 149 |
| 22 | Performing residential mortgages, of which: | | 3 007 | 2 419 | 89 518 | 72 581 |
| 23 | With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk | | 1 420 | 1 127 | 61 462 | 45 742 |
| 24 | Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products | | 1 140 | 1 673 | 23 630 | 25 033 |
| 25 | Interdependent assets | | - | - | - | - |
| 26 | Other assets: | | 22 458 | 370 | 13 831 | 18 750 |
| 27 | Physical traded commodities | | | | - | - |
| 28 | Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs | | - | - | 626 | 532 |
| 29 | NSFR derivative assets | | - | | | - |
| 30 | NSFR derivative liabilities before deduction of variation margin posted | | 2 850 | | | 143 |
| 31 | All other assets not included in the above categories | | 19 608 | 370 | 13 205 | 18 076 |
| 32 | Off-balance sheet items | | 19 777 | 17 379 | 66 286 | 5 531 |
| **33** | **Total RSF** | | | | | 275 010 |
| **34** | **Net Stable Funding Ratio (%)** | | | | | 156,1% |

## 2.8.5 Liquidity risk reporting

The Bank prepares daily, weekly, monthly and quarterly liquidity risk reports, with the monthly and quarterly reports concerning also the Bank's Group. The reports gather the information on liquidity risk exposure and updates on the use of limits for that risk. The reports are addressed mainly to: ALCO, RC, the Management Board, the Risk Committee and the Supervisory Board.

## 2.8.6 Management activities related to liquidity risk

The main liquidity risk management tools used in the Bank's Group include:
1) procedures for liquidity risk management, in particular contingency plans,
2) limits and thresholds to mitigate the liquidity risk,
3) deposit, investment and derivative transactions, including structured foreign exchange transactions, and the purchase and sale of securities,
4) transactions ensuring long-term financing of the lending activities.

The methods of liquidity risk management in the entities in the Bank's Group are defined in the internal regulations implemented by those entities for which liquidity risk is material. Such regulations are developed after consulting the Bank and taking into account the Bank's recommendations.

The acceptable level of risk at the level of both the Bank and the Bank's Group is determined as part of the Risk Management Strategy of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group.

At least once a year, the Bank reviews the risk management process (taking into account the ILAAP guidelines) in order to verify whether the liquidity risk management process is adequate to the scale and complexity of the liquidity risk to which the Bank is exposed and consistent with the process of managing other risks and the regulatory requirements. This activity ensures the continued effectiveness of hedging instruments and risk mitigation measures. Additionally, the effectiveness of the risk management process is constantly monitored as part of the reports specified in chapter 2.8.5 of this Report.

## 2.9 Operational risk

### 2.9.1 Introduction

Operational risk is understood as the risk of losses resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk does not include reputation risk or business risk, but does include legal risk and cybersecurity risk:
- legal risk – the risk of incurring a loss due to ignorance, misunderstanding and non-application of legal norms and accounting standards, the inability to enforce contractual provisions, unfavourable interpretations or decisions of courts or public administration bodies,
- cyber security risk – the degree of exposure by potential negative cyber security risk factors, related to information and communication technologies, which may cause financial damage to the organisation by compromising the availability, integrity, confidentiality or accountability of information processed in SIB resources.

In accordance with the operational risk management strategy, the objective of operational risk management is to ensure the operating and cost effectiveness as well as security of the activities by reducing the occurrence of operational events and their negative consequences.

Operational risk management in the Bank and at the Bank's Group's level follows the best practices for managing the risk in banks and is in line with the generally applicable provisions of the law.

The entities in the Bank's Group manage operational risk in accordance with the principles for managing this risk in the Bank, taking into account the scope and type of the relationships between the entities in the Bank's Group, the specific nature and scale of the operations of the individual entities.

The operational risk profile of the Bank and the Bank's Group is understood as the scale and structure of the exposure to operational risk, it is defined by strategic limits of tolerance for operational risk. The Management Board defines the levels of utilisation of strategic limits of tolerance for operational risk which, when exceeded, serve as a signal for undertaking management activities to mitigate operational risk.

Operational risk is managed at the level of the entire Bank and at the levels of the individual areas of systemic operational risk management. The Bank's internal regulations clearly define organisation, segregation of competences and tasks in the area of operational risk management.

Current operational risk management is carried out by each employee of the Bank's Group as part of their duties and obligations and consists of preventing operational events arising in servicing products, services, conducting processes and using applications from materialising and of responding to the occurrence of operational events.

Such responding includes:
1) identifying events and explaining the reasons for their occurrence,
2) defining the consequences of operational events,
3) recording data on operational events and their consequences,
4) monitoring information on operational events and their consequences,
5) eliminating negative consequences of operational events,
6) implementing recovery and prevention activities.

Systemic operational risk management consists of developing solutions used to control the operational risk level, enabling the Bank's objectives to be achieved. The main areas of systemic operational risk management are:
1) security and cyber security,
2) information technology,
3) settlements,
4) human resources,
5) business activity,
6) administration,
7) legal,
8) support (in particular insurance management, outsourcing, building and implementing an internal operational risk measurement model and systems of identification, assessment, monitoring and limiting of operational risk, etc.).

As part of operational risk management, the Supervisory Board supervises the operational risk management process, including:
1) approving strategic limits of tolerance for operational risk of the Bank and the Bank's Group,
2) approving the operational risk management strategy,
3) evaluating the operational risk management process, in particular on the basis of cyclical operational risk reports taking into account annual assessment of the adequacy and effectiveness of the operational risk management system and information on the implementation of the operational risk management strategy and conclusions of stress tests, and, if necessary, ordering the review of the operational risk management process.

As part of operational risk management, the Management Board determines the operational risk management process, in particular:
1) it sets the objective of the operational risk management,
2) it defines the operational risk management strategy,
3) it adopts resolutions on the operational risk management principles, strategic limits of tolerance for operational risk, and significant changes and extensions of the AMA,
4) it accepts the value of the management adjustment to the own funds requirement for operational risk according to the AMA,
5) it accepts reports and information on operational risk.

The correctness of the operational risk management process is regularly verified as part of:
1) review of the operational risk management strategy and processes aimed at assessing the adequacy and effectiveness of the operational risk management system,
2) self-assessment of maintenance of compliance with the AMA requirements,
3) validation of the AMA,
4) internal audit.

In 2024, the Bank was preparing for changes in the calculation of the own funds requirement for operational risk in connection with the entry into force of the CRR3 Regulation on 01.01.2025. The changes in the process will include a change in the scope of source data, the process of calculating the requirement, the scope of cooperation and responsibility of individual units in the Bank, and changes in internal regulations.

### 2.9.2 Identification, measurement and assessment of operational risk

For the purposes of operational risk management, the Bank collects internal and external data on operational events as well as the reasons for them and the consequences of their occurrence, data on business environment factors, the results of operational risk self-assessment, data on the values of operational risk indicators, and data on the quality of the internal audit system.

The operational risk self-assessment comprises the identification and assessment of operational risk for the Bank's products, services, processes and applications as well as organisational changes and it is conducted cyclically and before implementing new or changed Bank products, services, processes and applications, using the data gathered on operational events and information obtained during the measurement, monitoring, cooperation with the Bank's Group's entities and operational risk reporting, including internal audits and security audits.

In 2024, PKO Bank Polski S.A. and the PKO Leasing S.A. Group had a decisive impact on the operational risk profile of the Bank's Group.

The measurement of operational risk in the Bank is aimed at determining the scale of the threats related to the occurrence of operational risk, using defined risk measures. The measurement of operational risk comprises:
1) calculating operational risk indicators: *KRI* and *RI*,
2) calculating the own funds requirement for operational risk under the AMA (for the Bank, including the branches in Germany and the Czech Republic) and BIA (for the branch in the Czech Republic and the entities in the Bank's Group, subject to prudential consolidation),
3) stress-tests,
4) calculating the internal capital for the Bank's Group.

The BIA requirement regarding the Bank's operations subject to the BIA is calculated in accordance with the CRR (Part Three, Title III) and applies to the part of the Bank's operations for which the Bank has the PFSA's permission obtained in connection with combining the BIA and AMA approaches to calculating the own funds requirement for operational risk.

The AMA requirement is calculated in accordance with the CRR and taking into account the requirements included in the RTS AMA Regulation. The approach is subject to independent reviews and is verified each year as part of the self-assessment of the compliance with AMA requirements in accordance with the guidelines of the Polish Financial Supervision Authority on supervisory validation of statistical methods of capital requirements' calculation, which are treated by the Bank and a supplementary document representing the best practices in the application of the advanced approach to operational risk management.

The Bank complies with the standards relating to external and internal data referred to in Article 322(3) and (4) of the CRR.

In the measurement of the operational risk, the Bank takes into account internal operational incidents where the loss level has exceeded the adopted threshold and covers the following period:
1) for modelling severity – from 1 January 2005 until the date at which the measurement is performed,
2) for modelling frequency distribution: – from 1 May 2007 until the date at which the measurement is performed.

It is the full scope of the Bank's data, consistent with the consent granted by the PFSA for using the Advanced Measurement Approach (AMA).

The Bank is mapping internal historical data on losses to business lines determined in Article 317 of the CRR and to loss event types defined in Article 324 of the CRR. Further levels of event type categorisation were introduced for the Bank's purposes to collect data at a higher level of detail. Moreover, segmentation which takes into account the said categorisation was implemented for the purposes of measuring operational risk using AMA.

All operational events of the Bank, including those relating to credit and market risks, are collected in the operational events database. Losses due to both operational and credit risk which are taken into account when calculating the own funds requirement for credit risk pursuant to Article 322(3)(b) of the CRR are identified and excluded from the operational risk modelling in order to exclude the possibility of double-counting of the same risks. Losses associated with the market risk are taken into account in the operational risk measurement.

The Bank's internal regulations governing the procedure for collecting the operational event data make it obligatory to report all losses due to operational risk which exceed the threshold for all units of the Bank, irrespective of the systems and geographical locations to which the loss related. The value of a threshold for internal events was established taking into account the economic cost of collecting information on operational events and their added value in operational risk measurement.

As part of the information on operational events, the Bank collects:
1) descriptive information on loss event factors or reasons,
2) gross losses and amounts recovered from gross losses,
3) start and disclosure dates of events, and recognition dates understood as the date of the first recognition of the amount of loss resulting from operational events in the profit and loss account.

The method of allocating losses resulting from loss events in the Bank's units determines the business line to which the event should be allocated depending on the product to which it relates or the Bank's unit affected by the financial effect. Allocation to a business line is based on:
1) the banking product to which the loss relates,
2) the Bank's unit to which the loss relates, if not related to a banking product.

Losses arising from events occurring over time but related to one another and those arising at different times but resulting from the same event are reported as individual events with several financial outcomes allocated to them. In the case of events related to one another, the sum of losses arising from these events is aggregated to a single observation relative to the aggregating event. Any exceptions from the adopted aggregation method must be justified and it must be verified that they do not contribute to unduly reducing the AMA requirement. The following dates are adopted as observation dates taken into account in the measurement:

1) for events not related to the legal risk – the date of disclosing the operational event,
2) for events related to the legal risk – the date of recognition, and if no date of recognition is assigned to the observation – the earliest date of loss occurrence.

Additionally, the operational risk measurement takes into account macroeconomic data and data illustrating the scale of the Bank's operating and business activities, in accordance with Article 322(6) of the CRR. The business environment factors are used to scale the severity and frequency of losses in LDA measurement, and external control factors are taken into account in the adjustment for changes in the quality of control.

Pursuant to the requirements of Article 322(4) of the CRR, the Bank uses external data when calculating LDA for selected modelled risk categories of the AMA and as an information base for analyses in the scenario analysis. The external data complement the internal data as part of operational risk measurement and are derived from, among other things, a system of exchange of information on events in the operational risk area (the ZORO) maintained by the Polish Bank Association. The Bank regularly reviews the conditions for using external data in AMA measurement.

The own funds requirement for operational risk according to the AMA corresponds to value at risk in respect of operational risk plus the result of a scenario analysis and adjusted for the value of the adjustment for changes in the quality of internal audit and a management adjustment, in accordance with the following formula:

$AMA = (LDA+AS)*(1+KW)+KK$

where:

*AMA* - own funds requirement for operational risk (the AMA requirement),
*LDA* - value at risk,
*AS* - result of the scenario analysis,
*KW* - adjustment for changes in the quality of control,
*KK* - management adjustment.

The AMA measure captures potentially severe tail events, achieving a soundness standard comparable to a 99.9% confidence interval over a one year period, in accordance with Article 322(2)(a) of the CRR.

Value at risk is calculated using a loss distribution approach (LDA). Under this approach, based on historical internal and external data on operational events and on the operational environment, a potential loss is measured which, with 99.9% probability, will not be exceeded in the coming year.

The objective of the scenario analysis is to extend the AMA requirement to capture the operational risk relating to the types of operational events which have not been covered with the LDA approach. In accordance with Article 322(5) of the CRR, the scenario analysis results are based on expert opinions, information on the losses which occurred in other institutions and the profile of these institutions, and on supplementing information on the profile of the Bank's operations.

The adjustment for changes in the quality of control makes it possible to take into account the possibility of deterioration in the quality of control in the Bank's which would result in an increase in the frequency or severity of operational events. Applied assessments of the adequacy and effectiveness of key control mechanisms are prospective and reflect potential sources of operational risk – the assessments reflect the state of functioning of the Bank's processes, including control mechanisms, and identified issues, until they are eliminated, may cause financial losses and changes in the Bank's – risk profile (in accordance with Article 322 (6) of the CRR and Article 27 of the RTS AMA Regulation).

The objective of the management adjustment is to include extraordinary events which, due to their specific nature, were not included in the AMA requirement under the LDA approach or in the scenario analysis, in the calculation of the AMA requirement.

In accordance with the requirements of Article 322(5) of the CRR and Article 26 of the RTS AMA Regulation, risk measurement includes conducting stress tests related to the possible consequences of materialisation of extremely unfavourable, yet possible, scenarios. This is aimed at defining the sensitivity of the Bank's results to the materialisation of a test scenario and at determining whether the AMA requirement covers the total losses resulting from the materialisation of such scenarios. The previous results of stress tests do not challenge the sufficient conservatism of the AMA requirement. Additionally, the Bank performs the back testing of the correctness of the AMA requirement calculated. Back testing results confirm the sufficient conservatism of the AMA requirement

The Validation Department, as an independent unit of the Bank, regularly validates the AMA approach used in accordance with the requirements laid down in Article 321(f) of the CRR and Articles 16 and 17 of the RTS AMA Regulation. The objective of validation of the AMA approach is an independent assessment of the extent to which the model meets the business needs known at the time of the validation. Independence of the validation process is ensured by the placement of the validation unit in the Bank's organisational structure under the direct supervision of the Vice-President of the Management Board responsible for the Risk Management Division in matters relating to model validation.

The Internal Audit Department is responsible for conducting internal audits of the internal operational risk management system. Operational risk measurement systems and the assessment of the quality of sources and data used for operational risk measurement and management are important elements which are subject to audit in accordance with the guidelines of Article 16 of the AMA RTS Regulation.

## The Bank's insurance policy

To minimise the negative financial implications of operational events, the Bank follows an insurance policy which consists of ensuring continuing and effective insurance cover in return for an acceptable cost. PKO Bank Polski S.A. strives to apply uniform insurance principles for the entire Bank's Group so as to optimize the scope and costs of the insurance cover by using the effects of scale.

The Bank's insurance programme is monitored on an ongoing basis in order to identify the needs for the necessary changes.

### Impact of insurance

In calculating the own funds requirement for operational risk, the Bank takes into account the impact of insurance.

The insurance policies used by the Bank to reduce the own funds requirement for operational risk meet the criteria defined in Article 323 of the CRR and Articles 36-44 of the RTS AMA Regulation and are in compliance with the Bank's internal regulations regarding the calculation of reductions in the own funds requirement for insurance. The Bank's insurance policies primarily relate to crime and professional indemnity insurance, directors and officers liability insurance, the Bank's third party liability and all-risk property insurance. In calculating reductions in respect of insurances held, the Bank takes into account deductibles and franchises.

Pursuant to Article 323 of the CRR, the reduction in own funds requirements from the recognition of insurances and other risk transfer mechanisms shall not exceed 20% of the own funds requirement for operational risk before the recognition of risk mitigation techniques.

## 2.9.3 Control of the operational risk

The aim of operational risk management is to strive to maintain the level of operational risk of the Bank and the Bank's Group at a fixed level.

The control of the operational risk includes determining risk control mechanisms in the form of operational risk limits, in particular strategic limits of tolerance for operational risk, loss limits and operational risk indicators, including thresholds and critical values, tailored to the scale and complexity of the activities of the Bank and the Bank's Group.

Strategic limits of tolerance for operational risk are defined by the Management Board and approved by the Supervisory Board. Additionally, the Management Board defines the levels of utilisation of the strategic limits of tolerance for operational risk for the Bank and the Bank's Group, which, when exceeded, serve as a signal for undertaking management activities to mitigate operational risk.

The Bank has a system of loss limits allocated to the Bank's individual units or functional divisions managing the operational risk relating to the individual areas of systemic operational risk management, which is aimed at defining the maximum acceptable level of operational risk for the Bank's individual units or functional divisions, ensuring that the strategic limits of tolerance for operational risk are not exceeded.

## 2.9.4 Monitoring the operational risk

The objective of monitoring the operational risk is to observe deviations from the benchmarks assumed (in particular limits, thresholds, prior period measurements, recommendations and guidance) in order to diagnose areas requiring management activities.

The Bank regularly monitors, in particular:
1) the degree of utilisation of strategic tolerance limits for the Bank and the Bank's Group and loss limits for operational risk for the Bank,
2) operational events and their consequences,
3) results of the operational risk self-assessment,
4) the own funds requirement for operational risk under the BIA with regard to the activities of the branch in the Czech Republic and under the AMA with regard to the Bank's other activities, and under the BIA for the entities in the Bank's Group subject to prudential consolidation,
5) the results of stress tests, including reverse stress tests,
6) operational risk indicator values in relation to thresholds and critical values,
7) the level of risk for the Bank and the Bank's Group, areas and tools for managing operational risk in the Bank such as self-assessment, operational risk indicators, loss limits,
8) the effectiveness and timeliness of management activities undertaken to reduce or transfer operational risk,
9) management activities relating to the presence of elevated or high levels of operational risk and their effectiveness in reducing the level of operational risk.

## 2.9.5 Operational risk reporting

Information relating to operational risk is reported for the purpose of senior management, the ORC, the Risk Committee, the Management Board and the Supervisory Board in monthly and quarterly cycles. The scope of the information is tailored to the scope of responsibility of the individual users of the information.

The users of monthly information include the ORC, senior management, and the Bank's units responsible for systemic operational risk management. Monthly information includes, in particular, information on:
1) the number and consequences of operational events,
2) the structure of operational events,
3) the values of selected operational risk indicators,
4) the operational risk level for strategic limits of operational risk tolerance, loss limits and self-assessment of operational risk.

The quarterly statements are addressed to the ORC, the Risk Committee, the Management Board and the Supervisory Board. Quarterly reports include, in particular, information on:
1) the Bank's operational risk profile resulting from the process of identification and assessment of threats to the Bank's products, services, processes and applications, and the LDA measurement,
2) the operational risk level for the Bank, areas and tools for managing operational risk, such as self-assessment, operational risk indicators, loss limits,
3) the results of operational risk measurement and monitoring,
4) the activities undertaken to mitigate operational risk and the assessment of the effectiveness of the activities undertaken to reduce the level of operational risk.

## 2.9.6 Management activities related to operational risk

Management activities are taken in the following cases:
1) on an initiative of ORC or the Management Board,
2) on the initiative of the Bank's organizational units managing operational risk,
3) when operational risk has exceeded the levels determined by Management Board or ORC.

In particular, if operational risk has reached an increased or high level, the Bank uses the following approaches and operational risk management tools:

1) risk reduction – mitigating the impact of risk factors or the consequences of their occurrence by introducing or strengthening various types of instruments for managing operational risk such as:
   - control instruments (including authorisation, internal audit, segregation of duties),
   - human resources management instruments (selection of staff, increasing the qualifications of employees, incentive systems),
   - determination or verification of threshold values and critical operational risk indicators,
   - determination or verification of operational risk limits,
   - contingency plans,
2) risk transfer – transfer of responsibility for covering potential losses on a third-party:
   - insurance,
   - outsourcing,
3) risk avoidance – resignation from the risk-generating activity or eliminating the probability of the risk factor's occurrence.

### 2.9.7 Losses incurred and management activities mitigating operational risk

In 2024, operational risk events were disclosed in the Bank, excluding losses related to the lending process, which comprised the losses presented in Table 2.38 totalling PLN 18.69 million, net (PLN 88.72 million, gross).

The main source of operational risk losses in 2024 was external fraud events, mainly relating to electronic banking. The Bank has continuously been improving its processes and systems to block the above transactions or/and recover funds.

Table 2.35 Losses* related to disclosed events

| PKO BANK POLSKI SA | | 31.12.2024 | |
|---|---|---|---|
| General category | Specific category | Gross losses** | Net losses*** |
| Internal frauds | Non-legitimated activities | 0,27 | - |
| | Thefts and frauds | 0,90 | 0,47 |
| Regulations of employment and work safety | Labour issues | 2,33 | 0,33 |
| Client, products and operational practises | Customer service, disclosure of information about clients, responsibilities to clients | 0,17 | 0,16 |
| | Products malfunctions | 9,33 | 8,55 |
| | Customer classification and exposures | 0,04 | 0,02 |
| Disruption od bank operations and system failures | Systems | 20,68 | 0,68 |
| Making transactions, providing and managing operational processes | Recording in the system, making, calculating and servicing | 2,38 | 1,51 |
| | Inflow and registering clients | 0,01 | - |
| | Managing client's bank accounts | 0,17 | 0,03 |
| | Sellers and suppliers | 0,37 | 0,00 |
| Losses related to fixed assets | Natural disasters and other events | 4,62 | 0,75 |
| External frauds | Thefts and frauds | 47,45 | 6,18 |
| **Total** | | **88,72** | **18,69** |

* The losses do not include losses from operational risk related to credit risk, which are recognized as losses from credit risk and are used to calculate minimum requirements for own funds.
** According to Recommendation M of the PFSA, as at 31.12.2024gross losses include realised losses (e.g., provisions, allowances, expenses) and unrealised losses (potential losses); however, they do not include direct recoveries or recoveries from the risk transfer mechanism.
*** As at 31.12.2024, net losses include realised losses (e.g., provisions, allowances, expenses).

To mitigate losses from operational risk, the Bank undertakes both ad hoc and systemic management activities. Ad hoc activities include a direct response to the sources of risk identified, eliminating reversible irregularities and recovering lost funds. Systemic activities comprise, among other things, securing IT systems, improving transaction authorisation methods, developing identification processes and blocking transfers to accounts identified as accounts associated with criminal activities, developing an anti-fraud system, developing and optimising a system for combating money laundering and financing of terrorism (AML), processes improvement, internal audit optimisation, training, risk transfer (insurance, outsourcing).

In order to actively prevent phishing websites impersonating the Bank's websites, identifying the intentions and capabilities of criminals, including tactics, techniques and procedures, tracking the development of malware attacking the Bank's clients, developing mechanisms for detecting infected client computers, and improving rules and expanding the scope of monitoring electronic transactions, the Bank is constantly increasing the level of security of IT systems, in particular with regard to applications used by the Bank's clients. A specialist CERT unit operating within the Bank pursues a strategy for ensuring IT security of the services provided by the Bank. CERT PKO BP is a member of an international forum which brings together response teams – FIRST and belongs to the working group of European response teams – TERENA TF-CSIRT and the Trusted Introducer organisation which operates with it.

Joining international organisations allows the CERT PKO BP's team to respond more effectively and quickly to cyber security threats through operational cooperation and sharing experience and knowledge with similar entities around the world. The membership of the Bank, which is an organisation that meets the highest national and international standards in the field of cyber security, in the aforementioned organisations is confirmation of the high level of services provided and recognition of the Bank's professionalism and skills in ensuring IT security. The CERT PKO BP team operates on a 24/7/365 basis, and as part of its activities it pro-actively fights Internet threats, in particular those related to online and mobile banking. In addition, since 2021 a CyberSecurity Operations Centre (SOC) has been in operation at the Bank, which includes monitoring and incident response for the Bank's Group companies. The 24/7 SOC operates on the basis of a SOAR-class system allowing automation in monitoring, response as well as handling security incidents.

In 2024, the PKO BP CERT team notified and blocked, in cooperation with CSIRT PFSA, CERT Polska and CERT Orange, more than 982 fake pages. The targets of the frauds were mainly electronic services and clients of the Bank. This shows the contribution of the CERT PKO BP team to the overall level of ICT security in Polish cyberspace. The Bank uses advanced protection mechanisms against DDoS attacks, which allows CERT PKO BP to respond quickly and efficiently and remove the effects of volumetric attacks targeting electronic banking services. The Bank also has an internal cell (RedTeam) that simulates potential attacks in a controlled manner in order to identify vulnerabilities even before they are exploited by criminals. Activities that simulate attacks have been automated, including through the implementation of a BAS (Breach and Attack Simulation) tool. In addition, the analytical cell (Purple Team) is also active, supported by a dedicated platform for the collaboration of offensive and defensive teams and defensive teams.

The Bank educates its employees regularly in ICT environment security and the security of information processed in that environment. It provides employees with e-learning courses on cyber-security to help users gain knowledge of potential threats. The Bank performs training in accordance with the agreed schedule of training and monitors their performance by employees on an ongoing basis as part of independent monitoring of control mechanisms. In accordance with the Bank's policy, the principles of cybersecurity must be complied with also by third parties (contractors). The Bank sets security requirements for the providers of IT services as regards to the protection of the Bank's information, access to the Bank's buildings and rooms, and the protection of the Bank's information systems. The awareness-raising of employees also engages a program of simulated phishing attacks. The messages are sent to all persons employed in the Bank and imitate the actual risks to which users are exposed on a daily basis. Since 2022, Security Awareness training (simulation of a phishing attack) has been carried out periodically and extended to all employees and the Bank's Management Board.

The Bank's representatives become involved in the work carried out as part of the Banking Cybersecurity Centre (BCC) operating as part of the Polish Bank Association. The purpose of the BCC is to take comprehensive and long-term actions on several levels: intrasectoral, intersectoral (including cooperation with telecommunication, transport or power sector institutions), nationwide (cooperation with the state administration or law enforcement) and international, which are aimed at improving the safety of mobile and electronic banking and preparing crisis management tools (structures, procedures, information exchange mechanisms) in the event of, e.g., a massive attack of cybercriminals on the banking sector.

The Bank has an anti-fraud system in place to comprehensively detect fraud attempts to the detriment of the Bank and its customers. Anti-fraud analytics is based on decision engines operating in the NRT (near real time) mode for lending processes and in real time for transaction processes, for electronic banking, mobile banking and card transactions. Fraud detection algorithms use advanced statistical methods to detect rare events and any anomalies, both in the key areas of current account, deposit and credit products for customers in the Bank's branches and agencies, as well as in remote channels and transaction streams. Anti-fraud models analyse both unauthorised activity by Bank employees and detect accounts potentially operated to transfer fraudulent funds.

In order to counter financing of terrorism and to minimise the operational risk, the Bank applies specific restrictive measures consisting of freezing property values, as well as benefits derived from these assets and not making these values available to persons or entities. Tn the case of a suspicion of money laundering or terrorist financing, at the request of the General Inspector of Financial Information or the prosecutor, and in cases where financial security measures cannot be applied, the Bank suspends the transaction or blocks the account in accordance with the provisions of the Act on counteracting money laundering. Moreover, the Bank has been implementing, on an ongoing basis, the restrictions and changes resulting from the sanctions imposed on Russia and Belarus and introducing, on an ongoing basis, guidelines for the financing of and providing banking services to entities and customers having business dealings with Russia and Belarus.

As regards the physical security of facilities, the monetary assets they hold and the information they process, technical safeguards and remote protection in the form of monitoring of alarm signals with the guaranteed arrival of intervention teams are used. Additionally, on-site protection is provided in selected branches and key facilities. Physical protection management, monitoring of alarm signals and work on securing the facilities are aimed at minimising risks related to storing substantial amounts of cash, such as robberies, burglaries and other risks to physical security, such as fires, property damage, vandalism, aggressive customers, and terrorism. In addition, innovative activities are implemented to correlate data with the technical security systems and the transaction system that seek to detect persons in a self-service annex who do not make ATM transactions. The scope of physical protection services in facilities is adjusted to organisational changes in the branch network and current needs. Threat analyses of the Bank's facilities and self-service equipment are also carried out, resulting in the planning of a form of security for the facility or equipment in question that is appropriate to the needs and threats. In the case of equipment, this process identifies the most at-risk locations and supports them with additional security elements, particularly to prevent the property from being captured in explosive attacks. In connection with the update of the law, the process of retrofitting self-service devices with banknote neutralisation systems has been prepared (staining during break-in).

The technical safeguards and physical protection also serve the purpose of securing the Bank's ICT infrastructure, the information processed at the Bank, which constitutes banking secrecy, and personal data by ensuring a level of security required by law, adequate to the assessment of operational risk and optimal in terms of costs. IT system security is ensured by physical security and access restrictions as well as by the use of constantly upgraded alarm, access control, CCTV and fire protection systems.

Other security measures taken in 2024 are aimed at reducing operational risks and losses:
1) a project was implemented to upgrade the fire protection systems of selected Bank facilities;
2) systems for detection of incidents, anomalies, advanced types of malware were improved
3) the level of monitoring of the Bank's IT system was increased through implementation of new Cyber Security scenarios and modification of the current ones;
4) Active anti-DDoS protection was implemented to protect the organisation from volumetric attacks on electronic banking; vishing attack detection services, i.e. detection of attempts to impersonate Bank employees by phone and call clients to carry out fraud scenarios;
5) Future cyber security threats were modelled (Cyber Threat Intelligence);
6) Vulnerabilities were proactively identified and remediated and penetration tests were implemented;
7) training for branch and Agency staff on how to deal with security threats, so-called 'anti-phishing' training, continued;
8) new rules were introduced and existing rules were calibrated in connection with the analysis of current fraud trends together with the increase in the number of cases referred for telephone confirmation;
9) a cooling period was introduced for transfers, i.e. a temporary suspension of the transfer so that the client can cancel it (in a situation where the client acts unconsciously, succumbing to socio-technical manipulation) in order to ensure the security of funds;
10) BIK SA's behavioural biometrics was implemented in the verification of electronic transactions;
11) anti-spoofing solutions were expanded to prevent fraudulent impersonation of the Bank's call centre telephone number;
12) measures were introduced to reduce the risk of unauthorised transactions being carried out.

## 2.10 Business risk

### 2.10.1 Introduction

Business (strategic) risk is the risk of failing to achieve the assumed financial goals, including incurring losses, due to adverse changes taking place in the business environment, making bad decisions, incorrect implementation of the decisions made or failing to take appropriate action in response to changes taking place in the business environment.

The objective of business risk management is to maintain the potential negative financial consequences resulting from adverse changes taking place in the business environment, making bad decisions, incorrect implementation of the decisions made or failing to take appropriate action in response to changes taking place in the business environment at an acceptable level.

### 2.10.2 Identification, measurement and assessment of business risk

The identification of business risk consists of recognising and determining factors, both current and potential ones which arise from current and planned activities of the Bank's Group and which may significantly affect the financial position of the Bank's Group, generating revenue and expenses of the Bank's Group or a change in their amounts. Business risk is identified by making a qualitative assessment of business risk and by identifying and analysing the factors which contributed to significant deviations of the actual amounts of revenue and expenses from their forecasted amounts.

The measurement of business risk is aimed at defining the scale of threats related to the existence of business risk using the adopted risk measures. The measurement of business risk includes:
1) the calculation of internal capital,
2) stress tests,
3) reverse stress tests,
4) utilisation of the strategic limit of tolerance.

The level of business risk is assessed on a quarterly basis, based on the risk level resulting from:
1) the level of strategic tolerance limits calculated,
2) qualitative business risk assessment,
3) an indicator based on the deviation of the actual business revenue and costs from their forecast values and the level of internal capital.

### 2.10.3 Control of the business risk

The objective of the control of business risk is to strive to maintain the level of business risk of the Bank's Group at an acceptable level.

The control of the business risk includes determining and reviewing risk controls in the form of limits of tolerance for business risk along with its thresholds and critical values, adequate to the scale and complexity of the activities of the Bank's Group, on a regular basis.

### 2.10.4 Monitoring the business risk

Business risk is monitored to identify areas which require management activities to be undertaken. Monitoring the business risk includes, in particular:
1) strategic limits of business risk tolerance,
2) the results of stress tests (the scenarios include the following types of events: increase in costs without a simultaneous change in revenue, intensification of the phenomenon of failure to achieve the forecast result, accumulation of losses, increased scale of losses),
3) results of reverse stress tests,
4) internal capital level,
5) deviations from the business risk implementation from the forecast,
6) results of qualitative business risk assessment.

### 2.10.5 Business risk reporting

Reporting of business risk of the Bank's Group is performed quarterly. The users of business risk reports include the BCC, ALCO, Risk Committee, the Management Board, and the Supervisory Board. The reports include, among other things, the results of business risk measurement, in particular internal capital, the degree of utilisation of the strategic limit of tolerance for business risk, results of a qualitative assessment of business risk, a forecast for internal capital to cover business risk, reverse stress tests of the forecast, and the results of monitoring the amounts of the Bank's revenue and expenses, results of stress tests and reverse stress tests, results of an annual assessment of the adequacy and effectiveness of risk management, including a business risk management process review, information on the business risk in the entities in the Bank's Group, in particular internal capital and the degree of utilisation of the strategic limit of tolerance for business risk.

### 2.10.6 Management activities related to business risk

The management activities consist of, in particular:
1) verifying and updating quarterly financial forecasts, including activities aimed at reducing the level of business risk,
2) monitoring the level of the strategic limit of tolerance to business risk.

## 2.11 Model risk

### 2.11.1 Introduction

Model risk is the risk of incurring losses as a result of making wrong business decisions on the basis of the models in place. The model risk in the Bank's Group is managed both at the level of a given entity in the Bank's Group (the owner of a model) and at the level of the Bank as the parent company in the Bank's Group.

The objective of model risk management is to mitigate the risk of incurring losses as a result of making wrong business decisions on the basis of the models in place through a properly defined and implemented model management process.

All the models significant to the Bank and the models of the entities in the Bank's Group, significant to the Bank's Group, are subject to an independent validation carried out by the validation unit of PKO Bank Polski S.A.

### 2.11.2 Identification, measurement and assessment of model risk

The identification of model risk consists of, in particular:
1) collecting information on the models in place and models planned to be implemented,
2) determining the significance of the models.

The model risk evaluation is aimed at determining the scale of threats associated with the occurrence of the model risk. The assessment makes it possible to determine the risk profile and to identify the models which generate the highest risk, exposing the Bank's Group to potential losses. Model risk is assessed at the level of each model and in aggregate, at the level of each entity in the Bank's Group.

### 2.11.3 Control of the model risk

The objective of the control of model risk is to maintain an aggregated assessment of model risk at a level which is accepted by the Bank's Group. The control of the model risk consists of determining the mechanisms used to diagnose the model risk level and tools for reducing the level of this risk. The tools used to diagnose model risk include a strategic limit of tolerance for model risk and model risk thresholds.

### 2.11.4 Monitoring and reporting the model risk

The objective of monitoring model risk is to diagnose the areas which require management activities. Monitoring the model risk includes:
1) updating the model risk level,
2) evaluating the utilisation of the strategic limit of tolerance to the model risk and the thresholds of the model risk,
3) verifying the stage of implementation and evaluating the effectiveness of the implementation of actions intended to mitigate the model risk.

The monitoring results are presented regularly in reports intended for the Risk Committee, the Management Board and the Supervisory Board, and they contain a comprehensive assessment of model risk, in particular:
1) information on the degree of utilisation of the strategic limit of tolerance for model risk,
2) information on the level of model risk (on a separate and consolidated basis),
3) model risk map,
4) assessment of the effectiveness of the recommendations made to reduce the level of model risk,
5) suggested new management activities (if any) to mitigate model risk.

### 2.11.5 Management activities related to model risk

The objective of management activities is to shape the process of management of model risk and the level of such risk by setting acceptable risk levels and making decisions to use tools which support model risk management.

## 2.12 Macroeconomic risk

### 2.12.1 Introduction

Macroeconomic risk is the risk of deterioration in the financial position of the Bank's Group as a result of an adverse impact of changes in macroeconomic conditions. Macroeconomic risk includes geopolitical risk, understood as the macroeconomic effects taking into account the negative effects of the geopolitical environment on the economy and financial markets;

The objective of macroeconomic risk management is to identify macroeconomic factors which have a significant impact on the activities of the Bank's Group and to take action to mitigate the adverse impact of potential changes in the macroeconomic situation on the financial position of the Bank's Group.

### 2.12.2 Identification, measurement and assessment of macroeconomic risk

The identification of macroeconomic risk consists of determining the scenarios of potential macroeconomic changes and risk factors having the greatest impact on the financial position of the Bank's Group. Macroeconomic risk results from the interaction of factors dependent on the activities of the Bank's Group (in particular, the balance sheet structure and response plans developed for stress scenario purposes) and factors independent thereof (macroeconomic factors). The Bank's Group identifies factors affecting the level of macroeconomic risk in the course of comprehensive stress tests.

The measurement of macroeconomic risk is aimed at defining the scale of threats related to the existence of macroeconomic risk and includes:
1) determining, as part of comprehensive stress tests, the financial result (based on systemic scenarios – assuming a liquidity shock for the domestic economy caused by the tightening of the energy crisis and the outflow of capital from the region, mixed – additionally assuming that with the increase in energy prices and growing demand for them, a significant increase in the Bank's financing of strategic customers) together with its components and risk measures,
2) reverse stress tests,
3) calculating internal capital;

The level of macroeconomic risk is assessed annually, based on the results of periodical comprehensive stress tests (scenarios for assessing macroeconomic risk). The level of macroeconomic risk is assessed as moderate, increased or high.

### 2.12.3 Control of the macroeconomic risk

The objective of the control of macroeconomic risk is to strive to mitigate the adverse impact of potential changes in the macroeconomic situation on the financial position of the Bank's Group.

The control of the macroeconomic risk consists of determining an acceptable level of macroeconomic risk tailored to the scale of the activities of the Bank's Group and its impact on the operations and financial position of the Bank's Group. An acceptable level of macroeconomic risk is a situation in which the results of comprehensive stress tests do not indicate the need to take any remedial measures or the remedial measures which must be taken will be sufficient to improve the financial position of the Bank's Group.

### 2.12.4 Monitoring the macroeconomic risk

Monitoring the macroeconomic risk consists of analysing the macroeconomic situation, the macroeconomic factors to which the Bank's Group is sensitive, the level of macroeconomic risk and the results of comprehensive stress tests.

### 2.12.5 Macroeconomic risk reporting

Macroeconomic risk is reported quarterly in the form of a report submitted to the ALCO, RC, the Management Board, the Risk Committee of the Supervisory Board, and the Supervisory Board.

In particular, the following is reported:
1) results of the measurement of macroeconomic risk, in particular internal capital,
2) macroeconomic risk level,
3) results of comprehensive stress tests,
4) results of reverse stress tests.

### 2.12.6 Management activities related to macroeconomic risk

The management activities consist of, in particular:
1) determining acceptable levels of risk,
2) taking measures to reduce the risk level in the event of an increased or high level of macroeconomic risk.

## 2.13 Encumbered and unencumbered assets

A given asset is considered encumbered if it has been pledged or is subject to any form of arrangements aimed at securing or supporting the credit rating of any on-balance sheet or off-balance sheet transaction from which it may not be withdrawn freely (e.g., in order to be pledged for financing purposes).

The Group does not apply the difference in approach between the scope of regulatory consolidation used for asset encumbrance disclosures and the scope of application for applying liquidity requirements on a consolidated basis as defined in Part Two, Chapter 2, Title I of the CRR.

The Group does not apply differences in approach between, on the one hand, assets pledged and transferred in accordance with the applicable accounting standards and their application by the institution and, on the other hand, encumbered assets and the treatment of transactions.

The exposure values used for disclosure purposes shall be derived from the quarterly average end-of-quarter reporting for the preceding twelve months.

Based on the average balances for the 4 quarters of 2024, the Bank's Group had encumbered assets:
1) in respect of sell-buy-back transactions (repos),
2) State treasury bonds entered in the register of mortgage covered bonds pursuant to Article 18(3a) of the Act on mortgage covered bonds and mortgage banks,
3) own issued mortgage covered bonds and secured bonds.

Repos and sell-buy-back transactions are conditional transactions which result in encumbering assets transferred to counterparties as collateral for loans. Such transactions are normally used by the Bank under the business model used for managing liquidity on the financial markets and for servicing the transactional needs of the financial institutions which are the Bank's counterparties. The collateral transferred in respect of the current valuations contained in derivative transactions constitutes a standard mechanism for securing the Bank's credit exposure resulting from the collateral agreements concluded and, as such, forms part of the Bank's business model related to transactional activity on the financial markets. Additional information is included in notes 62.2 and 59 of the consolidated financial statements of the PKO Bank Polski S.A. Group for the year ended 31 December 2024.

In addition, the Bank Group held issued debt securities in the form of mortgage bonds issued by PKO Bank Hipoteczny S.A., the main collateral for which are mortgage loans in the average amount according to the balances of the last four quarters of PLN 16 116 million.

Information on overcollateralization, in particular in relation to collateralised liabilities, and the impact of this overcollateralization on encumbrance levels is presented in Note 59 (Assets pledged as security for liabilities and transferred financial assets) of the Consolidated Financial Statements of PKO Bank Polski S.A. Group for the year ended 31 December 2024.

All encumbrances on assets, collateral and off-balance sheet items are in PLN.

A general description of the part of the items shown as carrying amount of unencumbered assets that the Bank's Group would not consider as items that may be encumbered in the normal course of business is included in the relevant notes to the Consolidated Financial Statements of PKO Bank Polski S.A. Group for the year ended 31 December 2024.

Mortgage loans in PLN are the underlying assets of the mortgage covered bonds and notes issued by PKO Bank Hipoteczny S.A.

The carrying amount of selected financial liabilities mainly consists of deposits related to repurchase agreements, debt securities issued, encumbrances related to the Bank's deposit guarantee scheme.

The following tables provide information on the encumbered and unencumbered assets of the Bank Group.

Table 2.36 Encumbered and unencumbered assets [Template EU AE1]

| | | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | Carrying amount of encumbered assets | | Fair value of encumbered assets | | Carrying amount of unencumbered assets | | Fair value of unencumbered assets | |
| | | | of which notionally eligible EHQLA and HQLA | | of which notionally eligible EHQLA and HQLA | | of which EHQLA and HQLA | | of which EHQLA and HQLA |
| | | 010 | 030 | 040 | 050 | 060 | 080 | 090 | 100 |
| 010 | Assets of the reporting institution | 20 289 | 4 153 | | | 487 997 | 160 099 | | |
| 030 | Equity instruments | - | - | - | - | 377 | - | 375 | - |
| 040 | Debt securities | 4 166 | 4 153 | 414 | 414 | 194 357 | 160 077 | 93 639 | 74 174 |
| 050 | of which: covered bonds | - | - | - | - | - | - | - | - |
| 060 | of which: securitisations | - | - | - | - | - | - | - | - |
| 070 | of which: issued by general governments | 4 144 | 4 130 | 414 | 414 | 149 660 | 134 193 | 71 279 | 64 634 |
| 080 | of which: issued by financial corporations | 23 | 23 | - | - | 32 146 | 25 792 | 12 363 | 9 448 |
| 090 | of which: issued by non-financial corporations | - | - | - | - | 3 361 | 92 | 807 | 92 |
| 120 | Other assets | 16 123 | - | | | 293 263 | 23 | | |

Table 2.37 Collateral received and own debt securities issued [Template EU AE2]

| | | 31.12.2024 | | | |
|---|---|---|---|---|---|
| | | Fair value of encumbered collateral received or own debt securities issued | | Unencumbered | |
| | | | | Fair value of collateral received or own debt securities issued available for encumbrance | |
| | | | of which notionally eligible EHQLA and HQLA | | of which notionally eligible EHQLA and HQLA |
| | | 010 | 030 | 040 | 060 |
| **130** | **Collateral received by the reporting institution** | - | - | - | - |
| 140 | Loans on demand | - | - | - | - |
| 150 | Equity instruments | - | - | - | - |
| 160 | Debt securities | - | - | - | - |
| 170 | of which: covered bonds | - | - | - | - |
| 180 | of which: securitisations | - | - | - | - |
| 190 | of which: issued by general governments | - | - | - | - |
| 200 | of which: issued by financial corporations | - | - | - | - |
| 210 | of which: issued by non-financial corporations | - | - | - | - |
| 220 | Loans and advances other than loans on demand | - | - | - | - |
| 230 | Other collateral received | - | - | - | - |
| **240** | **Own debt securities issued other than own covered bonds or securitisations** | - | - | - | - |
| **241** | **Own covered bonds and asset-backed securities issued and not yet pledged** | | | - | - |
| **250** | **TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED** | 20 289 | 4 153 | | |

Table 2.38. Sources of encumbrance [Template EU AE3]

| | | 31.12.2024 | |
|---|---|---|---|
| | | Matching liabilities, contingent liabilities or securities lent | Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered |
| | | 010 | 030 |
| **010** | **Carrying amount of selected financial liabilities** | 9 504 | 18 301 |

## 2.14 Risk management at PKO Bank Hipoteczny S.A.

The risk management system in place at PKO Bank Hipoteczny S.A. is consistent with the one in place in the Bank's Group.

Due to the specialist nature of the mortgage bank:

1) credit risk management relates mainly to competences in the mortgage loan segment, the assessment of the credit standing of retail customers, and the assessment of the mortgage lending value (MLV) of real estate,
2) the main source of financing is the issue of long-term mortgage covered bonds, liquidity management competences are focused on issuing instruments on the domestic and foreign secured debt markets.

PKO Bank Hipoteczny S.A. builds its mortgage loan portfolio by way of agency sales and purchasing receivables from the parent company. The mortgage loan portfolio forms the basis of a collateral pool securing the issue of mortgage covered bonds.

The mortgage lending value of real estate is a value determined by PKO Bank Hipoteczny S.A. which, in the bank's opinion, reflects the level of the risk relating to the real estate as collateral for loans granted and is used to determine the amount up to which a loan secured with a mortgage on given real estate may be granted or to decide whether the receivable secured with the said real estate may be purchased by the bank.

PKO Bank Hipoteczny S.A. determines the MLV based on an appraisal of the mortgage lending value of real estate, which is carried out with due diligence and prudence, taking into account only those features of the real estate and the expenditure necessary to build it that will be durable and, assuming the reasonable operation thereof, will be possible to obtain by each owner of the real estate. In the appraisal, which is prepared for a specific date, the assumptions and parameters adopted for the analysis, the MLV determination process and the resultant proposed MLV are documented. The appraisal takes into account the analyses and forecasts concerning the parameters specific to given real estate, which affect the assessment of credit risk, as well as general factors, e.g., population growth, the unemployment rate, local land development plans.

A mortgage covered bond is a registered or bearer debt security issued by mortgage banks on the basis of a pool of receivables secured with a mortgage. Mortgage covered bonds are mainly issued for longer terms, therefore, they constitute a source of long-term financing for the Bank's Group.

PKO Bank Hipoteczny S.A.'s business model assumes a large percentage of mortgage covered bonds in the financing structure. A mortgage covered bond is a stable source of financing, but due to the balloon nature of its redemption in most cases, at the time of redemption, such financing has to be replaced with more issues or an alternative source of financing. In managing liquidity, PKO Bank Hipoteczny S.A. pays special attention to matching cash flow dates and the opportunities to renew its sources of financing at the time of maturity of significant liabilities (the redemption of mortgage covered bonds).

The risk management system and quantitative information on disclosures can be found in the Financial Statements of PKO Bank Hipoteczny S.A. as at and for the year ended 31 December 2024 and in the Directors' Report of PKO Bank Hipoteczny S.A. as at and for the year ended 31 December 2024.

# 3 CAPITAL ADEQUACY

Capital adequacy is a process aimed at ensuring that the level of the risk which the Bank and the Bank's Group take on in connection with the development of their business activities may be covered with the available capital, taking into account a specific risk tolerance level and time horizon. The process of managing capital adequacy comprises, in particular, compliance with the applicable regulations of the supervisory and control authorities, as well as the risk tolerance level determined within the Bank and the Bank's Group and the capital planning process, including the policy concerning the sources of acquisition of capital.

Major regulations applicable in the capital adequacy assessment process include:
1) The Polish Banking Law;
2) the CRR,
3) the Act on macro-prudential supervision,
4) the Regulation of the Minister of finance, funds and regional policy of 8 June 2021 on the risk management and internal audit systems and remuneration policy in banks,
5) the Regulation of the Minister of finance, funds and regional policy of 27 July 2021 on the detailed method of estimating internal capital and conducting reviews of estimation strategies and procedures and maintaining a permanent level of internal capital by banks,
6) BGF Act.

The objective of capital adequacy management is to maintain a level of own funds which is adequate to the scale and risk profile of the activities of the Bank and the Bank's Group on an ongoing basis.

Managing the capital adequacy of the Bank's Group includes:
1) specifying and pursuing the Bank's capital targets,
2) identifying and monitoring significant types of risk,
3) measuring or estimating internal capital to cover individual risk types of risk and total internal capital,
4) determining threshold values for capital adequacy measures;
5) forecasting, monitoring and reporting the level and structure of own funds,
6) managing the structure of the balance sheet to optimize the quality of the Bank's own funds,
7) emergency measures with regard to capital;
8) stress-tests,
9) forecasting requirements for own funds and internal capital,
10) assessing the profitability of individual business areas and customer segments.

Capital adequacy measures include:
1) Total Capital Ratio (TCR),
2) Tier 1 (T1) capital ratio,
3) Common Equity Tier 1 (CET1) capital ratio,
4) the ratio of own funds to internal capital,
5) leverage ratio,
6) MREL ratio - TREA,
7) MREL ratio – TEM.

The objective of monitoring the level of capital adequacy measures is to determine the degree of compliance with supervisory requirements and to identify cases which require initiating capital emergency measures or a capital protection plan.

Pursuant to Article 92 of the CRR, the minimum capital ratio levels maintained by the Bank's Group are:
1) Total Capital Ratio (TCR) – 8.0%,
2) Tier 1 (T1) capital ratio – 6.0%,
3) Common Equity Tier 1 (CET1) capital ratio – 4.5%.

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

Table 3.1 Key metrics [Template EU KM1]

| | | a | b | c | d | e |
|---|---|---|---|---|---|---|
| | | 31.12.2024 | 30.09.2024 | 30.06.2024 | 31.03.2024 | 31.12.2023 |
| **Available own funds (amounts)** | | | | | | |
| 1 | Common Equity Tier 1 (CET1) capital | 44 256 | 42 841 | 42 097 | 41 575 | 41 727 |
| 2 | Tier 1 capital | 44 256 | 42 841 | 42 097 | 41 575 | 41 727 |
| 3 | Total capital | 47 294 | 44 516 | 43 908 | 43 520 | 43 807 |
| **Risk-weighted exposure amounts** | | | | | | |
| 4 | Total risk-weighted exposure amount | 254 518 | 246 877 | 245 475 | 238 795 | 234 835 |
| **Capital ratios (as a percentage of risk-weighted exposure amount)** | | | | | | |
| 5 | Common Equity Tier 1 ratio (%) | 17,39% | 17,35% | 17,15% | 17,41% | 17,77% |
| 6 | Tier 1 ratio (%) | 17,39% | 17,35% | 17,15% | 17,41% | 17,77% |
| 7 | Total capital ratio (%) | 18,58% | 18,03% | 17,89% | 18,22% | 18,65% |
| **Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)** | | | | | | |
| EU 7a | Additional own funds requirements to address risks other than the risk of excessive leverage (%) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 7b | of which: to be made up of CET1 capital (percentage points) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 7c | of which: to be made up of Tier 1 capital (percentage points) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 7d | Total SREP own funds requirements (%) | 8,00% | 8,00% | 8,00% | 8,00% | 8,00% |
| **Combined buffer requirement (as a percentage of risk-weighted exposure amount)** | | | | | | |
| 8 | Capital conservation buffer (%) | 2,50% | 2,50% | 2,50% | 2,50% | 2,50% |
| EU 8a | Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| 9 | Institution specific countercyclical capital buffer (%) | 0,05% | 0,04% | 0,04% | 0,04% | 0,04% |
| EU 9a | Systemic risk buffer (%) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| 10 | Global Systemically Important Institution buffer (%) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 10a | Other Systemically Important Institution buffer | 2,00% | 2,00% | 2,00% | 2,00% | 2,00% |
| 11 | Combined buffer requirement (%) | 4,55% | 4,54% | 4,54% | 4,54% | 4,54% |
| EU 11a | Overall capital requirements (%) | 12,55% | 12,54% | 12,54% | 12,54% | 12,54% |
| 12 | CET1 available after meeting the total SREP own funds requirements (%) | 10,58% | 10,03% | 9,89% | 10,22% | 10,65% |
| **Leverage ratio** | | | | | | |
| 13 | Leverage ratio total exposure measure | 569 033 | 550 005 | 542 490 | 529 757 | 534 167 |
| 14 | Leverage ratio | 7,78% | 7,79% | 7,76% | 7,85% | 7,81% |
| **Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)** | | | | | | |
| EU 14a | Additional own funds requirements to address the risk of excessive leverage (%) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 14b | of which: to be made up of CET1 capital (percentage points) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 14c | Total SREP leverage ratio requirements (%) | 3,00% | 3,00% | 3,00% | 3,00% | 3,00% |
| **Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)** | | | | | | |
| EU 14d | Leverage ratio buffer requirement (%) | 0,00% | 0,00% | 0,00% | 0,00% | 0,00% |
| EU 14e | Overall leverage ratio requirement (%) | 3,00% | 3,00% | 3,00% | 3,00% | 3,00% |
| **Liquidity Coverage Ratio** | | | | | | |
| 15 | Total high-quality liquid assets (HQLA) (Weighted value - average) | 165 252 | 161 759 | 154 453 | 147 216 | 136 709 |
| EU 16a | Cash outflows - Total weighted value | 79 871 | 79 676 | 78 384 | 77 823 | 76 232 |
| EU 16b | Cash inflows - Total weighted value | 13 001 | 13 496 | 14 144 | 14 318 | 13 852 |
| 16 | Total net cash outflows (adjusted value) | 66 870 | 66 180 | 64 240 | 63 504 | 62 380 |
| 17 | Liquidity coverage ratio (%) | 247,3% | 240,3% | 240,3% | 231,7% | 218.7% |
| **Net Stable Funding Ratio** | | | | | | |
| 18 | Total available stable funding | 429 210 | 413 872 | 402 335 | 391 809 | 393 004 |
| 19 | Total required stable funding | 275 010 | 263 562 | 258 633 | 255 657 | 250 969 |
| 20 | NSFR ratio (%) | 156,1% | 157,0% | 155,6% | 153,3% | 156,6% |

In 2024, the values of capital adequacy measures remained above the internal and external limits.

## 3.1 Own funds

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

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

Common Equity Tier 1 capital includes:
1) share capital presented in accordance with the Articles of Association and the entry in the Commercial Register, at nominal value,
2) supplementary capital created as a result of the annual appropriation of net profit and earmarked for offsetting accounting losses which may arise in connection with the Group's operations,
3) reserve capital created independently of the supplementary capital as a result of the annual appropriation of net profit, in an amount determined in a resolution adopted by the General Meeting and earmarked solely for offsetting possible accounting losses,
4) other cumulative comprehensive income (excluding gains and losses relating to cash flow hedges),
5) general risk reserve created by appropriating net profit, in an amount determined in a resolution adopted by the General Meeting and earmarked for unidentified banking risks,
6) retained earnings (unappropriated profit from previous years),
7) the net profit (loss) in the course of being approved and the net profit (loss) for the current reporting period, calculated in accordance with the applicable accounting policies, less any expected charges and dividends, in amounts no higher than the profit amounts verified by a registered auditor; a net profit (loss) may be recognized in own funds on condition that it is approved by the General Meeting or, before being approved by the General Meeting, the PFSA's consent to its recognition in own funds is obtained. Once the aforementioned formal requirements have been met, the Bank makes retrospective adjustments to own funds[9].

The Common Equity Tier 1 capital is reduced by:
1) losses for the current financial year,
2) intangible assets stated at their carrying amounts, net of the related deferred income tax liability, the amount being deducted includes goodwill taken into account in the valuation of the Group's significant investments, software assets subject to prudential valuation are not deducted[10],
3) additional adjustments to assets measured at fair value, which result from compliance with the requirements for prudential valuation,
4) additional adjustments to the valuation of derivative instruments, reflecting the Bank's own credit risk,
5) deferred income tax assets based on future profitability and not resulting from temporary differences,
6) deferred income tax assets based on future profitability and resulting from temporary differences, which exceed 10% of the Common Equity Tier 1 capital of the Bank's Group (calculated without taking into account deductions in respect of equity exposures and deferred tax assets)[11],
7) direct and indirect equity exposures to financial sector entities if the Bank's Group has not made significant investments in these entities, in the form of shares held or other Common Equity Tier 1 instruments of these entities, the total of which exceeds 10% of the Common Equity Tier 1 capital of the Bank's Group (without taking into account deductions in respect of equity exposures and deferred tax assets),
8) direct and indirect equity exposures to financial sector entities if the Bank's Group has made significant investments in these entities, in the form of shares held or other Common Equity Tier 1 instruments of these entities, the total of which exceeds 10% of the Common Equity Tier 1 capital of the Bank's Group (without taking into account deductions in respect of equity exposures and deferred tax assets),
9) the amount by which the total of:
   - deferred income tax assets based on future profitability and resulting from temporary differences, up to 10% of the Common Equity Tier 1 capital of the Bank's Group (calculated without taking into account deductions in respect of equity exposures and deferred tax assets) and
   - direct and indirect equity exposures to financial sector entities if the Bank's Group has made significant investments in these entities, in the form of shares held or Common Equity Tier 1 instruments of these entities, up to 10% of the Common Equity Tier 1 capital of the Bank's Group (calculated without taking into account deductions in respect of equity exposures and deferred tax assets)exceeds an equivalent of 17.65% of the Common Equity Tier 1 capital of the Bank's Group (calculated taking into account all the deductions specified in sections 1-6 and the full total of the items specified in sections 9 a-b, without using a threshold representing 17.65% of the share capital. An amount below the threshold (17.65%) is recognized in risk-weighted assets.
10) The applicable amount of insufficient coverage for non-performing exposures, calculated in accordance with Article 47c of the CRR, except for the amount of insufficient coverage relating to exposures which arose before 26 April 2019, provided that the conditions of these exposures have not been changed in a manner that increases the Bank's exposure to a debtor,
11) Securitisation items – as an alternative to applying the 1,250% risk weight, exposures held by the Group (junior tranche and cash reserve to cover liquidity risk, less specific risk adjustments for the underlying exposures) reduce own funds.

Tier 2 capital includes, once the Bank has obtained the PFSA's consent, subordinated liabilities understood as liabilities in respect of funds acquired by the Bank, in the amount and in accordance with the rules laid down in the PFSA's decision issued at the Bank's request, which meet the conditions set out in Article 63 of the CRR, which are not held by the Bank, its subsidiaries or enterprises in which the Bank has a participation in the form of ownership, direct or by way of control, of 20% or more of the voting rights or capital of that undertaking. Subordinated liabilities included in Tier 2 capital shall be treated as the full value of instruments with a residual maturity of more than five years. During the last five years to maturity in Tier 2 capital, the amortised value of the liabilities calculated by multiplying the carrying amount of the instruments on the first day of the last five-year contractual maturity of the instruments is taken into account by the number of days in that period divided by the number of remaining contractual days of the instrument's maturity.

Tier 2 capital is reduced by:
1) direct and indirect equity exposures to financial sector entities in the form of Tier 2 capital instruments of these entities if an institution has made significant investments in these entities,

[9] In May 2020, the European Banking Authority (EBA) published, in a single rulebook Q&A, its position regarding the moment of recognition of annual and interim profits in the capital adequacy data (Q&A 2018_3822 and Q&A 2018_4085). According to this position, once the Bank or the Bank's Group have formally met the criteria for including their profit for a given period in the Tier 1 capital, this profit should be included retrospectively (as at the date of the profit, and not the date of meeting the criteria), and own funds should be adjusted accordingly as at the date of the profit.

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

[11] The Group uses the option indicated in the European Banking Authority's guidance set out in the Single Rulebook Q&A No. 2015_1887. According to the EBA's response, deferred tax assets related to gains or losses on cash flow hedges (which are not included in own funds according to Article 33 of the CRR) do not have to be included either in deferred tax assets included in deductions from own funds according to Articles 36 and 48 of the CRR.

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

If the value of the deductions referred to in sections 1 and 2 should reduce the value of Tier 2 capital to less than zero, the excess of these deductions over the value of Tier 2 capital is deducted from Common Equity Tier 1 capital.

Pursuant to Regulation 2021/637, Table 3.1 presents information on the nature and amounts of individual own fund items used to calculate a Total Capital ratio as at 31 December 2024. Only the rows with values equal to 0 were omitted.

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

| | | 31.12.2024 | |
|---|---|---|---|
| | | (a) | (b) |
| | | Amounts | Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation * |
| **Common Equity Tier 1 (CET1) capital: instruments and reserves** | | | |
| 1 | Capital instruments and the related share premium accounts | 1 250 | note 44. |
| | of which: Series A - ordinary registered shares | 313 | note 44. |
| | of which: Series A - ordinary bearer shares | 198 | note 44. |
| | of which: Series B - ordinary bearer shares | 105 | note 44. |
| | of which: Series C - ordinary bearer shares | 385 | note 44. |
| | of which: Series D - ordinary bearer shares | 250 | note 44. |
| 2 | Retained earnings | 11 777 | |
| 3 | Accumulated other comprehensive income (and other reserves) | 29 078 | |
| EU-3a | Funds for general banking risk | 1 070 | |
| 4 | Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1 | - | |
| 5 | Minority interests (amount allowed in consolidated CET1) | - | |
| EU-5a | Independently reviewed interim profits net of any foreseeable charge or dividend | 1 299 | |
| **6** | **Common Equity Tier 1 (CET1) capital before regulatory adjustments** | 44 474 | |
| **Common Equity Tier 1 (CET1) capital: regulatory adjustments** | | | |
| 7 | Additional value adjustments (negative amount) | - 214 | |
| 8 | Intangible assets (net of related tax liability) (negative amount) | - 2 619 | |
| 9 | Empty set in the EU | Not applicable | |
| 10 | Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount) | - | |
| 11 | Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value | 1 124 | |
| 12 | Negative amounts resulting from the calculation of expected loss amounts | - | |
| 13 | Any increase in equity that results from securitised assets (negative amount) | - | |
| 14 | Gains or losses on liabilities valued at fair value resulting from changes in own credit standing | - | |
| 15 | Defined-benefit pension fund assets (negative amount) | - | |
| 16 | Direct and indirect holdings by an institution of own CET1 instruments (negative amount) | - | |
| 17 | Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount) | - | |
| 18 | Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount) | - | |
| 19 | Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount) | - | |
| 20 | Empty set in the EU | - | |
| EU-20a | Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative | - | |
| EU-20b | of which: qualifying holdings outside the financial sector (negative amount) | - | |
| EU-20c | of which: securitisation positions (negative amount) | - | |
| EU-20d | of which: free deliveries (negative amount) | - | |
| 21 | Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount) | - | |
| 22 | Amount exceeding the 17,65% threshold (negative amount) | - | |
| 23 | of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities | - | |
| 24 | Empty set in the EU | - | |
| 25 | of which: deferred tax assets arising from temporary differences | - | |
| EU-25a | Losses for the current financial year (negative amount) | - | |
| EU-25b | Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount) | - | |
| 26 | Empty set in the EU | - | |
| 27 | Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount) | - | |
| 27a | Other regulatory adjusments (including IFRS 9 transitional adjustments when relevant) | 1 490 | |
| **28** | **Total regulatory adjustments to Common Equity Tier 1 (CET1)** | - 218 | |
| **29** | **Common Equity Tier 1 (CET1) capital** | 44 256 | note 61. |

| | | | |
|---|---|---|---|
| **Additional Tier 1 (AT1) capital: instruments** | | | |
| 30 | Capital instruments and the related share premium accounts | - | |
| 31 | of which: classified as equity under applicable accounting standards | - | |
| 32 | of which: classified as liabilities under applicable accounting standards | - | |
| 33 | Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) of CRR | - | |
| EU-33a | Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1 | - | |
| EU-33b | Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1 | - | |
| 34 | Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties | - | |
| 35 | of which: instruments issued by subsidiaries subject to phase out | - | |
| **36** | **Additional Tier 1 (AT1) capital before regulatory adjustments** | - | |
| **Additional Tier 1 (AT1) capital: regulatory adjustments** | | | |
| 37 | Direct and indirect holdings by an institution of own AT1 instruments (negative amount) | - | |
| 38 | Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount) | - | |
| 39 | Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount) | - | |
| 40 | Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount) | - | |
| 41 | Not applicable | - | |
| 42 | Qualifying T2 deductions that exceed the T2 items of the institution (negative amount) | - | |
| 42a | Other regulatory adjustments to AT1 capital | - | |
| **43** | **Total regulatory adjustments to Additional Tier 1 (AT1) capital** | - | |
| **44** | **Additional Tier 1 (AT1) capital** | - | |
| **45** | **Tier 1 capital (T1 = Common Equity Tier 1 (CET1) capital and Additional Tier 1 (AT1) capital)** | 44 256 | note 61. |
| **Tier 2 (T2) capital: instruments** | | | |
| 46 | Capital instruments and the related share premium accounts | 3 039 | |
| 47 | Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR | - | |
| EU-47a | Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2 | - | |
| EU-47b | Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2 | - | |
| 48 | Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties | - | |
| 49 | of which: instruments issued by subsidiaries subject to phase out | - | |
| 50 | Credit risk adjustments | - | |
| **51** | **Tier 2 (T2) capital before regulatory adjustments** | 3 039 | note 61. |
| **Tier 2 (T2) capital: regulatory adjustments** | | | |
| 52 | Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount) | - | |
| 53 | Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount) | - | |
| 54 | Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount) | - | |
| 54a | Not applicable | - | |
| 55 | Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount) | - | |
| 56 | Empty set in the EU | - | |
| EU-56a | Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount) | - | |
| 56b | Other regulatory adjusments to T2 capital | - | |
| **57** | **Total regulatory adjustments to Tier 2 (T2) capital** | - | |
| **58** | **Tier 2 (T2) capital** | 3 039 | note 61. |
| **59** | **Total capital (TC = T1 + T2)** | 47 294 | note 61. |
| **60** | **Total risk exposure amount** | 254 518 | |
| **Capital ratios and buffers** | | | |
| 61 | Common Equity Tier 1 | 17,39% | |
| 62 | Tier 1 | 17,39% | note 61. |
| 63 | Total capital | 18,58% | note 61. |
| 64 | Institution CET1 overall capital requirements | 9,05% | |
| 65 | of which: capital conservation buffer requirement | 2,50% | note 61. |
| 66 | of which: countercyclical buffer requirement | 0,05% | note 61. |
| 67 | of which: systemic risk buffer requirement | 0,00% | note 61. |
| EU-67a | of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer | 2,00% | note 61. |
| EU-67b | of which: additional own funds requirements to address the risks other than the risk of excessive leverage | 0,00% | |
| **68** | **Common Equity Tier 1 available to meet buffer (as a percentage of risk exposure amount)** | 10,58% | |
| **National minima (if different from Basel III)** | | | |
| 69 | Not applicable | Not applicable | |
| 70 | Not applicable | Not applicable | |
| 71 | Not applicable | Not applicable | |

| | | |
|---|---|---|
| **Amounts below the thresholds for deduction (before risk weighting)** | | |
| 72 | Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions) | 248 |
| 73 | Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions) | 1 389 |
| 74 | Not applicable | Not applicable |
| 75 | Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met) | 2 215 |
| **Applicable caps on the inclusion of provisions in Tier 2** | | |
| 76 | Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap) | - |
| 77 | Cap on inclusion of credit risk adjustments in T2 under standardised approach | - |
| 78 | Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap) | - |
| 79 | Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach | - |
| **Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)** | | |
| 80 | Current cap on CET1 instruments subject to phase out arrangements | - |
| 81 | Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities) | - |
| 82 | Current cap on AT1 instruments subject to phase out arrangements | - |
| 83 | Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities) | - |
| 84 | Current cap on T2 instruments subject to phase out arrangements | - |
| 85 | Amount excluded from T2 due to cap (excess over cap after redemptions and maturities) | - |

* Column (b) shows note numbers from the Consolidated Financial Statements of PKO Bank Polski S.A. Group as at 31 December 2024.

As at 31 December 2024, pursuant to Article 48 of the CRR the individual equity exposures to financial sector entities in consolidated terms and deferred tax assets did not exceed 10% of Common Equity Tier 1 capital, therefore, they do not constitute a deduction from the Bank's Group's own funds and they have been recognized in risk-weighted assets.

As at 31 December 2024, the Group's own funds calculated for capital adequacy purposes included the current result of the prudentially consolidated Group for the first half of 2024, net of expected charges (amounting to PLN 1,299 million), the inclusion of which was duly approved by the FSA.

As required by Regulation 2021/637, Table 3.4 shows reconciliations of the items in the statement of financial position used for the calculation of own funds with regulatory own funds as at 31 December 2024.

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

| | 31.12.2024 | | |
|---|---|---|---|
| | a) | b) | c) |
| | Balance sheet as in published financial statements | Under regulatory scope of consolidation | Reference* |
| | As at period end | As at period end | |
| **ASSETS - Breakdown by asset clases according to the balance sheet in the published financial statements** | | | |
| Cash and balances with the Central Bank | 23 494 | 23 494 | Note 27. |
| Amounts due from banks | 5 089 | 4 972 | Note 28. |
| Hedging derivatives | 120 | 120 | Note 29. |
| Other derivative instruments | 1 999 | 1 999 | Note 29. |
| Securities | 210 531 | 207 994 | Note 30. |
| Reverse repo transactions | 892 | 892 | |
| Loans and advances to customers | 266 158 | 265 585 | Note 31. |
| Receivables in respect of insurance activities | 105 | - | Note 35. |
| Property, plant and equipment transferred under operating lease | 2 653 | 2 653 | Note 66 |
| Property, plant and equipment | 3 320 | 3 149 | Note 37. |
| Non-current assets held for sale | 11 | 11 | |
| Intangible assets | 4 153 | 3 913 | Note 36. |
| Investments in associates and joint ventures | 291 | 1 894 | Note 38. |
| Current income tax receivables | 6 | 6 | |
| Deferred income tax assets | 3 056 | 2 342 | Note 26. |
| Other assets | 3 347 | 3 353 | Note 39. |
| TOTAL ASSETS | 525 225 | 522 377 | |
| **LIABILITIES - Breakdown by liability clases according to the balance sheet in the published financial statements** | | | |
| Amounts due to the Central Bank | 11 | 11 | |
| Amounts due to banks | 2 373 | 2 373 | Note 32. |
| Hedging derivatives | 285 | 285 | Note 29. |
| Other derivative instruments | 2 396 | 2 396 | Note 29. |
| Amounts due to customers | 419 778 | 419 754 | Note 33. |
| Repo transactions | - | - | |
| Liabilities in respect of insurance activities | 2 449 | - | Note 35. |
| Loans and advances received | 1 268 | 1 268 | Note 34. |
| Debt securities in issue | 23 457 | 23 805 | Note 34. |
| Subordinated liabilities | 4 291 | 4 291 | Note 34. |
| Other liabilities | 8 188 | 8 158 | Note 40. |
| Current income tax liabilities | 899 | 891 | |
| Deferred income tax provision | 809 | 36 | Note 26. |
| Provisions | 6 651 | 6 649 | Note 41. |
| TOTAL LIABILITIES | 472 855 | 469 917 | |
| **EQUITY** | | | |
| Share capital | 1 250 | 1 250 | |
| Other capital and reserves | 30 503 | 30 148 | |
| Retained earnings | 11 324 | 11 777 | |
| Net profit or loss for the year | 9 304 | 9 285 | |
| Capital and reserves attributable to equity holders of the parent | 52 381 | 52 460 | |
| Non-controlling interests | - 11 | - | |
| TOTAL EQUITY | 52 370 | 52 460 | |

* Column (c) shows note numbers from the Consolidated Financial Statements of PKO Bank Polski S.A. Group as at 31 December 2024.

A description of the main features of the instruments issued by the Bank and recognized in Common Equity Tier 1 capital and Tier 2 instruments is presented in Table 3.5. (the data is presented in PLN). The rows in the table are omitted only if they do not apply to the Bank's Group.

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Table 3.4 Main features of regulatory own funds instruments and eligible liabilities instruments [Template EU CCA] (in PLN)

| | 31.12.2024 | Name I | Name II | Name III | Name IV | Name V | Name VI | Name VII |
|---|---|---|---|---|---|---|---|---|
| 1 | Issuer | PKO BP | PKO BP | PKO BP | PKO BP | PKO BP | PKO BP | PKO BP |
| 2 | Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement) | PLPKO0000016 | PLPKO0000016 | PLPKO0000016 | PLPKO0000016 | PLPKO0000016 | PLPKO0000099 | PLPKO0000107 |
| 3 | Governing law(s) of the instrument | Polish law | Polish law | Polish law | Polish law | Polish law | Polish law | Polish law |
| 4 | Current treatment taking into account, where applicable, transitional CRR rules | Common Equity Tier I | Common Equity Tier I | Common Equity Tier I | Common Equity Tier I | Common Equity Tier I | Tier II | Tier II |
| 5 | Post-transitional CRR rules | Common Equity Tier I | Common Equity Tier I | Common Equity Tier I | Common Equity Tier I | Common Equity Tier I | Tier II | Tier II |
| 6 | Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated | Solo and consolidated | Solo and consolidated | Solo and consolidated | Solo and consolidated | Solo and consolidated | Solo and consolidated | Solo and consolidated |
| 7 | Instrument type (types to be specified by each jurisdiction) | common stock | common stock | common stock | common stock | common stock | bonds | bonds |
| 8 | Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date) | 312500000 | 197500000 | 105000000 | 385000000 | 250000000 | 1700000000 | 1000000000 |
| 9 | Nominal amount of instrument | 312500000 | 197500000 | 105000000 | 385000000 | 250000000 | 1700000000 | 1000000000 |
| EU-9a | Issue price | 312500000 | 197500000 | 105000000 | 385000000 | 250000000 | - | - |
| 12 | Perpetual or dated | perpetual | perpetual | perpetual | perpetual | perpetual | dated | dated |
| 13 | Original maturity date | no maturity | no maturity | no maturity | no maturity | no maturity | 28.08.2027 | 06.03.2028 |
| 17 | Fixed or floating dividend/coupon | Floating dividend | Floating dividend | Floating dividend | Floating dividend | Floating dividend | Floating coupon | Floating coupon |
| 30 | Write-down features | No | No | No | No | No | No | No |
| 36 | Non-compliant transitioned features | No | No | No | No | No | No | No |

## 3.2 Own funds requirements and risk-weighted exposure amounts

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

1) credit risk – under the standardised approach (pursuant to Part Three, Title II, Chapter 2 of the CRR),
2) operational risk:
   - under the *AMA* approach – in respect of the Bank's operations, including the operations of the foreign branch in Germany and the foreign branch in the Czech Republic,
   - under the *BIA* approach (pursuant to Part Three, Title III of the CRR) – in respect of the operations of the foreign branch in Slovakia and in respect of the operations of the entities in the Bank's Group subject to prudential consolidation.
3) market risk (pursuant to Part Three, Title IV, Chapters 2-4 of the CRR):
   - foreign exchange risk – calculated under the basic approach,
   - commodity risk – calculated under the simplified approach,
   - equity instruments risk – calculated under the simplified approach,
   - specific debt instrument risk – calculated under the basic approach,
   - general debt instrument risk – calculated under the duration-based approach,
   - other types of risk other than delta risk (non-delta risk) – calculated under the scenario approach for options for which the Bank uses its own valuation models and under the delta plus approach for the remaining options.
4) other risks:
   - settlement/delivery risk – calculated under the approach specified in Part Three, Title V, of the CRR,
   - counterparty credit risk, including the exposures to the central counterparty (CCP) – calculated under the standard method specified in Part Three, Title II, Chapter 6 of the CRR,
   - credit valuation adjustment (CVA) risk – calculated under the approach specified in Part Three, Title VI of the CRR,
   - exceeding the large exposures limit – calculated under the approach specified in Part Four of the CRR.

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

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

Information on the own funds requirements for the Bank's Group is presented in the following table.

Table 3.5 Overview of total risk exposure amounts [Template EU OV1]

| | | Total risk exposure amounts (TREA) | | Total own funds requirements |
|---|---|---|---|---|
| | | a | b | c |
| | | 31.12.2024 | 30.09.2024 | 31.12.2024 |
| 1 | Credit risk (excluding CCR) | 215 381 | 210 203 | 17 230 |
| 2 | Of which the standardised approach | 215 381 | 210 203 | 17 230 |
| 3 | Of which the Foundation IRB (F-IRB) approach | - | - | - |
| 4 | Of which: slotting approach | - | - | - |
| EU-4a | Of which: equities under the simple riskweighted approach | - | - | - |
| 5 | Of which the Advanced IRB (A-IRB) approach | - | - | - |
| 6 | Counterparty credit risk - CCR | 4 299 | 5 216 | 344 |
| 7 | Of which the standardised approach | 3 877 | 4 749 | 310 |
| 8 | Of which internal model method (IMM) | - | - | - |
| EU-8a | Of which exposures to a CCP | - | 6 | - |
| EU-8b | Of which credit valuation adjustment - CVA | 408 | 459 | 33 |
| 9 | Of which other CCR | 15 | 2 | 1 |
| 15 | Settlement risk | - | - | - |
| 16 | Securitisation exposures in the non-trading book (after the cap) | - | - | - |
| 17 | Of which SEC-IRBA approach | - | - | - |
| 18 | Of which SEC-ERBA (including IAA) | - | - | - |
| 19 | Of which SEC-SA approach | - | - | - |
| EU-19a | Of which 1 250 % | - | - | - |
| 20 | Position, foreign exchange and commodities risks (Market risk) | 1 434 | 2 056 | 115 |
| 21 | Of which the standardised approach | 1 434 | 2 056 | 115 |
| 22 | Of which IMA | - | - | - |
| EU-22a | Large exposures | - | - | - |
| 23 | Operational risk | 33 404 | 29 403 | 2 672 |
| EU-23a | Of which basic indicator approach | 4 445 | 4 445 | 356 |
| EU-23b | Of which standardised approach | - | - | - |
| EU-23c | Of which advanced measurement approach | 28 959 | 24 958 | 2 317 |
| 24 | Amounts below the thresholds for deduction (subject to 250% risk weight) (For information) | 9 009 | 9 282 | 721 |
| **29** | **Total** | **254 518** | **246 877** | **20 361** |

The Bank's Group includes the insurance companies PKO Życie Towarzystwo Ubezpieczeń SA and PKO Towarzystwo Ubezpieczeń SA which are excluded from prudential consolidation as financial entities subject to separate supervision by the PFSA which also includes the assessment of compliance with the capital requirements for insurance companies.

As at 31 December 2024, the Group included its holdings in insurance companies in the calculation of deductions from own funds in accordance with the CRR. All capital exposures in the financial sector entities up to the values of the thresholds specified in Article 48 of the CRR are included in risk-weighted assets with a risk weight of 250%.

The largest share of the own funds requirement for market risk in the Bank's Group in 2024 was for the capital requirement relating to interest rate risk (specific and general – 98.68%) (Table 3.6.).

Table 3.6 The Bank's Group's Market risk under the standardised approach [Template EU MR1]

| | | 31.12.2024 |
|---|---|---|
| | | a |
| **Outright products** | | **RWEAs** |
| 1 | Interest rate risk (general and specific) | 1 415 |
| 2 | Equity risk (general and specific) | - 4 |
| 3 | Foreign exchange risk | - |
| 4 | Commodity risk | - |
| **Options** | | |
| 5 | Simplified approach | - |
| 6 | Delta-plus approach | 0 |
| 7 | Scenario approach | 6 |
| 8 | Securitisation (specific risk) | - |
| **9** | **Total** | **1 434** |

As at the end of 2024, the Bank's Group did not have an open position for commodities risk and the foreign exchange position did not exceed the threshold of 2% of own funds, so the own funds requirements for this were zero.

Due the fact that the Bank's Group does not use any internal models for calculating own funds requirements for market risk, Article 455 of the CRR 'Use of Internal Market Risk Models' does not apply.

The division of the own funds requirement for operational risk according to the calculation method used is presented in Table 3.7.

Table 3.7 Operational risk own funds requirements and risk-weighted exposure amounts [Template EU OR1]

| | | 31.12.2024 | | | | |
|---|---|---|---|---|---|---|
| | Banking activities | a | b | c | d | e |
| | | Relevant indicator | | | Own funds requirements | Risk weighted exposure amount |
| | | Year-3 | Year-2 | Last year | | |
| 1 | Banking activities subject to basic indicator approach (BIA) | 2 191 | 2 032 | 2 888 | 356 | 4 445 |
| 2 | Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches | - | - | - | - | - |
| 3 | Subject to TSA: | - | - | - | | |
| 4 | Subject to ASA: | - | - | - | | |
| 5 | Banking activities subject to advanced measurement approaches AMA | 12 891 | 15 260 | 21 299 | 2 317 | 28 959 |

## 3.3 Capital buffers

Pursuant to the CRR and the Act on macro-prudential supervision, financial institutions are required to maintain a combined buffer requirement above the minimum levels set out in the CRR for:
1) total capital ratio (TCR),
2) Tier 1 (T1) capital ratio,
3) Common Equity Tier 1 (CET1) capital ratio.

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

The capital conservation buffer is applicable to all banks.

The countercyclical buffer is imposed to mitigate the systemic risk arising from the lending cycle. It is introduced by the minister responsible for financial institutions during periods of an excessive increase in lending activities and lifted when they slow down. As at 31 December 2024, the countercyclical buffer rate was 0% for credit exposures in Poland.

Additionally, the Bank's Group calculates a countercyclical buffer rate specific to a given institution, taking into account the value of all credit exposures in other countries and the respective value of the countercyclical buffer for those countries in its calculations. As at 31 December 2024, the countercyclical buffer specific to the Bank's Group was 0.05%.

Table 3.8 and Table 3.9 present information on the geographical distribution of relevant credit exposures and the amount of the countercyclical buffer specific to the Bank's Capital Group.

Table 3.1 Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer [Template EU CCyB1]

| | 31.12.2024 | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | a | b | c | d | e | f | g | h | i | j | K | l | m |
| | General credit exposures | | Relevant credit exposures – Market risk | | | | Own fund requirements | | | | | | |
| Breakdown by country: | Exposure value under the standardised approach | Exposure value under the IRB approach | Sum of long and short positions of trading book exposures for SA | Value of trading book exposures for internal models | Securitisation exposures Exposure value for non-trading book | Total exposure value | Relevant credit risk exposures - Credit risk | Relevant credit exposures – Market risk | Relevant credit exposures – Securitisation positions in the non-trading book | Total | Risk-weighted exposure amounts | Own fund requirements weights (%) | Countercyclical buffer rate (%) |
| **Poland** | **291 698** | **0** | **585** | **0** | **0** | **292 283** | **15 314** | **41** | **0** | **15 355** | **191 941** | **94,76%** | **0,00%** |
| Germany | 1 857 | - | - | - | - | 1 857 | 144 | - | - | 144 | 1 804 | 0,89% | 0,75% |
| Ukraine | 1 587 | - | - | - | - | 1 587 | 92 | - | - | 92 | 1 153 | 0,57% | 0,00% |
| Dutch | 1 372 | - | - | - | - | 1 372 | 103 | - | - | 103 | 1 282 | 0,63% | 2,00% |
| Czech Republic | 1 289 | - | - | - | - | 1 289 | 97 | - | - | 97 | 1 209 | 0,60% | 1,25% |
| France | 560 | - | - | - | - | 560 | 45 | - | - | 45 | 562 | 0,28% | 1,00% |
| Ireland | 505 | - | - | - | - | 505 | 40 | - | - | 40 | 505 | 0,25% | 1,50% |
| Luxembourg | 502 | - | - | - | - | 502 | 40 | - | - | 40 | 502 | 0,25% | 0,50% |
| South Korea | 489 | - | - | - | - | 489 | 39 | - | - | 39 | 489 | 0,24% | 1,00% |
| Malta | 465 | - | - | - | - | 465 | 37 | - | - | 37 | 465 | 0,23% | 0,00% |
| Great Britain | 411 | - | - | - | - | 411 | 32 | - | - | 32 | 399 | 0,20% | 2,00% |
| Cyprus | 363 | - | - | - | - | 363 | 29 | - | - | 29 | 363 | 0,18% | 1,00% |
| Austria | 350 | - | - | - | - | 350 | 26 | - | - | 26 | 326 | 0,16% | 0,00% |
| United States of America | 261 | - | - | - | - | 261 | 9 | - | - | 9 | 109 | 0,05% | 0,00% |
| Denmark | 204 | - | - | - | - | 204 | 16 | - | - | 16 | 204 | 0,10% | 2,50% |
| Hungary | 204 | - | - | - | - | 204 | 16 | - | - | 16 | 204 | 0,10% | 0,50% |
| Norway | 204 | - | - | - | - | 204 | 16 | - | - | 16 | 204 | 0,10% | 2,50% |
| Slovakia | 179 | - | - | - | - | 179 | 14 | - | - | 14 | 178 | 0,09% | 1,50% |
| Lithuania | 173 | - | - | - | - | 173 | 14 | - | - | 14 | 173 | 0,09% | 1,00% |
| Bahamas | 139 | - | - | - | - | 139 | 11 | - | - | 11 | 139 | 0,07% | 0,00% |
| Spain | 107 | - | - | - | - | 107 | 9 | - | - | 9 | 107 | 0,05% | 0,00% |
| Switzerland | 94 | - | - | - | - | 94 | 8 | - | - | 8 | 97 | 0,05% | 0,00% |
| Italy | 44 | - | - | - | - | 44 | 4 | - | - | 4 | 44 | 0,02% | 0,00% |
| Japan | 40 | - | - | - | - | 40 | 2 | - | - | 2 | 20 | 0,01% | 0,00% |
| Finland | 32 | - | - | - | - | 32 | 3 | - | - | 3 | 32 | 0,02% | 0,00% |
| Romania | 29 | - | - | - | - | 29 | 2 | - | - | 2 | 29 | 0,01% | 1,00% |
| Sweden | 3 | - | - | - | - | 3 | 0 | - | - | 0 | 4 | 0,00% | 2,00% |
| Estonia | 2 | - | - | - | - | 2 | 0 | - | - | 0 | 2 | 0,00% | 1,50% |
| Belgium | 2 | - | - | - | - | 2 | 0 | - | - | 0 | 2 | 0,00% | 1,00% |
| Belarus | 2 | - | - | - | - | 2 | 0 | - | - | 0 | 2 | 0,00% | 0,00% |
| Georgia | 1 | - | - | - | - | 1 | 0 | - | - | 0 | 1 | 0,00% | 0,00% |
| United Arab Emirates | 1 | - | - | - | - | 1 | 0 | - | - | 0 | 1 | 0,00% | 0,00% |
| Ecuador | 1 | - | - | - | - | 1 | 0 | - | - | 0 | 1 | 0,00% | 0,00% |
| Australia | 1 | - | - | - | - | 1 | 0 | - | - | 0 | 1 | 0,00% | 1,00% |
| Central African Republic | 0 | - | - | - | - | 0 | 0 | - | - | 0 | 1 | 0,00% | 0,00% |
| Other | 4 | - | - | - | - | 4 | 0 | - | - | 0 | 3 | 0,00% | - |
| | 303 173 | 0 | 585 | 0 | 0 | 303 758 | 16 163 | 41 | 0 | 16 205 | 202 559 | - | |

Table 3.2 Amount of institution-specific countercyclical capital buffer [Template EU CCyB2]

| | | 31.12.2024 |
|---|---|---|
| | | (a) |
| 1 | Total risk exposure amount | 254 518 |
| 2 | Institution specific countercyclical capital buffer rate | 0,05% |
| 3 | Institution specific countercyclical capital buffer requirement | 129 |

The Other Systemically Important Institution (O-SII) buffer is an additional requirement for institutions which may generate systemic risk. The Bank was identified as other systemically important institution based on the PFSA's decision of 10 October 2016. According to the PFSA's decision of 16 December 2022, the Bank is obliged to maintain the level of the Other Systemically Important Institution (O-SII) buffer in the amount equal to 2.00% of the total risk exposure amount, calculated in accordance with Article 92(3) of the CRR. The buffer must be maintained both on an individual and consolidated basis.

Therefore, as at 31.12.2024 the capital ratios should be no lower than:
- TCR – 12.56% for the Bank and 12.55 % for the Bank's Group,
- T1 – 10.56% for the Bank and 10.55% for the Bank's Group,
- CET1 – 9.06% for the Bank and 9.05% for the Bank's Group,

In a letter dated 16 December 2024, PFSA advised that no additional capital charge (P2G) had been set to absorb potential stress losses at the individual and consolidated levels.

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

Pursuant to Article 99a(6) of the BGF Act, the Bank is required to publicly disclose information on its own funds and eligible liabilities, their components, including their maturity profile and degree of preference in insolvency proceedings, as well as the amount of the minimum requirement for own funds and eligible liabilities (MREL) set by the Bank Guarantee Fund.

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

The MREL TREA requirement for the Bank was set on a consolidated basis at 15.36% of TREA (total risk exposure). In addition, the combined buffer requirement as at 31 December 2024 was 4.55% for the Bank Group6 and the amount of Common Equity Tier 1 capital used to cover it cannot be used to cover MREL TREA.

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

As the Bank's forced restructuring group, as at 31 December 2023, exceeded the level of EUR 100 billion in total assets, it was recognized as a so-called Top Tier Bank, i.e. it met the condition set out in Article 97h clause 1 of the BFG Act. Consequently, the Bank is obliged to comply with the MREL subordination requirement designated for Top Tier Bank as of 1 January 2027.

The Bank's MREL TREA requirement for the Bank on a consolidated basis should be met by own funds and eligible liabilities meeting the 14.56% TREA subordination requirement from 1 January 2027. Until then, the Bank is required to maintain own funds and eligible liabilities meeting a subordination requirement of not less than 13.90% TREA.

The Bank's MREL TEM requirement on a consolidated basis should be met by own funds and eligible liabilities meeting a subordination requirement of 5.91% of TEM from 1 January 2027 Until then, the Bank is required to maintain own funds and eligible liabilities meeting a subordination requirement of not less than 5.62% of TEM.

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

Table 3.10 Key metrics – MREL [Template EU KM2]

| | | a |
|---|---|---|
| | | Minimum requirement for own funds and eligible liabilities (MREL) |
| **Own funds and eligible liabilities, ratios and components** | | 31.12.2024 |
| 1 | Own funds and eligible liabilities | 59 892 |
| EU-1a | Of which own funds and subordinated liabilities | 56 687 |
| 2 | Total risk exposure amount of the resolution group (TREA) | 247 025 |
| 3 | Own funds and eligible liabilities as a percentage of TREA (row1/row2) | 24,25% |
| EU-3a | Of which own funds and subordinated liabilities | 22,95% |
| 4 | Total exposure measure of the resolution group | 554 331 |
| 5 | Own funds and eligible liabilities as percentage of the total exposure measure | 10,80% |
| EU-5a | Of which own funds or subordinated liabilities | 10,23% |
| **Minimum requirement for own funds and eligible liabilities (MREL)** | | |
| EU-7 | MREL requirement expressed as percentage of the total risk exposure amount | 15,36% |
| EU-8 | Of which to be met with own funds or subordinated liabilities | 13,90% |
| EU-9 | MREL requirement expressed as percentage of the total exposure measure | 5,91% |
| EU-10 | Of which to be met with own funds or subordinated liabilities | 5,62% |

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

As at 31.12.2024, the Bank's Group had a surplus of own funds and eligible liabilities of PLN 10,367 million above the level implied by the MREL TREA requirement plus the combined buffer requirement. The excess over the subordinated MREL TREA requirement plus the combined buffer requirement was PLN 10,769 million. The surplus above the level resulting from the MREL TEM requirement was PLN 27,131 million, with a surplus above the subordinated MREL TEM requirement of PLN 25,534 million.

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Table 3.3 Composition - MREL [Template EU TLAC1]

| | | 31.12.2024<br>a<br>Minimum requirement for own funds and eligible liabilities (MREL) |
|---|---|---|
| **Own funds and eligible liabilities and adjustments** | | |
| 1 | Common Equity Tier 1 capital (CET1) | 44 010 |
| 2 | Additional Tier 1 capital (AT1) | - |
| 6 | Tier 2 capital (T2) | 3 039 |
| 11 | Own funds for the purpose of Articles 92a CRR and 45 BRRD | 47 048 |
| **Own funds and eligible liabilities: Non-regulatory capital elements** | | |
| 12 | Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered) | 8 478 |
| EU-12a | Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered) | - |
| EU-12b | Eligible liabilities instruments that are subordinated to excluded liabilities, issued prior to 27 June 2019 (subordinated grandfathered) | - |
| EU-12c | Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items | 1 161 |
| 13 | Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre cap) | 3 205 |
| EU-13a | Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap) | - |
| 14 | Amount of non subordinated instruments eligible, where applicable after application of Article 72b (3) CRR | 3 205 |
| 17 | Eligible liabilities items before adjustments | 12 844 |
| EU-17a | Of which subordinated | 9 639 |
| **Own funds and eligible liabilities: Adjustments to non-regulatory capital elements** | | |
| 18 | Own funds and eligible liabilities items before adjustments | 59 892 |
| 20 | (Deduction of exposures between MPE resolution groups) | - |
| 22 | Own funds and eligible liabilities after adjustments | 59 892 |
| EU-22a | Of which own funds and subordinated | 56 687 |
| **Risk-weighted exposure amount and leverage exposure measure of the resolution group** | | |
| 23 | Total risk exposure amount | 247 025 |
| 24 | Total exposure measure | 554 331 |
| **Ratio of own funds and eligible liabilities** | | |
| 25 | Own funds and eligible liabilities (as a percentage of total risk exposure amount ) | 24,25% |
| EU-25a | Of which own funds and subordinated | 22,95% |
| 26 | Own funds and eligible liabilities (as a percentage of total exposure measure) | 10,80% |
| EU-26a | Of which own funds and subordinated | 10,23% |
| 27 | CET1 (as a percentage of TREA) available after meeting the resolution group's requirements | 8,89% |

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

The Bank uses mainly Common Equity Tier 1 capital to meet MREL requirements. In addition, subordinated liabilities included in Tier 2 capital and the amortised portion of subordinated liabilities under Article 64 of the CRR Regulation, as well as eligible liabilities arising from the issue of senior preferred notes, are used to meet the requirement.

Table 3.4 Creditor ranking - resolution entity [Template EU TLAC3b]

| | 31.12.2024 | insolvency ranking | | | | sum of 1-9 |
|---|---|---|---|---|---|---|
| | | 1 (most junior) | 3 | 5 | 9 | |
| 1 | Description of insolvency rank (free text) | The Bank's own funds referred to in Art. 26 of the CRR Regulation (Tier 1 capital) | Liabilities included in the Bank's own funds referred to in Art. 62 of the CRR Regulation (Tier II capital) | Subordinated liabilities not included in the Bank's own funds, referred to in Art. 64 of the CRR Regulation | Other liabilities | |
| 5 | Subset of row 4 that are own funds and liabilities potentially eligible for meeting [choose as a appropriate: TLAC/ MREL] | 42 325 | 4 200 | 8 478 | 3 205 | 58 207 |
| 6 | o/w residual maturity ≥ 1 year < 2 years | - | - | - | 3 205 | 3 205 |
| 7 | o/w residual maturity ≥ 2 year < 5 years | - | 2 700 | 8 478 | - | 11 178 |
| 8 | o/w residual maturity ≥ 5 years < 10 years | - | 1 500 | - | - | 1 500 |
| 9 | o/w residual maturity ≥ 10 years, but excluding perpetual securities | - | - | - | - | - |
| 10 | o/w perpetual securities | 42 325 | - | - | - | 42 325 |

The table omits rows that are a blank set in the EU and columns that do not contain instruments that meet MREL.

The table below shows the insolvency ranking in accordance with the Bankruptcy Law (Journal of Laws of 2003, No 60, item 535, as amended), with specific categories in which the Bank reported own funds and eligible liabilities satisfying the MREL requirement.

Table 3.5 Insolvency ranking

| Insolvency rank | Category name | Description | Legal basis |
|---|---|---|---|
| **1 (lowest)** | **Category 10** | **Amounts receivable in respect of liabilities included in the bank's own funds referred to in Article 26 of the CRR, together with interest and enforcement costs.**<br>Where the instruments to which the receivables indicated in Category 10 relate are only partly recognized as an item of the bank's own funds, the receivables in respect of the entire instrument are treated as receivables arising from the category in which the instrument is included. | **Article 440(2)(10)** and Article 440(2b) **of the Bankruptcy Law** |
| 2 | Category 9 | Amounts receivable in respect of liabilities included in the bank's own funds referred to in Article 51 of the CRR, together with interest and enforcement costs.<br>Where the instruments to which the receivables indicated in Category 9 relate are only partly recognized as an item of the bank's own funds, the receivables in respect of the entire instrument are treated as receivables arising from the category in which the instrument is included. | Article 440(2)(9) and Article 440(2b) of the Bankruptcy Law |
| 3 | **Category 8** | **Amounts receivable in respect of liabilities included in the bank's own funds referred to in Article 62 of the CRR, together with interest and enforcement costs.**<br>**Where the instruments to which the receivables indicated in Category 8 relate are only partly recognized as an item of the bank's own funds, the receivables in respect of the entire instrument are treated as receivables arising from the category in which the instrument is included.** | **Article 440(2)(8)** and Article 440(2b) **of the Bankruptcy Law** |
| **4** | Category 7 | Amounts receivable in respect of subordinated liabilities not included in the bank's own funds, including interest and enforcement costs. | **Article 440(2)(7) of the Bankruptcy Law** |
| 5 | **Category 6** | **Receivables in respect of bonds or other debt instruments that have the characteristics of tradable debt, or in respect of instruments that have the legal effect of debt financial instruments, together with interest and enforcement costs, excluding those included in category 9, if all of the following conditions are met:**<br>**a) the original contractual maturity of the receivable is at least one year,**<br>**b) the agreement or the documents and information attached thereto relating to the issue of debt financial instruments or instruments having the legal effect of debt financial instruments and, where applicable, the prospectus, clearly and prominently identify the insolvency rank,**<br>**c) receivables do not arise from:**<br>**- derivative instruments, in particular those that relate to assets, rights, liabilities, indices and other indicators, or that exhibit the characteristics of derivative financial instruments,**<br>**- structured finance products as referred to in Article 2(1)(28) of** | Article 440(2)(6) of the Bankruptcy Law |

| Insolvency rank | Category name | Description | Legal basis |
|---|---|---|---|
| | | **Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (OJ L 173, 12.06.2014, p. 84, as amended).** | |
| 6 | Category 5 | Amounts receivable by partners or shareholders in respect of a loan or other legal transaction having similar effects, in particular the deferred delivery of goods, made to the bankrupt being a capital company within 5 years before the date of bankruptcy, together with interest, if they are not subject to satisfaction in the lower categories. | Article 440(2)(5) of the Bankruptcy Law |
| 7 | Category 4b | Amounts receivable by the entity managing the protection system referred to in Article 130e(1) of the Act of 29 August 1997 – the Banking Law and the entity managing the protection system referred to in Article 22d(1)(2) of the Act of 7 December 2000 on the functioning of cooperative banks, their affiliation and affiliating banks, together with interest and enforcement costs. | Article 440(2)(4)(b) of the Bankruptcy Law |
| 8 | Category 4a | Interest on receivables included in Category 3d, as well as court fines and administrative fines and receivables in respect of donations and bequests. | Article 440(2)(4)(a) of the Bankruptcy Law |
| **9** | **Category 3d** | **Other receivables, if not subject to satisfaction in other categories, in particular taxes and other public levies, as well as other receivables in respect of social security contributions.** | **Article 440(2)(3)(d) of the Bankruptcy Law** |
| 10 | Category 3c | Interest on receivables included in the categories referred to in Categories 1 and 2 and Categories 3a and 3b. | Article 440(2)(3) (c) of the Bankruptcy Law |
| 11 | Category 3b | Other receivables arising from bank account agreements. | Article 440(2)(3)(b) of the Bankruptcy Law |
| 12 | Category 3a | Other receivables in respect of funds covered by guarantee protection other than guaranteed funds within the meaning of Article 2(65) of the BGF Act. | Article 440(2)(3)(a) of the Bankruptcy Law |
| 13 | Category 2 | Amounts receivable by natural persons, micro-entrepreneurs, small and medium-sized entrepreneurs in respect of funds covered by guarantee protection other than guaranteed funds within the meaning of Article 2(65) of the BGF Act. | Article 440(2)(2) of the Bankruptcy Law |
| 14 | Category 1 | Amounts receivable referred to in Article 39(1) of the BGF Act, together with interest and enforcement costs, due for the period before the declaration of bankruptcy from the employment relationship, with the exception of claims for remuneration of the bankrupt's representative or remuneration of the person performing activities of the bankrupt, amounts receivable by farmers under agreements for the provision of products from their own farms, alimony claims and annuities in respect of compensation for causing illness, incapacity to work, disability or death and annuities in respect of the conversion of entitlements covered by the content of the right of life into an annuity, due for the last three years before the date of the bankruptcy declaration, amounts due in respect of social insurance contributions within the meaning of the Act of 13 October 1998 on the Social Security System. | Article 440(2)(1) of the Bankruptcy Law |

## 3.5 Impact of transitional arrangements on capital adequacy

The PKO Bank Polski S.A. Group applies a transitional adjustment in the calculation of own funds to minimise the impact of the implementation of IFRS 9 on own funds, in accordance with Article 473 a of the CRR Regulation and, from July 2024 (previously applied until the end of 2022), the provisional treatment of unrealised gains and losses on securities at fair value through other comprehensive income (in accordance with in accordance with Article 468 of the CRR Regulation).

### 3.5.1 Transitional adjustment to minimise the impact of implementing IFRS 9 on own funds

On 1 January 2018, IFRS 9 'Financial Instruments', which replaced IAS 39 'Financial Instruments', entered into force. Changes were made to the classification and measurement of financial instruments, recognition and calculation of their impairment, and hedge accounting.

The impact of IFRS 9 on own funds and capital adequacy measures is governed by Regulation 2020/873 of the European Parliament and of the Council of 24 June 2020 amending Regulations (EU) No 575/2013 and (EU) 2019/876 as regards certain adjustments in response to the COVID-19 pandemic (Regulation 2020/873). This provision allows to mitigate the impact on the write-downs recorded as of 1 January 2020 on Tier 1 capital.

The Bank's Group decided to apply the transitional provisions in full and to spread the impact of the adjustments for the implementation of IFRS 9 on own funds and capital adequacy measures over time.

Such a solution can be applied up to 2024, inclusive, whereas the adjustment ratio allocated to this value decreases gradually. The Bank's Group decided that in the light of Art. 473a (7a) of the CRR implemented by the aforesaid Regulation, it would apply an option according to which the adjustment mitigating the impact of the introduction of IFRS 9 on own funds would receive a risk weight equal to 100% and the resulting value would be added to the total exposure.

### 3.5.2 Provisional treatment of unrealised gains and losses on securities measured at fair value through OCI

According to Article 468 of the CRR (as amended by the aforementioned Regulation 2020/873), from July 2024, the Bank's Group applies a temporary treatment of unrealized gains and losses measured at fair value through OCI. This approach enables excluding from the calculation of the Bank's common equity position the portion of the unrealized gains and losses accumulated from 31 December 2019 included in the balance sheet under 'changes in fair value of debt instruments measured at fair value through OCI', corresponding to exposures to central governments, regional governments or local authorities, and to public sector entities, excluding those financial assets that are impaired due to credit risk. In 2023 and in the first half of 2024 the Group no longer applied this transitional adjustment. The possibility of re-applying the adjustment was introduced by Regulation CRR3.

Table 3.6 Comparison of the institution's own funds and capital ratio and leverage ratio with and without the application of IFRS 9 transitional arrangements or expected credit loss, as well as with and without provisional treatment under Article 468 of CRR [Template IFRS 9]

| | | 31.12.2024 | 30.09.2024 | 30.06.2024 | 31.03.2024 | 31.12.2023 |
|---|---|---|---|---|---|---|
| **Available capital (amounts)** | | | | | | |
| 1 | Common Equity Tier 1 capital (CET1) | 44 255 | 42 841 | 42 098 | 41 575 | 41 727 |
| 2 | Common Equity Tier 1 (CET1) capital if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 43 445 | 42 092 | 41 349 | 40 888 | 40 354 |
| 2a | Common Equity Tier 1 capital (CET1) if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive according to Article 468 of the CRR | 43 434 | 42 481 | 42 098 | 41 575 | 41 727 |
| 3 | Tier 1 capital (T1) | 44 255 | 42 841 | 42 098 | 41 575 | 41 727 |
| 4 | Tier 1 capital if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 43 445 | 42 092 | 41 349 | 40 888 | 40 354 |
| 4a | Tier 1 capital if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income according to Article 468 of the CRR | 43 434 | 42 481 | 42 098 | 41 575 | 41 727 |
| 5 | Total capital | 47 294 | 44 516 | 43 909 | 43 520 | 43 807 |
| 6 | Total capital, if the IFRS 9 transitional or similar expected loan losses were not applied | 46 484 | 43 767 | 43 160 | 42 833 | 42 434 |
| 6a | Total capital, if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income according to Article 468 of the CRR | 46 473 | 44 156 | 43 909 | 43 520 | 43 807 |
| **RWAs (amounts)** | | | | | | |
| 7 | Total RWAs | 254 517 | 246 877 | 245 463 | 238 795 | 234 835 |
| 8 | Total RWAs if the IFRS 9 transitional or similar expected credit losses were not applied | 253 715 | 246 126 | 244 714 | 238 113 | 233 465 |
| **Capital ratios** | | | | | | |
| 9 | Common Equity Tier 1 capital (as a percentage of the risk exposure amount) | 17,39% | 17,35% | 17,15% | 17,41% | 17,77% |
| 10 | Common Equity Tier 1 capital (as a percentage of the risk exposure amount) if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 17,12% | 17,10% | 16,90% | 17,17% | 17,28% |
| 10a | Common Equity Tier 1 capital (as a percentage of the risk exposure amount) if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Art. 468 of the CRR | 17,06% | 17,21% | 17,15% | 17,41% | 17,77% |
| 11 | Tier 1 capital (as a percentage of the risk exposure amount) | 17,39% | 17,35% | 17,15% | 17,41% | 17,77% |
| 12 | Tier 1 capital (as a percentage of the risk exposure amount) if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 17,12% | 17,10% | 16,90% | 17,17% | 17,28% |
| 12a | Tier 1 capital (as a percentage of the risk exposure amount) if there was no provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Article 468 of the CRR | 17,06% | 17,21% | 17,15% | 17,41% | 17,77% |
| 13 | Total capital (as a percentage of the risk exposure amount) | 18,58% | 18,03% | 17,89% | 18,22% | 18,65% |
| 14 | Total capital (as a percentage of the risk exposure amount) if the IFRS 9 transitional or similar expected credit losses were not applied | 18,32% | 17,78% | 17,64% | 17,99% | 18,18% |
| 14a | Total capital (as a percentage of the risk exposure amount), if there was no provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Article 468 of the CRR | 18,26% | 17,89% | 17,89% | 18,22% | 18,65% |
| **Leverage ratio** | | | | | | |
| 15 | The leverage ratio total exposure measure | 569 033 | 550 005 | 542 490 | 529 757 | 534 196 |
| 16 | Leverage ratio | 7,78% | 7,79% | 7,76% | 7,85% | 7,81% |
| 17 | The leverage ratio if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 7,65% | 7,66% | 7,63% | 7,73% | 7,57% |

The table above compares the institutions' own funds and capital and leverage ratios with and without the application of the transitional arrangements for IFRS 9 or analogous expected credit losses and with and without the provisional treatment under Article 468 of the CRR regulation for the Group.

If the transitional arrangements for the partial reversal of the impact of IFRS 9 under Article 473a of the CRR Regulation had not been applied, the Bank's Tier 1 capital would have been PLN 41,585 million, total capital would have been PLN 44,624 million, the Tier 1 capital ratio would have been 19.19%, the total capital ratio would have been 20.60% and the leverage ratio would have been 8.08%.

If the transitional arrangements for the temporary treatment of unrealised gains and losses at fair value through other comprehensive income under Article 468 of the CRR regulation had not been applied, the Bank's Tier 1 capital would have been PLN 41,397 million, total capital PLN 44,436 million, the Tier 1 capital ratio would have been 19.04%, the total capital ratio 20.44% and the leverage ratio 8.03%.

## 3.6 Internal capital (Pillar 2)

In 2024, the Bank's Group determined the internal capital in accordance with:
1) the CRR,
2) the Polish Banking Law,
3) the Regulation of the Minister of finance, funds and regional policy of 27 July 2021 on the detailed method of estimating internal capital and conducting reviews of estimation strategies and procedures and maintaining a permanent level of internal capital by banks,
4) the Act on macro-prudential supervision,

and the internal regulations of the Bank and the Bank's Group.

Internal capital is the amount of capital required to cover all the identified material types of risk which occur in the business activities of the Bank and the Bank's Group and the effect of changes in the business environment, taking into account the expected risk level.

The objective of estimating internal capital is to maintain own funds at the level specified in the Strategy, ensuring the safety of the activities, taking into account changes in the profile and scale of the activities and unfavourable stress conditions and to enable more effective management of the Bank and the Bank's Group oriented towards improving the profitability of the operations and the return on capital invested.

For each risk considered material, the Bank's Group develops and uses appropriate methods for its assessment and measurement. The Bank monitors the materiality of individual risk types related to the business activities of the Bank and the Bank's Group on a regular basis. The internal capital to cover individual risk types is determined in accordance with the methods specified in the internal regulations.

The total internal capital of the Bank's Group is the total of the internal capital required to cover all the material risk types to which the Bank and the Bank's Group, including the entities subject to prudential consolidation, are exposed (assuming no correlation between the individual risks).

The internal capital to cover the Bank's credit default risk is determined as the value of the own funds requirement for credit risk estimated using the IRB approach, the standardised approach to calculating the capital requirement for credit risk, set out in the CRR, and the internal method. Internal capital for credit risk of a CCP's central counterparty is estimated in accordance with the approach described in the CRR for calculating the capital requirement for exposures to an eligible central counterparty, including the preferential risk weighting. In the case of non-standard credit risk exposures of financial institutions and countries in the Bank's portfolio, for which internal capital assessment is required, the solutions described in the CRR apply. The internal capital to cover the Bank's credit default risk is determined for on-balance and off-balance sheet exposures subject to credit risk. The entities in the Bank's Group in which credit risk is material determine the internal capital for credit risk on the basis of the value of the own funds requirement for credit risk. The total internal capital to cover credit default risk is the total of the internal capital determined for separate exposure portfolios and the entities in the Bank's Group in which the internal capital for credit risk is estimated.

Internal capital to cover the risk of foreign currency mortgage loans is estimated based on the value of projected losses from customer litigation resolutions less losses from disputes and settlements already included in the Bank's results.

Internal capital for market risk comprises internal capital amounts for interest rate risk in the non-trading book, interest rate risk in the trading book and foreign exchange risk.

The calculation of internal capital for interest rate risk in the non-trading book uses measures of sensitivity of interest income, measures of sensitivity of economic value and the results of stress tests on the sensitivity of credit spreads from activities included in the non-trading book (CSRBB).

The VaR method is used to calculate internal capital for interest rate risk in the trading book, taking into account the results of stress tests.

The internal capital for foreign exchange risk is calculated using the Value-at-Risk method, taking into account the results of stress tests.

The internal capital to cover the interest rate risk and foreign exchange risk of the Bank's Group is calculated using a method similar to that used for the Bank, taking into account the specific nature of the entities for which the internal capital is calculated.

The internal capital to cover liquidity risk includes the total estimated cost of liquidating a portfolio of securities quickly in order to cover stress-test outflows and the cost of obtaining additional funds to finance the amount of liquid assets necessary to meet the level of liquid assets required at the Bank and the cost associated with the planned issue of traditional bonds instead of green bonds. The total internal capital for the liquidity risk of the Bank's Group is the total of the internal capital of the Bank and the entities in the Bank's Group for which liquidity risk was considered material. The internal capital for the entities in the Bank's Group is calculated using a method similar to that used for the Bank, taking into account their specific nature.

The internal capital to cover the Bank's operational risk is equal to the level of the Bank's operational risk calculated using the AMA and the BIA. The internal capital to cover the operational risk of the entities in the Bank's Group is adopted for the entities in the Bank's Group subject to prudential consolidation, which assessed operational risk as being material – at the amount of the capital estimated by those entities.

The internal capital to cover the Bank's business risk is determined on the basis of the analysis of the historical volatility of deviations of the actual net business revenue from the forecast amounts, in accordance with the Earnings at Risk concept, and the results of a scenario analysis.

The internal capital to cover the business risk of the entities in the Bank's Group is adopted for the entities in the Bank's Group which assessed business risk as being material. The internal capital to cover the business risk of the Bank's Group is determined as the total of the Bank's internal capital and the internal capitals of the entities in the Bank's Group.

The Bank and Group entities where the risk of macroeconomic changes is significant, shall determine the internal capital to cover the risk of macroeconomic changes on the basis of the results of comprehensive stress tests. The internal capital is equal to the arithmetic mean of the amounts of the total own funds requirement in the shock scenario, which cause the total capital ratio TCR to fall below the level resulting from the base scenario, calculated for four consecutive quarters.

The internal capital to cover the model risk of the Bank and the entities in the Bank's Group is determined on the basis of a ratio specifying the amount of the internal capital to cover model risk, depending on the model risk level.

Capital adequacy from an internal capital perspective is determined in relation to own funds. The current own funds of the Bank and the Bank's Group cover these requirements with a significant safety margin.

## 3.7 Leverage

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

The objective of leverage risk management is to ensure a proper relationship between the amount of Tier 1 capital and the total balance sheet assets and off-balance sheet liabilities granted of the Bank and the Bank's Group. The method of leverage risk management is governed in the Bank's internal regulations. The Banking Risk Division (the Capital Adequacy and Operational Risk Department) and the Accounting and Reporting Department are responsible for assessing leverage risk.

The identification of leverage risk consists of recognising the current and potential risk sources and factors and determining its potential impact on the activities of the Bank and the Bank's Group. For the purpose of measuring the risk of excessive leverage, a leverage ratio is calculated as a measure of Tier 1 capital divided by the measure of total exposure and is expressed as a percentage rate. As at 31 December 2024, the leverage ratio was calculated with reference to the transitional definition of Tier 1 capital (within the meaning of the transitional arrangements regarding the mitigation of the impact of introducing IFRS 9 on own funds and the transitional treatment of unrealised gains and losses for securities at fair value through other comprehensive income in accordance with Article 468 of the CRR). The Bank's Group also discloses (in chapter 3.5 of this Report) the value the leverage ratio would have if the transitional arrangements regarding IFRS 9 were not applied.

In order to maintain the leverage ratio at an acceptable level, a strategic tolerance limit and a threshold are set, whose levels are regularly monitored and verified at least once a year. Leverage risk is considered low, when the leverage ratio is equal to or higher than the threshold, it is considered increased, when the leverage ratio is below the threshold and is equal to or higher than the strategic tolerance limit, and it is considered high, when the leverage ratio is below the strategic tolerance limit.

The leverage ratio is calculated and reported on a regular basis. In the event of a high or increased leverage risk, management activities are suggested, taking into account the current macroeconomic situation, the costs related to the activities suggested and their impact on the level of excessive leverage risk. The leverage ratio is forecast during the financial planning process and takes into account the planned changes in the activities of the Bank and the Bank's Group as well as the impact of the asset structure on its level. The Bank has a list of potential tools to be used in case it needs to increase Tier 1 capital or to adjust the structure of on-balance sheet and off-balance exposures (the denominator of the leverage ratio).

In 2024, the leverage ratio remained above the internal and external limits as well as above the minimum levels recommended by the PFSA.

Table 3.7. Summary reconciliation of accounting assets and leverage ratio exposures [Template EU LR1 – LRSum]

| | | 31.12.2024 |
|---|---|---|
| | | a |
| | | Applicable amount |
| 1 | Total assets as per published financial statements | 527 183 |
| 2 | Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation | - 49 |
| 3 | (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference) | - |
| 4 | (Adjustment for temporary exemption of exposures to central bank (if applicable)) | - |
| 5 | (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with point (i) of Article 429a(1) CRR) | - |
| 6 | Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting | - |
| 7 | Adjustment for eligible cash pooling transactions | - |
| 8 | Adjustments for derivative financial instruments | 1 413 |
| 9 | Adjustment for securities financing transactions (SFTs) | - |
| 10 | Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures) | 34 632 |
| 11 | (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital) | - |
| EU-11a | (Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (c ) of Article 429a(1) CRR) | - |
| EU-11b | (Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR) | - |
| 12 | Other adjustments | 5 854 |
| **13** | **Leverage ratio total exposure measure** | **569 033** |

Table 3.8 Leverage ratio. Leverage ratio common disclosure under the CRR [Template EU LR2 – LRCom]

| | | CRR leverage ratio exposures | |
|---|---|---|---|
| | | 31.12.2024 | 31.12.2023 |
| **On-balance sheet exposures (excluding derivatives and SFTs)** | | | |
| 1 | On-balance sheet items (excluding derivatives, SFTs, but including collateral) | 529 224 | 505 172 |
| 2 | Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework | - | - |
| 3 | (Deductions of receivables assets for cash variation margin provided in derivatives transactions) | - 293 | - 997 |
| 4 | (Adjustment for securities received under securities financing transactions that are recognised as an asset) | - | - |
| 5 | (General credit risk adjustments to on-balance sheet items) | - | - |
| 6 | (Asset amounts deducted in determining Tier 1 capital) | - 2 865 | - 2 764 |
| 7 | Total on-balance sheet exposures (excluding derivatives and SFTs) | 526 067 | 501 411 |
| **Derivative exposures** | | | |
| 8 | Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin) | 1 720 | 2 024 |
| EU-8a | Derogation for derivatives: replacement costs contribution under the simplified standardised approach | - | - |
| 9 | Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions | 5 720 | 5 842 |
| EU-9a | Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach | - | - |
| EU-9b | Exposure determined under Original Exposure Method | - | - |
| 10 | (Exempted CCP leg of client-cleared trade exposures) (SA-CCR) | - | - |
| EU-10a | (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach) | - | - |
| EU-10b | (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method) | - | - |
| 11 | Adjusted effective notional amount of written credit derivatives | - | - |
| 12 | (Adjusted effective notional offsets and add-on deductions for written credit derivatives) | - | - |
| 13 | Total derivatives exposures | 7 440 | 7 866 |
| **Securities financing transaction (SFT) exposures** | | | |
| 14 | Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions | 894 | 493 |
| 15 | (Netted amounts of cash payables and cash receivables of gross SFT assets) | - 2 | - 0 |
| 16 | Counterparty credit risk exposure for SFT assets | 2 | 0 |
| EU-16a | Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR | - | - |
| 17 | Agent transaction exposures | - | - |
| EU-17a | (Exempted CCP leg of client-cleared SFT exposure) | - | - |
| 18 | Total securities financing transaction exposures | 894 | 493 |
| **Other off-balance sheet exposures** | | | |
| 19 | Off-balance sheet exposures at gross notional amount | 102 879 | 98 984 |
| 20 | Off-balance sheet exposures at gross notional amount | - 68 246 | - 66 265 |
| 21 | (General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures) | - | - |
| 22 | Off-balance sheet exposures | 34 632 | 32 720 |
| **Excluded exposures** | | | |
| EU-22k | Total exempted exposures) | - | - |
| **Capital and total exposure measure** | | | |
| 23 | Tier 1 capital | 44 256 | 42 097 |
| 24 | Total exposure measure | 569 033 | 542 490 |

| | | | |
|---|---|---|---|
| **Leverage ratio** | | | |
| 25 | Leverage ratio (%) | 7,78% | 7,76% |
| EU-25 | Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%) | 7,78% | 7,76% |
| 25a | Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%) | 7,78% | 7,76% |
| 26 | Regulatory minimum leverage ratio requirement (%) | 3,00% | 3,00% |
| EU-26a | Additional own funds requirements to address the risk of excessive leverage (%) | Not applicable | Not applicable |
| EU-26b | of which: to be made up of CET1 capital | Not applicable | Not applicable |
| 27 | Leverage ratio buffer requirement (%) | Not applicable | Not applicable |
| EU-27a | Overall leverage ratio requirement (%) | 3,00% | 3,00% |
| **Choice on transitional arrangements and relevant exposures** | | | |
| EU-27b | Choice on transitional arrangements for the definition of the capital measure | Transitional | Transitional |
| **Disclosure of mean values** | | | |
| 28 | Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables | 497 | 350 |
| 29 | Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables | 892 | 493 |
| 30 | Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables) | 568 637 | 542 346 |
| 30a | Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables) | 568 637 | 542 346 |
| 31 | Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables) | 7,78% | 7,76% |
| 31a | Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables) | 7,78% | 7,76% |

Table 3.9 Split-up of on balance sheet exposures* (excluding derivatives, SFTs and exempted exposures) [Template EU LR3 – LRSpl]

| | | 31.12.2024 |
|---|---|---|
| | | a |
| | | CRR leverage ratio exposures |
| **EU-1** | **Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:** | **529 224** |
| EU-2 | Trading book exposures | 1 624 |
| EU-3 | Banking book exposures, of which: | 527 600 |
| EU-4 | Covered bonds | - |
| EU-5 | Exposures treated as sovereigns | 196 488 |
| EU-6 | Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns | 20 077 |
| EU-7 | Institutions | 4 794 |
| EU-8 | Secured by mortgages of immovable properties | 104 236 |
| EU-9 | Retail exposures | 88 496 |
| EU-10 | Corporate | 78 707 |
| EU-11 | Exposures in default | 6 324 |
| EU-12 | Other exposures (eg equity, securitisations, and other non-credit obligation assets) | 28 479 |

* Balance sheet exposures for the calculation of the leverage ratio as defined in the CRR (excluding derivatives and securities financing transactions)

In 2024, strategic decisions had an indirect impact on the leverage ratio.

The factors affecting the leverage ratio:
1) an increase in exposure as a result of:
   - an increase in the value of loans and advances to customers,
   - changes in the value of Treasury bonds,
2) changes in the amount of own funds as a result of including the Group's profit for the first half of 2024 in the funds and the discontinuation of applying transitional solutions regarding unrealised gains and losses measured at fair value through accumulated comprehensive income.

## 3.8 Retrospective inclusion of the profit (loss) for 2023 and the first half of 2024

Pursuant to Article 26(2) of the CRR, an institution may include interim or year-end profits in Common Equity Tier 1 capital after the Bank's Group has taken a formal decision confirming the final profit (loss) of the Bank's Group in a given year or before it has taken the formal decision, only with the competent authority's prior permission. In May 2020, the European Banking Authority (EUNB) published, in a single rulebook Q&A, its position regarding the moment of recognition of annual and interim profits in the capital adequacy data (Q&A 2018_3822 and Q&A 2018_4085). According to this position, once the Bank's Group have formally met the criteria for including their profit for a given period in the Tier 1 capital, this profit should be included retrospectively (as at the date of the profit, and not the date of meeting the criteria), and own funds should be adjusted accordingly as at the date of the profit.

In view of the above, the restated data concerning the value of own funds, capital requirements and capital ratios for the periods ending 31 December 2023, 31 March 2024, 30 June 2024, and 30 September 2024 are presented below.

The restated figures for 31 December 2023 and as at 31 March 2023 are presented including in own funds the amount of the Bank Group's profit for 2023 (less dividends provided for) in the amount of PLN 1,771 million (in light of Resolution No. 8/2024 of the Ordinary General Meeting of the Bank of 28 June 2024 on the distribution of profit of PKO Bank Polski S.A. achieved in 2023, determination of the amount of dividend per share, the dividend date and determination of the dividend payment date, in which the Ordinary General Meeting decided to distribute 66.50% of the profit for 2023 to the shareholders and to leave PLN 1,631 million of profit in the Bank's reserves for future dividend payment, in addition, the General Meetings of the Group's companies decided to retain PLN 140 million in the reserves), with part of this amount (in the amount of PLN 1,697 million) already included in the figures published as at 31 December 2023.

Due to the Bank Group's approval to include part of the profit for H1 2024, net of expected charges, in the funds for 30 June 2024 and 30 September 2024, the amount of the Group's profit for H1 2024, net of expected charges, was recognized retrospectively in the funds for 30 June 2024 and 30 September 2024 in the amount of PLN 1,299 million, after obtaining the relevant approval from the PFSA.

Due to the change in the date of allocation of profit as own funds in these periods, the amounts of insufficient coverage of the write-downs of non-performing exposures (NPE) and the temporary adjustment related to the impact of IFRS 9 on own funds were recorded in the periods. The thresholds under Article 48 of the CRR and the related amount of deferred tax assets reducing own funds have also changed.

As a result of the application of the above EBA guidelines, as at 31 December 2023, 31 March 2024, 30 June 2024 and 30 September 2024, there was an increase in the Group's own funds by PLN 191 million at the end of December, PLN 125 million at the end of March, PLN 1,343 million as at the end of June and PLN 1 337m as at the end of September, at the same time there was a decrease in the capital requirement for credit risk by PLN 106 million at the end of December, PLN 112 million at the end of March, PLN 68 million at the end of June and PLN 92 million at the end of September, respectively, and consequently there was an increase in the total capital ratio by 0.19 p.p. at the end of December, 0.16 p.p. at the end of March, 0.61 p.p. at the end of June and 0.63 p.p. at the end of September.

Table 3.10 Comparison of the institution's own funds and capital ratio and leverage ratio with and without the application of IFRS 9 transitional arrangements or expected credit loss, as well as with and without provisional treatment under Article 468 of CRR [Template IFRS 9] after retroactive accounting of profit

| | | 31.12.2024 | 30.09.2024* | 30.06.2024* | 31.03.2024* | 31.12.2023* |
|---|---|---|---|---|---|---|
| **Available capital (amounts)** | | | | | | |
| 1 | Common Equity Tier 1 capital (CET1) | 44 255 | 44 178 | 43 441 | 41 700 | 41 918 |
| 2 | Common Equity Tier 1 (CET1) capital if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 43 445 | 43 368 | 42 631 | 40 951 | 40 420 |
| 2a | Common Equity Tier 1 capital (CET1) if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive according to Article 468 of the CRR | 43 434 | 43 818 | 43 441 | 41 700 | 41 918 |
| 3 | Tier 1 capital (T1) | 44 255 | 44 178 | 43 441 | 41 700 | 41 918 |
| 4 | Tier 1 capital if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 43 445 | 43 368 | 42 631 | 40 951 | 40 420 |
| 4a | Tier 1 capital if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income according to Article 468 of the CRR | 43 434 | 43 818 | 43 441 | 41 700 | 41 918 |
| 5 | Total capital | 47 294 | 45 853 | 45 252 | 43 645 | 43 998 |
| 6 | Total capital, if the IFRS 9 transitional or similar expected loan losses were not applied | 46 484 | 45 043 | 44 442 | 42 896 | 42 500 |
| 6a | Total capital, if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income according to Article 468 of the CRR | 46 473 | 45 493 | 45 252 | 43 645 | 43 998 |
| **RWAs (amounts)** | | | | | | |
| 7 | Total RWAs | 254 517 | 245 727 | 244 613 | 237 399 | 233 510 |
| 8 | Total RWAs if the IFRS 9 transitional or similar expected credit losses were not applied | 253 715 | 244 915 | 243 803 | 236 651 | 232 015 |
| **Capital ratios** | | | | | | |
| 9 | Common Equity Tier 1 capital (as a percentage of the risk exposure amount) | 17,39% | 17,98% | 17,76% | 17,57% | 17,95% |
| 10 | Common Equity Tier 1 capital (as a percentage of the risk exposure amount) if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 17,12% | 17,71% | 17,49% | 17,30% | 17,42% |
| 10a | Common Equity Tier 1 capital (as a percentage of the risk exposure amount) if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Art. 468 of the CRR | 17,06% | 17,83% | 17,76% | 17,57% | 17,95% |
| 11 | Tier 1 capital (as a percentage of the risk exposure amount) | 17,39% | 17,98% | 17,76% | 17,57% | 17,95% |
| 12 | Tier 1 capital (as a percentage of the risk exposure amount) if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 17,12% | 17,71% | 17,49% | 17,30% | 17,42% |
| 12a | Tier 1 capital (as a percentage of the risk exposure amount) if there was no provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Article 468 of the CRR | 17,06% | 17,83% | 17,76% | 17,57% | 17,95% |
| 13 | Total capital (as a percentage of the risk exposure amount) | 18,58% | 18,66% | 18,50% | 18,38% | 18,84% |
| 14 | Total capital (as a percentage of the risk exposure amount) if the IFRS 9 transitional or similar expected credit losses were not applied | 18,32% | 18,39% | 18,23% | 18,13% | 18,32% |
| 14a | Total capital (as a percentage of the risk exposure amount), if there was no provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Article 468 of the CRR | 18,26% | 18,51% | 18,50% | 18,38% | 18,84% |
| **Leverage ratio** | | | | | | |
| 15 | The leverage ratio total exposure measure | 569 033 | 548 240 | 540 493 | 528 485 | 531 811 |
| 16 | Leverage ratio | 7,78% | 8,06% | 8,04% | 7,89% | 7,88% |
| 17 | The leverage ratio if the IFRS 9 transitional arrangements or similar expected credit losses were not applied | 7,65% | 7,92% | 7,90% | 7,76% | 7,62% |
| 17a | The leverage ratio if the provisional treatment of unrealized gains and losses measured at fair value through other comprehensive income, according to Article 468 of the CRR | 7,63% | 7,99% | 8,04% | 7,89% | 7,88% |

* Restated figures are those after retroactive accounting of profit

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

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

The following disclosure has been prepared on the basis of Commission Implementing Regulation (EU) 2024/3172 of November 29, 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council as regards the public disclosure by institutions of the information referred to in Titles II and III of Part Eight of that Regulation and repealing Commission Implementing Regulation (EU) 2021/637. This regulation sets out uniform formats for the disclosure of ESG risks.

In accordance with the CRR, prudential consolidation is applied for the purpose of Pillar 3 disclosures in respect of ESG risks.

## 4.1 Prudential information on environmental, social and governance risks

### 4.1.1 Qualitative information on environmental risks

#### Business strategy and processes

In October 2024, the Bank's Management Board adopted **the Growth and Development Strategy 2025-2027**, in which it identified 7 main pillars that set the Bank Group's objectives. One of these is to be 'Number 1' in financing the energy transition, aiming for a share of over 20% in bank financing and focusing on the following activities:
1) low-carbon energy financing;
2) financing low-carbon buildings;
3) financing the purchase and leasing of zero-emission cars.

In the Strategy, the Bank declared:
1) More than 20% share of bank financing of Poland's energy transition,
2) achieving net-zero 2050 in all emissions bands in line with the Paris Agreement[12]:
   - reducing own emissions by modernising infrastructure and investing in technologies to improve the energy efficiency of buildings (scope 1);
   - using at least 90% of Power from renewable energy sources (scope 2);
   - covering more than 50% of the loan portfolio in the transformation plan by the end of 2027 (scope 3).

The Bank Group's product offering is being tailored to the changing needs of its clients and is gradually being expanded with new in-house solutions as well as solutions developed in cooperation with other institutions, such as green warranties from KUKE[13], to support the competitiveness of Polish companies in the face of rising energy prices and changing business and regulatory requirements. These actions are intended to help redirect capital towards activities that will contribute significantly to the achievement of the European Green Deal goals[14], such as climate neutrality and resilience, zero emissions, protection of biodiversity and ecosystems, transition to a closed loop economy and sustainable use of water and marine resources.

In August 2024, the Bank Group adopted the Green Bond Issuance Framework (*Green Bond Framework*), which builds on the *Green Bond Principles* (2021). The Green Bond Issuance Framework has been published on the Bank's website[15]. Based on the adopted Green Bond Issuance Framework, in September 2024 the Bank issued its first green bonds with a total nominal value of EUR 750 million. The funds raised from the issue will be used to finance/refinance housing loans that meet the conditions set out in this Framework. PKO Bank Hipoteczny S.A. plans to issue green mortgage bonds under this Framework.

In October 2024, the Bank introduced the SLL formula loan in its product offering in the corporate client segment for syndicated financing, which was developed on the basis of the SLLP ( *Sustainability Linked Loan Principles*) principles and guidelines. Work is currently underway on the implementation of further products, which will be dedicated to financing to support sustainable development in both the corporate segment as well as in the corporate and business segment.

The Bank has developed a Transformation Plan, including targets and actions for its own operations and financed issues (Scope 3 - loan portfolio). The Transformation Plan covers 2 sectors, namely power generation (PAC 35.11 and PAC 35.30) and retail real estate. These sectors have been identified as key from the perspective of the Bank Group's loan portfolio. Decarbonisation of these sectors is an important element in achieving the EU's 2050 climate neutrality target. In addition, the decarbonisation of the power generation sector, which is the main source of GHG emissions in Poland, will contribute to changing Poland's energy mix, thereby reducing GHG emissions in all other sectors (the power generation sector underpins the functioning of other sectors of the economy that user the energy generated by this sector).

[12] Paris Agreement ( Paris Agreement ) - the 2015 agreement crowning the 21st UN Climate Change Conference, with the main goal of limiting global warming well below 2°C and ultimately to 1.5°C relative to the pre-industrial era.
[13] KUKE S.A. - Korporacja Ubezpieczeń Kredytów Eksportowych S.A. - an entity that provides export insurance to ensure trade security in high-risk markets, which is guaranteed by the State Treasury.
[14] European Green Deal - a set of policy initiatives from the European Commission with the overarching goal of achieving climate neutrality in Europe by 2050.
[15] https://www.pkobp.pl/relacje-inwestorskie/emisje/emisje-pko-banku-polskiego/emisje-obligacji-w-ramach-programu-emtn.

| SECTOR NAME | SCOPE OF SECTOR EMISSIONS | EMISSION INTENSITY IN THE BASE YEAR - 2023 | EMISSION INTENSITY REDUCTION TARGET 2030 | THE SECTOR'S DECARBONISATION PATH SET OUT |
|---|---|---|---|---|
| Power generation and supply | 1 | 349 kg $CO_2$e/MWh | Achieve 47% reduction in emissions intensity 2023-2030 | International Energy Agency 1.5°C |
| Residential real estate | 1 and 2 | 58,8 kg $CO_2$e/$m^2$ | Achieve 31% reduction in emissions intensity 2023-2030 | By 2030, approaching CRREM 2°C; Target CRREM 1.5°C |

Additionally, in the area of risk, the Bank has been working to:
- build an internal knowledge centre in terms of new green technologies and financing in accordance with the principles of sustainable development, including building data acquisition and analytics mechanisms of the Bank's customers in the ESG incorporating the results of climate stress tests into the Bank's credit policy,
- building credit risk assessment models that take into account ESG elements,

compliance with the EBA Guidelines[16] on Environmental, Social and Governance (ESG) Risk Management. Lending policies are one of the environmental risk management tools within the credit risk framework for selected industries/sectors. In the corporate segment, the Bank has the following policies: Renewable Energy Sources, Carbon-Intensive Energy Sector Chemistry-Oil-Gas, Revenue Real Estate, Construction and building materials, Chemistry-Oil-Gas, Car Dealers and CFM companies, Public Healthcare, Trade, LGU. The policy assumptions are described in the Statement on non-financial information, which is a part of the Report on activities of the PKO Bank Polski Group.

In 2024, the Bank updated its industry policy for the Building Contractors sector, which includes recommendations for financing with sustainability and decarbonisation targets in mind. Further industry policies will be reviewed in the short term. In addition to the above-mentioned policies, the Bank keeps abreast of market developments and trends in various industries/sectors, publishes internal materials (e.g. industry leaflets that identify current market trends) and organises industry meetings. These activities are aimed at gradually changing the structure of the loan portfolio by successively reducing exposure to carbon-intensive entities and building a loan portfolio that supports sustainable development, including in line with the systematics (EU Taxonomy[17]).

## Corporate governance

The Management Board of the Bank defines the risk framework, oversees the implementation of the set objectives, strategies and policies and defines the principles of their management in the context of the risk management in the field of environmental protection. In accordance with their powers, organisational units are responsible for the coordination and management of individual ESG risks and their impact on the Bank's operational risk.

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

The Sustainability Committee supports the Management Board in setting priorities, orientations and targets for sustainability and energy transition, oversees the implementation of the Bank's and the Bank Group's sustainability objectives and initiatives and energy transformation. The Committee also oversees the development of policies and systems to manage sustainability and energy transition within the Bank Group, as well as the arrangements to support the financing of the energy transition. The Committee also oversees the implementation, updating and application of the Bank's internal regulations on sustainable financing, including the *Green Bond Framework*. The Committee is composed of elected members of the Management Board and directors of designated areas. The Committee's work is chaired by the Management Board Vice President, who oversees the Finance and Accounting Area, and deputised by the Management Board Vice President, who oversees the Risk Management Area.

The Operational Risk Committee supports the Management Board in the management of operational risks and, within the scope of its tasks and competences, takes decisions, makes recommendations, recommendations, opinions also with regard to ESG risk-related activities - in cases where operational risks arise from ESG risk factors in the environmental area. Starting from the reporting period for 4Q2023, the Bank includes data on ESG risk factors in its internal operational risk reports.

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

The Credit Risk Department is responsible for the development and creation of solutions and tools that support ESG risk management, including the acquisition of information for ESG risk management and the implementation of solutions that result from generally applicable legislation (e.g. EU Taxonomy, Pillar III disclosure) or regulations of supervisory or auditing bodies regarding ESG risk management. The Credit Risk Department, is also responsible for monitoring strategic credit risk limits and strategic climate risk limits for credit risk, monitoring the use of internal portfolio limits, in particular on climate risk limits, coordinating the implementation of consistent risk management standards across the Bank Group on mitigating the impact of climate factors on individual risks, in particular on the Bank Group's portfolio risk level.

The ESG Public Programmes Department is responsible for supporting the development of the Bank's offering to banking clients: companies, enterprises and corporate banking in terms of products and services linked to public and EU programmes, including those supporting ESG sustainability, in particular climate transformation.

The Bank manages ESG risk at three independent, mutually complementary levels:

[16] EBA - European Banking Authority
[17] EU Taxonomy - Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088.

1) the first level is the business - business units that identify ESG risks at an early stage, carry out ESG risk assessments while establishing customer relationships or during periodic review, conduct a dialogue with the customer to discuss ESG risk-related topics, assess the customer's risk mitigation measures and strategies, and create and implement ESG risk mitigation products,
2) the second level consists primarily of the organisational units of the risk management division, whose task is to carry out an independent and expert assessment in which the ESG risk credit policies have been developed and tasks performed at the first level of the ESG risk associated with transactions are actively supported. The Bank carries out tasks aimed to develop tools for the identification and assessment of ESG risk, development of the climate stress testing process, and seeking integration with other regulatory processes, e.g., ICAAP[18],
3) the third level represents internal audit, which carries out independent assessments of the Bank's management system activities, including ESG risk management. The internal audit plan includes audits which cover their scope, including, among others, verification of the Bank's fulfilment of obligations arising from the ESG regulations in the areas of: granting loans, implementation of disclosures arising from the CRR, remuneration policy or security of key IT infrastructure. Information concerning the identified irregularities, including their materiality assessments, and results of monitoring the actions taken to eliminate them is presented to the Management Board and the Supervisory Board.

Environmental risks are monitored and reported on an ongoing basis in:
1) the Statement on non-financial information, which is a part of the Report on activities of the PKO Bank Polski Group at a frequency of 12 months;
2) this Report at a frequency of 6 months;
3) the Report on the review of the Internal Capital Adequacy Assessment Process (ICAAP) at a frequency of 12 months;
4) the Credit Risk Report at a frequency of 3 months.

The Bank's ‘Remuneration Policy for Employees of the Bank and the Bank Group’ guarantees a consistent remuneration system by, among other things, ensuring compliance with the environmental risk strategy, social policy and corporate governance. The variable remuneration of the members of the Management Board of the Bank depends on the achievement of the ESG objectives included in the Bank's strategy. The Bank does not operate a bonus programme for Supervisory Board Members who are eligible for fixed remuneration. Members of the Supervisory Board assess the Management Board's effectiveness in achieving ESG objectives, which is indirectly linked to their role in the sustainability management system. The remuneration policy for the members of the Supervisory Board and the Management Board of the Bank stipulates that the management objectives of individual Management Board members should, according to the area of responsibility entrusted to them, also take into account criteria such as the Bank's attention to the consideration of the social interest and the Bank's contribution to the protection of the environment and the prevention or elimination of possible negative social impacts of the Bank's activities. In 2024, the Management Board's performance evaluation is influenced by the ratio of women in positions that have a significant impact on the Bank's risk profile. Such a target represents 10% of the Bank's note, which is an indicator that adjusts the amount of variable remuneration.

## Risk management

The Bank manages ESG risk as part of its management of other risks as, due to the nature of ESG risk, it is not a separate risk but a cross-disciplinary risk that can cause the Bank’s individual risks to materialise, in particular credit risk.

Definitions of ESG are included in the ‘Risk Management Strategy at PKO Bank Polski S.A. and PKO Bank Polski S.A. Capital Group’. These are:

1) ESG factors - environmental, social and corporate governance factors that may have a positive or negative impact on clients and counterparties or the Bank's balance sheet items; ESG factors with a negative impact are referred to as ESG risk factors,
2) ESG risk - the risk of negative financial impact on the Bank as a consequence of the current or future impact of ESG risk factors on clients and counterparties or the Bank's balance sheet items.

In the credit portfolio assessment process[19], the Bank adopts a definition of environmental (including climate) physical risk and transition risk in line with the CRR Regulation:

1) physical risk, as part of environmental risk, means the risk of any adverse financial impact on an institution caused by the current or future effects of the physical effects of environmental factors on that institution's counterparties or on the assets it invests in its assets;
2) transition risk, as part of environmental risk, means the risk of any adverse financial effect on an institution caused by the current or future impact of a transition to an environmentally sustainable economy on its counterparties or on its invested assets or on its invested assets.

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

Poland, being a signatory to international agreements that relate to, inter alia, the environment, takes their provisions into account in national legislation.

Accordingly, the Bank Group, acting in accordance with national law, complies, insofar as the Group's activities are concerned, with international agreements.

The Bank verifies and assesses the level of risk generated and compliance with sustainable development, taking into account ESG risks in the short, medium, and long term in its financial, capital, and strategic plans.

The Bank reviews and assesses in terms of the level of risk generated and sustainability compliance (taking into account ESG risks in the short, medium and long term) financial, capital and strategic plans.

At the current stage of development of ESG risk management methodologies, the Bank does not estimate internal capital for this type of risk, but considers that ESG risks can have a significant impact on credit risk and is considering the inclusion of ESG factors in the internal capital adequacy assessment process (ICAAP).

In June 2024, the Bank's Management Board introduced a uniform classification of sustainability financing. The principles take into account the requirements posed by international standards and the regulatory environment, in particular those arising from the EU Taxonomy. The Principles are subject to regular review at least once a year. The conclusions of the review are presented to the Sustainability Committee.

[18] ICAAP (ang. Internal Capital Adequacy Assessment Process) the process of estimating internal capital and capital management used to develop risk measurement and determine internal capital
[19] The Bank is in the process of updating its internal regulations for the assessment of corporate clients, which will detail the division of ESG risk into physical risk and transition risk.

In December 2024, the Management Board of the Bank introduced a regulation on how to assess the fulfilment of the minimum warranties and the implementation of a due diligence mechanism for assessing the negative impact of activities on human rights under the minimum warranties by clients and counterparties of the Bank. The assessment of the fulfilment of the minimum warranties is linked to the examination of the areas of corruption prevention, taxation, fair competition, science, technology and innovation, and human and labour rights. The manner in which the fulfilment of the minimum warranties is assessed is reviewed, at least once a year, for compliance with generally applicable law. The ESG Sustainability Department is responsible for the review. The Bank is currently planning to implement the way it assesses compliance with the minimum warranties in its internal banking processes.

The Bank has, in each case, assessed the impact of environmental, social and governance (so-called ESG) factors on a customer's creditworthiness in the credit process for customers in the corporate segment and customers in the company and enterprise segment that are assessed using the rating method/ The Bank also examines the impact of credit transactions on ESG and classifies them to four categories, from transactions with a positive impact on ESG to those with material negative impact. The lending process also includes an assessment related to the loan transaction. On the one hand, the Bank assesses the impact of a given loan transaction on ESG issues, and on the other hand, it examines how ESG factors affect the loan transaction. When assessing the ESG factors, the Bank takes into account such factors as the risk of climate change and its impact on the customer’s operations, potential influence of the customer on climate, factors related to human capital or health and safety, and governance factors (including the corporate culture and internal audit).

In terms of activities of local government units (LGUs) and lending transactions with LGUs, the Bank applies the principle that their impact on the environment, social and governance issues shall be neutral, provided that the Bank has no personalised information in relation to a particular customer or transaction – in which case the customer and transaction assessment reflects the assessment of such information.

The ESG risk assessment in the credit process is also carried out through credit policies for industries/sectors described in the Statement on non-financial information, which is part of the Report on activities of the PKO Bank Polski Group.

In the first half of 2024, for the purposes of ESG risk management and reporting, the Management Board of the Bank adopted a credit portfolio classification framework that specifically defines the criteria for identifying and classifying exposures that finance environmental, social policy and corporate governance activities. The Bank distinguishes four classes of exposures financing environmental, social policy and corporate governance activities:

1) exposures in support of sustainable development - light green exposures which relate to the financing of business activities that have a positive impact on the environment and, in particular, contribute to the achievement of the environmental objectives described in Article 9 of the EU Taxonomy and relate to the financing of activities that have a positive impact on society and communities;
2) environmentally sustainable exposures (following the systematic approach) - dark green exposures which relate to the financing of economic activities meeting the criteria described in Article 3 of the EU Taxonomy;
3) environmentally neutral exposures - white exposures which relate to the financing of economic activities for which it is not possible to assign an environmental objective and which have not been assigned to the exposure class supporting the sustainable development objectives, to the environmentally sustainable exposure class, and are not assigned to the negative environmental impact exposure class;
4) exposures with negative environmental impacts - brown exposures that involve the financing of economic activities that contribute significant greenhouse gas emissions, air, water and soil pollution, deforestation, waste production, destruction of biodiversity or overuse of natural resources.

The industry in which the Bank’s Group operates does not have a significant direct impact on the climate. This impact manifests itself primarily indirectly through the financing provided to customers. Therefore, the Bank carries out a number of projects and analyses at the customer and portfolio level aimed at developing solutions and tools to support ESG risk management. The Bank analyses exposures in the non-trading book sensitive to:

1) the impact of chronic and sharp physical events related to climate change according to the sector and geographical location of the customer's activity or the location of the collateral in the form of real estate.
2) transition risks associated with the transition to a low-carbon and climate-resilient economy, according to sectors that are major contributors to climate change.

The Bank takes climate risk into account in its assessment of credit collateral, in particular by examining the environmental risk that arises from the use of the property, the impact of environmental factors on its value, including physical risk and energy transition risk. The Bank also analyses exposures in the loan portfolio linked to collateral in the form of developed real estate, according to the size of the EP ratio[20]. The Bank considers the impact of ESG factors on the value of real estate in its valuation of corporate clients' loan collateral. The Bank's regulations require that certificates issued for the property in terms of compliance with environmental standards, in particular an energy performance certificate, be submitted with the appraisal. If the property generates above-average risks, in particular environmental risks, it can only provide supporting collateral. Detailed information on the results of these analyses can be found later in this report. In order to verify the submission of the above-mentioned documents, the Bank obtains from the Central Register of Building Energy Performance and records in the internal database CBN (Central Property Database) data on the energy performance of buildings for all types of developed properties and for premises properties and uses them in the property assessment process.

At the same time, the Bank is developing its approach to the assessment of ESG aspects in collateral analysis - in the retail client segment (companies and businesses), internal regulations for the assessment process of collateral established on commercial properties have been made more specific with regard to the requirement to take into account the impact of ESG factors. The Bank has also adapted the guidelines for valuers, broadening and detailing how to include ESG sustainability aspects in the appraisal report.

An element of environmental risk management is a strategic ESG risk tolerance limit. The measure of this risk tolerance is the quotient of loans to clients in carbon-intensive industries and the value of the Bank's total assets. As at 31 December 2024, the share of loans to clients in carbon-intensive industries was 0.13% (with a tolerance limit for the Bank ≤ 1.6% % and the Bank Group ≤ 1.6%) compared to a value of at the end of 2023 of 0.19% (with a tolerance limit for the Bank ≤ 1.6% and the Bank Group ≤ 1.6%). This limit is monitored quarterly and reported to the Management Board of the Bank.

One of the analytical tools used to assess the resilience of the loan portfolio to environmental risks as part of climate risk management in financial institutions is climate stress testing. The Bank has developed its own climate stress-testing methodology, designed on the basis of standards set by the European Central Bank (hereafter: ECB 2022), NGFS climate scenarios and available recognized publications on the materialisation of climate risk from the perspective of financial institutions' credit losses. It allows a wide range of climate factors to be taken into account, as long as they can be quantified from the perspective of clients' financial statements or variables present in credit risk models. In December 2024, the Bank conducted a climate stress-test of its corporate clients' loan portfolio as at 31 December 2023. It analysed the impact of physical risks (droughts and floods) and the impact of transition risks (political and legal - changes in the price of greenhouse gas emission allowances; technological - costs of switching to low-carbon technologies) on clients' ratings, as well as probability of default (PD) and expected credit loss (ECL) indicators. The scenarios are analysed are analysed

[20] The EP indicator determines the annual demand for non-renewable primary energy required for heating, ventilation, cooling and domestic hot water, and, in the case of public, residential, manufacturing, business and storage buildings, also for lighting.

over 3 time horizons (1 year, 3 years, 30 years), allowing for a thorough analysis of risk in the short as well as the long term. Detailed information on climate stress testing can be found in the Sustainability Report, which is part of the PKO Bank Polski Group Management Report.

The Bank continues to disclose the emissivity of its loan portfolio (Scope 3 Category 13 and 15 from a Bank Group perspective under the *Greenhouse Gas Protocol*). As one of the key milestones in this task, the Bank joined the *Partnership for Carbon Accounting Financials* (PCAF) in December 2023, which has developed a single global standard for counting and reporting GHG emissions for the financial sector. The PCAF methodology quantifies the GHG emissions associated with corporate loans, securities, mortgages and car loans, among others. The results of the GHG emissivity calculation are presented, inter alia, in Formula 1 'Banking portfolio - Indicators of potential transition risk associated with climate change: credit quality of exposures by sector, emissions and residual maturity'. The estimation of the issuance quality of the loan portfolio takes into account information on groups of common credit risks that are used in the client and transaction credit assessment. The Bank uses the calculation of loan portfolio issuance levels to determine loan portfolio decarbonisation paths in the Transformation Plan and in the estimation of transaction risk levels using climate stress testing.

In January 2024, taxonomy surveys were implemented in the Bank, which are key to assessing the fulfilment of the technical eligibility criteria of the EU Taxonomy for targeted financing. The surveys form the basis for obtaining information from the Bank's clients on meeting the minimum requirements that Bank-financed investments should meet to be considered environmentally sustainable. The surveys are used to identify/classify sustainable assets. The systematic data obtained with the taxonomy surveys, in addition to the KPIs[21] extracted from the non-financial reports[22] of clients who are required to report on the Taxonomy, form the basis for the calculation of the GAR[23] green asset index and the BTAR[24] systematic compliance index of the banking portfolio. The Bank is working on identifying (flagging) the Bank's credit exposures that qualify for the systematics, are in compliance with the systematics and relate to financing supporting activities, transition activities or specialised financing. At the same time, the Bank is adapting its IT infrastructure and tools, which will enable more and more ESG data to be extracted, analysed, compiled and aggregated. The above is in response to the Bank's increasing reporting obligations in the coming years.

The ESG risk management requires systemic and sector-specific solutions. The key challenge is the availability of information to assess the ESG risk. The Bank is working to expand its IT systems for collecting, aggregating and managing sustainability data. The Bank systematically analyses the possibilities of obtaining the necessary data for ESG risk management and precautionary reporting.

All banks face a key challenge in developing a systemic solution for obtaining ESG data. This includes, among other factors:
1) physical risks (lack of data allowing for a sector-wide uniform assessment of the impact of floods, droughts, heatwaves, hurricanes, etc., on the non-trading book),
2) the emission levels of customers regarding Scope 1, Scope 2, and Scope 3 emissions.

The Bank Group continuously monitors the risks that arise from changes in ESG regulations addressed to the financial sector. New external regulations that govern climate policy may result in an increase in the legal risks associated with environmental risks in the future. In addition, the Bank participates in the work of the Polish Bank Association and ESG working groups within the framework of interbank cooperation regarding the interpretation of regulations in the ESG area and the development of systemic solutions that will become helpful in preparing ESG disclosures in a transparent and comparable manner for all financial market participants.

In terms of liquidity and funding risks, the Bank considers ESG risks from the point of view of risk factors that have a direct or indirect impact on these risks. Aspects related to ESG risk factors are included in the liquidity risk measures, in the methodology for determining internal capital to cover this risk - by capturing the additional costs caused by the failure to raise sustainability funding on the wholesale market (which are a cheaper type of funding), when rolling over/raising long-term funding sources. The impact of ESG risk within liquidity risk on internal capital is minor. In addition, ESG risk is indirectly included in the stress-testing of deposit outflows, e.g. as a factor in the increase in the cost of the Power transition, which will directly translate into higher current consumption outflows triggered by significantly higher Power bills.

In the process of market risk management, the Bank identifies derivative risks, which are mitigated by setting limits and thresholds and conducting stress tests. In the area of market risk, current valuations of financial instruments do not indicate that transactions differ due to potential ESG aspects. Only within the scope of the held portfolio of corporate bonds valued at fair value, it is possible to take into account an additional ESG risk spread component on the basis of an assessment of the ESG component for individual debt issuers. Such a spread component (and its market volatility resulting from different market perceptions of issuers) can lead to different volatility in the valuation of individual debt instruments. The Bank's analyses indicate a stable, low spread between sustainability issues and other debt securities issues.

Starting from the reporting period for 4Q2023, the Bank includes data on ESG risk factors in its internal operational risk reports. The Bank has assumed that factor E (environmental protection) occurs when:

1) the environment, including the climate affects the Bank's operations, clients, counterparties, i.e. if an operational event results from the negative effects of the materialisation of:
   - physical risks, i.e. extreme/urgent events in the environment, e.g. storms, floods, fires or heat waves;
   - long-term effects of environmental change, e.g. temperature change;
2) The bank, clients, customers, contractors negatively affect the environment, i.e.:
   - transition risk, i.e. the event relates to energy transition, e.g. financing of mines/investments/companies with an adverse impact on the on the environment, if this is prohibited by law or the Bank's internal policy, or
   - if an operational event will result in an adverse environmental impact, e.g. environmental pollution by the Bank.

The Bank monitors the impact of environmental risks (including physical risks and transition risks) on its reputation risk, including greenwashing risk , by analysing publicly available information about the Bank, primarily publications in the mass media that have a negative impact on the Bank's image and concern all areas of its business. In addition, the Bank, in order to obtain information on risks of an image nature, including those arising from environmental

[21] The Turnover KPI ( *Key Performance Indicator Turnover*) - a key performance indicator on turnover, which indicates what % of a company's turnover is in line with the systematic, and the CapEx KPI ( *Key Performance Indicator CapEx*) - a key performance indicator on capital expenditure, which indicates what % of a company's capital expenditure is in line with the systematic

[22] 'Non-financial report' in practice takes different names: statement on non-financial information, ESG report. Current regulations give the name 'sustainability report'. The preparation of this report results from the disclosure obligation described in Article 19a or 29a of Directive 2013/34/EU of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006 43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC, as amended.

[23] GAR ( *Green Asset Ratio*) - a key performance indicator for credit institutions that reflects the extent to which funded activities comply with the systematic approach. The indicator is presented later in the report in Template 6 - Summary of key performance indicators for systematically compliant exposures.

[24] The *Banking Book Taxonomy Alignment Ratio*(BTAR) is presented later in this report in Template 9 - Mitigating measures: Banking Book Taxonomy Alignment Ratio.

protection, obtains information from the Bank's units, inter alia, as part of a cyclical study on the identification of sources and factors of reputational risk. Bank units, as part of their ongoing activities, also have the opportunity to report identified risks, including ESG risks.
Risks of non-compliance and ESG conduct are identified by analysing internal regulations, advertising materials and monitoring adaptations to regulatory changes. This also includes assessing the actions of regulators, market standards, assessing the potential for conflicts of interest and checking regulations and marketing messages for greenwashing. These activities are carried out on an ongoing basis, and risk identification takes place at least once a year. ESG risks are reported as part of compliance risk reporting if the ESG factors included in the compliance risk are material.

The Bank carries out a materiality assessment of traditional banking risks, during which it identifies a catalogue of material and monitorable risks. The 2024 survey considers the impact of ESG factors, with a particular focus on climate risk factors, in the charters of those risks where the Bank notes their potential materialisation, i.e. credit risk, market risk (interest rate risk, foreign exchange risk), liquidity risk (including funding), operational risk, reputation risk, compliance risk and conduct risk.

Table 4.1 ESG risk mapping on traditional risks:

| Type of the bank's risk | The impact of physical risk | The impact of transformation (transition) risk |
|---|---|---|
| Credit risk | physical risk through transmission channels (increased costs, decreased revenues, decreased collateral value) may have a negative impact on borrowers and reduce their ability to service debt or decrease the value of the loan collateral. | EU regulations or national regulations may negatively affect the ability of entities operating in high-emission sectors, such as energy, the fuel sector, transport and logistics, to service their debt. |
| Market risk | serious physical events may lead to changes in market expectations and may cause sudden revaluation, greater volatility and losses in asset values in some markets. | transformation risk factors may cause sudden revaluation of securities and derivative instruments, for example in relation to products associated with asset-stricken industries. |
| Liquidity risk | Climate change, including natural disasters and sudden weather phenomena, may cause a sudden increase in demand for funds. | transformation risk factors may affect the profitability of some business lines and lead to the risk of limited repayment of loans granted by customers who do not have time to implement solutions, or a decrease in the volume of funds invested by these customers in the Bank; sudden revaluation of securities, e.g., due to stranded assets, may lower the value of the Bank's high-quality liquid assets, thereby affecting liquidity buffers; a downgrade in the Bank's ESG rating may affect financing risk by making it difficult to attract new investors and increasing financing costs. |
| Operational risk | extreme/acute environmental events (storms, floods, fires or heat waves) or prolonged effects of environmental changes (e.g. temperature change) may prevent or hamper business operations of, among others, the Bank's branches | an operational event related to the energy transition (e.g. financing of mines/investments/companies with an adverse environmental impact if the law or the Bank's internal policy prohibits it) may result in penalties for non-compliance with guidelines, standards, legal costs (lawsuits from customers or market participants) |
| Reputation risk | climate change, including natural disasters, sudden weather phenomena, as well as long-term environmental changes may affect the Bank's operations (e.g. generate operational difficulties) and the activities of the Bank's stakeholders (e.g. cause an unexpected increase in cash requirements), which may have an indirect impact on the Bank's image | the financing of carbon-intensive sectors negatively perceived by regulators, stakeholders, market participants and rating agencies may affect the Bank's reputation and, consequently, result in loss of profits or a decrease in market capitalisation |
| Compliance and conduct risks | may arise from the materialisation of the above risks, including in the event of an inability, or significant impediment, to conduct the Bank's business, resulting, for example, in an inability to fulfil the Bank's obligations | the Bank's failure to comply with changes in the law, external requests from supervisory and control authorities and market standards may lead to the materialisation of compliance risk and thus to the imposition of fines by supervisory and control authorities on the Bank, or to clients making claims in court proceedings |

### 4.1.2 Qualitative information on social risks

#### Business strategy and processes

In its Growth and Development Strategy 2025-2027, the Bank set out its social responsibility objectives, focusing on the following areas:

1) closing the gender pay gap to less than 5% - achieving this goal will require systematic monitoring of remuneration and implementation of systemic solutions at all levels of the organisation;
2) increasing the representation of the underrepresented gender in the Bank's authorities - aiming to achieve at least 33% of the underrepresented gender in the Bank's authorities (Management Board and Supervisory Board). In addition, in the context of senior management positions (B-1, B-2), the Bank plans for their share to be at least 40%. In the long term, it assumes a gender balance in these positions;
3) Educational initiatives - achieving the ambitious target of carrying out 6,000 educational initiatives per year, which will be geared towards building the competences of the future, including financial education, so that the Bank's activities have a positive impact on the development of society, the improvement of professional skills and the financial inclusion of different social groups.

The Bank plans that by 2027:

1) at least 33% of positions in the Bank's authorities are held by women;
2) the participation rate of women in senior management positions is at least 40%;
3) the gender pay gap is less than 5%;
4) inclusion of ESG targets for Management Board and MRT staff in remuneration schemes;
5) more than 90% of employees have completed mandatory ESG training.

The strategic indicators are monitored on a cyclical basis and their implementation is presented annually in the Sustainability Report, which is part of the PKO Bank Polski S.A. Group Activity Report.

The Bank ensures effective mechanisms to counter money laundering and terrorist financing by:

1) assigning personal responsibility for the AML/CFT process;
2) strengthening the AML/CFT supervision of the Bank's Group entities by adopting the 'Strategy for Counteracting Money Laundering and Financing of Terrorism in the PKO Bank Polski S.A. Capital Group'. and the 'Group Policy for Counteracting Money Laundering and Financing of Terrorism in the PKO Bank Polski S.A. Capital Group'. The regulations these are aligned with the regulator's guidelines;
3) Strengthening of the Bank's anti-money laundering and counter-terrorist financing supervision through the adoption of the 'Strategy for Counteracting Money Laundering and Terrorist Financing at PKO Bank Polski S.A.'.

In order to counteract money laundering and terrorist financing, as well as to minimise operational risk, the Bank applies specific restrictive measures (freezing of assets, benefits derived from these assets and limiting their availability). Where a risk of money laundering or terrorist financing is identified, at the request of the General Inspector of Financial Information or the public prosecutor, and in cases where financial security measures cannot be applied, the Bank stops the transaction or blocks the account in accordance with the provisions of the Law on the prevention of money laundering. The Bank Group keeps abreast of the geopolitical situation and implements appropriate regulations in response to the sanctions imposed by the regulator.

The Bank develops AML and terrorist financing IT systems on an ongoing basis to mitigate the risks to which the Bank Group is exposed.

The PKO Bank Polski Foundation is committed to social welfare, life and health protection and ecology. The Bank and the PKO Bank Polski Foundation carry out projects jointly or separately. The PKO Bank Polski Foundation encourages employees of all entities in the Bank's Capital Group to get involved for the benefit of local communities. Currently, there are more than 600 volunteers. Their support activities in 2024 involved involvement in projects initiated by the PKO Bank Polski Foundation, such as: Eco-volunteering, the PKO Charity Run, the Become a Bank Santa campaign and helping flood victims.

The bank continues its #JestemUSiebie initiative, which builds awareness around inclusive collaboration. The programme includes webinars, workshops for employees and managers and live events. During these events, topics related to the use of diversity in building effective collaboration and communication are discussed. The videos, available to all employees, provide insights into unconscious biases or neurodiversity. Towards the end of 2024, the programme gained an additional #Re-USiebie event, where the Bank supports parents who are returning to work after a long-term absence.

In November 2024, a #RotundaRÓżnorodności event took place, where invited guests shared their experience and knowledge of diversity. The event resulted in the signing of a Diversity Charter. Following this, the Bank launched the mandatory e-learning course 'JestemUSiebie: przyjazne środowisko zaczyna się od Ciebie', which discusses the topics of diversity, empathetic communication and unconscious bias.

In 2024, the Bank promoted its values - Partnership, Development and Influence - through the implementation of an awareness campaign under the slogan 'naWARTOŚCIowani Razem tworzymy całość'. The Bank's values indicate expected behaviours and attitudes, which include aspects of collaboration, mutual respect, respect and harnessing diversity. In addition, the Bank has a programme called #NoweBrzmieniePrzywództwa, which supports female and male leaders in leadership development at the Bank. The programme provides a cafeteria of development activities focused on cultural change priorities and consistent with the Bank's leadership model.

In the first half of 2024, the Bank updated its Code of Ethics based on the above values. In March 2024, the Bank conducted a full survey under the theme #JakCiSięPracuje, which illustrates the 'employee eNPS', i.e. a measure of employees' propensity to recommend the Bank as a place to work, as well as 14 other indices influencing engagement at work. Abbreviated editions of this survey in the form of a 'pulse check' took place in the remaining quarters of 2024.

The Bank employs people from different generations. As a result, the Bank tailors its training offerings to appeal to all employees. The Bank offers traditional stationary workshops, online workshops or workshops using modern solutions and tools such as VR goggles and educational games. Trainings on the topic of generational diversity included the workshops: 'Empathic leadership for the Generation Z manager' and 'Intergenerational dialogue. How to make it effective'.

#### Corporate governance

The responsibility of the Management Board in terms of social risk concerns management and supervisory actions as regards to the shaping of internal regulations and the Bank's operating strategy, taking into account, among others, the following issues:

1) adherence to human and labour rights, determination of appropriate attitudes and behaviours, prevention of ethical violations, prevention of bullying and discrimination,

2) cooperation with the Bank's counterparties on principles consistent with corporate social responsibility, as well as
3) monitoring the implementation of accepted principles in the area of social risk management, including within established mechanisms of control and mandatory reporting.

Social risk issues are continuously monitored and reported on, and internal reporting on this matter takes on a multi-dimensional form. The most important issues in this area concern the monitoring and reporting of compliance with ethical standards, including violations of labour rights, as well as the assessment of the functioning of the compensation policy. Members of the Management Board are informed quarterly about employee complaints in the areas they supervise and the way in which the case has been resolved, and the President of the Management Board is informed quarterly of all employee complaints.

The verification of adherence to ethical standards within the Bank, including monitoring of risk associated with violations, with a comprehensive approach that includes:
1) ethics of Bank employees and other persons performing tasks for the Bank,
2) ethics in relations with customers,
3) ethics in business activity,
4) ethics in relations between the Bank and its environment,

is subject to an annual assessment carried out by the Management Board. The Supervisory Board is informed at least once a year of the results of the assessment carried out by the Management Board. The assessment of the functioning of the Bank's compensation policy, in terms of its compliance with 'Corporate Governance Principles for Supervised Institutions' issued by the PFSA, as well as other regulatory requirements, is carried out annually as part of a review of the Bank's corporate governance. The report is accepted by the Supervisory Board and then presented to the General Meeting.

The Bank has an anonymous reporting system through which employees, contractors and other eligible persons can report actions that are not in compliance with the law, internal regulations or the Bank's ethical standards. Anonymous reports can be submitted electronically, by telephone or by letter, as well as through a dedicated, independent and encrypted communication channel for reporting[25]. Those who choose to report anonymously are guaranteed complete confidentiality of their data and the information provided. If the reporter's identity can be determined from the content of the report, this information is deleted by the recipient of the report before further action is taken. Whistleblowing employees, even if their allegations are not substantiated, are protected, in particular against actions of a repressive nature, discrimination or other types of unfair treatment. In the event of experiencing any reprisals, there is the possibility of obtaining assistance from the President of the Management Board of the Bank. Information on reports of irregularities and the results of their verification are reported periodically to the Management Board of the Bank and the Supervisory Board as part of the quarterly compliance risk reports. Once a year, the Supervisory Board assesses the adequacy of the anonymous reporting system in place at the Bank.

The 'Policy for remunerating the employees of the Bank and the Bank's Group' applies within the Bank's Group, taking into account social risk and providing a consistent remuneration system, among other things, by shaping the level of remuneration based on market trends, job valuation, ensuring gender-neutral practices in the area of employee compensation within the Bank's Group, and ensuring compliance with the strategy in the area of environmental, social, and management-related risks.

The assessment of the achievement of ESG-related targets is appropriately included in the assessment of the Bank's Management Board members and key managers as part of the target accounting for the determination of variable remuneration.

## Risk management

As part of social risk management, national and European supervisory guidelines, best practices of the Warsaw Stock Exchange[26], recommended benchmark values, as well as market standards are utilised, which include:
1) striving for gender balance in the composition of management bodies and achieving a minimum representation of 30% of the underrepresented gender,
2) maintaining a minimum of 40% of women in management positions in the overall number of managers.

The Bank continuously monitors the changing regulatory environment in the above scope and updates its policies and other internal regulations as part of social risk management.

As part of social risk management in terms of gender pay equality, the method developed by the financial market is applied to determine the relationship between the average pay of women and men in the Bank, based on the weighted average of the total remuneration paid in a given year.

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

In socially sensitive aspects such as diversity of employment, the level of employee satisfaction that results from the standards implemented and working conditions, employee rights, anti-bullying and anti-discrimination, the Bank monitors on an ongoing basis employee satisfaction, employee turnover rates, including the rate of voluntary departures, the level of employment of women and men in key managerial positions. On a cyclical basis, at least once a year, the Bank reviews remuneration, taking into account the valuation of positions, and determines appropriate action strategies in this respect.

Social risk may materialise in particular as:
1) operational risk, which takes into account the impact of socially harmful events, such as unequal treatment of a group of employees or violation of data protection or disclosure requirements towards customers, which may result in financial losses for the Bank's Group resulting from lawsuits or fines imposed by supervisory authorities,
2) reputation risk, which, as a risk arising from the Bank's failure to consider the public interest in its activities, may relate to:
   - employees - when unethical practices, acts contrary to the law, supervisory recommendations and best practices are undertaken in relation to employees, including, in particular, failure to respect human rights and labour law, or a lack of transparency in internal and external communication regarding employee issues, including in external reporting,
   - customers - when unethical practices, acts contrary to the law, supervisory recommendations and best practices are undertaken in relation to customers, including, in particular, failure to ensure a sufficient level of security, including data protection, failure to comply with disclosure requirements, participation in projects that are controversial to the public, or dissemination of claims that may amount to greenwashing,

[25] https://www.pkobp.pl/sygnanet/.
[26] 'Dobre Praktyki Spółek Notowanych na GPW 2021. - Corporate governance principles for joint-stock companies that are issuers of shares, convertible bonds or bonds with priority rights that are admitted to trading on a regulated market operated by the Warsaw Stock Exchange.

- other stakeholders – when unethical practices, acts contrary to the law, supervisory recommendations and best practices are undertaken in relation to stakeholders, as well as the selection of counterparties who do not represent the highest ethical standards in their actions or who have been found to be in material breach of laws, including ESG laws.

In notice of the banks' key role in financing the economy, the Bank continues to develop its employees' awareness in the area of sustainability, conducts intensive educational activities, and builds core and expert competencies to enable the Bank's effective ESG transformation. The organisation of live events started last year as part of the #ESGo! initiative continued in 2024. At the online meetings organised, topics from greenwashing, climate change and carbon footprint and corporate climate competitiveness were discussed. In 2024, 18,401 employees participated in ESG conferences and trainings. The majority of the Bank's employees attended the training 'ESG - sustainability from the Bank's perspective', which aimed to explain what ESG is and highlight the Bank's role in the implementation of ESG objectives. Similarly to last year, some employees started a Postgraduate Course on ESG and sustainability, some employees continued or are continuing their education in 5 courses of study. In addition, in the context of employee education and competence development, the Bank enabled employees to participate in a number of new development activities, including the live event #TimeToDevelop (promotion of the general development offer for the month), the Development Impulse podcast, or access to the Application Zone, e.g. hard training courses on EXCEL, SQL, Python, among others. A Foreign Language Zone was also launched, which enables self-learning on a language platform, participation in meetings conducted in English 'Speaking club", participation in monthly language webinars and use of recommended books for learning foreign languages. In addition, as part of measures to support education, an ESG training standard has been adopted in 2024, which defines the scope of knowledge and competences in the ESG area, together with the identification of target groups requiring training.

As part of its credit risk assessment of corporate clients, the Bank assesses social and labour issues and issues of respect for human rights. The financial activities and ventures undertaken by the client (counterparty) represent an investment in human capital or communities. Inequality risk, social cohesion and inclusion and labour relations are assessed. At the lending and monitoring stage, factors related to a client's social policy are taken into account in the expert assessment of that client's credit risk and reflected in the form of a rating and in the ESG category of the transaction in question.

The Bank is working to improve the methods and possibilities of using tools to assess social ESG risk factors at the lending and monitoring stage.

In the case of companies and businesses, the impact of socially harmful events occurring at a counterparty on its financial performance and the way in which this risk is managed is assessed at the credit granting and monitoring stage (applies to clients assessed using the rating method with exposures above PLN 1 million).

With regard to operational risk management, starting from the reporting period for 4Q2023, the Bank includes data on ESG risk factors in its internal operational risk reports. The Bank has assumed that factor S (social policy) occurs when an operational event relates to the Bank's failure to take into account the social interest in its operations, in particular in the case of employees, customers and counterparties.

### 4.1.3 Qualitative disclosures on corporate governance risks

#### Corporate governance

As part of the credit risk assessment of corporate clients, the Bank assesses factors related to the client's corporate governance. The following are assessed such as organisational structure and governance, compliance of the risk management process, organisational and supervisory culture, transparency and management reporting. At the lending and monitoring stage, the client's corporate governance factors are taken into account in the expert assessment of that client's credit risk and reflected in the form of a rating and in the ESG category of the transaction.

The assessment of corporate governance-related ESG risk factors is based on an expert assessment conducted on the basis of the client's non-financial information and publicly available data. This assessment may affect the client's rating level. The Bank is working to improve the methods and feasibility of using tools to assess corporate governance risk factors at the lending and monitoring stage, including exploring the use of external business intelligence and databases, e.g. BIK[27]. In the short term, the Bank plans to update this assessment method.

For companies and corporates, the impact of corporate governance factors on the financial performance of the company and the way corporate governance risks are managed is assessed at the time of lending and monitoring (applies to clients assessed using the rating method with exposures above PLN 1 million).

The Bank applies the 'Code of Ethics for Suppliers or Bidders Cooperating with PKO Bank Polski S.A.' implemented in April 2022. as part of procurement proceedings. The Code of Ethics organises the requirements in the Bank-supplier/bidder-external environment relationship taking into account corporate social responsibility in terms of, inter alia, information security, prevention of corruption and conflicts of interest, environmental protection and supply chain relations. Suppliers/Bidders should analyse their activities with due diligence in terms of environmental protection, e.g. $CO_2$ emissions, waste water management, waste disposal, noise reduction, biodiversity protection. In line with the aforementioned Code of Ethics, the Bank does not accept any form or manifestation of forced labour, unauthorised child labour or work that does not comply with health and safety regulations.

Following the 'Code of Ethics for Suppliers or Bidders Cooperating with PKO Bank Polski S.A.' introduced in April 2022. in its procurement procedures, the Bank has introduced criteria for all ESG areas to be used in the evaluation of suppliers in procurement processes in all tender procedures.

In the second half of 2024, the Bank undertook work on an amendment to the 'Code of Ethics for entities cooperating with PKO Bank Polski S.A. in the procurement process. The project envisages the introduction of more detailed standards and rules for cooperation in the context of the new EU regulations. The Bank plans for 70% of its suppliers and partners to declare compliance with the Code of Ethics by 2027.

The Bank Group aims to harmonise requirements for the purchase of goods and services. The Bank continues to work on adapting the requirements of the CSRD[28], CSDD[29] and the EU Taxonomy regulation on meeting minimum warranties to its purchasing processes. Efforts are being made to be able to verify all bidders in the purchasing platform with regard to the general ESG principles.

In the first half of 2024, the Bank's comprehensive efforts to realistically integrate ESG aspects into the purchasing process were recognized by the Responsible Business Forum in its report 'Responsible Business in Poland 2023. Good practices'. The publication is the largest overview of ESG initiatives in Poland.

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[27] Biuro Informacji Kredytowej S.A. - an institution established under Article 105 clause 4 of the Banking Law, has the statutory right to process data constituting banking secrecy in order to assist banks and SKOKs in assessing the creditworthiness of their clients.
[28] 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
[29] 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 ( *Corporate Sustainability Due Diligence Directive*).

In June 2024, the Bank's procurement processes were positively reviewed by the world's largest procurement organisation, CIPS ( *Chartered Institute of Procurement and Supply*), and the Bank will again receive the *Procurement Excellence* certificate confirming the application of the best market standards in the Bank's purchasing processes.

## Risk management

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

The Bank makes every effort to ensure that, among other things:
1) products are adequate to the needs of the customers,
2) the manner and form of proposing the purchase of products are adequate to their nature,
3) reliable, transparent, comprehensive, and truthful information on the product is provided to customers before and during the implementation of the agreement, within the scope provided by law and market practice, which eliminates the potential risk of greenwashing.

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

The Bank requires its employees and entities acting on its behalf to comply with ethical attitudes, such as honesty, integrity, and professionalism, specified in the ‘PKO Bank Polski SA’s Code of Ethics’ and the ‘Code of Banking Ethics (Good Banking Practices) of the Polish Bank Association’.

As the Bank's transformation continues, internal purchasing regulations are changing in a way that takes into account sustainable operations. In the first half of 2024, work began on a comprehensive revision of the purchasing regulations to incorporate the Bank's changes, including the environmental and social impact of the supply chain, into the new general regulations.

From the 4Q2023 reporting period onwards, the Bank includes ESG risk factor data in its internal operational risk reports. The Bank has assumed that a G-factor (corporate governance) occurs when an operational event is due to mismanagement, e.g. business model, organisational culture, information policy, information transparency, ethics, remuneration policy, internal control and risk management systems, anti-corruption, fraud and money laundering, or through unethical business conduct.

## 4.2 Quantitative information on transition risk and physical risk related to climate change

The Bank's Group has developed a policy of disclosing information on transition risk and physical risk related to climate change, in accordance with the applicable regulation on implementing technical standards (ITS[30]). The limited availability of certain data (e.g., actual information on energy efficiency, exact coordinates of the place of operation) requires the use of expert estimates for some of the data disclosed in the following template.

Table 4.2 Non-trading book – Indicators of potential climate change transition risk: credit quality of exposure by sector, emissions and residual maturity [Template 1]

| | 31.12.2024 | Gross carrying amount (mln EUR) | | | | | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (mln EUR) | | | GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent) | | GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Sector/subsector | | Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation | Of which environmentally sustainable (CCM) | Of which stage 2 exposures | Of which non-performing exposures | | Of which Stage 2 exposures | Of which non-performing exposures | | Of which Scope 3 financed emissions | | | | | | |
| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
| 1 | Exposures towards sectors that highly contribute to climate change* | 22 338 | 1 285 | 42 | 4 882 | 1 566 | - 1 073 | - 357 | - 596 | 15 941 041 | 9 285 868 | 15,16% | 17 209 | 3 318 | 1 788 | 23 | 4 |
| 2 | A - Agriculture, forestry and fishing | 569 | - | - | 194 | 29 | - 39 | - 18 | - 16 | 792 157 | 204 499 | 0,53% | 417 | 145 | 7 | - | 4 |
| 3 | B - Mining and quarrying | 297 | 78 | 1 | 115 | 1 | - 2 | - 2 | - 1 | 304 310 | 111 517 | 44,73% | 203 | 94 | - | - | 3 |
| 4 | B.05 - Mining of coal and lignite | 73 | 73 | - | 73 | - | - 1 | - 1 | - | 138 320 | 46 650 | 66,09% | 34 | 40 | - | - | 3 |
| 5 | B.06 - Extraction of crude petroleum and natural gas | 0 | 0 | - | - | - | - | - | - | 31 | - | 102,62% | 0 | - | - | - | 3 |
| 6 | B.07 - Mining of metal ores | 146 | - | 1 | - | - | - 0 | - | - | 98 823 | 42 076 | 57,42% | 99 | 47 | - | - | 3 |
| 7 | B.08 - Other mining and quarrying | 74 | - | - | 42 | 1 | - 2 | - 1 | - 1 | 58 840 | 20 056 | 0,61% | 66 | 8 | - | - | 3 |
| 8 | B.09 - Mining support service activities | 4 | 4 | - | 1 | 0 | - 0 | - 0 | - 0 | 8 296 | 2 736 | 7,04% | 4 | - | - | - | 2 |
| 9 | C - Manufacturing | 6 996 | 136 | 21 | 1 684 | 723 | - 406 | - 126 | - 250 | 7 113 142 | 5 155 260 | 17,88% | 5 951 | 987 | 58 | 1 | 3 |
| 10 | C.10 - Manufacture of food products | 1 339 | - | 0 | 204 | 20 | - 36 | - 18 | - 13 | 1 699 204 | 1 426 538 | 2,75% | 1 154 | 181 | 4 | - | 2 |
| 11 | C.11 - Manufacture of beverages | 314 | - | - | 3 | 4 | - 4 | - 0 | - 2 | 453 315 | 396 593 | 1,10% | 311 | 3 | - | - | 2 |
| 12 | C.12 - Manufacture of tobacco products | 3 | - | - | 1 | - | - 0 | - 0 | - | 3 000 | 2 614 | 3,42% | 3 | - | - | - | 1 |
| 13 | C.13 - Manufacture of textiles | 52 | - | - | 26 | 2 | - 2 | - 1 | - 1 | 18 533 | 12 023 | 1,81% | 39 | 11 | 2 | - | 3 |
| 14 | C.14 - Manufacture of wearing apparel | 25 | - | - | 6 | 2 | - 1 | - 0 | - 1 | 8 497 | 4 034 | 3,63% | 22 | 2 | 0 | - | 3 |
| 15 | C.15 - Manufacture of leather and related products | 11 | - | - | 4 | 0 | - 0 | - 0 | - 0 | 4 402 | 2 807 | 2,35% | 10 | 0 | 0 | - | 2 |
| 16 | C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials | 262 | - | - | 139 | 16 | - 22 | - 13 | - 8 | 139 863 | 73 551 | 5,68% | 211 | 47 | 4 | - | 3 |
| 17 | C.17 - Manufacture of pulp, paper and paperboard | 199 | - | - | 26 | 5 | - 5 | - 1 | - 3 | 99 542 | 65 329 | 1,13% | 137 | 56 | 6 | - | 4 |
| 18 | C.18 - Printing and service activities related to printing | 98 | - | - | 12 | 5 | - 5 | - 1 | - 4 | 42 018 | 26 367 | 2,10% | 80 | 13 | 4 | - | 4 |
| 19 | C.19 - Manufacture of coke oven products | 146 | 136 | 1 | 1 | 87 | - 18 | - 0 | - 18 | 361 859 | 253 407 | 92,25% | 67 | 79 | - | - | 4 |
| 20 | C.20 - Production of chemicals | 880 | - | 0 | 105 | 385 | - 131 | - 6 | - 122 | 1 524 646 | 879 160 | 58,46% | 837 | 44 | - | - | 2 |
| 21 | C.21 - Manufacture of pharmaceutical preparations | 71 | - | - | 4 | 0 | - 0 | - 0 | - 0 | 42 623 | 23 750 | 1,83% | 64 | 6 | - | 1 | 5 |
| 22 | C.22 - Manufacture of rubber products | 632 | - | 3 | 266 | 6 | - 27 | - 21 | - 3 | 526 599 | 288 859 | 10,39% | 484 | 142 | 5 | - | 3 |
| 23 | C.23 - Manufacture of other non-metallic mineral products | 262 | - | - | 87 | 5 | - 12 | - 9 | - 2 | 170 346 | 87 240 | 1,26% | 228 | 29 | 4 | - | 3 |
| 24 | C.24 - Manufacture of basic metals | 175 | - | 2 | 20 | 16 | - 10 | - 3 | - 7 | 116 250 | 72 922 | 31,96% | 166 | 8 | 0 | - | 2 |
| 25 | C.25 - Manufacture of fabricated metal products, except machinery and equipment | 880 | - | 7 | 196 | 51 | - 41 | - 15 | - 22 | 1 069 272 | 903 841 | 25,48% | 782 | 86 | 12 | - | 3 |
| 26 | C.26 - Manufacture of computer, electronic and optical products | 68 | - | - | 7 | 0 | - 0 | - 0 | - 0 | 20 864 | 16 426 | 4,37% | 59 | 9 | 0 | - | 2 |

[30]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 the disclosure of environmental, social and corporate governance risks.

| | 31.12.2024 | Gross carrying amount (mln EUR) | | | | | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (mln EUR) | | | GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent) | | GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Sector/subsector | | Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation | Of which environmentally sustainable (CCM) | Of which stage 2 exposures | Of which non-performing exposures | | Of which Stage 2 exposures | Of which non-performing exposures | | Of which Scope 3 financed emissions | | | | | | |
| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
| 27 | C.27 - Manufacture of electrical equipment | 317 | - | - | 170 | 4 | - 18 | - 17 | - 0 | 308 118 | 278 206 | 17,07% | 249 | 67 | 1 | - | 3 |
| 28 | C.28 - Manufacture of machinery and equipment n.e.c. | 295 | - | 6 | 64 | 19 | - 11 | - 2 | - 8 | 98 614 | 73 924 | 13,56% | 219 | 75 | 1 | - | 3 |
| 29 | C.29 - Manufacture of motor vehicles, trailers and semi-trailers | 326 | - | 2 | 57 | 42 | - 32 | - 5 | - 24 | 137 445 | 114 692 | 18,34% | 277 | 46 | 3 | - | 3 |
| 30 | C.30 - Manufacture of other transport equipment | 163 | - | - | 88 | 38 | - 4 | - 0 | - 3 | 42 238 | 36 638 | 1,40% | 155 | 8 | - | - | 2 |
| 31 | C.31 - Manufacture of furniture | 262 | - | - | 136 | 8 | - 15 | - 10 | - 4 | 119 959 | 59 499 | 6,08% | 216 | 42 | 4 | - | 3 |
| 32 | C.32 - Other manufacturing | 67 | - | - | 26 | 2 | - 3 | - 1 | - 1 | 25 962 | 13 211 | 5,17% | 55 | 10 | 2 | - | 3 |
| 33 | C.33 - Repair and installation of machinery and equipment | 150 | - | - | 36 | 6 | - 5 | - 1 | - 3 | 79 975 | 43 629 | 7,72% | 124 | 22 | 5 | - | 3 |
| 34 | D - Electricity, gas, steam and air conditioning supply | 1 344 | 520 | 19 | 95 | 3 | - 19 | - 7 | - 2 | 2 025 825 | 1 185 055 | 39,38% | 591 | 258 | 477 | 18 | 8 |
| 35 | D35.1 - Electric power generation, transmission and distribution | 1 175 | 430 | 17 | 61 | 3 | - 15 | - 4 | - 2 | 1 640 630 | 914 645 | 37,46% | 458 | 233 | 466 | 18 | 9 |
| 36 | D35.11 - Production of electricity | 1 143 | 430 | 14 | 60 | 3 | - 15 | - 4 | - 2 | 1 555 076 | 890 132 | 36,23% | 426 | 233 | 466 | 18 | 9 |
| 37 | D35.2 - Manufacture of gas; distribution of gaseous fuels through mains | 90 | 90 | 2 | 0 | - | - 1 | - | - | 288 581 | 248 384 | 97,71% | 90 | 0 | - | - | - |
| 38 | D35.3 - Steam and air conditioning supply | 79 | - | 0 | 35 | - | - 3 | - 3 | - | 96 614 | 22 026 | 1,39% | 43 | 25 | 11 | - | 6 |
| 39 | E - Water supply; sewerage, waste management and remediation activities | 487 | - | - | 122 | 6 | - 13 | - 7 | - 4 | 172 662 | 52 328 | 1,69% | 261 | 35 | 192 | - | 8 |
| 40 | F - Construction | 1 343 | - | 1 | 385 | 121 | - 114 | - 33 | - 73 | 651 075 | 316 966 | 6,35% | 1 245 | 66 | 31 | 0 | 3 |
| 41 | F.41 - Construction of buildings | 537 | - | 0 | 154 | 53 | - 52 | - 12 | - 37 | 213 410 | 125 073 | 8,84% | 495 | 27 | 15 | 0 | 3 |
| 42 | F.42 - Civil engineering | 238 | - | 1 | 69 | 11 | - 14 | - 6 | - 7 | 138 395 | 71 578 | 4,04% | 223 | 14 | 2 | - | 3 |
| 43 | F.43 - Specialised construction activities | 567 | - | - | 162 | 57 | - 48 | - 15 | - 30 | 299 270 | 120 316 | 4,95% | 527 | 25 | 14 | - | 3 |
| 44 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles | 4 769 | 257 | 0 | 782 | 236 | - 201 | - 56 | - 120 | 2 606 922 | 1 684 328 | 20,76% | 4 205 | 500 | 64 | 0 | 2 |
| 45 | H - Transportation and storage | 3 084 | 295 | - | 822 | 281 | - 120 | - 36 | - 65 | 2 011 966 | 501 178 | 7,68% | 2 316 | 629 | 139 | - | 4 |
| 46 | H.49 - Land transport and transport via pipelines | 2 380 | 295 | - | 717 | 260 | - 102 | - 31 | - 54 | 1 699 119 | 353 401 | 6,00% | 1 825 | 457 | 98 | - | 4 |
| 47 | H.50 - Water transport | 120 | - | - | 36 | 5 | - 3 | - 1 | - 2 | 18 207 | 10 594 | 0,45% | 50 | 45 | 26 | - | 7 |
| 48 | H.51 - Air transport | 32 | - | - | 3 | 0 | - 0 | - 0 | - 0 | 44 277 | 25 813 | 1,94% | 16 | 15 | 1 | - | 5 |
| 49 | H.52 - Warehousing and support activities for transportation | 443 | - | - | 59 | 13 | - 13 | - 3 | - 8 | 212 883 | 103 594 | 15,87% | 318 | 110 | 14 | - | 4 |
| 50 | H.53 - Postal and courier activities | 109 | - | - | 7 | 3 | - 2 | - 0 | - 1 | 37 480 | 7 775 | 20,80% | 107 | 2 | 0 | - | 1 |
| 51 | I - Accommodation and food service activities | 447 | - | - | 74 | 105 | - 50 | - 4 | - 45 | 97 498 | 37 712 | 18,79% | 338 | 81 | 27 | 0 | 4 |
| 52 | L - Real estate activities | 3 001 | - | - | 610 | 60 | - 108 | - 70 | - 21 | 165 485 | 37 025 | 2,18% | 1 681 | 522 | 793 | 4 | 7 |
| 53 | **Exposures towards sectors other than those that highly contribute to climate change*** | 4 571 | - | 2 | 1 130 | 115 | - 109 | - 39 | - 51 | | | | 3 665 | 670 | 200 | 36 | 5 |
| 54 | K - Financial and insurance activities | 313 | - | - | 12 | 4 | - 4 | - 0 | - 2 | | | | 311 | 2 | 0 | - | 3 |
| 55 | Exposures to other sectors (NACE codes J, M - U) | 4 258 | - | 2 | 1 118 | 111 | - 105 | - 38 | - 49 | | | | 3 354 | 669 | 200 | 36 | 5 |
| 56 | TOTAL | 26 908 | 1 285 | 44 | 6 012 | 1 680 | - 1 182 | - 396 | - 647 | 15 941 041 | 9 285 868 | 12,59% | 20 873 | 3 988 | 1 988 | 59 | 4 |

* In accordance with Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU climate transition benchmarks and EU benchmarks adapted to the Paris Agreement - Regulation on standards for climate benchmarks - recital 6: sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2; municipal bonds, JST (local government) sector and financial clients are not included in the exposures.
** The value in column k for line 1 differs from the value in column k for line 56. The value in line 56 refers to the total WBB reported in the framework, including exposures to sectors other than those with large contributions to climate change (line 53).

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

The Administrator of the benchmarks, i.e. the WSE Benchmark S.A., did not provide a list of entities that significantly harm at least one objective of the in the field of environmental protection. The Administrator is working to develop indices that take into account GHG emissions data with a view to developing indices that take into account decarbonisation targets aligned with the Paris Agreement. Accordingly, the Bank does not identify exposure to the above entities within this disclosure.

Column b only discloses exposures to entities that meet the criteria under Article 12(1)(d)-(g) of Commission Delegated Regulation EU 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU climate transition benchmarks and EU benchmarks aligned with the Paris Agreement. The identification of exposures to these entities was based on an expert review of the non-financial corporate portfolio, which consisted of assigning clients to groups of companies operating in the fossil fuel, oil fuel, natural gas and power generation industries. In notice of the current status of the Polish energy sector, a conservative assumption was made that power generation companies (other than those producing energy solely from RES) qualify as companies that derive at least 50% of their revenue from power generation, whose greenhouse gas emission intensity is above 100g $eCO_2$/kWh (according to the emission factors for Power published by KOBiZE[31], which show that the average emission intensity of Power produced in fuel combustion installations for 2023 is 733g $CO_2$/kWh of energy [excluding non-$CO_2$ greenhouse gases]).

Column c discloses the commitment to entities reporting under Directive 2013/34/EU[32] whose economic activities are environmentally sustainable, i.e. in line with the scheme and contributing to Environmental Objective I - Climate Change Mitigation (CCM).

The scope of the calculation of financed GHG emissions included the exposures of the Bank and its subsidiaries: PKO Leasing S.A. (including Prime Car Management S.A.) and PKO Faktoring S.A. within the following asset classes:

1) corporate loans (class PCAF *Business loans and unlisted equity*);
2) Corporate equities and bonds (class PCAF *Listed equity and* corporate bonds );
3) Project Finance (class PCAF *Project finance*);
4) Vehicle finance (including vehicle leasing) (class PCAF *Motor vehicle loans*).

The calculations for each asset class were carried out in accordance with the *Partnership for Carbon Accounting Financials* (PCAF) Global Greenhouse Gas Accounting and Reporting Standard for the Financial Industry.

For the calculation of the financed emissions, the Bank Group used internal and external data sources. The range of data obtained from external sources included:

1) actual client emissions data obtained from the Notoria database and directly from company reports;
2) data contained in the Central Register of Energy Performance of Buildings maintained by the Ministry of Development and Technology used for the calculation of financed emissions related to commercial real estate loans;
3) the emission factors contained in the PCAF online emission factor database used for the calculation of financed emissions related to corporate loans, corporate shares and bonds, Project Finance and vehicle financing;
4) the benchmarks contained in the European building benchmark database maintained by PCAF, used for the calculation of financed emissions related to commercial real estate loans.

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

1) reported emissions (information on the emissions of the client or company to which the financing was granted);
2) emissions estimated based on the physical activity data of the client or investee company, including: energy consumption, production, information from energy performance certificates (actual or estimated) of financed properties;
3) emissions estimated on the basis of data on the economic activity of the client or investee company, including, inter alia, revenue information obtained by the Bank from the clients' financial statements;

and, in accordance with the PCAF methodology, estimated an attribution coefficient for each type of asset, which indicates what proportion of a client's issues is attributable to the Bank Group depending on the share of financing.

[31] KOBiZE - National Balancing and Emissions Management Centre - a research centre within the structures of the Institute of Environmental Protection - National Research Institute. It administers the *European Union Emission Trading System*( *EU ETS*) in Poland, including the management of the Polish part of the EU Emission Trading Register. KOBiZE maintains a national database that collects data on emissions of greenhouse gases and other substances.
[32] Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006 43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC, as amended.

Table 4.3 Non-trading book – Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral [Template 2]

| 31.12.2024 | Total gross carrying amount amount (mln EUR) | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Level of energy efficiency (EP score in kWh/m² of collateral) | | | | | | Level of energy efficiency (EPC label of collateral) | | | | | | | Without EPC label of collateral | |
| Counterparty sector | | 0; <= 100 | > 100; <= 200 | > 200; <= 300 | > 300; <= 400 | > 400; <= 500 | > 500 | A | B | C | D | E | F | G | | Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated |
| | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
| **1 Total EU area** | **33 684** | **13 667** | **12 793** | **5 142** | **1 111** | **391** | **83** | | | | | | | | **33 684** | **73%** |
| 2 Of which Loans collateralised by commercial immovable property | 5 481 | 414 | 1 559 | 2 974 | 369 | 87 | 18 | | | | | | | | 5 481 | 73% |
| 3 Of which Loans collateralised by residential immovable property | 28 203 | 13 253 | 11 233 | 2 168 | 743 | 303 | 65 | | | | | | | | 28 203 | 73% |
| 4 Of which Collateral obtained by taking possession: residential and commercial immovable properties | 0 | - | - | 0 | - | - | - | | | | | | | | 0 | 100% |
| 5 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated | 24 700 | 8 907 | 9 906 | 4 649 | 900 | 331 | 2 | | | | | | | | 24 700 | 100% |
| **6 Total non-EU area** | **173** | - | - | - | - | - | - | | | | | | | | **173** | - |
| 7 Of which Loans collateralised by commercial immovable property | 132 | - | - | - | - | - | - | | | | | | | | 132 | - |
| 8 Of which Loans collateralised by residential immovable property | 41 | - | - | - | - | - | - | | | | | | | | 41 | - |
| 9 Of which Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | - | - | | | | | | | | - | - |
| 10 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated | - | - | - | - | - | - | - | | | | | | | | - | - |

Template 2 discloses all exposures related to real estate collateral. Expert, conservative estimates of the EP[33] indicator, i.e., the level of energy efficiency (primary non-renewable energy consumption per square meter of property per year in kWh/m$^2$) were applied to all types of properties, if the year of construction was known. For some of the exposures, the actual EP values were disclosed - at present, the Bank's Group has obtained data on energy certificates from the Central Register of Energy Performance of Buildings and is successively updating the data in its internal systems.

Where it was necessary to estimate the value of the EP indicator, data published by the Ministry of Development and Technology and the Announcement of the Minister of Development and Technology of April 15, 2022 on the announcement of a uniform text of the regulation of the Minister of Infrastructure on the technical conditions that buildings and their location should meet were used. Columns h-n are empty because the Bank's Capital Group does not have in its portfolio exposures related to collateral with assigned energy performance certificate marks of the collateral (energy efficiency classes of buildings A-G).

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

Table 4.4 Non-trading book – Indicators of potential climate change transition risk: alignment metrics [Template 3]

| | 31.12.2024 sector | NACE Sectors (a minima) | Portfolio gross carrying amount (mln EUR) | Alignment metric** | Year of reference | Distance to IEA NZE2050 in % *** | Target (year of reference + 3 years) |
|---|---|---|---|---|---|---|---|
| | a | b | c | d | e | f | g |
| 1 | Power | 35.11, 35.30 | 1 221 | 304,2 gCO2/kWh | 2 023 | 64% | 269 gCO2/kWh |
| 2 | Fossil fuel combustion | Mapping of NACE codes to PKD sectors in accordance with EU regulations | 420 | 74,74 tCO2/TJ | 2 022 | 24% | 72,11 tCO2/TJ |
| 3 | Automotive | | 327 | 0,0597 kgCO2/ tkm - trucks | 2 022 | 41% | 0,05559 kgCO2/tkm |
| | | | | 0,147 kgCO2/ pkm - cars | 2 022 | 141% | 0,1536 kgCO2/pkm |
| 4 | Aviation | | 120 | - | - | - | - |
| 5 | Maritime transport | | 443 | - | - | - | - |
| 6 | Cement, clinker and lime production | | 155 | - | - | - | - |
| 7 | Iron and steel, coke, and metal ore production | | 603 | 0,925 tCO2/t | 2 022 | -14% | 0,5492 tCO2/t |
| 8 | Chemicals | | 951 | 1,58 tCO2/t | 2 022 | 19% | 1,43 tCO2/t |

* by 'Reference Year', the Bank means the base year, i.e. the year of the sector-specific adjustment factor as disclosed in the Capital Adequacy Report as of 30 June 2024 For the individual sectors in the years listed, the following values of the adjustment factor are assumed: Energy - 349 gCO2/kWh (according to the Transformation Plan), Fossil fuel combustion - 74.74 tCO2/TJ, Automotive - trucks - 0.0623 kgCO2/tkm, Automotive - cars - 0.1727 kgCO2/pkm, Iron and steel, coke and metal ore production - 0.5492 tCO2/t, Chemicals - 1.43 tCO2/t
** value missing to reach the 2030 data points in the NZE2050 scenario in %.

Template 3 discloses the Bank's exposures (excluding credit exposure to the Central Bank and the State Treasury) broken down by Sectors that have a significant impact on the emission of GHG from Scope 3.

The Bank Group carried out an analysis of its alignment activities against the Paris Agreement targets for the 3 sectors indicated in the model, i.e.: energy, fossil fuel combustion, automotive, aviation, maritime transport, cement, slag and lime production, iron and steel production, coke and metal ores, and chemicals.

In accordance with regulation[34], sectors that are material to the financing activities of the Bank's CG are subject to disclosure. Applying the precautionary approach to the presentation of results, minor sectors (<1% to the total exposure amount of the economic portfolio), i.e. aviation and the production of cement, slag and lime, as well as a sector for which there is a lack of data of sufficient quality, i.e. maritime transport, are excluded from disclosure.

The Bank Group used the *Net Zero Emissions by 2050* scenario indicators by sector for 2030, referring to the document '*World Energy Outlook 2023*', published by the International Energy Agency (IEA).

The adaptation indicators and three-year targets were determined based on data from clients' non-financial reports and statistical data at the Polish level, including data from the National Balancing and Emissions Management Centre (KOBIZE) and the Central Statistical Office (CSO). 2022 and 2023 were taken as the reference year for the analysis of the adjustment factors, depending on data availability.

For the energy sector, an adaptation factor expressed in $gCO_2/kWh$ was used. The value of the indicator in the reference year was determined on the basis of actual emission intensity data for key clients that disclosed the respective indicators in their non-financial reports. In addition, intensity factors from the PCAF database were used for RES clients. For other clients, statistical data were used from KOBIZE. The final indicator was calculated as a weighted average of the balance sheet debt. Compared to the previous reporting period, the scope of disclosure (the energy sector was limited to PKD codes 35.11 and 35.30) and the adopted target value were changed. The above changes are due to the need to align the Bank's adopted decarbonisation trajectories and align the pathway for the energy sector with the Transformation Plan. At the same time, the target in the 'reference year + 3 years' period was set in line with the trajectory of the adopted decarbonisation pathway for the energy sector until 2030. The decrease in the value of the adjustment indicator is related to the increase in the share and WBB[35] of nominal RES financing.

In the fossil fuel combustion sector, an emission intensity factor expressed through carbon intensity per unit of energy ($tCO_2/TJ$) was adopted as the adjustment factor. The adjustment factor for the reference year was determined based on statistical data, i.e. fossil fuel combustion emissions for Poland from the IEA and the total energy supply from the IEA (it did not change compared to the previous reporting period). The target value of the indicator for the 'reference year + 3 years' was set assuming that the decarbonisation pathway will have the same downward trajectory as the NZE2050 IEA scenario (pathway parallel to the IEA scenario).

For the iron and steel, coke and metal ore sectors, the adopted adjustment factor represents the emission intensity in $tCO_2$ per tonne of production.

For key clients, actual data on emission intensities from non-financial reports were used. For other clients, statistical data were used (source: *WiseEurope).* The final indicator was calculated as an average weighted by balance sheet debt. This indicator has changed compared to the last reporting period due to the greater availability of actual data. The target for 'reference year + 3 years' was set based on the assumption that it will be equal to the value of the reference year (the value in the reference year is below that assumed by the IEA NZE2050 scenario).

For the automotive sector, the adopted adjustment factor represents the emission intensity in $kgCO_2$ per tonne-kilometre (for trucks) and passenger-kilometre (for cars). Statistical data (e.g. from KOBIZE and the CSO) was used for all clients. For passenger cars, the adjustment indicator has changed as a result of the revision of statistical data. The value of the indicator for the 'reference year + 3 years' was determined assuming that the decarbonisation pathway would have the same downward trajectory as the IEA's NZE2050 scenario (pathway parallel to the IEA scenario).

In the chemicals sector, the adopted adjustment factor represents the emission intensity in $tCO_2$ per tonne of production. The adjustment factor in the reference year was determined based on reported actual data on emission intensities for key clients. For other clients, statistics from KOBIZE were used. The final indicator is the balance sheet debt weighted average. This indicator has changed compared to the to the last reporting period due to greater availability of actual data. The target for 'reference year + 3 years' was set based on the assumption that it would take the value of the reference year (the value in the reference year is below that assumed by the IEA NZE2050 scenario).

The results for the emissions calculations and adjustment pathways presented in this document depend on the calculation model adopted and the benchmark values adopted. The Bank Group has made every effort to ensure that the results are as precise and reliable as possible.

The Bank Capital Group is working to improve the quality of the data it collects and will strive to maximise portfolio coverage with actual emissions or production intensity data directly from its clients, so that future disclosures better and more accurately reflect the characteristics of the Bank's portfolio.

[34] 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 the disclosure of environmental, social and corporate governance risks.
[35] WBB - Gross Balance Sheet Value

Table 4.5 Non-trading book – Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms [Template 4]

| | a | b | c | d | e |
|---|---|---|---|---|---|
| | Gross carrying amount (aggregate) | Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)* | Of which environmentally sustainable (CCM) | Weighted average maturity | Number of top 20 polluting firms included |
| 1 | 7 | 0,01% | - | 2 | 2 |

(*) exposures to the top 20 carbon intensive firms

Template 4 discloses the Bank Group's exposures to the 20 largest carbon emitting companies in the world on the list published by the *Carbon Majors Database 2022 Data Set Released April 2024*.The disclosure includes exposures to the entities on the above list and their subsidiaries identified from the consolidated financial reports.

Table 4.6 Non-trading book – Indicators of potential climate change transition risk: Exposures subject to physical risk [Template 5]

| | 31.12.2024 | Gross carrying amount (mln EUR) | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | of which exposures sensitive to impact from climate change physical events | | | | | | | | | | | | |
| | Variable: Geographical area subject to climate change physical risk - acute and chronic events | | Breakdown by maturity bucket | | | | | of which exposures sensitive to impact from chronic climate change events | of which exposures sensitive to impact from acute climate change events | of which exposures sensitive to impact both from chronic and acute climate change events | Of which Stage 2 exposures | Of which non-performing exposures | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions | | |
| | | | <= 5 years | > 5 year <= 10 years | > 10 year <= 20 years | > 20 years | Average weighted maturity | | | | | | | of which Stage 2 exposures | Of which non-performing exposures |
| | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
| 1 | A - Agriculture, forestry and fishing | 494 | 1 | - | - | - | 2 | - | 1 | - | 0 | 0 | - 0 | - 0 | - 0 |
| 2 | B - Mining and quarrying | 297 | - | 47 | - | - | 6 | 47 | - | - | - | - | - 0 | - | - |
| 3 | C - Manufacturing | 4 798 | 82 | 22 | - | - | 2 | 22 | 82 | - | 12 | 1 | - 1 | - 0 | - 0 |
| 4 | D - Electricity, gas, steam and air conditioning supply | 1 322 | 0 | 15 | 194 | - | 15 | 209 | 0 | - | 27 | - | - 4 | - 2 | - |
| 5 | E - Water supply; sewerage, waste management and remediation activities | 392 | 0 | 2 | - | - | 6 | 2 | 0 | - | 0 | - | - 0 | - 0 | - |
| 6 | F - Construction | 1 125 | 11 | 2 | - | - | 3 | 1 | 12 | - | 4 | 2 | - 2 | - 1 | - 1 |
| 7 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles | 3 793 | 9 | 1 | - | - | 3 | 2 | 9 | - | 3 | 1 | - 1 | - 0 | - 1 |
| 8 | H - Transportation and storage | 2 934 | 3 | 0 | - | - | 3 | 0 | 3 | - | 0 | 1 | - 0 | - 0 | - 0 |
| 9 | L - Real estate activities | 1 850 | 3 | 25 | 67 | - | 12 | 68 | 26 | - | 1 | 0 | - 1 | - 0 | - 0 |
| 10 | Loans collateralised by residential immovable property | 28 244 | 9 | 33 | 202 | 354 | 21 | - | 597 | - | 57 | 9 | - 12 | - 7 | - 5 |
| 11 | Loans collateralised by commercial immovable property | 5 613 | 89 | 66 | 13 | 0 | 5 | - | 168 | - | 128 | 9 | - 17 | - 10 | - 6 |
| 12 | Repossessed colalterals | 0 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Other relevant sectors (breakdown below where relevant) | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

Template 5 discloses the sensitivity of the portfolio to the impact of long-term and abrupt physical events related to climate change, which is assessed using the climate model of the Institute of Environmental Protection - National Research Institute (KLIMADA 2.0 project) based on the IPCC RCP 8.5 scenario[36]. The model above presents information on assets located in Poland.

Compared to the 30 June 2024 disclosure, the number of assets vulnerable to the impact of long-term climate change events has increased. This is due to the new risk assessment methodology (moving to a 'risks' variable) and the inclusion of an additional long-term risk factor - water shortages.

The Bank is continuously working on the accuracy of the physical risk data used. In response to the occurrence of floods in Poland in 2024, we conducted a back-test of the indicators used to date to assess the exposure of loan portfolio assets to flood and waterlogging risk. As a result, it was determined that a more accurate assessment of the level of risk is provided by the use of the 'hazard' variable, compared to the 'risk' variable used to date. In order to provide more precise information on the portfolio's exposure to flood and waterlogging risk, the Bank decided to assess the exposure of assets as at 31 December 2024 using the new variable, according to the methodology described below.

Data at regional (municipality) level is analysed in relation to the geographical location of the client's business or the location of the real estate collateral. The gross level of risk (hazard) is assessed, in relation to the type of long-term risk (drought and water deficiency) and sudden risk (flooding and floods and hurricanes - winds above 30 m/s). A municipality is deemed to be exposed to a given risk if the risk level is determined to be greater than or equal to 0.75. The analysis covers 3 time horizons (up to 2030, 2040 and 2050) and takes into account the maturities of the Bank's loan portfolio. In terms of mortgage collateral, the Bank Group has broken down residential and commercial properties, taking into account maturities, degree of sensitivity (long-term and abrupt climate change events), STAGE baskets with an indication of cumulative impairment. The Bank Group does not disclose exposures to businesses in the construction, service, transport and sales network industries by to the impact of climate phenomena, in notice of the assumed low impact of physical risk on the overall activities of these entities, which is due to the strong dispersion of their activities.

[36] A scenario assuming that the current rate of increase in greenhouse gas emissions is maintained, referred to as 'business as usual'. It assumes a 4.5oC increase in average global temperature relative to the pre-industrial era.

Table 4.7 Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures [Template 6]

| 31.12.2024 | KPI | | | % coverage (over total assets)* |
|---|---|---|---|---|
| | Climate change mitigation | Climate change adaptation | Total (Climate change mitigation + Climate change adaptation) | |
| GAR stock | 1,84% | 0,02% | 1,86% | 65,95% |
| GAR flow | 2,56% | 0,03% | 2,60% | 50,49% |

(*) % of assets covered by the KPI over total assets

Table 4.8 Mitigating actions: Assets for the calculation of GAR [Template 7]

| | 31.12.2024 mln EUR | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T | | | | | | | | | | | | | | | |
| | | Total gross carrying amount | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | |
| | | | 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 specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which adaptation | Of which enabling | | | Of which specialised lending | Of which transitional/ adaptation | Of which enabling |
| | **GAR - Covered assets in both numerator and denominator** | | | | | | | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 32 002 | 27 791 | 1 494 | 1 443 | 0 | 29 | 40 | 20 | - | | 10 | 27 831 | 1 514 | 1 443 | 0 | 38 |
| **2** | **Financial corporations** | **104** | **20** | **6** | **-** | **-** | **0** | **15** | **2** | **-** | | **-** | **36** | **8** | **-** | **-** | **0** |
| 3 | Credit institutions | 4 | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 4 | Loans and advances | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 5 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 6 | Equity instruments | 4 | - | - | | - | - | - | - | | | - | - | - | | - | - |
| 7 | Other financial corporations | 100 | 20 | 6 | - | - | 0 | 15 | 2 | - | | - | 36 | 8 | - | - | 0 |
| 8 | of which investment firms | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 9 | Loans and advances | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 10 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 11 | Equity instruments | - | - | - | | - | - | - | - | | | - | - | - | | - | - |
| 12 | of which management companies | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 13 | Loans and advances | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 14 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 15 | Equity instruments | - | - | - | | - | - | - | - | | | - | - | - | | - | - |
| 16 | of which insurance undertakings | 34 | 15 | 2 | - | - | - | 15 | 2 | - | | - | 31 | 3 | - | - | - |
| 17 | Loans and advances | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 18 | Debt securities, including UoP | 34 | 15 | 2 | - | - | - | 15 | 2 | - | | - | 31 | 3 | - | - | - |
| 19 | Equity instruments | - | - | - | | - | - | - | - | | | - | - | - | | - | - |
| **20** | **Non-financial corporations (subject to NFRD disclosure obligations)** | **3 857** | **105** | **44** | **-** | **0** | **28** | **25** | **18** | **-** | | **10** | **130** | **63** | **-** | **0** | **38** |
| 21 | Loans and advances | 3 665 | 87 | 34 | - | 0 | 27 | 10 | 4 | - | | 2 | 98 | 38 | - | 0 | 29 |
| 22 | Debt securities, including UoP | 193 | 18 | 11 | - | - | 1 | 14 | 14 | - | | 8 | 32 | 25 | - | - | 9 |
| 23 | Equity instruments | - | - | - | | - | - | - | - | | | - | - | - | | - | - |
| **24** | **Households** | **28 000** | **27 665** | **1 443** | **1 443** | **-** | **-** | | | | | | **27 665** | **1 443** | **1 443** | **-** | **-** |
| 25 | of which loans collateralised by residential immovable property | 27 971 | 27 665 | 1 443 | 1 443 | - | - | | | | | | 27 665 | 1 443 | 1 443 | - | - |
| 26 | of which building renovation loans | 520 | 519 | - | - | - | - | | | | | | 519 | - | - | - | - |
| 27 | of which motor vehicle loans | 27 | - | - | - | - | - | | | | | | - | - | - | - | - |
| **28** | **Local governments financing** | **41** | **-** | **-** | **-** | **-** | **-** | **-** | **-** | **-** | | **-** | **-** | **-** | **-** | **-** | **-** |
| 29 | Housing financing | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 30 | Other local governments financing | 41 | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 31 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | - | - | - | - | | - | - | - | - | - | - |
| 32 | TOTAL GAR ASSETS | 32 002 | 27 791 | 1 494 | 1 443 | 0 | 29 | 40 | 20 | - | | 10 | 27 831 | 1 514 | 1 443 | 0 | 38 |

| | 31.12.2024 mln EUR | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Disclosure reference date T | | | | | | | | | | | | | | |
| | | Total gross carrying amount | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | |
| | | | 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 specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which adaptation | Of which enabling | | | Of which specialised lending | Of which transitional/ adaptation | Of which enabling |
| | **Assets excluded from the numerator for GAR calculation (covered in the denominator)** | | | | | | | | | | | | | | | | |
| **33** | **EU Non-financial corporations (not subject to NFRD disclosure obligations)** | **33 531** | | | | | | | | | | | | | | | |
| 34 | Loans and advances | 17 194 | | | | | | | | | | | | | | | |
| 35 | Debt securities | 644 | | | | | | | | | | | | | | | |
| 36 | Equity instruments | 18 | | | | | | | | | | | | | | | |
| **37** | **Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)** | **257** | | | | | | | | | | | | | | | |
| 38 | Loans and advances | 149 | | | | | | | | | | | | | | | |
| 39 | Debt securities | 95 | | | | | | | | | | | | | | | |
| 40 | Equity instruments | 13 | | | | | | | | | | | | | | | |
| 41 | Derivatives | 250 | | | | | | | | | | | | | | | |
| 42 | On demand interbank loans | 323 | | | | | | | | | | | | | | | |
| 43 | Cash and cash-related assets | 945 | | | | | | | | | | | | | | | |
| 44 | Other assets (e.g. Goodwill, commodities etc.) | 14 052 | | | | | | | | | | | | | | | |
| **45** | **TOTAL ASSETS IN THE DENOMINATOR (GAR)** | **81 360** | | | | | | | | | | | | | | | |
| | **Other assets excluded from both the numerator and denominator for GAR calculation** | | | | | | | | | | | | | | | | |
| 46 | Sovereigns | 33 922 | | - | | | | | | | | | | | | | |
| 47 | Central banks exposure | 6 800 | | | | | | | | | | | | | | | |
| 48 | Trading book | 1 282 | | | | | | | | | | | | | | | |
| **49** | **TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR** | **42 004** | | | | | | | | | | | | | | | |
| **50** | **TOTAL ASSETS** | **123 364** | | | | | | | | | | | | | | | |

Table 4.9 GAR (%) [Template 8]

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T: KPIs on stock | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | |
| 31.12.2024 | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of total assets covered |
| | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | |
| % (compared to total covered assets in the denominator) | | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which adaptation | Of which enabling | | | Of which specialised lending | Of which transitional/ adaptation | Of which enabling | |
| 1 | GAR | 34,16% | 1,84% | 1,77% | 0,00% | 0,04% | 0,05% | 0,02% | - | - | 0,01% | 34,21% | 1,86% | 1,77% | 0,00% | 0,05% | 65,95% |
| 2 | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 86,84% | 4,67% | 4,51% | 0,00% | 0,09% | 0,13% | 0,06% | - | - | 0,03% | 86,97% | 4,73% | 4,51% | 0,00% | 0,12% | 25,94% |
| 3 | Financial corporations | 19,72% | 6,27% | - | - | 0,33% | 14,94% | 1,56% | - | - | - | 34,66% | 7,82% | - | - | 0,33% | 0,08% |
| 4 | Credit institutions | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0,00% |
| 5 | Other financial corporations | 20,53% | 6,52% | - | - | 0,35% | 15,55% | 1,62% | - | - | - | 36,08% | 8,14% | - | - | 0,35% | 0,08% |
| 6 | of which investment firms | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 | of which management companies | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | of which insurance undertakings | 45,26% | 4,72% | - | - | - | 45,26% | 4,72% | - | - | - | 90,52% | 9,44% | - | - | - | 0,03% |
| 9 | Non-financial corporations subject to NFRD disclosure obligations | 2,73% | 1,15% | - | 0,00% | 0,73% | 0,64% | 0,47% | - | - | 0,26% | 3,37% | 1,63% | - | 0,00% | 0,99% | 3,13% |
| 10 | Households | 98,80% | 5,15% | 5,15% | - | - | | | | | | 98,80% | 5,15% | 5,15% | - | - | 22,70% |
| 11 | of which loans collateralised by residential immovable property | 98,90% | 5,16% | 5,16% | - | - | | | | | | 98,90% | 5,16% | 5,16% | - | - | 22,67% |
| 12 | of which building renovation loans | 99,70% | - | - | - | - | | | | | | 99,70% | - | - | - | - | 0,42% |
| 13 | of which motor vehicle loans | - | - | - | - | - | | | | | | - | - | - | - | - | 0,02% |
| 14 | Local government financing | - | - | - | - | - | | | | | | - | - | - | - | - | 0,03% |
| 15 | Housing financing | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 16 | Other local governments financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0,03% |
| 17 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | | | | | | - | - | - | - | - | - |

| | | q | r | s | t | u | v | w | x | y | z | aa | ab | ac | ad | ae | af |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T: KPIs on flows | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | |
| 31.12.2024 | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of total new assets covered |
| | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | |
| % (compared to total covered assets in the denominator) | | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which adaptation | Of which enabling | | | Of which specialised lending | Of which transitional/ adaptation | Of which enabling | |
| 1 | GAR | 28,05% | 2,56% | 2,44% | - | 0,05% | 0,04% | 0,03% | - | - | - | 28,09% | 2,60% | 2,44% | - | 0,05% | 50,49% |
| 2 | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 82,49% | 7,54% | 7,17% | - | 0,14% | 0,11% | 0,10% | - | - | - | 82,60% | 7,64% | 7,17% | - | 0,14% | - |
| 3 | Financial corporations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4 | Credit institutions | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 | Other financial corporations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 6 | of which investment firms | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 | of which management companies | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | of which insurance undertakings | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Non-financial corporations subject to NFRD disclosure obligations | 3,94% | 2,21% | - | - | 0,83% | 0,65% | 0,61% | - | - | - | 4,59% | 2,82% | - | - | 0,83% | 2,87% |
| 10 | Households | 98,28% | 8,61% | 8,61% | - | - | | | | | | 98,28% | 8,61% | 8,61% | - | - | 14,30% |
| 11 | of which loans collateralised by residential immovable property | 98,28% | 8,61% | 8,61% | - | - | | | | | | 98,28% | 8,61% | 8,61% | - | - | 14,30% |
| 12 | of which building renovation loans | 99,97% | - | - | - | - | | | | | | 99,97% | - | - | - | - | 0,21% |
| 13 | of which motor vehicle loans | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 14 | Local government financing | - | - | - | - | - | | | | | | - | - | - | - | - | 0,00% |
| 15 | Housing financing | - | - | - | - | - | | | | | | - | - | - | - | - | - |
| 16 | Other local governments financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0,00% |
| 17 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | | | | | | - | - | - | - | - | - |

The taxonomic disclosure presented in Formulas 6, 7 and 8 has been prepared on the basis of the regulations that have been implemented into European law by the EU Taxonomy Regulation together with the following Commission Delegated Regulations (EU): 2021/2139[37], 2021/2178[38], 2022/1214[39], 2023/2485[40], 2023/2485[41], 2023/2486[42], 2024/3215[43].

The taxonomy is a classification system for sustainable development activities, which aims to increase transparency and comparability of the market in this area and to support investors in their investment decisions. The taxonomy establishes a framework for EU systematisation by defining four conditions that an economic activity must meet in order to be classified as environmentally sustainable.

The Taxonomy includes 6 main environmental objectives: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems.

According to Article 3 of the EU Taxonomy, an environmentally sustainable activity (in line with the systematics) is one that simultaneously:
1) makes a significant contribution to one or more of the six environmental objectives,
2) does not seriously harm any of the other objectives (‘do no serious harm’ principle, DNSH),
3) is carried out in accordance with *minimum safeguards*,
4) meets the technical eligibility criteria (as indicated in the delegated regulations issued by the Commission (EU) supplementing the EU Taxonomy Regulation). The technical qualification criteria, while setting out the requirements for each economic activity, indicate under which conditions that activity makes a significant contribution to one or more environmental objectives and does not cause serious harm to any other environmental objectives.

## Scope of taxonomic disclosures covered in this report

The Bank Group's disclosure as at 31 December 2024 includes a full taxonomic analysis of the Bank Group's individual transactions in terms of eligibility for systematisation against the six environmental objectives and compliance with the systematization in relation to the first two environmental objectives: *climate change mitigation* (CCM) and *climate change adaptation* (CCA), by client segment, financial instrument and activity type.

The primary performance indicator for credit institutions is the *Green Asset Ratio* (GAR), which relates to the to the Bank Group's core lending and investment activities, which include loans, advances and debt securities, as well as equity instruments. The GAR reflects the extent to which the Bank Group finances systemically compliant business activities, i.e. the percentage of assets financing systemically compliant business activities compared to all Bank Group assets included in the GAR calculation.

The green asset ratio is calculated on the basis of the scope of prudential consolidation in accordance with the CRR Regulation and the FINREP report, i.e. consolidated financial statements prepared for central banks. A list of the Bank Group entities included in prudential consolidation is included in this Report.

The GAR is presented with reference to the stock as at 31 December 2024 and with reference to the flow (applicable to new exposures arising in 2024).

The assets included in the GAR numerator, in accordance with regulatory requirements, represent the Bank Group's exposures in loans and advances, debt securities and equity instruments in the banking book to:
1) financial undertakings that meet the criteria indicated in Article 19a or 29a of Directive 2013/34/EU
2) non-financial undertakings that meet the criteria indicated in Article 19a or 29a of Directive 2013/34/EU,
3) households in relation to residential property loans, building renovation loans and motor vehicle loans,
4) local authorities/municipalities in relation to the funding of housing and other specialist funding needs, and
5) seized collateral in the form of commercial and residential property.

The assets included in the GAR denominator are all balance sheet assets of the Bank Group excluding exposures to central governments, central banks and supranational issuers and the trading book.

[37] 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 technical qualification criteria to determine the conditions under which an economic activity qualifies as making a significant contribution to climate change mitigation or adaptation, and to determine whether that economic activity does not cause significant harm to any other environmental objective.

[38] Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by clarifying the content and presentation of the information on environmentally sustainable business activities to be disclosed by companies subject to Article 19a or 29a of Directive 2013/34/EU and specifying the method for fulfilling this disclosure obligation.

[39] Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards business activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards public disclosure of specific information in relation to those economic activities.

[40] Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 laying down additional technical eligibility criteria for determining the conditions under which certain economic activities qualify as making a significant contribution to climate change mitigation or adaptation and whether the activity does not cause significant damage to any other environmental objective.

[41]Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 laying down additional technical eligibility criteria for determining the conditions under which certain economic activities qualify as making a significant contribution to climate change mitigation or adaptation and whether the activity do not cause serious harm to any other environmental objective.

[42] 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 technical eligibility criteria for determining the conditions under which an economic activity qualifies as making a significant contribution to the sustainable use and conservation of water and marine resources, the transition to a circular economy, the prevention and control of pollution, the protection and restoration of biodiversity and ecosystems and whether that economic activity does not cause serious harm to any other environmental objective, and amending Commission Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information in relation to those economic activities.

[43] Commission Delegated Regulation (EU) 2024/3215 of 28 June 2024 correcting certain language versions of Delegated Regulation (EU) 2021/2139 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical eligibility criteria for determining the conditions under which an economic activity qualifies as making a significant contribution to climate change mitigation or adaptation and whether that economic activity does not cause significant harm to any other environmental objective.

## Identification of entities subject to Directive 2013/34/EU

The Bank has analysed its portfolio for clients required to disclose sustainability-related information in accordance with the accordance with the criteria indicated in Article 19a or 29a of Directive 2013/34/EU, including the disclosure of sustainability-related information[44] among others, mandatory disclosure in terms of the EU Taxonomy. These are:

1) large entities, which are public-interest entities that exceed the criterion of an average number of 500 employees at the balance sheet date during the financial year;
2) public-interest entities which are the parent undertakings of a large group exceeding, on a consolidated basis, the criterion of an average number of 500 employees during the year at the balance sheet date, and subsidiaries consolidated by these parent undertakings.

As part of the client verification process, the Bank used the most up-to-date non-financial reports published by companies that are subject to Directive 2013/34/EU, posted on the websites of the aforementioned companies. As part of the client verification process, information posted in the Notoria Module ESG database, which contains data resulting from the non-financial reporting obligations of Polish companies, was used.

In order to identify the subsidiaries financed from the capital groups formed by the parent companies, the Bank uses the EMIS Information and Analysis Platform. In this database, the relationships and the list of subsidiaries that are consolidated by the parent are made visible for each group

## Method of assessing whether minimum warranties are met

Verification of the fulfilment of the minimum warranties set out in Article 18 of the EU Taxonomy by non-financial and financial companies that are subject to Directive 2013/34/EU is based on data extracted from the Notoria Module ESG database and information contained in the in the non-financial reports of these clients. The verification consists of an analysis of the Notoria data on, inter alia, the occurrence of violations of the OECD Principles and a comparison of the above analysis results with the information contained in the non-financial reports. The final stage is a comparison of the collected data, on the basis of which an expert assessment is made and a tag of 'YES' is assigned accordingly for companies that meet the minimum warranties or 'NO' for companies that do not meet the minimum warranties. Business activities of non-financial and financial undertakings that are subject to Directive 2013/34/EU and do not meet the minimum warranties are disclosed as eligible for systematisation, but not compliant with the systematics.

The Bank assumes that all subsidiaries consolidated by the parent company of a group have been taken into account when assessing the fulfilment of the minimum warranties for the activities carried out by that group. If the parent undertaking publishes information about the fulfilment of the minimum warranties, the Bank assumes that all subsidiaries consolidated before the parent company also fulfil the minimum warranties.

The method described above for verifying the fulfilment of minimum warranties is valid until the banking industry has developed uniform guidelines/clarifications/recommendations on how to verify minimum warranties on the basis of non-financial reports.

The Bank Group does not verify retail clients' compliance with minimum warranties for the acquisition of real estate. According to the Commission's Third Notice (EU) C/2024/6691, credit institutions should obtain documentation confirming compliance with the relevant technical eligibility criteria and minimum warranties from manufacturers providing goods and services to retail clients. The Notice does not indicate that this applies to the acquisition of real estate. In addition, the Sustainable Finance Platform[45] takes the view that households are not covered by minimum warranties and that minimum warranties apply to businesses or local authorities and therefore banks do not need to obtain information from households on compliance with minimum warranties when providing mortgages or other types of financing.

## Assessment of eligibility for and compliance with systematics of exposures to financial and non-financial entities subject to Directive 2013/34/EU

In order to identify exposures to financial and non-financial entities that are subject to Directive 2013/34/EU and their subsidiaries consolidated by the parent companies of the respective group as qualifying for and complying with the systematics, the Bank used the key performance indicator Turnover KPI. This indicator was disclosed by entities required to report non-financially in non-financial reports published in 2024 (for 2023). With regard to exposures included in the banking book where the purpose of the funds is not known (loans and advances, debt securities and equity instruments), the value of assets eligible for systematics and in line with systematics was calculated as the product of the gross carrying amount and the Turnover KPI.
For subsidiaries in the parent group, the Bank used the following key: exposures to subsidiaries are multiplied by the key performance indicator of that subsidiary as disclosed by its parent; if the subsidiary's key performance indicator is not available, the key performance indicator of the nearest parent is used; if the key performance indicator of the nearest parent is not available, the consolidated key performance indicator at group level is used.
The Bank assumes that all subsidiaries consolidated by the parent company are included in the calculation of the consolidated key performance indicators (KPIs). For exposures included in the banking book, the purpose of which is unknown (loans and advances, debt securities and equity instruments), the value of assets eligible for and in line with the systematics was calculated as the product of the gross carrying amount and the relevant KPI of Turnover. [46]

The Bank did not report systematically eligible and compliant exposures for targeted financing due to the lack of data to confirm that the technical eligibility criteria of the EU Taxonomy are met for the financed investment project.

In terms of off-balance sheet exposures, the Bank does not identify financial warrants that support loans and advances and debt securities that finance business activities in line with the systematic approach.
Exposures in terms of managed assets from systemically compliant business finance companies relate to a subsidiary of the Bank Group. Off-balance sheet exposures to non-financial entities subject to Directive are assessed as systematic eligibility and systematic compliance based on the KPI of Turnover. The KPI of these clients has been disclosed in the non-financial reports published in 2024 (for 2023).

[44] Sustainability reporting is a requirement introduced by Directive (EU) 2022/2464 of 14 December 2022 with regard to the to corporate sustainability reporting (abbreviated *CSRD*), which replaced the existing EU regulations on non-financial disclosure.
[45] The Sustainable Finance Platform - an advisory body to the European Commission, which operates through expert groups, with the main objective of developing proposals and standards sustainable finance for the EU as a whole.
[46] Turnover KPI (*Key Performance Indicator Turnover*) - a key performance indicator on turnover, published in non-financial reports of companies subject to disclosure under Directive 2013/34/EU, indicating what % of a company's turnover is in line with the systematic.

## Assessment of eligibility and compliance with the systematic exposure to households

Exposures to households for loans for building renovations were considered eligible for the systematics but not in line with the systematics due to lack of data to confirm that the technical eligibility criteria are met (concerns the activities of sections 7.2, 7.3, 7.4, 7.5, 7.6. set out in Appendix I of Delegated Regulation (EU) 2021/2139).

Exposures to households on residential real estate loans were considered eligible for the systematics, but as compliant with the systematics, if they meet the condition of making a material contribution to climate change mitigation and the principle of ‘no significant damage’ of climate change adaptation (refers to the activity of section 7.7 set out in Appendix I of Delegated Regulation (EU) 2021/2139).

According to the interpretation of the Ministry of Development and Technology, the assessment of a significant contribution to climate change mitigation for residential buildings constructed before 31 December 2020 is met when the non-renewable primary energy demand for heating, ventilation heating, ventilation, cooling and domestic hot water preparation (EP indicator) is less than 83.91 kWh/(m$^2$*year) for a single-family residential building and less than 81.86 kWh/(m$^2$*year) for a multi-family residential building and is confirmed on the basis of an energy performance certificate for the building.
According to the interpretation of the Ministry of Development and Technology, the assessment of a significant contribution to climate change mitigation for residential buildings erected after 31 December 2020 is met when the EP indicator is at least 10% lower than the threshold set for the requirements for near-zero energy buildings in the national measures implementing Directive 2010/31/EU of the European Parliament and of the Council. To this end, the Bank compared the calculated value of the EP indicator with the 10% lesser limit value (determined as set out in § 329 clause 1 of the Decree of the Minister of Infrastructure of 12 April 2002 on the technical conditions to be met by buildings and their location; hereinafter the Decree), amounting to 63 kWh/(m$^2$*year) for single-family residential buildings and 58.5 kWh/(m$^2$*year) for multi-family buildings. The value of the EP indicator was confirmed by the building's energy performance certificate.
Confirmation of the 'do no severe damage' principle against the environmental objective of climate change adaptation was achieved by examining the physical risk exposure of the analysed properties using the KLIMADA 2.0 portal on the basis of a property address for which a threat level of less than 0.75 risk was determined (in the time frame corresponding to the maturity of the loan in question).

The Bank did not classify exposures to households for vehicle loans into the systematics due to the lack of detailed information on the subject of the financing (refers to the activity of section 6.5 set out in Appendix I of Delegated Regulation (EU) 2021/2139).

## Assessment of eligibility and compliance with the systematic exposure to local authorities

PKO BP S.A. is a universal bank and its business model is not based on financing public housing. The Bank has not reported exposures to local authorities for loans and advances financing public housing. The bank does not classify exposures to public authorities related to specialised lending due to a lack of information on the eligibility and compliance with the systematics of the financed investment projects.

## Assessing the eligibility and compliance of the commercial and residential real estate collateral taken over

The bank has not reported exposures that represent foreclosed commercial and residential real estate collateral.

Table 4.10 Mitigating actions: Assets for the calculation of BTAR [Template 9.1]

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | 31.12.2024 | | | | | | | | | | | | | | | |
| | | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | |
| | | | 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) | | | |
| | Mln EUR | Total gross carrying amount | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which transitional | Of which enabling |
| 1 | Total GAR Assets | 32 002 | 27 791 | 1 494 | 1 443 | 0 | 29 | 40 | 20 | - | - | 10 | 27 831 | 1 514 | 1 443 | 0 | 38 |
| | **Assets excluded from the numerator for GAR calculation (covered in the denominator) but included in the numerator and denominator of the BTAR** | | | | | | | | | | | | | | | | |
| 2 | EU Non-financial corporations (not subject to NFRD disclosure obligations) | 33 531 | 426 | 220 | - | 26 | 21 | - | - | - | - | - | 426 | 220 | - | 26 | 21 |
| 3 | Loans and advances | 17 198 | 424 | 220 | - | 26 | 21 | - | - | - | - | - | 424 | 220 | - | 26 | 21 |
| 4 | of which loans collateralised by commercial immovable property | 197 | 199 | 32 | - | - | 17 | | | | | | 199 | 32 | - | - | 17 |
| 5 | of which building renovation loans | 4 | 2 | 2 | - | - | 2 | | | | | | 2 | 2 | - | - | 2 |
| 6 | Debt securities | 644 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 7 | Equity instruments | 18 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | Non-EU Non-financial corporations (not subject to NFRD disclosure obligations) | 257 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Loans and advances | 149 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Debt securities | 95 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | Equity instruments | 13 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 12 | **TOTAL BTAR ASSETS** | 65 790 | 28 217 | 1 714 | 1 443 | 26 | 49 | 40 | 20 | - | - | 10 | 28 257 | 1 734 | 1 443 | 26 | 59 |
| | **Assets excluded from the numerator of BTAR (covered in the denominator)** | | | | | | | | | | | | | | | | |
| 13 | Derivatives | - | | | | | | | | | | | | | | | |
| 14 | On demand interbank loans | 323 | | | | | | | | | | | | | | | |
| 15 | Cash and cash-related assets | 25 | | | | | | | | | | | | | | | |
| 16 | Other assets (e.g. Goodwill, commodities etc.) | 15 222 | | | | | | | | | | | | | | | |
| 17 | **TOTAL ASSETS IN THE DENOMINATOR** | 81 360 | | | | | | | | | | | | | | | |
| | **Other assets excluded from both the numerator and denominator for BTAR calculation** | | | | | | | | | | | | | | | | |
| 18 | **TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR** | 37 504 | | | | | | | | | | | | | | | |
| 19 | **TOTAL ASSETS** | 123 364 | | | | | | | | | | | | | | | |

Table 4.11 BTAR % [Template 9.2]

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T: KPIs on stock | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | |
| | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Proportion of eligible assets funding taxonomy relevant sectors | | | | | Udział procentowy aktywów ogółem objętych wskaźnikiem |
| | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | |
| | % (compared to total covered assets in the denominator) | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which transitional | Of which enabling | |
| 1 | **BTAR** | 35,00% | 2,11% | 1,77% | 0,03% | 0,06% | 0,05% | 0,02% | - | 0,01% | 0,00% | 34,73% | 2,13% | 1,77% | 0,04% | 0,06% | 53,33% |
| 2 | **GAR** | 34,16% | 1,84% | 1,77% | 0,00% | 0,04% | 0,05% | 0,02% | - | 0,01% | 0,00% | 34,21% | 1,86% | 1,77% | 0,01% | 0,04% | 65,95% |
| 3 | EU Non-financial corporations not subject to NFRD disclosure obligations | 0,52% | 0,27% | - | 0,03% | 0,03% | - | - | - | - | - | 0,52% | 0,27% | - | 0,03% | 0,03% | 27,18% |
| 4 | of which loans collateralised by commercial immovable property | 0,24% | 0,04% | - | - | 0,02% | - | - | - | - | - | 0,24% | 0,04% | - | - | 0,02% | 0,16% |
| 5 | of which building renovation loans | 0,00% | 0,00% | - | - | 0,00% | - | - | - | - | - | 0,00% | 0,00% | - | - | 0,00% | 0,00% |
| 6 | Non-EU country counterparties not subject to NFRD disclosure obligations | 0,32% | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0,21% |

| | | q | r | s | t | u | v | w | x | y | z | aa | ab | ac | ad | ae | af |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Disclosure reference date T: KPIs on flows | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | |
| | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of new eligible assets funding taxonomy relevant sectors | | | | | Proportion of total new assets covered |
| | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | | Of which environmentally sustainable | | | | |
| | % (compared to total covered assets in the denominator) | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which transitional | Of which enabling | | | Of which specialised lending | Of which transitional | Of which enabling | |
| 1 | **BTAR** | 30,60% | 3,91% | 2,44% | 0,17% | 0,18% | 0,04% | 0,03% | - | - | - | 30,64% | 3,94% | 2,44% | 0,17% | 0,18% | 69,00% |
| 2 | **GAR** | 28,05% | 2,56% | 2,44% | - | 0,05% | 0,04% | 0,03% | - | | - | 28,09% | 2,60% | 2,44% | - | 0,05% | 50,49% |
| 3 | EU Non-financial corporations not subject to NFRD disclosure obligations | 2,55% | 1,34% | - | 0,17% | 0,13% | - | - | - | - | - | 2,55% | 1,34% | - | 0,17% | 0,13% | 18,38% |
| 4 | of which loans collateralised by commercial immovable property | 1,12% | 0,14% | - | - | 0,11% | | | | | | 1,12% | 0,14% | - | - | 0,11% | 0,58% |
| 5 | of which building renovation loans | 0,02% | 0,02% | - | - | 0,02% | | | | | | 0,02% | 0,02% | - | - | 0,02% | 0,01% |
| 6 | Non-EU country counterparties not subject to NFRD disclosure obligations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 0,13% |

Table 4.12 Summary table - BTAR % [Template 9.3]

| | KPI | | | % coverage (over total assets)* |
|---|---|---|---|---|
| | Climate change mitigation (CCM) | Climate change adaptation (CCA) | Total (CCM + CCA) | |
| BTAR stock | 2,11% | 0,02% | 2,13% | 53,33% |
| BTAR flow | 3,91% | 0,03% | 3,94% | 69,00% |

The Bank Group disclosure presented in the Templates above is linked to the taxonomy disclosure (Templates 6, 7 and 8) and presents the *Banking Book Taxonomy Alignment Ratio* (BTAR).
This indicator measures the extent to which the Bank Group finances systemically compliant activities towards enterprises that meet the criteria indicated in Article 19a or 29a of Directive 2013/34/EU, towards households, local governments and foreclosed real estate collateral, and towards non-financial enterprises that are not subject to disclosure obligations under Article 19a or 29a of Directive 2013/34/EU, including information under the EU Taxonomy regulation.

In order to disclose the BTAR, the Bank used the information it will receive from its counterparties, i.e. EU non-financial corporations that are not subject to non-financial disclosure obligations under Article 19a or 29a of Directive 2013/34/EU, on a voluntary basis and on a bilateral basis as part of the lending process.

The assets included in the BTAR numerator, in accordance with regulatory requirements, represent the Bank Group's exposures relating to loans and advances, debt securities and equity instruments in the banking book to:
1) financial undertakings that meet the criteria indicated in Article 19a or 29a of Directive 2013/34/EU;
2) non-financial undertakings that meet the criteria indicated in Article 19a or 29a of Directive 2013/34/EU;
3) households in relation to residential property loans, building renovation loans and motor vehicle loans;
4) local authorities/municipalities in relation to the funding of housing and other specialist funding needs;
5) seized collateral in the form of commercial and residential property;
6) EU non-financial corporations that are not subject to disclosure obligations under Article 19a or 29a of Directive 2013/34/EU, including loans secured by commercial real estate, loans for the renovation of buildings ;
7) non-EU non-financial companies that are not subject to disclosure obligations under Article 19a or 29a of Directive 2013/34/EU.

Assets included in the BTAR denominator are all balance sheet assets of the Bank Group excluding exposures to central governments, central banks and supranational issuers and the trading book.

The assessment of eligibility for systematics and compliance with systematics against exposures included in the BTAR numerator to non-financial corporations that are not subject to Directive 2013/34/EU is described below. The assessment of eligibility for systematics and compliance with systematics of exposures included in the BTAR numerator towards financial and non-financial corporations that are subject to Directive 2013/34/EU, households, local governments and foreclosed real estate collateral (these exposures are also included in the GAR numerator) and how these entities are identified in the banking book are presented in the taxonomic disclosure presented in the Sustainability Report, which is part of the PKO Bank Polski S.A. Group Management Report.

## Identification of entities that are not subject to disclosure obligations pursuant to Article 19a or 29a of Directive 2013/34/EU

The Bank has analysed its portfolio of EU and non-EU based non-financial corporations. The definition of non-financial corporations is met by autonomous institutional units that have legal personality and are market producers whose primary activity is the production of non-financial goods and services. These include private and public enterprises, cooperatives and companies, public producers, non-profit institutions and associations, head offices controlling a group of enterprises, special purpose entities, private and public enterprise-type units. The pool of non-financial companies excludes those companies that are subject to disclosure obligations under Article 19a or 29a of Directive 2013/34/EU.

## Assessment of eligibility for and compliance with the systematics of exposures to non-financial undertakings that are not subject to disclosure obligations under Article 19a or 29a of Directive 2013/34/EU

The Bank assessed the eligibility for systematics of exposures with unknown funding purpose (loans and advances, factoring, debt securities and equity instruments) on the basis of a simplified approach[47] focused on the assessment of the company's main economic activity, i.e. its main source of revenue. The company's predominant activity (based on the PKD/NACE code) was analysed and those activities whose code/description coincides with the code/description of the activity in the technical eligibility criteria described in the acts delegated to the EU Taxonomy were considered eligible for the systematics.
The Bank did not disclose systematically compliant exposures with an unknown financing purpose due to a lack of information regarding the overall compliance with the systematics of the dominant business activities of the companies analysed.

[47] A simplified approach, i.e. taking into account the reasonable effort and information already available to the Bank.

In the case of specialised lending, the assessment of eligibility for and compliance with systematics was carried out using taxonomic questionnaires developed on the basis of the technical eligibility criteria of the EU Taxonomy.
The assessment of eligibility for systematics is based on the extent to which a specific funded project qualifies as making a significant contribution to the to an environmental objective, i.e. climate change mitigation (CCM) or climate change adaptation (CCA).

To assess compliance with the systematics, the Bank used a simplified approach of assessing overall compliance with the systematics based on meeting only the condition of significant contribution to an environmental objective, i.e. climate change mitigation (CCM) or climate change adaptation (CCA). The other compliance criteria, i.e. the DNSH principle and the fulfilment of minimum warranties, were not examined.

Exposures from loans secured by commercial real estate were considered eligible for systematics. The assessment of compliance with the systematics is carried out under the simplified approach for the mitigation target (CCM) only, based on the energy efficiency of the underlying collateral (i.e. EP ratio).

Buildings constructed before 31 December 2020 were considered to be compliant with the scheme if the primary energy demand (EP ratio) is less than 114.76 kWh/(m$^2$*year) for a residential building; 169.03 kWh/(m$^2$*year) for a public building - healthcare; 109.84 kWh/(m$^2$*year) for a public building - other; 74.70 kWh/(m$^2$*year) for an individual recreation building; 109.4 kWh/(m$^2$*year) for a commercial, storage, production building. The value of the EP indicator was confirmed based on the energy performance certificate for the commercial building.
The above energy efficiency thresholds are in line with the interpretation of the Ministry of Development and Technology and the fact that a building has the indicated EP indicator values demonstrates that it meets a significant contribution to the Climate Change Mitigation (CCM) objective, i.e. such building is among the 15% most efficient buildings in the country or region in terms of primary energy demand (PED), which must be supported by appropriate evidence that includes at least a comparison of the energy performance of the building in question with the energy performance of buildings constructed in the country or region before 31 December 2020 and includes a distinction at least between residential and non-residential buildings.

Buildings erected after 31 December 2020 were deemed to comply with the scheme if the primary energy demand (EP ratio) is less than 67.5 kWh/(m$^2$*year) for a collective residence building; 171 kWh/(m$^2$*year) for a public building - healthcare; 40,5 kWh/(m$^2$*year) for a public building - other; 63 kWh/(m$^2$*year) for a commercial, storage, production building. The above values have been calculated using the precautionary method by using a partial EP value for heating, ventilation and hot water preparation, as data on partial EP values for cooling and lighting were not available.
The EP value was confirmed on the basis of the commercial building's energy performance certificate or the building's design energy performance.
The above energy efficiency thresholds are in line with the interpretation of the Ministry of Development and Technology and the fact that the building has the indicated EP-index values shows that it meets a significant contribution to the climate change mitigation (CCM) objective, i.e. the primary energy demand is 10% less than the threshold (partial EP-index values for heating, ventilation and hot water preparation) set for the to the requirements for nearly zero energy buildings in the national measures implementing Directive 2010/31/EU of the European Parliament and of the Council.

Table 4.13 Other climate change mitigating actions that are not covered in Regulation (EU) 2020/852 [Template 10]

| 31.12.2024 | Type of financial instrument | Type of counterparty | Gross carrying amount (mln EUR) | Type of risk mitigated (Climate change transition risk) | Type of risk mitigated (Climate change physical risk) | Qualitative information on the nature of the mitigating actions |
|---|---|---|---|---|---|---|
| | a | b | c | d | e | f |
| 1 | Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards) | Financial corporations | 0 | n/a | n/a | n/a |
| 2 | | Non-financial corporations | 111 | transition risk | n/a | More favorable bond issue conditions support enterprises in their energy transformation by increasing the share of renewable energy sources in their energy mix. |
| 3 | | Of which Loans collateralised by commercial immovable property | 0 | n/a | n/a | as above |
| 4 | | Other counterparties | 0 | n/a | n/a | as above |
| 5 | Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards) | Financial corporations | 0 | n/a | n/a | n/a |
| 6 | | Non-financial corporations | 4244 | Legal and regulatory risk, reputational risk, technological change risk, market risk. | Risks resulting from sudden weather-related events (storms, floods, flooding) and long-term climate changes leading to a continuous increase in average temperatures and hydrological drought. | Financing investments as part of the Capital Group's product offer shown in Template 10 (including renewable energy sources, electromobility, thermal modernization of real estate) enables the adaptation of the business models of the Capital Group's clients to the requirements of an environmentally sustainable economy, limiting the physical and transition risks associated with change climate, listed in columns d and e. |
| 7 | | Of which Loans collateralised by commercial immovable property | 822 | as above | as above | as above |
| 8 | | Households | 1396 | as above | as above | Discount on the margin of a housing loan offered to households after providing a property energy performance certificate that meets certain conditions, which constitutes the promotion of properties with better energy efficiency. Financing or refinancing of residential buildings that meet the criteria set out in the Green Covered Bond Framework, based on the value of the EP index or year of construction, including those consistent with the Climate Bond Initiative (CBI) standard for low-emission buildings. More favorable financing conditions for electromobility and photovoltaic devices help households reduce their carbon footprint and reduce electricity expenses. |
| 9 | | Of which Loans collateralised by residential immovable property | 1357 | as above | as above | as above |
| 10 | | Of which building renovation loans | 5 | as above | as above | as above |
| 11 | | Other counterparties | 0 | n/a | n/a | n/a |

Products supporting climate change mitigation and adaptation activities as understood by the Bank's Group, as at 31 December 2024, that are not fully aligned with the Taxonomy, are presented below.

1. **Sustainability-linked bonds** according to market standards for debt instruments: Sustainability-Linked Bond Principles.
2. **Environmental impact bonds** - e.g. corporate bonds; proceeds from the issue are used to finance environmental investments.
3. **'Własny Kąt' mortgage loan:**
   - **for buildings that meet certain EP ratings** – the option to reduce the loan margin upon delivery to the Bank, following the conclusion of the agreement, of an energy performance certificate for the property pledged as collateral for the loan, documenting compliance with the primary energy demand (PE) ratio and its validity period;
   - **for residential buildings meeting the criteria set out in the *Green Covered Bond Framework***, based on the value of the EP index or the year of construction, including compliance with the *Climate Bond Initative (CBI)* standard for low carbon buildings.
4. **Loans to finance commercial buildings meeting certain EP indicators** - in accordance with the guidelines of the Ministry of Development and Technology; the primary energy (EP) requirement is confirmed by an energy performance certificate for the property or design energy performance of the building.
5. **'Nasz Remon**t' investor's loan - a loan with a thermomodernization or renovation bonus from BGK - the loan makes it possible to obtain non-refundable aid from the state budget in the form of a thermomodernization bonus or renovation bonus. The implementation of projects financed with this loan allows to reduce the non-renewable energy demand of the building.
6. **Green loans** – investment loans which have been designated, among others, for financing RES.

7. **Sustainability-linked loans** according to market standards for sustainable financing: Sustainability-Linked Loan Principles.
8. **BIZNESMAX PLUS guarantee from BGK** - possibility to secure loans intended for so-called pro-ecological investments, e.g. electromobility, renewable energy sources.
9. **BIZNESMAX guarantees from BGK** - a possibility to secure loans intended for the so-called pro-ecological investments, inter alia, electromobility, renewable energy sources.
10. **EKOMAX guarantee from BGK** - a possibility to secure loans intended for the financing of investments related to the implementation of energy-efficient solutions.
11. **Ekopożyczka PKO** – the option to reduce the interest rate after providing the Bank with an invoice documenting the purchase of eco-friendly equipment, such as photovoltaic panels, solar collectors or heat pumps, and meeting the condition of a certain percentage of the purchase costs in the total value of the loan.
12. **FENG green bonus loan** – a loan granted by the Bank to an entrepreneur for an environmental investment, which is partly repaid in the form of an environmental bonus, i.e. a subsidy for micro, small and medium-sized enterprises and small mid-caps and mid-caps that want to upgrade their infrastructure (e.g. buildings, machinery and equipment). This upgrade must result in a reduction in primary energy consumption in the upgraded area of at least 30% compared to current consumption.
13. **Leasing or loan for the financing of photovoltaic equipment** – product provides the opportunity to finance photovoltaic panels together with their installation. Both modules installed on roofs as well as on the ground are financed.
14. **Leasing of electric vehicles** – an agreement of PKO Leasing and Masterlease with Bank Ochrony Środowiska S.A. as part of the implementation of a government programme 'Mój elektryk' (My e-car). Provision of assistance to customers in obtaining a subsidy under a programme for the purchase of an electric or hydrogen powered vehicle combined with an offer of lease services. The product applies to both institutional and individual customers.
15. **Leasing or loan to finance wind turbines, heat pumps and other prosumer energy generation equipment.** An offering addressed to the prosumer business customer.
16. **Lease or loan to finance electric vehicle charging points** – a product providing the opportunity to finance an electric vehicle charging point over a financing period of up to 5 years. The offering is addressed to a business customer.
17. **Loan to finance electric vehicle charging stations - ground stations and energy storage facilities** – a product providing the opportunity to finance charging stations, including high-powered facilities and energy storage. The offering is addressed to a business customer.
18. **Loan to finance PV farms – investment projects** – Offering for customers operating as commercial companies. The funding relates to photovoltaic equipment with installation services, where the equipment is installed on the ground for the purpose of producing energy for sale.
19. **Lease or loan with Invest EU guarantee for RES financing** - financing applies to photovoltaic equipment, wind turbines, power storage, electric vehicle chargers and other equipment in the area of renewable energy. Thanks to the EIF guarantee[48], attractive financing conditions are offered with an attractive financing conditions with an own contribution from 0% and favourable price conditions. The offer is aimed at small and medium-sized enterprises with up to 500 employees.

Exposures reported under Model 10 were not considered to be Taxonomy-aligned because the Bank did not verify them to meet the technical screening criteria and minimum safeguards, or they did not fully meet these requirement

[48] EIF guarantee - a guarantee provided by the European Investment Fund to cover the repayment risk of between 50% and 70% of the value of the financing.

# 5 Remuneration policy

## 5.1 Main elements of the remuneration policy and ways of their application formula

### 5.1.1 Bodies supervising the remuneration policy

The objective of the Appointments and Remuneration Committee of the Supervisory Board (SBARC) at the Bank is to support the Supervisory Board in the performance of its statutory duties and tasks arising from legal regulations. The SBARC is composed of members of the Bank's Supervisory Board.

Composition of the Appointments and Remuneration Committee of the Supervisory Board at PKO Bank Polski S.A. as at 31 December 2024:

| No. | Name and Surname | Function |
|---|---|---|
| 1. | Katarzyna Zimnicka-Jankowska | Chair of the Committee |
| 2. | Hanna Kuzińska | Deputy Chair of the Committee |
| 3. | Maciej Cieślukowski | Member of the Committee |
| 4. | Jerzy Kalinowski | Member of the Committee |
| 5. | Andrzej Oślizło | Member of the Committee |
| 6. | Marek Panfil | Member of the Committee |
| 7. | Jerzy Śledziewski | Member of the Committee |
| 8. | Paweł Waniowski | Member of the Committee |

In particular, the SBARC is responsible for carrying out the following tasks:
1) reviewing the policy of remunerating persons holding managerial positions at the Bank on a periodical basis and presenting the results of the review to the Supervisory Board,
2) presenting to the Supervisory Board proposals of principles for hiring and remunerating members of the Management Board;
3) giving opinions on the general rules of the policy of remunerating persons whose professional activities have a material impact on the Bank's risk profile, which are subject to approval by the Supervisory Board,
4) reviewing the report of the Internal Audit Department's review of the implementation of the remuneration policy;
5) preparing a draft report on the evaluation of the functioning of the Remuneration Policy in the Bank, which is presented by the Supervisory Board to the General Shareholders' Meeting.

In 2024, SBARC held 15 meetings.

The policy for remunerating the employees of the Bank and the PKO BP S.A. Group (hereinafter the 'Remuneration Policy' or the 'Policy') shall apply to the Bank and the companies of the Bank's Group taking into account the principle of proportionality, based on the following criteria: legal form of business, size, risk related to business activity, internal organisation and the nature and complexity of the conducted business activity. The remuneration policy is applied to foreign branches to the extent consistent with local regulations.

In the process of identifying positions with a significant impact on the risk profile of the Bank, a Bank's Group company, or the entire Bank's Group (MRT), the positions of:
1) members of the Management Board and the Supervisory Board of the Bank,
2) members of the Management Boards and Supervisory Boards of the Bank's Group companies having a significant impact on the risk profile, are considered to be positions with significant influence on the risk profile of the Bank, the Bank's Group companies or the entire Bank's Group respectively.

The MRT positions in the Bank, other than those listed above, identify the Bank's Management Board and, in the case of the Bank's Group companies, the MRTs identify the management board of the Bank's Group, taking into account in particular the provisions of the European Commission delegated regulation supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to regulatory technical standards specifying the criteria for determining the staff or categories of staff whose professional activities affect the institution's risk profile, according to which the MRTs are considered to be MRT:
1) senior management executives responsible for material business units, for managing specific risk categories and for control functions,
2) positions responsible for providing internal support, which are decisive to conducting the operations by exposing the Bank to a material operational risk and other types of risk,
3) positions generating credit risk and market risk, identified using criteria based on competence limits.

In order to identify MRT positions in the Bank's Group companies, the materiality of the company's impact on the risk profile of the Bank's Group Company or the Group as a whole is determined, taking into account the risk management strategy and the requirements of common law. or Group Companies with subsidiaries, the identification of MRT positions within its group is performed by the parent company.

### 5.1.2 Structure of the remuneration system

The remuneration policy provides a consistent remuneration system through:

1) applying a salary system which is in line with market trends,
2) acquiring optimal job candidates,
3) adjusting mechanisms, tools and salary levels to the strategy and goals of the Bank and the Bank's Group,
4) taking into account the ability of the Bank's Group to determine the desired mechanisms and salary levels,

5) determining fixed salaries on the basis of the valuation of positions,
6) determining the remuneration structure on the basis of performance at work and the appraisal of the employees' skills,
7) building the employees' responsibility for the tasks they carry out, on the basis of objectivised criteria,
8) guaranteeing that variable remuneration components are parameterised so that they take into account the cost of risk, the cost of capital and liquidity risk of the Bank and the Bank's Group in the long-term,
9) ensuring that the monetary or non-monetary forms of remuneration do not encourage the persons involved to favour their own interests or the interests of the Bank and the entities in the Bank's Group to the detriment of customers,
10) ensuring gender neutrality in the remuneration of the Group's employees,
11) ensuring compliance with the strategy on environmental, social and governance (ESG) risks.

The Management Board adopts the Policy, and is responsible for implementing the principles resulting from the Remuneration Policy in the Bank and in the Bank's Group companies – through appropriate internal banking regulations and through cooperation with the individual Bank's Group companies. The Supervisory Board approves the Policy.

The Company Collective Bargaining Agreement (ZUZP) concluded with the trade union organisations on 28 March 1994 (as amended) provides the basis for granting the following remuneration components to the Bank employees:
1) base remuneration,
2) additional remuneration for working overtime and under conditions which are particularly onerous and detrimental to health,
3) bonuses and rewards for special career achievements.

Variable remuneration may be reduced, to the point of total disqualification, as a result of the following actions on the part of the MRT up to the date of payment
(in particular during an assessment period equal to at least the last three years):
1) significant breaches of contractual obligations,
2) improper performance of professional duties,
3) lack of compliance with the legal regulations or customer service standards,
4) significant behaviour towards other employees which violates the principles of social coexistence.

When deciding on the payment of variable remuneration for all MRTs, a decision can be made about:
1) possibly limiting the amount of funds for variable remuneration, taking into account:
   - the effect on regulatory capital, solvency ratio and equity so that the payment of variable remuneration does not limit the possibility of enhancing them,
   - the effect on the cost of capital so that the payment of variable remuneration does not limit the possibility of maintaining an adequate capital base,
   - the desired risk profile, including the related costs,
   - the financial performance with regard to long-term development plans.
2) a temporary change, in the event of extraordinary and unforeseen circumstances that require taking a conservative approach to variable remuneration of the MRT:
   - the proportion of deferred to non-deferred variable remuneration in favour of increasing the deferred variable remuneration,
   - extending the deferral periods as regards to the payment of variable remuneration specified in the MRT remuneration principles and the dates as of which:
     - the base value of variable remuneration is converted into the value of financial instruments,
     - the value of financial instruments will constitute the basis for converting a financial instrument into cash to be paid out,
   - the proportion between the cash and the financial instrument component of variable remuneration in favour of an increase in the financial instrument component of variable remuneration.

Before making a payment of variable remuneration, the Management Board determines whether and in which period the conditions for a reduction in variable remuneration (malus) for the assessment period occurred – using the following assessment scheme:
1) significant deterioration in performance due to:
   - balance sheet loss or threat of balance sheet loss,
   - the emergence of a threat of insolvency or loss of liquidity (taking into account the cost of risk, cost of capital and long-term liquidity risk),
2) determination that there has been a material adverse change in equity,
3) a breach of a provision of law, rules and regulations, procedures or obligations arising from the MRT's employment relationship or the MRT committing material errors, e.g., non-compliance with an internal code of conduct, compliance guidelines or core values, particularly in areas of risk management,
4) adjustment of the MRT's performance/objectives and degree of achievement of results/objectives,
5) deterioration in the performance of structures supervised by the MRT,
6) having awarded variable remuneration on the basis of incorrect, misleading information or as a result of fraud by the MRT concerned,
7) a decrease in the ROA ratio below the level that initiates the recovery plan and a decrease in the Tier 1 capital ratio or the total capital ratio TCR below the level of the combined buffer requirement,
8) a decrease in the NSFR below the level that initiates the recovery plan,
9) a decrease in the total capital ratio TCR below the level initiating the recovery plan.

Once the combined buffer or leverage ratio buffer is exceeded, variable remuneration payments are made on a scale that does not cause the MDA or L-MDA to be exceeded within the meaning of the Act of 5 August 2015 on macro-prudential supervision of the financial system and crisis management in the financial system.

The report for 2023 on the evaluation of the functioning of the remuneration policy was adopted by the Supervisory Board by resolution, based on the recommendation of the SBARC. The report indicates that in 2023, the Bank and the Bank's Group continued the remuneration policy leading to a coherent and transparent remuneration system, based on the alignment of remuneration levels to the different grade groups and comparing them to market remuneration. The Bank continues its policy in line with the job evaluation method, relating to the determination of individual job weights according to: skills, problem solving and impact on results, and the programme for recommending job candidates.

Employment on a position, termination of the employment contract and change in the terms and conditions of the employment contract as regards to a position, made in accordance with the employer's decision concerning the head of the internal audit function or the head of the compliance unit – requires prior approval of the Supervisory Board. Determination of the amount of basic remuneration and changes thereto made as regards to such persons are approved by the Supervisory Board or its competent committee, respectively.

Termination of an employment contract and changes in the terms and conditions of the employment contract as regards to a position or changes resulting in a reduction of the basic remuneration, made at the employer's initiative as regards to an employee of the internal audit function or an employee of the compliance unit, require prior approval of the President of the Management Board.

The level of remuneration of persons performing independent control functions should enable the institution to employ qualified and experienced staff to perform these functions, which is taken into account in the job evaluation process. The remuneration of persons performing independent control functions should be predominantly fixed and should reflect the nature of the duties performed, which is taken into account at the goal-setting stage.

Guaranteed variable remuneration components are exceptional and may occur only at the time of initiating an employment relationship or concluding a different contract forming the basis for the provision of work, and are limited to the first year of employment.

A member of the Management Board or MRT may be granted a severance payment (not resulting from the generally applicable regulations) related to the termination of employment, in an amount not exceeding three times the fixed remuneration (arising from the contract on the last day of employment), provided that:
1) the person was employed for an appropriate period,
2) the contract was terminated for any reason other than a breach of fundamental contractual obligations.

If severance pay is granted, its amount should reflect the assessment for the last three years.

### 5.1.3 Description of the ways in which current and future risks are taken into account in the remuneration processes.

The Bank applies the ex-ante and ex post adjustment mechanisms described in section 5.1.2 above.

When deciding on payment, the Bank assesses the relation of the payment to: the Bank's capital requirement, the Bank's equity, the total capital ratio.

The consideration of risk in the process of shaping the MRT remuneration is also visible in the bonus targets set for MRT, which are linked to the level of risk in the Bank's business (see section 5.1.5).

### 5.1.4 The ratio of fixed to variable remuneration components

The total amount of the Variable MRT for a given bonus period may not exceed 100% of the fixed remuneration for the duration of the position. The Bank applies ex ante and ex post adjustment mechanisms described in section 5.1.2.

The impact of risk on the variable remuneration is secured in the process of setting objectives, in accordance with section 5.1.5. below.

### 5.1.5 Description of the ways in which the institution seeks to link performance during a performance measurement period with levels of remuneration.

MRTs are covered by the Management by Objectives System 'MbO'. The objectives set for MRTs include both institutional level objectives as well as individual level objectives specific to the business area and are assigned for the bonus period. The objectives assigned are intended to ensure that the Bank's business cycle and risks are taken into account both by setting appropriate, risk-sensitive performance evaluation criteria and by reducing or not providing variable remuneration in the event of deteriorated financial performance, loss or deterioration of other indicators. MRT's bonus targets also include quantitative as well as qualitative criteria, and are set in a way that ensures:
1) motivating work and behaviour in such a way that the Bank and the Group achieve the best possible stable financial results in the long term,
2) supporting proper and effective risk management and discouraging excessive risk-taking beyond the risk appetite approved by the Supervisory Board,
3) supporting the implementation of the business strategy and limiting conflicts of interest.

MRT's deferred and non-deferred variable remuneration consists of the following components:
1) cash, which represents 50% of variable remuneration,
2) a financial instrument (phantom shares), which represents 50% of variable remuneration.

The only financial instruments used are the Bank's phantom shares, hence there is no need for the Bank to assess the balance between the different types of instruments granted.

When deciding on the payment, the Bank applies the criteria and performance indicators indicated in section 5.1.3. In the event of 'poor' performance, the Bank may apply the measures described in section 5.1.2.

### 5.1.6 Description of the ways in which the institution seeks to adjust remuneration to take account of long-term performance

The total variable remuneration for a given bonus period is determined in the form of non-deferred variable remuneration and deferred variable remuneration in a ratio of 60% to 40% below a particularly large amount and 40% to 60% above a particularly large amount. The Bank, for the variable remuneration for 2024, applies a 5-year deferral period, consisting of annual settlement periods following the end of the remuneration period and calculation of the total base value of all MRT variable remuneration components. The Bank also applies the appropriate required holding period for the instrument.

The Bank does not apply a clawback mechanism for previously paid bonuses. Before making a payment of variable remuneration, it is determined whether and in which period the conditions for a reduction in variable remuneration (malus) for the assessment period occurred, in accordance with section 5.1.2.

### 5.1.7 Description of the main parameters and rationale for any variable component scheme and any other non-cash benefits in accordance with Article 450(1)(f) of the CRR

The Bank applies performance measurement through appropriate target setting which takes into account:
1) Net profit of the Bank's Group,
2) C/I ratio of the Bank's Group in the period (%),
3) ROE of the Bank's Group (in %),
4) Share of impaired receivables in the loan portfolio of the Bank's Group including loans measured at FVPL (in %),

5) Strategic objective:
- Improvement in customer referral rate as measured by the distance to the average relational NPS of individual customers for the top 3 banks surveyed (excluding cooperative banks),
- Improvement in customer referral rate as measured by the distance to the average relational NPS of institutional customers for the top 3 banks surveyed (excluding cooperative banks),
- employee referral rate - the Bank's employee NPS.

The structure of performance indicators combines various types of KPIs, in particular quantitative and effectiveness indicators consistent with the specific nature of an organisation. All performance indicators are parameterised and measurable. Due to the nature of a given managerial position, a different percentage of each objective in the overall assessment is defined by assigning weights to the aforementioned *KPI* types. Responsibility for long-term financial performance was used, adjusted for risk and costs with a different structure of objectives depending on the specific nature of the tasks performed. The positions responsible for control functions are assessed in terms of accomplishment of objectives which are independent of the performance of the structures being controlled.

The division of MRT's deferred and non-deferred variable remuneration is described in section 5.1.5.

### 5.1.8 Other remuneration policy issues

The Bank does not benefit from the derogation set out in Article 94(3)(a) of the CRD. The provisions arising from Article 94(3)(b) of the CRD applied to the Bank in 2024.

## 5.2 Quantitative data on remuneration

The following tables present quantitative data on remuneration for 2024 At the date of publication, variable remuneration components such as bonuses for 2024 have not yet been awarded. Quantitative data on all variable remuneration components awarded for 2024 will be published together with the information on capital adequacy of the PKO Bank Polski S.A. Group prepared for the first half of 2025.

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

| | | | 31.12.2024 | | | |
|---|---|---|---|---|---|---|
| | | | a | b | c | d |
| | | | MB Supervisory function | MB Management function | Other senior management | Other identified staff |
| 1 | Fixed remuneration | Number of identified staff | 8 | 7 | 53 | 179 |
| 2 | | Total fixed remuneration | 1,74 | 8,85 | 34,46 | 58,73 |
| 3 | | Of which: cash-based | 1,74 | 8,56 | 32,76 | 55,13 |
| 4 | | (Not applicable in the EU) | | | | |
| EU-4a | | Of which: shares or equivalent ownership interests | - | - | - | - |
| 5 | | Of which: share-linked instruments or equivalent non-cash instruments | - | - | - | - |
| EU-5x | | Of which: other instruments | - | - | - | - |
| 6 | | (Not applicable in the EU) | | | | |
| 7 | | Of which: other forms | - | 0,30 | 1,70 | 3,60 |
| 8 | | (Not applicable in the EU) | | | | |
| 9 | Variable remuneration* | Number of identified staff | 8 | 7 | 53 | 179 |
| 10 | | Total variable remuneration | - | 5,09 | 9,84 | 1,78 |
| 11 | | Of which: cash-based | - | 5,09 | 9,84 | 1,78 |
| 12 | | Of which: deferred | - | - | - | - |
| EU-13a | | Of which: shares or equivalent ownership interests | - | - | - | - |
| EU-14a | | Of which: deferred | - | - | - | - |
| EU-13b | | Of which: share-linked instruments or equivalent non-cash instruments | - | - | - | - |
| EU-14b | | Of which: deferred | - | - | - | - |
| EU-14x | | Of which: other instruments | - | - | - | - |
| EU-14y | | Of which: deferred | - | - | - | - |
| 15 | | Of which: other forms | - | - | - | - |
| 16 | | Of which: deferred | - | - | - | - |
| **17** | **Total remuneration (2 + 10)** | | **1,74** | **13,95** | **44,30** | **60,51** |

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

| | | 31.12.2024 | | | |
|---|---|---|---|---|---|
| | | a | b | c | d |
| | | MB Supervisory function | MB Management function | Other senior management | Other identified staff |
| **Guaranteed variable remuneration awards** | | | | | |
| 1 | Guaranteed variable remuneration awards - Number of identified staff | - | - | - | - |
| 2 | Guaranteed variable remuneration awards -Total amount | - | - | - | - |
| 3 | Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap | - | - | - | - |
| **Severance payments awarded in previous periods, that have been paid out during the financial year** | | | | | |
| 4 | Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff | - | - | 6 | 1 |
| 5 | Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount | - | - | 0,24 | 0,01 |
| **Severance payments awarded during the financial year** | | | | | |
| 6 | Severance payments awarded during the financial year - Number of identified staff | - | 1 | 19 | 5 |
| 7 | Severance payments awarded during the financial year - Total amount | - | 0,34 | 4,21 | 0,49 |
| 8 | Of which paid during the financial year | - | 0,22 | 3,86 | 0,32 |
| 9 | Of which deferred | - | - | - | - |
| 10 | Of which severance payments paid during the financial year, that are not taken into account in the bonus cap | - | - | 1,81 | 0,12 |
| 11 | Of which highest payment that has been awarded to a single person | - | 0,34 | 1,53 | 0,28 |

Table 5.3 Deferred remuneration [Template EU REM3]

| | | 31.12.2024 | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | EU - g | EU - h |
| | Deferred and retained remuneration | Total amount of deferred remuneration awarded for previous performance periods | Of which due to vest in the financial year | Of which vesting in subsequent financial years | Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year | Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years | Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e.changes of value of deferred remuneration due to the changes of prices of instruments) | Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year | Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods |
| 1 | **MB Supervisory function** | - | - | - | - | - | - | - | - |
| 2 | Cash-based | - | - | - | - | - | - | - | - |
| 3 | Shares or equivalent ownership interests | - | - | - | - | - | - | - | - |
| 4 | Share-linked instruments or equivalent non-cash instruments | - | - | - | - | - | - | - | - |
| 5 | Other instruments | - | - | - | - | - | - | - | - |
| 6 | Other forms | - | - | - | - | - | - | - | - |
| 7 | **MB Management function** | 9,08 | 2,40 | 6,68 | 1,49 | 4,39 | 1,13 | 2,63 | 1,20 |
| 8 | Cash-based | 4,54 | 1,20 | 3,34 | 0,75 | 2,19 | 0,05 | 0,51 | - |
| 9 | Shares or equivalent ownership interests | - | - | - | - | - | - | - | - |
| 10 | Share-linked instruments or equivalent non-cash instruments | 4,54 | 1,20 | 3,34 | 0,75 | 2,19 | 1,08 | 2,12 | 1,20 |
| 11 | Other instruments | - | - | - | - | - | - | - | - |
| 12 | Other forms | - | - | - | - | - | - | - | - |
| 13 | **Other senior management** | 23,77 | 5,23 | 18,55 | 0,59 | - | 3,81 | 9,57 | 2,04 |
| 14 | Cash-based | 11,82 | 2,60 | 9,22 | 0,27 | - | 0,03 | 2,36 | - |
| 15 | Shares or equivalent ownership interests | - | - | - | - | - | - | - | - |
| 16 | Share-linked instruments or equivalent non-cash instruments | 11,18 | 2,47 | 8,72 | 0,31 | - | 3,76 | 6,98 | 1,88 |
| 17 | Other instruments | 0,77 | 0,16 | 0,61 | 0,01 | - | 0,02 | 0,23 | 0,16 |
| 18 | Other forms | - | - | - | - | - | - | - | - |
| 19 | **Other identified staff** | 25,14 | 4,83 | 20,31 | 0,42 | - | 4,22 | 9,64 | 1,34 |
| 20 | Cash-based | 12,57 | 2,42 | 10,15 | 0,21 | - | 0,18 | 2,39 | - |
| 21 | Shares or equivalent ownership interests | - | - | - | - | - | - | - | - |
| 22 | Share-linked instruments or equivalent non-cash instruments | 11,02 | 2,20 | 8,82 | 0,21 | - | 4,00 | 7,02 | 1,20 |
| 23 | Other instruments | 1,55 | 0,21 | 1,33 | - | - | 0,03 | 0,24 | 0,14 |
| 24 | Other forms | - | - | - | - | - | - | - | - |
| 25 | **Total amount** | 57,99 | 12,46 | 45,54 | 2,51 | 4,39 | 9,17 | 21,84 | 4,58 |

In 2024, there were no individuals across the PKO Bank Polski S.A. Group who will receive total remuneration of €1 million or more, therefore table EU REM4 has not been completed.

Table 5.4 Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile* (identified staff) for 2023 [Template EU REM5]

| | | 31.12.2024 | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | a | b | c | d | e | f | g | h | i | j |
| | | Management body remuneration | | | Business areas | | | | | | |
| | | MB Supervisory function | MB Management function | Total MB | Investment banking | Retail banking | Asset management | Corporate functions | Independent internal control functions | All other | Total |
| 1 | Total number of identified staff | | | | | | | | | | 247 |
| 2 | Of which: members of the MB | 8 | 7 | 15 | | | | | | | |
| 3 | Of which: other senior management | | | | 1 | 10 | - | 27 | 3 | 12 | |
| 4 | Of which: other identified staff | | | | 13 | 49 | 17 | 51 | 34 | 15 | |
| 5 | Total remuneration of identified staff | 1,74 | 13,95 | 15,69 | 5,04 | 25,42 | 6,36 | 38,79 | 12,36 | 16,85 | |
| 6 | Of which: variable remuneration | - | 5,09 | 5,09 | 0,20 | 1,30 | 0,15 | 5,95 | - | 4,02 | |
| 7 | Of which: fixed remuneration | 1,74 | 8,85 | 10,59 | 4,84 | 24,12 | 6,21 | 32,83 | 12,36 | 12,83 | |

# 6 Glossary of terms and abbreviations

| | |
|---|---|
| **AMA** *(Advanced Measurement Approach)* | operational risk advanced measurement approach for the purpose of defining the own funds requirements for operational risk according to the CRR Interest Rate Swap) |
| **BRR** | Directive (EU) 2017/2399 of the European Parliament and of the Council of 12 December 2017 requires Member States to create a new category for the settlement of claims in insolvency proceedings. |
| **Carbon Majors Database and Thomson Reuters** | databases used to identify companies with the largest carbon dioxide emissions recommended by the European Commission |
| **CBI** (*Climate Bond Initiative)* | an international organisation working to mobilise global capital for climate action, involved in developing climate bond standards and a certification system |
| **CIRS** (*Currency Interest Rate Swap*) | a transaction involving the exchange of interest payments between counterparties based on different currency denominations and different interest rates |
| **CRD** | Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC |
| **CSA** *(Credit Support Annex)* | a collateral agreement – annex to the framework agreement |
| **EaR** (*Earnings at risk*) | defines maximum deviation of net business income from expected value with an assumed range of confidence in a specified time horizon |
| **EBA** *(European Banking Authority)* | European Banking Authority |
| **ECAI** *(External Credit Assessment Institutions)* | external credit assessment institution |
| **ESG** *(environmental, social responsibility and corporate governance)* | environmental, social and governance issues |
| **ESRS** *European Sustainability Reporting Standards* | European Sustainability Reporting Standards |
| ***FX Swap*** | foreign currency exchange swap – a transaction in which two parties exchange agreed amounts including accrued interest in different currencies for a specified period of time |
| ***Greenwashing*** | marketing communication of a company based on false or misleading statements regarding the compliance of the product or its components with environmental protection principles |
| **IRB** (*Internal Ratings Based Approach*) | an internal ratings method used to determine the capital requirement for credit risk |
| **ISDA** (*International Swap and Derivatives Association*) | International Swap Dealers Association |
| **Internal capital** | amount of capital, that is required to cover all identified significant types of risk present in the Bank or the Bank's Group's business activity and the effect of changes in its business environment, taking into account the anticipated risk level. |
| **KRI** (*Key Risk Indicator*) | operational risk measure, defined as key for a given area of the systemic operational risk management, application, product, service, or process in the context of losses resulting from operational events, i.e., monitoring the main factors affecting the level of key risks for the Bank |
| **CVA** (*Credit Value Adjustment*) | adjustment of the valuation of derivatives reflecting counterparty credit risk |
| **DVA** (*Debt Value Adjustment*) | adjustment of the valuation of liabilities and derivatives reflecting the Bank's own credit risk |
| **LDA** (*Loss Distribution Approach*) | an approach in which historical data on internal and external events are used, as well as the information on the development of business environment factors for statistical measurement of operational risk |
| **LGD** (*Loss Given Default*) | a loss suffered by the Bank in case of customer's default |

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| **TCR** *(Total Capital Ratio)* | the main measure of capital adequacy, calculated as the quotient of own funds and total own funds requirements multiplied by 12.5 |
| **MREL** *(Minimum Requirement for own funds and Eligible Liabilities)* | the minimum requirement for own funds and eligible liabilities pursuant to Article 97 of the PGF Act |
| **MRT** *(Material Risk Takers)* | members of the Management Board and key managers with a significant impact on the risk profile of the Bank |
| **IAS** | International Accounting Standards |
| **IFRS** | International Financial Reporting Standards |
| **NACE** *(nomenclature statistique des activités économiques dans la Communauté européenne)* | The Statistical Classification of Economic Activities in the European Community. NACE is a four-digit classification providing a framework for collecting and presenting a wide range of statistical data according to economic activity in economic statistics and other statistical areas developed within the European Statistical System (ESS). |
| **NBP** | The National Bank of Poland |
| ***Outsourcing*** | using external resources, by delegating certain tasks and actions to be performed by external companies on the basis of contracts |
| **P2G (***Pillar 2 Guidance***)** | Capital recommendations under Pillar 2 imposed by the Polish Financial Supervision Authority to absorb potential losses resulting from extreme conditions. |
| **Non-trading book** | the book containing operations not included in the trading book, specifically related to credit facilities and loans and deposits extended or accepted within the bank's basic business activity or for the purposes of liquidity and interest rate risk management |
| **Trading book** | all positions in financial instruments and commodities held by an institution either with trading intent, or in order to hedge positions held with trading intent. |
| **Individual position for a specific foreign currency (the currency position)** | the difference between total assets in a currency, off-balance sheet liabilities received and assets indexed to that currency on the one hand, and total liabilities in that currency, off-balance sheet liabilities awarded and liabilities indexed to that currency on the other hand |
| **Probability of Default** *(PD)* | a statistical assessment of the probability of a borrower's insolvency on the annual scale (defines the portfolio-related credit risk to become materialised in the future) |
| **RI** (*Risk Indicator*) | operational risk measure, not specified as a key, operational nature, supporting monitoring of operational risk level for a given area, systemic operational risk management, application or process |
| **RTS AMA** | Commission Delegated Regulation (EU) 2018/959 of 14 March 2018 supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards of the specification of the assessment methodology under which competent authorities permit institutions to use Advanced Measurement Approaches for operational risk |
| **Business risk** | the risk of failing to achieve the assumed financial goals, including incurring losses, due to adverse changes taking place in the business environment, making bad decisions, incorrect implementation of the decisions made or failing to take appropriate action in response to changes taking place in the business environment. |
| **Credit risk** | the risk of losses resulting from customer's failure to meet obligations towards the Bank or the risk of a decrease in the economic value of the Bank's receivables as a result of deterioration of the customer's ability to service obligations |
| **Model risk** | the risk of suffering losses as a result of wrong business decisions taken on the basis of functioning models |

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| **Operational risk** | the risk of losses resulting from inadequacy or unreliability of the internal processes, the human factor and systems, or from external events; Operational risk does not include reputation risk or business risk, but does include:<br>• legal risk – the risk of incurring losses resulting from the ignorance, misunderstanding and non-application of legal and accounting standards, inability to enforce contractual provisions, unfavourable interpretations or decisions of courts or public administration authorities,<br>• cybersecurity risk – the degree of vulnerability due to potential negative ICT-related cyber security risk factors that could cause a financial loss to the organisation by compromising the availability, integrity, confidentiality or accountability of information processed on SIB resources. |
| **Liquidity risk** | the risk of inability to timely discharge of liabilities due to non-availability of liquid means |
| **Interest rate risk** | the risk of loss on the Bank's balance sheet and off-balance sheet items sensitive to interest rate changes, resulting from unfavourable interest rate changes on the market |
| **Foreign exchange risk** | the risk of loss due to changes in the foreign exchange rates, generated through maintaining open currency positions in individual currencies |
| **Reputation risk** | Current or future risk of reputation deterioration among customers, counterparties, investors, external supervisory and control bodies, and public opinion as a result of business decisions, operational incidents, security incidents, cases of non-compliance or other events that may have an unfavourable impact on financial results, own funds, or liquidity. |
| **Macroeconomic risk** | the risk of deterioration of the Bank's financial condition as a result of adverse impact of changes in macroeconomic conditions, macroeconomic risk includes geopolitical risk, understood as the macroeconomic effects taking into account the negative effects of the geopolitical environment on the economy and financial markets. |
| **Expected Loss** *(EL)* | a statistically assessed value of the mean (expected) credit risk loss that the bank expects to incur on the portfolio within one year |
| **Strategic tolerance limit** | the level of risk appetite set by the Management Board |
| **Rating method** | a method for assessing the bank's credit risk involved in the financing of institutional customers, incurred when awarding or changing the essential terms of a loan transaction and in the period of performance of such transaction |
| **EU taxonomy** | A set of regulations supporting companies in sustainable activities for the environment and climate. The primary document is the Regulation of the European Parliament and of the Council of the European Union 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088. |
| **TEM** *(Total Exposure Measure)* | the total exposure measure calculated in accordance with Article 429 and Article 429a of the CRR |
| **Stress tests** | a risk management tool used for assessment of the potential impact of a specific event or changes in the market parameters on the Bank or the Bank's Group |
| **TLAC** *(Total Loss-Absorbing Capacity)* | requirements for own funds and eligible liabilities for global systemically important institutions and material subsidiaries of non-EU global systemically important institutions (G-SIIs) |
| **TREA** *(Total Risk Exposure Amount)* | the total risk exposure amount calculated in accordance with Article 92(3) and (4) of the BGF Act |
| **Fair value** | an amount for which a specific asset might be exchanged, and a liability discharged, within a market transaction between interested and informed unrelated parties |
| **Value-at-Risk** *(VaR)* | a potential loss resulting from changes in the present value of cash flows from financial instruments, or a potential loss on the maintained currency positions due to changes in the foreign exchange rates, on the assumption that a defined confidence level and holding period of the position are kept |
| **Credit Value-at-Risk** *(CVaR)* | a potential loss that should not be exceeded in relation to credit risk on the maintained credit portfolio, on the assumption that a defined confidence level and holding period of the position are kept |
| **EP indicator** | determines the level of energy efficiency of a property, which is the unit consumption of non-renewable primary energy in kWh/m2 of the property per year. |
| **LCR indicator** | liquidity coverage requirement describes relation of high-quality liquid assets to total net cash outflows (including cash inflows) over a 30-day period under stress scenario – European measure defined in CRDIV/CRR package |

| | |
|---|---|
| **NSFR indicator** | Net Stable Funding Ratio, which determines the relation between stable funding positions and required stable funding positions – European supervisory measure. |
| **LtV** *(Loan to Value*) | ratio of the credit exposure amount to the value of the real property offered as collateral of that exposure. |
| **Tier 1 (T1) capital ratio** | Capital adequacy measure, calculated as the ratio of Tier 1 capital and the sum of own funds requirements, multiplied by 12.5. No elements of additional Tier 1 capital are identified in the Bank and the Bank's Group, consequently the Common Equity Tier 1 (CET1) ratio is equal to the Tier 1 capital ratio (T1) |
| **Requirements for own funds** | total own funds requirements for particular risk types and own funds requirements for exceeded limits and other violations of norms described in the CRR and CRD, BRR and decisions of external supervisory and control bodies |
| **PBA** | the Polish Bank Association |
| **OGSM** | Ordinary General Shareholders' Meeting |

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

The Management Board of PKO Bank Polski S.A.:

- represents that, to the best of its knowledge, the information has been prepared in compliance with the internal control processes;
- represents that, to the best of its knowledge, the adequacy of risk management arrangements at PKO Bank Polski S.A. ensures that the risk management systems used are appropriate to the risk profile and strategy of the Bank and the Bank's Group;
- approves this Report "Capital Adequacy and other information subject to disclosure of the Group of Powszechna Kasa Oszczędności Bank Polski Spółka Akcyjna as at 31 December 2024", which includes information on risk, discusses the overall risk profile of the Bank and the Bank's Group related to the business strategy and includes key indicators and figures that provide external stakeholders with a holistic view of the risk management of PKO Bank Polski S.A. and the PKO Bank Polski S.A. Group, including interactions between the Bank's risk profile and risk tolerance expressed in the form of strategic tolerance limits determined by the Management Board and approved by the Supervisory Board.