ING

2011

Annual Financial Statements of the ING Bank Śląski S.A. for the year 2011

Table of contents

Annual financial statements of the ING Bank Śląski S.A.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

INCOME STATEMENT	Note	the period from 01 Jan 2011 to 31 Dec 2011	the period from 01 Jan 2010 to 31 Dec 2010
- Interest income	2	3,383.1	2,931.4
- Interest expenses	2	1,544.3	1,330.8
Net interest income	2	**1,838.8**	**1,600.6**
- Commission income	3	1,091.6	1,039.7
- Commission expenses	3	124.1	107.8
Net commission income	3	**967.5**	**931.9**
- Net income on instruments measured at fair value through profit and loss and FX result	4	17.3	75.4
- Net income on investments	5	142.1	28.3
- Net income on hedge accounting	6	-33.4	-12.1
- Net income on other basic activities	7	1.4	-1.4
Result on basic activities		**2,933.7**	**2,622.7**
- General and administrative expenses	8	1,621.5	1,533.1
- Result on other operating income and expenses	9	-8.1	-10.9
- Impairment losses and provisions for off-balance sheet liabilities	10	172.4	201.7
Profit (loss) before tax		**1,131.7**	**877.0**
Income tax	11	227.9	174.7
Net result for the current period		**903.8**	**702.3**

Net profit (loss)		**903.8**	**702.3**
Weighted average number of ordinary shares		**130,100,000**	**130,100,000**
Earnings per ordinary share (PLN)*)	12	**6.95**	**5.40**

*) *In 2011 and 2010, there were no dilution factors at the Bank, therefore the diluted earnings per share equal the core earnings per share.*

SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

Małgorzata Kołakowska
President
Signed on the Polish original

Mirosław Boda
Vice President
Signed on the Polish original

Michał Bolesławski
Vice President
Signed on the Polish original

Justyna Kesler
Vice President
Signed on the Polish original

Oscar Edward Swan
Vice President
Signed on the Polish original

Ignacio Juliá Vilar
Vice President
Signed on the Polish original

SIGNATURE OF THE PERSON ENTRUSTED WITH KEEPING THE ACCOUNTING BOOKS

Tomasz Biłous
Director of Accounting Department
Chief Accountant
Signed on the Polish original

Katowice, 28-02-2012

Income Statement shall be analysed together with the notes to the financial statement being the integral part thereof.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

STATEMENT OF COMPREHENSIVE INCOME		the period from 01 Jan 2011 to 31 Dec 2011	the period from 01 Jan 2010 to 31 Dec 2010
Net result for the period		**903.8**	**702.3**
Other comprehensive income, of which:			
- Gains/losses on remeasurement of available-for-sale financial assets charged to equity	*34*	36.8	8.0
including deferred tax		*-5.3*	*-2.0*
- Reclassification to the financial result as a result of sale of available-for-sale financial assets	*34*	-24.2	2.3
including deferred tax		*5.6*	*-0.4*
- Amortisation of gains or losses previously recognised in equity concerning securities re-classified from the available-for-sale portfolio to the portfolio of loans and receivables	*34*	-0.3	-0.8
including deferred tax		*0.1*	*0.2*
- Remeasurement of property, plant and equipment	*34*	4.7	3.7
including deferred tax		*-1.1*	*-0.9*
- Effective part of cash flow hedging instruments revaluation	*34*	57.8	1.4
including deferred tax		*-13.5*	*-0.3*
- Disposal of property, plant and equipment	*34, 35*	0.2	0.6
including deferred tax		*0.0*	*0.0*
Total other comprehensive income		**75.0**	**15.2**
Total comprehensive income for the period		**978.8**	**717.5**

SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

Małgorzata Kołakowska
President
Signed on the Polish original

Mirosław Boda
Vice President
Signed on the Polish original

Michał Bolesławski
Vice President
Signed on the Polish original

Justyna Kesler
Vice President
Signed on the Polish original

Oscar Edward Swan
Vice President
Signed on the Polish original

Ignacio Juliá Vilar
Vice President
Signed on the Polish original

SIGNATURE OF THE PERSON ENTRUSTED WITH KEEPING THE ACCOUNTING BOOKS

Tomasz Biłous
Director of Accounting Department
Chief Accountant
Signed on the Polish original

Katowice, 28-02-2012

Statement of Comprehensive Income shall be analysed together with the notes to the financial statement being the integral part thereof.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

STATEMENT OF FINANCIAL POSITION	*Note*	as of 31 Dec 2011	as of 31 Dec 2010
A S S E T S			
- Cash in hand and balances with the Central Bank	*14*	1,493.1	2,394.2
- Loans and receivables to other banks	*20*	967.1	1,521.5
- Financial assets measured at fair value through profit and loss	*15*	639.6	636.7
- Valuation of derivatives	*16, 38*	1,858.4	1,158.9
- Investments	*17*	20,450.1	23,005.9
- available-for-sale	*17, 38*	*15,467.8*	*16,787.9*
- held-to-maturity	*17*	*4,982.3*	*6,218.0*
- Derivative hedge instruments	*19, 38*	433.4	104.8
- Loans and receivables to customers	*20*	42,298.7	33,959.3
- Investments in controlled entities	*21*	238.3	451.7
- Property, plant and equipment	*23*	562.4	530.7
- Intangible assets	*24*	360.8	340.9
- Property, plant and equipment held for sale	*25*	22.4	3.1
- Current income tax assets		146.5	0.0
- Deferred tax assets	*26*	15.4	163.5
- Other assets	*27*	138.1	157.2
T o t a l a s s e t s		**69,624.3**	**64,428.4**

SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

Małgorzata Kołakowska
President
Signed on the Polish original

Mirosław Boda
Vice President
Signed on the Polish original

Michał Bolesławski
Vice President
Signed on the Polish original

Justyna Kesler
Vice President
Signed on the Polish original

Oscar Edward Swan
Vice President
Signed on the Polish original

Ignacio Juliá Vilar
Vice President
Signed on the Polish original

SIGNATURE OF THE PERSON ENTRUSTED WITH KEEPING THE ACCOUNTING BOOKS

Tomasz Biłous
Director of Accounting Department
Chief Accountant
Signed on the Polish original

Katowice, 28-02-2012

Statement of Financial Position shall be analysed together with the notes to the financial statement being the integral part thereof.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

STATEMENT OF FINANCIAL POSITION	*Note*	as of 31 Dec 2011	as of 31 Dec 2010
EQUITY AND LIABILITIES			
LIABILITIES			
- Liabilities due to other banks	*28*	4,951.8	4,151.1
- Financial liabilities measured at fair value through profit and loss	*29, 39*	1,814.7	4,681.4
- Valuation of derivatives	*16, 39*	1,694.1	1,292.7
- Derivative hedge instruments	*19, 39*	900.6	600.5
- Liabilities due to customers	*30*	53,044.3	47,430.8
- Provisions	*31*	56.6	54.4
- Current income tax liabilities		0.0	138.3
- Other liabilities	*32*	930.7	641.1
Total liabilities		**63,392.8**	**58,990.3**
EQUITY			
- Share capital	*33*	130.1	130.1
- Supplementary capital - issuance of shares over nominal value		956.3	956.3
- Revaluation reserve from measurement of available-for-sale financial assets	*34*	20.4	8.1
- Revaluation reserve from measurement of property, plant and equipment	*34*	34.8	35.6
- Revaluation reserve from measurement of cash flow hedging instruments	*34*	58.2	0.4
- Revaluation of share-based payment		30.8	21.1
- Retained earnings	*35*	5,000.9	4,286.5
Total equity		**6,231.5**	**5,438.1**
Total equity and liabilities		**69,624.3**	**64,428.4**
Solvency ratio		**11.94%**	**12.20%**
Net book value		**6,231.5**	**5,438.1**
Number of shares		**130,100,000**	**130,100,000**
Net book value per share (PLN)		**47.90**	**41.80**

SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

Małgorzata Kołakowska
President
Signed on the Polish original

Mirosław Boda
Vice President
Signed on the Polish original

Michał Bolesławski
Vice President
Signed on the Polish original

Justyna Kesler
Vice President
Signed on the Polish original

Oscar Edward Swan
Vice President
Signed on the Polish original

Ignacio Juliá Vilar
Vice President
Signed on the Polish original

SIGNATURE OF THE PERSON ENTRUSTED WITH KEEPING THE ACCOUNTING BOOKS

Tomasz Biłous
Director of Accounting Department
Chief Accountant
Signed on the Polish original

Katowice, 28-02-2012

Statement of Financial Position shall be analysed together with the notes to the financial statement being the integral part thereof.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

STATEMENT OF CHANGES IN EQUITY

the period from 01 Jan 2011 to 31 Dec 2011

	Share capital	Supplementary capital - issuance of shares over nominal value	Revaluation reserve from measurement of available-for-sale financial assets	Revaluation reserve from measurement of property, plant and equipment	Revaluation reserve from measurement of cash flow hedging instruments	Revaluation of share-based payment	Retained earnings	**Total equity**
Opening balance of equity	**130.1**	**956.3**	**8.1**	**35.6**	**0.4**	**21.1**	**4,286.5**	**5,438.1**
Net result for the current period	-	-	-	-	-	-	903.8	**903.8**
Other comprehensive income, of which:	**0.0**	**0.0**	**12.3**	**-0.8**	**57.8**	**0.0**	**5.8**	**75.1**
- gains/losses on remeasurement of available-for-sale financial assets charged to equity	-	-	*36.8*	-	-	-	-	*36.8*
- reclassification to the financial result as a result of sale of available-for-sale financial assets	-	-	*-24.2*	-	-	-	-	*-24.2*
- amortisation of gains or losses previously recognised in equity concerning securities re-classified from the available-for-sale portfolio to the portfolio of loans and receivables	-	-	*-0.3*	-	-	-	-	*-0.3*
- remeasurement of property, plant and equipment	-	-	-	*4.7*	-	-	-	*4.7*
- effective part of cash flow hedging instruments revaluation	-	-	-	-	*57.8*	-	-	*57.8*
- merger with subsidiary	-	-	-	-	-	-	*-0.7*	*-0.7*
- disposal of property, plant and equipment	-	-	-	*-5.5*	-	-	*6.5*	*1.0*
Transactions with owners, of which:	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**9.7**	**-195.2**	**-185.5**
- revaluation of share-based payment	-	-	-	-	-	*9.7*	-	*9.7*
- dividends paid	-	-	-	-	-	-	*-195.2*	*-195.2*
Closing balance of equity	**130.1**	**956.3**	**20.4**	**34.8**	**58.2**	**30.8**	**5,000.9**	**6,231.5**

Note: 33, 34, 35

the period from 01 Jan 2010 to 31 Dec 2010

	Share capital	Supplementary capital - issuance of shares over nominal value	Revaluation reserve from measurement of available-for-sale financial assets	Revaluation reserve from measurement of property, plant and equipment	Revaluation reserve from measurement of cash flow hedging instruments	Revaluation of share-based payment	Retained earnings	**Total equity**
Opening balance of equity	**130.1**	**956.3**	**-1.4**	**33.4**	**-1.0**	**15.9**	**3,582.2**	**4,715.5**
Net result for the current period	-	-	-	-	-	-	702.3	**702.3**
Other comprehensive income, of which:	**0.0**	**0.0**	**9.5**	**2.2**	**1.4**	**0.0**	**2.0**	**15.1**
- gains/losses on remeasurement of available-for-sale financial assets charged to equity	-	-	*8.0*	-	-	-	-	*8.0*
- reclassification to the financial result as a result of sale of available-for-sale financial assets	-	-	*2.3*	-	-	-	-	*2.3*
- amortisation of gains or losses previously recognised in equity concerning securities re-classified from the available-for-sale portfolio to the portfolio of loans and receivables	-	-	*-0.8*	-	-	-	-	*-0.8*
- remeasurement of property, plant and equipment	-	-	-	*3.7*	-	-	-	*3.7*
- effective part of cash flow hedging instruments revaluation	-	-	-	-	*1.4*	-	-	*1.4*
- disposal of property, plant and equipment	-	-	-	*-1.5*	-	-	*2.0*	*0.5*
Transactions with owners, of which:	**0.0**	**0.0**	**0.0**	**0.0**	**0.0**	**5.2**	**0.0**	**5.2**
- revaluation of share-based payment	-	-	-	-	-	*5.2*	-	*5.2*
Closing balance of equity	**130.1**	**956.3**	**8.1**	**35.6**	**0.4**	**21.1**	**4,286.5**	**5,438.1**

Note: 33, 34, 35

SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

Małgorzata Kołakowska
President
Signed on the Polish original

Mirosław Boda
Vice President
Signed on the Polish original

Michał Bolesławski
Vice President
Signed on the Polish original

Justyna Kesler
Vice President
Signed on the Polish original

Oscar Edward Swan
Vice President
Signed on the Polish original

Ignacio Juliá Vilar
Vice President
Signed on the Polish original

SIGNATURE OF THE PERSON ENTRUSTED WITH KEEPING THE ACCOUNTING BOOKS

Tomasz Biłous
Director of Accounting Department
Chief Accountant
Signed on the Polish original

Katowice, 28-02-2012

Statement of Changes in Equity shall be analysed together with the notes to the financial statement being the integral part thereof.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

CASH FLOW STATEMENT	Note	the period from 01 Jan 2011 to 31 Dec 2011	the period from 01 Jan 2010 to 31 Dec 2010
OPERATING ACTIVITIES			
Net profit (loss)		**903.8**	**702.3**
Adjustments		**-2,929.2**	**-2,032.0**
- Depreciation and amortisation	8, 23, 24	131.3	119.2
- Interest accrued (from the profit and loss account)	2	1,838.8	1,600.6
- Interest paid		1,522.6	1,391.5
- Interest received		-3,702.7	-3,268.7
- Dividends received	5	-109.0	-30.9
- Gains (losses) on investment activities		-1.6	0.1
- Income tax (from the profit and loss account)	11	227.9	174.7
- Income tax paid		-364.6	-271.1
- Change in provisions	31	2.2	0.3
- Change in loans and other receivables to other banks	20, 42	676.9	288.5
- Change in financial assets at fair value through profit or loss	15, 42	-3.4	7,584.3
- Change in available-for-sale financial assets	18, 42	1,363.7	-9,918.5
- Change in valuation of derivatives	16	-298.1	506.5
- Change in derivative hedge instruments	19	29.3	104.9
- Change in loans and other receivables to customers	20, 42	-8,304.1	-3,982.6
- Change in other assets		-19.7	-32.9
- Change in liabilities due to other banks	28, 42	796.5	201.7
- Change in liabilities at fair value through profit or loss	29	-2,866.7	3,683.4
- Change in liabilities due to customers	30, 42	5,639.4	-288.7
- Change in other liabilities		512.1	105.7
Net cash flow from operating activities		**-2,025.4**	**-1,329.7**
INVESTMENT ACTIVITIES			
- Purchase of property plant and equipment	23	-135.1	-85.5
- Disposal of property, plant and equipment		2.6	1.3
- Purchase of intangible assets	24	-78.5	-65.9
- Redemption of held-to-maturity financial assets	17	1,290.4	1,145.0
- Interest received from held-to-maturity financial assets	17	260.2	363.3
- Dividends received	5	109.0	30.9
Net cash flow from investment activities		**1,448.6**	**1,389.1**
FINANCIAL ACTIVITIES			
- Dividends paid	13	-195.2	0.0
Net cash flow from financial activities		**-195.2**	**0.0**
Effect of exchange rate changes on cash and cash equivalents		***104.5***	***-36.3***
Net increase/decrease in cash and cash equivalents		**-772.0**	**59.4**
Opening balance of cash and cash equivalents		**3,077.7**	**3,018.3**
Closing balance of cash and cash equivalents	42	**2,305.7**	**3,077.7**

SIGNATURES OF THE MEMBERS OF THE MANAGEMENT BOARD OF ING BANK ŚLĄSKI S.A.

Małgorzata Kołakowska
President
Signed on the Polish original

Mirosław Boda
Vice President
Signed on the Polish original

Michał Bolesławski
Vice President
Signed on the Polish original

Justyna Kesler
Vice President
Signed on the Polish original

Oscar Edward Swan
Vice President
Signed on the Polish original

Ignacio Juliá Vilar
Vice President
Signed on the Polish original

SIGNATURE OF THE PERSON ENTRUSTED WITH KEEPING THE ACCOUNTING BOOKS

Tomasz Biłous
Director of Accounting Department
Chief Accountant
Signed on the Polish original

Katowice, 28-02-2012

Cash Flow Statement shall be analysed together with the notes to the financial statement being the integral part thereof.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Accounting policy and additional explanatory notes

I. Information on the Bank

1. Key Bank data

ING Bank Śląski S.A. ("Bank", "Company") with the headquarters in Katowice, Sokolska Str. 34, was entered into the entrepreneurs National Court Register managed by the Commercial Department of the Regional Court in Katowice under the reference number KRS 5459.The Bank statistical number is REGON 271514909, and the tax identification number is NIP 634-013-54-75.

2. Scope and duration of operations

ING Bank Śląski S.A. offers a broad range of banking services rendered for individual and institutional clients in line with the scope of services outlined in the Bank's charter. The Bank runs operations both in the home currency and in foreign currencies. The Bank is also active on the domestic and foreign financial markets. The duration of the Bank was determined as indefinite in the Bank's charter.

3. Share capital

The share capital of ING Bank Śląski S.A. is PLN 130,100,000 and is divided in 130,100,000 ordinary bearer shares with a par value of PLN 1.00 each. In 2011, share face value was split. The details of the said split have been presented in Chapter II. *Significant events in 2011* referred to in item 3. *Split of ING Bank Śląski S.A. share face value*

4. Shareholding structure of ING Bank Śląski S.A.

ING Bank Śląski S.A. is a subsidiary of ING Bank NV, which as at 31st December 2011 held 75% share in the share capital of ING Bank Śląski and 75% shares in the total number of votes at the General Meeting of Shareholders. ING Bank NV belongs to the Capital Group, herein referred to as ING Group.
As at 31st December 2011, ING Bank NV was the sole shareholder holding 5 and more percent of rights to vote at the General Meeting of ING Bank Śląski Spółka Akcyjna.
The data on the number of shares and rights to vote as well as the percentage of shares and rights to vote at the General Meeting have been included in the below table:

No.	Entity	Number of shares and votes	% of total number of shares and votes at General Shareholders Meeting
1.	ING Bank N.V.	97,575,000	75.00

5. Entity authorised to audit financial statements

Entity authorised to audit financial statements is Ernst & Young Audit Sp. z o.o. having its registered office in Warsaw, 1 Rondo ONZ, entered into the list under number 130.

6. Approval of 2010 financial statements

The annual financial statements of the ING Bank Śląski S.A. for the period from 1st January 2010 to 31st December 2010 were approved by the General Meeting on 7th April 2011.

The annual consolidated financial statements of the ING Bank Śląski S.A. Capital Group for the period from 1st January 2011 to 31st December 2011 shall be published and approved on the same day as the standalone financial statements.

II. Significant events in 2011

1. Changes to the Capital Group of ING Bank Śląski S.A. structure

- *merger of ING Bank Śląski S.A .with ING Bank Hipoteczny S.A.*

On 31st October 2011, the District Court in Katowice 8 Commercial Division of the National Court Register issued decision on consolidation of ING Bank Śląski S.A. (the Acquiring Company) with its subsidiary ING Bank Hipoteczny S.A. (the Acquired Company). Since the Acquiring Company held all shares of the Acquired Company, the consolidation was executed in keeping with Article 515 section 1 of the Commercial Companies Code Act, without the increase of the share capital.

The consolidation was carried out pursuant to the method corresponding to the conditions for shares consolidation under the Accounting Act dated 29th September 1994 and it consisted in including the individual items under relevant assets and liabilities of the Acquired Company in the solo financial statements of the Acquiring Company at values recognised in the financial statements of the Acquiring Company as at the consolidation date. The identified differences were insignificant and resulted above all from applying different amortisation rates at the Acquired Company. The differences were not booked as they were immaterial.

- *purchase of 100% of ING ABL Polska S.A.shares*

On 29th December 2011, an agreement of purchase of 1,585,858 shares of ING ABL Polska S.A. company (ING ABL), corresponding to 100% of its share capital, by ING Bank Śląski S.A was concluded. The Bank acquired shares from ING Lease Holding N.V. with the registered office in Amsterdam (Seller). ING ABL is a dominant entity to ING Lease Polska Sp. z o.o. company (ING Lease) and ING Commercial Finance S.A. company (ING CF), where it holds 100% of the share capital. In line with the agreement, the ownership rights were transferred to the Bank on 1st January 2012.

The purchase of the companies dealing with leasing and factoring is to extend the product offer with asset based lending, first and above oriented at the corporate segment. The solution will be beneficial for both the clients as they will be able to take advantage of a full array of financial services within one institution and the Bank who will be capable of using the current client service and distribution network more effectively.

Under the agreement, the purchase price was determined at the net value of ING ABL assets as at 31st December 2011. By 5th January 2012, the Bank remitted to the Seller a prepayment of PLN 213.9 million (i.e. the value of net assets of ING Lease and ING CF companies as at 31st October 2011). The transaction will be settled after the final valuation of the net assets of the acquired company, based on the audited consolidated financial statements of ING ABL developed as at 31st December 2011 for the purpose of the said transaction. The settlement will have been made by 31st March 2012 at the latest.That the financial terms and conditions of the transaction are fair was confirmed by the PwC Polska Sp. z o.o. company in the Fairness opinion delivered to the Bank. The transaction will not impact the 2011 financial results of the Bank.

2. Changes to the statutory authorities of ING Bank Śląski S.A.

- *Bank Management Board*
  - resignation on 27th June 2011 of Mr. Evert Derks Drok from the position of the Vice-President of the Management Board of ING Bank Śląski S.A.
- *Supervisory Board*
  - resignation on 1st April 2011 of Mr. Cornelis Leenaars from the position of the Member of the Supervisory Board.
  - resignation on 16th September 2011 of Mr. César González-Bueno from the position of the Member of the Supervisory Board.
  - appointment on 24th October 2011 of Mr. Roland Boekhout as a Member of the supervisory Board .

3. ING Bank Śląski S.A. share face value split

In 2011, share face value was split. The relevant resolution was passed at the Extraordinary General Meeting of ING Bank Śląski S.A. on 24th October 2011. The change was entered into the register of entrepreneurs of the National Court Register with the decision of the District Court in Katowice of 31st October 2011. Prior to the split the face value of one share amounted to PLN 10. Shares of the Bank are quoted on the Warsaw Stock Exchange (sector: banks). 18th November 2011 was the first day of quotation of the ING Bank Śląski S.A. shares after the split of their face value. As of 31st December 2011, the share price of ING Bank Śląski S.A. was PLN 78.60, whereas during the same period last year it was at the level of PLN 89,40[1].

The decision to split the share face value was justified by the following:

- increasing the availability of ING Bank Śląski S.A. shares for the larger share of investors, especially for individual investors,
- increasing the liquidity of ING Bank Śląski S.A. values on the Warsaw Stock Exchange.

4. Sale of securities from portfolio of financial assets held to maturity

In 2011, the Bank sold securities of the face value of PLN 1.2 million from the portfolio of the financial assets held to maturity. The sale took place on 20th April 2011 and concerned sale of securities with maturity date as at 24th May 2011. The aim of the sale was to change securities with approaching maturity date to securities with longer maturity date, which upon purchase were classified to the portfolio of available-for-sale financial assets. The sale transaction has been previously analysed in terms of fulfilment of requirements determined in IAS 39 concerning the possibility of premature sale of financial assets held to maturity; in the said case the premature sale was admitted on account of securities' close (less than 3 months) maturity date and insignificant impact of market changes on their fair value as well as the fact that the sold securities were not a material part of the portfolio of securities held by the Bank. The Bank earned a positive result on this transaction amounting to PLN 1.9 million. The income was included in the income statement in item *Investment income*.

[1] After making figures comparable (1:10 split).

5. Dismissal of the action for declaring the Resolutions of the General Meeting invalid

In August 2011, the District Court in Katowice dismissed the entire action lodged by Związek Zawodowy Górników w Polsce (Polish Miners Trade Union) and Związek Zawodowy "KADRA" Pracowników Katowickiego Holdingu Węglowego S.A. ("KADRA" Trade Union of Katowice Coal Holding S.A. Employees) for declaring the resolutions of the General Meeting of ING Bank Śląski S.A. passed on 7th April 2011 invalid, and demanding their repeal. The said resolutions concerned the approval of the annual financial statements for the year 2010, acknowledgement of the fulfilment of duties by the President of the Management Board of ING Bank Śląski for the year 2010 and approval of the distribution of profit for the year 2010.

6. Portfolio sale

In 2011, the Bank concluded two agreements regarding the credit portfolio sale:

1) The agreement of 9th March 2011 on the sale of portfolio of identified non-performing loans with Ultimo Niestandaryzowany Sekurytyzacyjny Fundusz Inwestycyjny Zamknięty (Ultimo Non-Standardised Closed Securitisation Investment Fund) with its registered office in Warsaw. The total amount of receivables sold as part of the above agreement totalled PLN 41.1 million (principals, interests and other incidental dues), which in material part are recognized as impairment losses, or written off the Bank balance sheet in full. Contractual price of the portfolio sale was established at PLN 0.9 million. As a consequence of the agreement described herein, the Bank decreased its impairment losses on loans and other receivables by PLN 12.9 million. Net impact on the Bank's net income under portfolio sale amounted to PLN +0.2 million.
2) The agreement of 3rd October 2011 on the sale of portfolio of corporate receivables recognized as impaired loans or written off the Bank balance sheet in full concluded with Kredyt Inkaso I Niestandaryzowany Sekurytyzacyjny Fundusz Inwestycyjny Zamknięty (Loan Collection 1 Non-Standard Closed-End Securitisation Investment Fund). The total amount of receivables sold under the agreement equalled PLN 201.9 million (principals and interests), which in material part are recognized as impairment losses, or written off the Bank balance sheet in full. Contractual price of the portfolio sale was established at PLN 13.6 million. As a consequence of the agreement described herein, the Bank increased its impairment losses on loans and other receivables by PLN 76.8 million. Net impact on the Bank's net income under portfolio sale amounted to PLN +11.3 million.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

7. Conclusion of significant agreements

Date	Type of agreement	Contracting party	Amount	Duration
07 July 2011	Credit Agreement	2 equity-related entities from the financial sector	maximum PLN 630 million	2 years
21 July 2011	in cooperation with the consortium of other banks, annex to the agreement related to increasing the bond issue programme	fuel and energy sector entity	max PLN 5.0 billion in which max PLN 917.0 million is attributable to ING Bank Śląski S.A.	4 years
28 October 2011	In cooperation with the consortium of other banks, annex to the agreement related to increasing the bond issue programme	energy sector entity	max PLN 4.3 billion in which max PLN 716.4 million is attributable to ING Bank Śląski S.A.	5 years
20 December 2011	credit agreement - as part of the consortium with another bank	wholesale distribution sector entity	max PLN 1.07 billion in which max PLN 535 million is attributable to ING Bank Śląski S.A.	4 years

III. Significant events after the balance sheet date

1. Changes to the statutory authorities of ING Bank Śląski S.A.

On 9th January 2012, the Supervisory Board of ING Bank Śląski S.A. appointed Mr. Ignacio Juliá Vilar for the position of the Vice-President of the Bank Management Board as of 1st February 2012.

2. Changes to the Capital Group of ING Bank Śląski S.A. structure

On 5th January 2012, the ING Usługi dla Biznesu S.A. company was established; ING Bank Śląski holds 100% shares thereof. The operations of the newly established company include provision of a wide array of services for Bank's clients as regards handling their business operations.

3. Conclusion of significant agreement

1) On 19th January 2012, ING Bank Śląski S.A. concluded a credit agreement with ING Lease Polska S.A. on providing the credit line totalling PLN 2,040.0 million by 31st January 2013 (with potential extension). This agreement supersedes the framework agreement of 30th January 2006 as amended, as well as terminates the agreement on financial pledge on securities concluded by and between the Bank and ING Lease Polska S.A. on 9th April 2008 as amended. The total credit exposure of the Bank towards ING Lease Polska S.A. is PLN 2,040.0 million. The borrower is an affiliated entity of ING Bank Śląski S.A.
2) On 2nd January 2012, there was concluded a credit agreement with ING Commercial Finance Polska S.A. on providing the credit line totalling PLN 1,365.0 million by 31st January 2013 (with potential extension). This agreement supersedes the credit agreement concluded by and between the Bank and ING Commercial Finance Polska S.A. of 8th September 2006 with further annexes and it also terminates the agreement on financial pledge on securities concluded by and between the Bank and ING Commercial Finance Polska S.A. on 9th April 2008 with further annexes. The total exposure of the Bank towards the

ING Commercial Finance Polska S.A. Company is PLN 1,695.0 million. The borrower is an affiliated entity of ING Bank Śląski S.A.

IV. Statement of compliance with International Financial Reporting Standards

These annual financial statements for the period from 1st January 2011 to 31st December 2011 were prepared in compliance with the International Financial Reporting Standards ("IFRS") approved by the European Union. In view of the ongoing process of IFRS introduction in the EU and the business run by the Company, as at the approval date of this report, there were no differences between the already effective IFRSs and the IFRSs approved by the EU in terms of the accounting principles applied by the Company. IFRS include standards and interpretations accepted by the International Accounting Standards Board ("IASB") and International Financial Reporting Interpretation Committee ("IFRIC").

Income statement, statement of comprehensive income, statement of changes in equity, and cash flow statement for the period from 1st January 2011 to 31st December 2011, and statement of financial position as at 31s December 2011 together with comparable data were prepared according to the same principles of accounting for each period.

1. Going-concern

These annual financial statements were prepared on a going-concern basis as regards the foreseeable future, namely as regards the period of minimum 12 months from the balance sheet date. As of the date of approving these statements, the Bank Management Board has not identified any events that could indicate that the continuation of the operations by the ING Bank Śląski S.A. is endangered.

2. Discontinued operations

No operations were discontinued during the 2011 and 2010.

3. Financial statements scope and currency

The Bank is the dominant entity of the Capital Group of ING Bank Śląski S.A. and besides these financial statements it also produces the consolidated financial statements compliant with IFRS.

These annual financial statements have been developed in Polish zloties ("PLN"). Unless provided for otherwise, all values were given rounded up to PLN million. Therefore, some totals and individual notes can be inconsistent in mathematical terms.

4. Term of the statements and comparable data

These annual financial statements of the ING Bank Śląski S.A. cover the period from 1st January 2011 to 31st December 2011 and include the comparative data:

- items from the statement of financial position as at 31st December 2010,
- items in the income statement, statement of comprehensive income, statement of changes in equity and cash flow statement for the period from 1st January 2010 to 31st December 2010.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

5. Changes to accounting standards

In these annual financial statements the Bank took account of the following binding standards and interpretations approved by the European Union for annual periods starting on or after 1s January 2011:

Change	Scope	Influence on the Bank statements
IAS 32 Financial Instruments: Presentation	Applicable to annual periods beginning after 1 February 2010. The amendment pertains to the manner of classification of specified pre-emptive right where the issued financial instruments are denominated in the currency other than the functional currency of the issuer.	It has no substantial impact on the financial statements of the Bank.
IAS 24 *Related Party Disclosure*	Applicable to annual periods beginning on or after 1 January 2011. The introduced amendments concern the simplification of the definition of the related entity and deletion of some internal inconsistencies and exemption of some entities related to government form certain requirements of information disclosure.	It has no substantial impact on the financial statements of the Bank.
IFRS 1 *Limited Exemption from Comparative IFRS7 Disclosures for First-time adopters*	Applicable to annual periods beginning after 1 July 2010.	It has no substantial impact on the financial statements of the Bank.
IFRIC 14 *The Limit of a Defined Benefit Asset, and Minimum Funding Requirements and their Interaction*	Applicable to annual periods beginning 1 January 2011 onwards. Interpretation concerns the plan of specified benefits under minimum funding requirements the prepayment of which is recognized as element of financial assets.	It has no substantial impact on the financial statements of the Bank.
IFRIC 19 *Extinguishing Financial Liabilities with Equity*	Applicable to annual periods beginning after 1 July 2010. The interpretation presents recommendation as to recognizing by the debtor the equity instruments issued by such creditor as a result of renegotiation of the terms and conditions of financial liability in order to extinguish such liability fully or partially.	It has no substantial impact on the financial statements of the Bank.
Amendments resulting from annual review of IFRS applicable to annual reporting periods starting 1 January 2011.	The annual reviews is to improve and specify in more detail the international accounting standards. The majority of amendments either specify existing IFRS in more detail, introduce amendments thereto or constitute amendments resulting from previous amendments to IFRS. Amendments to IFRS 1, IFRS 3, IFRS 7, IAS 1, IAS 27, IAS 34 and IFRIC 13 embrace amendments to existing requirements or constitute additional explanation as to application of the said requirements.	The financial statements have been updated with the consideration of the changes made, in particular related to IFRS 7; however, the said changes have not materially affected the Bank financial statements.

The published standards and interpretations which were already issued but are still ineffective as they were not approved by the European Union or were approved by the European Union but were not previously applied by the Bank:

Change	Scope	Influence on the Bank statements
IAS 1 Presentation of Financial Statements	The changes result from co-operation between IASB and FASB (US GAAP has been changed in the same manner) and refer to the guidelines for items presentation under other total income.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.

IAS 12 *Income Taxes*	The amendments pertain to classification of the revenue depending on expectations of the entity whether or not it will recover the carrying value of a given assets either through use or sale.	Currently, the Bank is analyzing the impact of the amendments on financial statements.
IAS 19 Employee Benefits	The changes refer to the removal of the possibility to defer income and costs recognition (i.e. elimination of the "corridor method"), presentation under other total income and requirements for disclosure.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IAS 27 *Separate financial statements*	The amendment introduces the necessity to recognize investments in subsidiaries, jointly controlled entities and associates at cost or in line with rules set forth in IFRS 9 *Financial Instruments* in separate financial statements. The name of the standard was also changed.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IAS 28 *Investments in associates*	The amendments concern the accounting principles for investments in associates and determine the requirements that have to be met in order to apply accounting using the equity method for investments in associates and jointly controlled entities.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IAS 32 *Financial instruments: Presentation*	The change specifies the meaning of the phrase "have the on-going possibility to exercise the right to set off" and that certain systemic gross settlements can be treated as the equivalent of net settlement.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IFRS 1 *First-time Adoption of International Financial Reporting Standards: severe hyperinflation and removal of fixed dates for those who adopt IFRS for the first time.*	The change specifies the guidelines related to reinstitution of the financial statements presentation in line with the IFRS following the term when the functional currency was exposed to significant hyperinflation, thus enabling the given entity to fulfil the IFRS requirements and to delete the fixed dates of IFRS first-time application.	It has no impact on the financial statements of the Bank.
IFRS 7 *Financial Instruments: Disclosures*	The amendment specifies in more details the requirements as to transfer of financial assets. Change of requirements for disclosures related to offsetting of financial assets and liabilities.	Currently, the Bank is analyzing the impact of the amendments on financial statements.
IFRS 9 *Financial Instruments*	The standard is the result of the outcome of the first stage of IASB Project focusing on the replacement of IAS 39 and it comprises the classification and valuation of assets and financial liabilities. The subsequent stages of IASB Project will cover hedge accounting and permanent impairment of financial assets. The change concerns shift of the obligatory date for standard application from 1 January 2013 to 1 January 2015.	Standard implementation will affect the structure of the financial statements; however, the Bank will comprehensively assess the impact of the new standard together with the guidelines related to hedge accounting and impairment, which were not published before.

IAS 10 Consolidated Financial Statements	New standard presenting the guidelines for financial statements consolidation including in particular but not limited to the indications confirming the requirement to include entities in the Consolidated Financial Statements.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IAS 11 Joint Arrangements	New standard sets out the requirements for joint arrangements recognition and measurement.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IAS 12 Disclosure of Interest in Other Entities	New standard sets out the disclosures of interest in other entities.	The Bank is currently analysing the impact of the changes on the financial statements. The preliminary analysis shows that the change will affect the structure of the Bank financial statements but it will be of immaterial nature.
IAS 13 Fair Value Measurement	New standard sets out the fair value guidelines.	Currently, the Bank is analyzing the impact of the amendments on financial statements.
IFRIC 20 Stripping Costs in the Production of a Surface Mine	The interpretation clarifies when production stripping should lead to the recognition of an asset and how that asset should be measured, both initially and in subsequent periods.	Not applicable.

V. Material accounting principles

1. Basis for preparation of financial statements

The concept of fair value has been applied in the statements for own real property and investment property as well as financial assets and liabilities measured at fair value, including derivative instruments, and financial assets classified as available-for-sale, excluding those for which the fair value cannot be determined in a reliable manner. Other items of financial assets (including loans and receivables) are presented at amortized cost less impairment charges or at purchase price less impairment charges.

Fixed assets for sale are recognised at the lower of their balance sheet value and the fair value minus sales costs.

2. Accounting Estimates

The preparation of financial statements in accordance with IFRS requires from the Bank the use of estimates and assumptions that affect the amounts reported in the financial statements and notes thereto.

Estimations and assumptions applied to the presentation of value of assets, liabilities, revenues and costs are made on basis of historical data available and other factors considered to be relevant in given circumstances. Applied assumptions related to the future and available data sources are the base for making estimations regarding carrying value of assets and liabilities, which cannot be determined explicitly on the basis of other sources. The estimates reflect the reasons for/ sources of uncertainties as at the balance sheet date. The actual results may differ from estimates.

The estimations and assumptions are reviewed on an on-going basis. Adjustments to estimates are recognized in the period when the estimation was changed provided that the adjustment applies to this period alone or in the period when the estimation was changed and in the following periods, should the adjustment impact both the current and future periods.

Below are the most significant booking estimates made by the Bank.

2.1. Impairment of financial assets

At each balance sheet date the Bank assesses whether there is objective evidence of impairment of a given financial asset or of a group of such assets. Impairment of a financial asset or of a group of financial assets is incurred only if there is objective evidence for the impairment due to one or many events. The occurrence of such event or group of such events affects the estimation of expected cash flows regarding these assets. The estimates may take into account any observable indications pointing at the occurrence of an unfavourable change in the solvency position of debtors belonging to any particular group or in the economic situation of a given country or part of a country, which is associated with the problems appearing in that group of assets. Historical parameters of recoveries are adjusted on the basis of the data coming from current observations so as to take into consideration the influence of current conditions and to exclude the influencing factors from the prior periods that are not currently present.

In order to estimate impairment or its recovery it is necessary to estimate the present value of the expected cash flows. If there is objective evidence that an impairment loss on loans and receivables carried at amortized cost has been incurred the amount of the loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows discounted using effective interest rate. If in a subsequent period the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognized the previously recognized impairment loss is reversed by adjusting a carrying amount of the financial asset. The amount of the reversal shall be recognised in the income statement up to the value of prior impairment.

The methodology and the assumptions on the basis of which the estimated cash flows and their anticipated timing are determined are regularly reviewed and updated. Moreover the tests on historical data are carried out in order to compare actual results with estimations of impairment.

2.2. Credit risk connected with derivative instruments

The Bank has been systematically reviewing the level of credit risk concerning derivative instruments portfolio.

The approach adopted by the Bank to estimation of the credit risk generated by derivative instruments with future settlement dates (active transactions outstanding as at the balance sheet date) is in line with the approach adopted by the Bank for the purpose of assessing the credit risk generated by credit receivables. The valuation adjustments are estimated at the level of a single counterparty using the expert knowledge, the value of PD and LGD

ratios and amount of the expected credit exposure. In 2011, the Bank made the methodology of estimating the valuation adjustment more precise by including the element resulting from the credit risk of negative exposures against the Bank credit risk.
In addition for mature transactions or terminated and unsettled as at the balance sheet date the Bank made charges using the methodology for assessing the risk of impaired loans.

The two types of fair value adjustments as mentioned above were differently reflected in the financial statement. Fair value adjustments due to risk for non-matured transactions were presented under the item *Net income on instruments measured at fair value through profit and loss and FX result* whereas the charges for matured transactions under the item *Impairment charges for financial assets and provisions for off-balance-sheet liabilities.* If a transaction whose fair value was adjusted in the previous reporting period in the position *Net income on instruments measured at fair value through profit and loss and FX result* becomes mature or subject to restructuring, then the amount of the previous fair value adjustment should be moved to the position *Impairment charges* and the added part of the impairment charge for such already matured transaction is presented in the profit and loss account in the position *Impairment charges and provisions for off-balance liabilities*. Therefore the financial result is influenced only by the amount of surplus of the current impairment charge (or write-down) for a mature transaction above the amount of the fair value adjustment established before the transaction has matured.

In addition, the Bank assesses the level of FX option risk, being the consequence of:

- fair value change of the FX rate-based derivatives,
- change to the counterparty credit risk assessment made by the Bank.
-

The assessment is made at the balance sheet date based on the valuation figures as at that date and taking into account the risk assessment as at that day. The Bank will perform periodic assessment of the financial condition of clients holding similar instruments.

2.3. Impairment of other non-current assets

At each balance sheet date the Bank assesses the existence of circumstances indicating of impairment of a non-current asset. If such indicators exist the Bank performs an estimation of recoverable value. Estimation of value-in-use of a non-current asset (or cash generating unit) requires assumptions to be adopted regarding among others amounts and timing of future cash flows which the Bank may obtain from the given non-current asset (or cash generating unit). Adoption of different measurement assumptions could affect the carrying value of some of the non–current assets. The Bank performs an estimation of the fair value less costs to sell on the basis of available market data regarding this subject or estimations made by external bodies which are also based on estimations.

2.4. Measurement of financial instruments that do not have a quoted market price

The fair value of financial instruments not quoted on active markets is measured using valuation models. For non-option derivatives, the models based on discounted cash flows apply. Options are valued using option valuation models including the assessment of counterparty risk.
Valuation models used by the Bank are verified by independent bodies before/prior to their usage. Where possible in models the Bank uses observable data from active markets. However, the Bank also adopts assumptions as to probability (as counterparty risk, variables and market correlations). The change of assumptions concerning these factors may influence valuation of some financial instruments.

2.5. Retirement and pension benefits provision

The Bank establishes the provisions for retirement and pension benefit in accordance with IAS 19. The provision for retirement and pension benefit pay awarded as part of the benefits under the Labour Code regulations is calculated using the actuarial method by an independent actuary as the current value of the future long-term Bank obligations towards its employees according to the headcount and payroll state as at the updating date.

The provisions are calculated based on the range of assumptions, related to both macroeconomic conditions as well as to those related to staff rotation, death risk and others. The employees provision is calculated based on the estimated retirement or pension benefit which the Bank undertakes to pay under the General Conditions of Remuneration effective. The estimated retirement amount is calculated as the product of the following elements:

- the estimated assessment basis for retirement and pension benefit, in keeping with the General Conditions of Remuneration,
- the estimated growth of assessment basis by the time of reaching the retirement age,
- percentage rate depending on seniority (in keeping with the General Conditions of Remuneration).

The resulting amount is discounted on an actuarial basis as at the year end day. In accordance with IAS 19 requirements, the financial discount rate used for calculating the current value of the employee benefit obligations is determined on the basis of the market yield on government bonds, whose currency and maturity date is consistent with the currency and estimated term of the employees benefit obligations.

The discounted amount is lowered by the annual impairment provisions discounted using actuarial method as at the same day, the purpose whereof is to increase the employee provisions. The actuarial discount stands for the product of the financial discount and the probability that the given individual will survive until the retirement age as the Bank employee.

The amount of annual impairments and the probability are calculated based on the models assuming the following three risks:

- probability of quitting work,
- full incapacity to work,
- death.

The probability of quitting work is estimated according to the statistical distribution principle, with the consideration of the Bank's statistical data. The probability of employee quitting work depends on the age of employee and is at fixed level in every work year.

The risk of death has been reflected in the latest statistical data from the Polish life-tables for men and women published by the Central Statistical Office as at the valuation date.

The provision being the result of the actuarial valuation is updated annually.

The Bank adopts a corridor approach to recognition of a determined portion of the cumulated net value of actuarial gains and losses. Under this method when determining an obligation due to certain benefits the Bank recognises some actuarial gains and losses as revenue or costs when the net value of accumulated unrecognised actuarial gains and losses as at the end of the previous reporting period exceeds the higher of the following two values:

- 10% of the current value of the obligation due to certain benefits as at that day (before deduction of the plan's assets),
- 10% of the fair value of the plan's assets as at that day.

A portion of the actuarial gains and losses above the said limit is recognised in the income statement as the quotient of the above named excess and the average expected remaining working life of the Bank employees. The Bank presents in the balance sheet the net value of the liability comprising the current value of the liability and unrecognised actuarial gains/ losses.

The potential impact of implementation of the planned changes to IAS 19 on the Bank financial statements considered as immaterial was presented in Chapter IV. *Compliance with the International Financial Reporting Standards* in the item related to changes to the accounting standards.

3. Investments in subsidiaries and affiliated companies

Investments in subsidiaries and affiliated companies are measured at purchase price minus impairment charges.

3.1. Consolidation of companies in legal terms

When settling the transactions of consolidating the Bank with its subsidiary (being under joint supervision), the Bank applies consolidation approach where under the shares were consolidated under Accounting Act of 29th September 1994.

Under this approach, particular items of relevant assets and liabilities of the consolidated subsidiary are included in the standalone financial statements of the Bank according to values recognized in the consolidated financial statements of the dominant entity as at consolidation date. The consolidation does not affect the comparable data; thus the data do not require any change.

The takeover approach is applied when settling the purchase of entities from non-associated parties. On takeover date, the Bank recognize, separately from goodwill, purchased identifiable assets and the taken over liabilities possible to identify taking into account recognition criteria and all non-controlling interests in the taken over entity.

4. Foreign currency

4.1. The functional currency and the presentation's currency

The items contained in presentations of the Bank are priced in the currency of the basic economic environment in which a given entity operates ("the functional currency"). These financial statements is presented in Polish Zloty, which is the functional currency and the presentation currency of the Bank.

4.2. Transactions and balances in foreign currency

Transactions expressed in foreign currencies are translated at FX rate prevailing on the transaction date. The financial assets and liabilities, being result of the said transactions and denominated in foreign currencies are translated at the FX rate prevailing on a given day. The foreign exchange differences resulting from the settlements of the said transactions and the balance sheet valuation of the financial assets and liabilities denominated in foreign currency are recognized in the income statement in the detailed item *FX result,* which is an element of *Net income on instruments measured at fair value through profit and loss and FX result.*

Foreign exchange differences due to such items as equity instruments classified as available-for-sale financial assets are recognized in revaluation capital of available-for-sale financial assets.

5. Financial assets and liabilities

5.1. Classification

The Bank classifies financial instruments to the following categories: financial assets and liabilities valued at fair value through profit and loss, loans and receivables, investments held to maturity, available for sale financial assets.

5.1.1. Financial assets and liabilities valued at fair value through profit and loss

These are financial assets or financial liabilities that meet either of the following conditions.

- are classified as held for trading. A financial asset or financial liability is classified as held for trading if it is: acquired or incurred principally for the purpose of selling or repurchasing it in the near term or are a part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking. Derivatives are also classified as held for trading, other than those that are designated and effective hedging instruments,
- upon initial recognition it is designated by the Bank as at fair value through profit and loss. Such designation can be made only if:
  - the designated financial asset or financial liability is a hybrid instrument containing one or many embedded derivatives, which qualify for separate recognition and embedded derivatives cannot change significantly the cash flows resulting from the host contract or separation of embedded derivative is forbidden;
  - usage of such classification of financial asset or liability eliminates or decreases significantly the inconsistency of measurement or recognition (so called accounting difference due to various methods of assets and liabilities valuation or various recognition of gains and losses attributable to them);
  - the group of financial assets and liabilities or both categories is managed properly, and its results are measured using fair value, in accordance with documented risk management principles or the Bank's investment strategy.

5.1.2. Investment held to maturity

Those are the financial assets other than derivatives with payments specified or possible to specify and with the maturity date specified, other than those defined as loans or receivables, which the Bank intends to and is able to hold by the maturity date.

In case of sale or reclassification of more than an insignificant amount of held-to-maturity investments in relation to the total held-to-maturity investments before maturity all the assets of this category are reclassified to the available sale category. In such a case, the Bank must not classify any financial assets as investments held to maturity for 2 years.

5.1.3. Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market, other than:

- those that the entity intends to sell immediately or in the near term, which are classified as held for trading, and those that the entity upon initial recognition designates at fair value through profit and loss;
- those that the entity upon initial recognition designates as available for sale;
- those for which the holder may not recover substantially all of its initial investment, other than because of credit deterioration, which are classified as available for sale.

Loans and receivables include loans and cash loans extended to other banks and clients including repurchased debt claims, debt securities reclassified from the portfolio of financial assets available for sale and debt securities not listed on the active market, that comply with the definition of loans and receivables.

5.1.4. Financial assets available for sale

Available-for-sale financial assets are those non-derivative financial assets that are designated as available for sale or are not classified as loans and receivables, held-to-maturity investments or financial assets at fair value through profit and loss.

5.1.5. Other financial liabilities

Financial liabilities being a contractual obligation to deliver cash or other financial asset to another entity not valued at fair value through the profit and loss, being a deposit or loan received.

5.1.6. Financial guarantee contracts

A financial guarantee contract is a contract that requires the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument.

5.2. Recognition

The Bank recognizes financial assets or liabilities on the balance sheet when, and only when it becomes a party to the contractual provisions of the instrument. Purchase and sale transactions of financial assets valued at fair value through profit and loss, held-to-maturity and available for sale are recognized, in accordance with accounting policies applied to all transactions of a certain type, at the settlement date, the date on which the asset is delivered to an entity or by an entity. Loans and receivables are recognized on distribution of the cash to borrower.

5.3. Derecognition

The Bank derecognises a financial asset when, and only when: the contractual rights to the cash flows from the financial asset expire or the Bank transfers the contractual right to receipt of the cash flow from the financial asset.

On transferring a financial asset, the Bank evaluates the extent to which it retains the risks and rewards of ownership of the financial asset. Accordingly, where the Bank:

- transfers substantially all the risks and rewards of ownership of the financial asset, it derecognises the financial asset,
- retains substantially all the risks and rewards of ownership of the financial asset, it continues to recognise the financial asset,
- neither transfers nor retains substantially all the risks and rewards of ownership of the financial asset, it the Bank determines whether it has retained control of the financial asset. In this case if the Bank has retained control, it continues to recognise the financial asset, and if the Bank has not retained control, it derecognises the financial asset to the extent of its continuing involvement in the financial asset.

The Bank removes a financial liability (or a part of a financial liability) from its balance sheet when, and only when the obligation specified in the contract is realised or cancelledor expires.

The Bank derecognizes loans and receivables or its part from its balance sheet, if rights pertaining to the credit agreement expire, the Bank waives such rights, or sells the loan.

When irrevocability of financial assets is declared, the Bank most frequently writes down receivables as impairment charges.

The amounts of receivables written down as loss and recovered thereafter shall diminish the value of impairment loss in the income statement.

5.4. Measurement

When a financial asset or financial liability is recognised initially, the Bank measures it at its fair value plus, in the case of a financial asset or financial liability not at fair value through profit and loss, transaction costs that are directly attributable to the acquisition or issue of the financial asset or financial liability.

After initial recognition, the Bank measures financial assets, including derivatives that are assets, at their fair values, without any deduction for transaction costs it may incur on sale or other disposal, except for the following financial assets:

- loans and receivables which are measured at amortized cost using the effective interest method;
- held-to-maturity investments which are measured at amortised cost using the effective interest method;
- investments in equity instruments that do not have a quoted market price in an active market and their fair value cannot be reliably measured and derivatives that are linked to and must be settled by delivery of such unquoted equity instruments, which are measured at cost.

After initial recognition, the Bank measures all financial liabilities at amortised cost using the effective interest method, except for:

- financial liabilities at fair value through profit and loss. Such liabilities, including derivatives that are liabilities, are measured at fair value except for a derivative liability that is linked to and must be settled by delivery of an unquoted equity instrument which fair value cannot be reliably measured, are measured at cost,

- financial liabilities resulting from the transfer of a financial asset which does not qualify for being excluded from the balance sheet or recognised on a *continuing involvement* basis.

The other financial liabilities are measured at depreciated cost or the amount of due payment.

Granted financial guarantees are measured at the higher of:

- the amount being the most appropriate estimation of the expenditures needed to fulfil the current obligation arising from the financial guarantee, upon consideration of the probability of materialisation thereof;
- the amount recognised at the initial entry, adjusted with the settled amount of commission received for granting the guarantee.

5.5. Reclassification

With the current scope of Banks' activity the principles of reclassification described below are applicable.

A particular financial asset classified as available-for-sale may be reclassified from this category should it fulfil the definition of loans and receivables and should the Bank intend and be able to maintain this financial asset in the foreseeable future or until its maturity. Fair value of the financial asset on the reclassification date is deemed as its new cost or new depreciated cost, respectively.

In the event of a maturing financial asset, the profits or losses recognised as equity until the date of reclassification are amortised and carried through the income statement for the remaining term until maturity. All differences between the new amortised cost and the amortisation amount are amortised for the remaining term until the instrument's maturity, similarly to the amortisation of premium or discount. Amortisation is based on the effective interest rate method.

In the event of a non-maturing asset, the profits or losses remain with equity until the asset has been sold or disposed of otherwise when it is carried through the income statement.

5.6. Gains and losses resulting from subsequent measurement

A gain or loss arising from a change in the fair value of a financial asset or financial liability that is not part of a hedging relationship is recognised, as follows:

- a gain or loss on a financial asset or financial liability classified as at fair value through profit and loss is recognised in the income statement;
- a gain or loss on an available-for-sale financial asset is recognized directly in equity through list of changes in equity.

The interest calculated using the effective interest rate method is recognised in the income statement.

As of impairment of items of financial assets or a group of financial assets, the Bank carries the amount of contractual interest not paid at the impairment date through profit and loss. Since then, the Bank accrues interest on the items of financial assets or a group of financial assets less the impairment charge. Interest is accrued at the interest rate used to calculate the impairment charge for the financial assets affected. Later, the value is adjusted with the contractual interest paid in a given period.

Dividends on an available-for-sale equity instrument are recognised in the income statement when the entity's right to receive payment is established.

Foreign exchange gains and losses arising from a change in the fair value of a non monetary financial asset available for sale denominated in foreign currency are recognized directly in equity. Foreign exchange gains and losses arising from monetary financial assets (e.g. debt securities) denominated in foreign currency are recognized directly in the income statement.

At the moment of derecognition of financial assets from the balance sheet, cumulated gains and losses recognized previously in equity, are transferred to the income statement. If any objective evidence exists that a financial asset or group of financial assets is impaired, the Bank recognizes impairment in accordance with the established rules of determination of impairment of financial assets.

The fair value of financial assets and liabilities quoted in an active market (including securities) is determined on the basis of the bid price for long position and offer price for short position. Valuation techniques include using recent arm's length market transactions between knowledgeable, willing parties, if available, discounted cash flow analysis and option pricing models and other techniques used by market members.

Based on the employed methods of determining the fair value, financial assets/liabilities are classified to the following categories:

- Level I: financial assets/liabilities measured directly on the basis of prices quoted in the active market or measurement techniques based solely on market data,
- Level II: financial assets/liabilities measured on the basis of measurement techniques based on assumptions using data from an active market or market observations,
- Level III: financial assets/liabilities measured on the basis of measurement techniques commonly used by the market players, the assumptions of which are not based on data from an active market.

5.7. Derivative instruments and hedge accounting

Derivative instruments are valued at fair value without cost of transactions, which are to be incurred at the moment of its sale. The base of initial fair value measurement of derivative instruments is value at cost, i.e. fair value of received or paid amount.

The Bank separates and recognizes in the balance sheet derivative instruments being a component of hybrid instruments. A hybrid (combined) instrument includes a non-derivative host contract and derivative instrument, which causes some or all of the cash flows arising from the host contract to be modified according to a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable.

The Bank separates embedded derivatives from the host contract and accounts for them as a derivative if, and only if the economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host contract, and the host contract is not valued at fair value through profit and loss. An embedded derivative is valued at fair value, and its changes are recognized in income statement.

The Bank uses derivative instruments in order to hedge against FX and interest rate risk, arising from activity of the Bank. Those derivatives, which were not designated as hedge instruments pursuant to the principles of hedge accounting, are classified as instruments earmarked for trade and evaluated in fair value.

5.7.1. Hedge accounting

Hedge accounting presents the offset effects of fair value changes of both hedging instruments and hedged items which impact the income statement.

The Bank designates certain derivative instruments as fair value hedge or cash flow hedge. The Bank uses hedge accounting, if the following conditions are met:

- formalised documentation of the hedging relationship was prepared when the hedging was established. The documentation sets out the purpose of risk management and the hedging strategy adopted by the Bank. In the documentation, the Bank designates the hedging instrument to hedge a given position or transaction, and specifies the type of risk to be hedged against. The Bank specifies the manner for assessing the effectiveness of the hedging instrument in compensating for changes in cash flows due to the hedged transaction in terms of mitigation of risk the Bank hedges against,
- the hedging instrument and hedged instrument are similar, especially nominal value, maturity date and volatility for interest rate and foreign exchange changes,
- the hedge is expected to be highly effective in achieving offsetting changes in fair value or cash flows attributable to the hedged risk, consistently with the originally documented risk management strategy for that particular hedging relationship,
- for cash flow hedges, a forecast transaction that is the subject of the hedge must be highly probable and must present an exposure to variations in cash flows that could ultimately affect profit or loss,
- the effectiveness of the hedge may be assessed credibly, so the fair value of the hedged item or the cash flows of the said item as well as fair value of a hedge instrument may be valued credibly,
- the hedge is assessed on an ongoing basis and determined actually to have been highly effective throughout the financial reporting periods for which the hedge was designated.

a) Fair value hedge

Fair value hedge: a hedge of the exposure to changes in fair value of a recognised asset or liability or an unrecognised firm commitment, or an identified portion of such an asset, liability or firm commitment, that is attributable to a particular risk and could affect the income statement.

A fair value hedge is accounted for as follows: the gain or loss from remeasuring the hedging instrument at fair value (i.e. for a derivative hedging instrument) is recognised in the income statement; the gain or loss on the hedged item attributable to the hedged risk adjust the carrying amount of the hedged item and are recognised in income statement. In view of the above, any ineffectiveness of the strategy (i.e. lack of full compensation for changes to the fair value of the hedged item and changes to the fair value of the hedged instrument) is immediately disclosed in the income statement.

If a hedged item is a component of financial assets available for sale, the profit or loss resulting from the hedged risk is included in the income statement, and the profit or loss resulting from non-hedged risk is included in equity.

The Bank applies the fair value hedge accounting in order to hedge changes in fair value of fixed-rate debt instruments classified to the portfolio of available-for-sale assets and fixed-rate debt instruments classified to the portfolio of loans and receivables before the risk resulting from interest rate changes.

b) Cash flow hedge

Cash flow hedge: a hedge of the exposure to volatility in cash flows that:

- is attributable to a particular risk associated with a recognised asset or liability (such as all or some future interest payments on variable rate debt) or a highly probable forecast transaction,

- could affect income statement.

A cash flow hedge is accounted for as follows: the changes of the fair value of the hedge instrument, which are an effective part of hedging relationship, are recognised directly in equity through the statement of comprehensive income, while the ineffective portion of the gain or loss on the hedging instrument is recognised in the income statement.

The associated gains or losses that were recognised directly in equity (effective hedge), at the moment of recognition of a financial asset and liability being a result of planned future transaction, are transferred into income statement in the same period or periods during which the asset acquired or liability assumed affects the income statement.

The Bank applies cash flow hedge accounting in order to hedge the amount of future cash flows of certain portfolios of assets/liabilities of the Bank or the portfolio of highly probable planned transactions against the interest rate risk and the highly probable planned transaction against the FX risk.

5.7.2. Derivative instruments not qualifying as hedging instruments

Changes in fair value of derivatives that do not fulfil the criteria of hedge accounting are disclosed in the income statement for the current period. Changes in fair value of IR-derivatives arising from ongoing accrual of interest coupon are disclosed under *Interest result on derivatives,* whereas the remaining part of changes in the fair value of IR-derivatives are presented under *Net income on instruments measured at fair value through profit and loss and FX-result.*

Changes in the fair value of FX-derivatives are decomposed into three elements, which are presented as follows:

- changes in fair value arising from ongoing accrual of swap/forward points are presented under *Interest result on derivatives,*
- changes in fair value due to changes of foreign exchange rates are presented under *Net income on instruments measured at fair value through profit and loss and FX-result,*
- the remaining part of change in fair value (i.e. due to the change of interest rates) is presented under *Net income on instruments measured at fair value through profit and loss and FX-result.*

5.8. Offsetting financial instruments

Financial assets and financial liabilities are offset and the net amount is reported in the balance sheet when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

In order to mitigate credit risk, the Bank concludes special master agreements with contracting parties, with which the Bank concludes transactions of significant volume. These special master agreements do not enable the offsetting financial assets and liabilities, because they are generally settled gross.

5.9. Repo, reverse repo, sell–buy–back, buy–sell–back transactions

The Bank presents financial assets with the repurchase clauses (repo, sell–buy–back transactions) in its balance sheet, simultaneously recognizing a financial liability resulting from repurchase clause. This is done in order to reflect the risks and benefits arising on this asset that are retained by the Bank after the transfer.

When the Bank purchases securities with a repurchase clause (Reverse Repo, BSB), the financial assets are presented as receivables arising from repurchase clause.

Repo and reverse repo transactions are measured at amortized cost, and securities which are subject to repo/reverse repo transactions are derecognised from balance sheet and are measured in accordance with principles applicable for particular securities portfolio. The difference between sale and repurchase price is treated as interest income or cost, respectively and is accrued over the period of the agreement by application of an effective interest rate.

The Bank designates sell-buy-back and buy-sell-back transactions to be valued at fair value through profit and loss. The change in fair value of financial assets and liabilities is presented in profit and loss account in the caption *Net income on instruments measured at fair value through profit and loss and FX result*.

Securities borrowed from other entities are not recognised in the Bank's financial statement. If sold by the Bank, there will be generated financial assets in the form of cash from sales and the liability measured at fair value that reflects the need to return the borrowed securities. The fair value of the liability equals the fair value of borrowed securities.

5.10. Impairment

5.10.1. Assets valued at amortized cost

The Bank assesses at each balance sheet date whether there is any objective evidence that a financial asset or group of financial assets is impaired. A financial asset or a group of financial assets is impaired and impairment losses are incurred if, and only if, there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a 'loss event') and that loss event (or events) has an impact on the estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated. Losses expected as a result of future events, no matter how likely, are not recognised. Objective evidence that a financial asset or group of assets is impaired includes observable data that comes to the attention of the holder of the asset about the following loss events:

- significant financial difficulty of the issuer or obligor;
- a breach of contract, such as a default or delinquency in interest or principal payments above 90 days;
- the lender, for economic or legal reasons relating to the borrower's financial difficulty, granting to the borrower a concession that the lender would not otherwise consider;
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganisation;
- the disappearance of an active market for that financial asset because of financial difficulties;
- observable data indicating that there is a measurable decrease in the estimated future cash flows from a group of financial assets since the initial recognition

of those assets, although the decrease cannot yet be identified with the individual financial assets within the group.

The Bank first assesses whether objective evidence of impairment exists for financial assets that are significant and for financial assets that are not individually significant. The Bank classifies loan receivables by size of exposure, into the individual and group portfolios. If after the assessment we find that for a given financial assets item assessed individually there are no objective reasons for impairment or there are reasons for impairment but estimated impairment charges amount to 0, the item shall be included in the group of financial assets with similar features of credit risk, which indicate that the debtor is capable to repay the entire debt according to provisions of the agreement. Next, such groups are subject to collective assessment in terms of impairment. Assets that are individually assessed for impairment and for which an impairment loss is or continues to be recognised are not included in a collective assessment of impairment. In a group portfolio, groups of similar credit risk characteristics are identified, which are then assessed collectively for the impairment.

If there is any objective evidence of impairment of loans and receivables, or investments held-to-maturity valuated according to depreciated cost, then the amount of the impairment is the difference between the carrying amount of an asset and the current value of estimated future cash flows, discounted using an original effective interest rate established with the initial recognition of a given financial asset.

If the existing objective proofs for impairment of assets component or financial assets group component valued according to depreciated cost indicate that there will be no expected future cash flows from the abovementioned financial assets, the impairment charge of assets equals their balance sheet value.

Future cash flows concerning groups of financial assets assessed collectively in terms of their possible impairment are estimated on the basis of historical loss experience for assets with credit risk characteristics similar to those in the Bank. Historical loss experience is adjusted on the basis of current observable data to reflect the effects of current conditions that did not affect the period in which the historical loss experience is based and to remove the effects of conditions in the historical period that do not exist currently. The Bank regularly verifies the methodology and assumptions adopted to estimate future cash flows in order to mitigate the differences between estimated and actual losses.

For the purposes of the calculation of the provision against balance sheet exposures analysed collectively, the probability of default (PD) method has been applied. Modification of the PD parameter takes into account characteristics of specific products and emerging periods for losses on those products. This approach allows specifically for:

- detecting the losses that have already occurred,
- losses that occurred as at the impairment date, but have not been documented yet (incurred but not reported IBNR).

The impairment is presented as a reduction of the carrying amount of the asset either through use of an allowance account and the amount of the loss shall be recognized in income statement.

If in a consecutive period, the amount of loss due to the impairment decreases as a result of the event that took place after the impairment (e.g. improved credit capacity assessment of the debtor), the previous impairment charge is reversed through the income statement by a proper adjustment of impairment charges.

5.10.2. Financial assets available for sale

When a decline in the fair value of an available-for-sale financial asset has been recognised directly in equity and there is objective evidence that the asset is impaired, the cumulative loss that has been recognized directly in equity is removed from equity and recognised in the income statement even though the financial asset has not been derecognised.

The amount of the cumulative loss that is removed from equity and recognised in the income statement is the difference between the acquisition cost (net of any principal repayment and amortisation) and current fair value, less any impairment loss on that financial asset previously recognised in the income statement.

Impairment losses recognised in the income statement for an investment in an equity instrument classified as available for sale is not reversed through income statement. If, in a subsequent period, the fair value of a debt instrument classified as available for sale increases and the increase can be objectively related to an event occurring after the impairment loss was recognised in the income statement, the impairment loss is reversed, with the amount of the reversal recognized in the income statement.

5.10.3. Financial assets carried at cost

If there is objective evidence that an impairment loss has been incurred on an unquoted equity instrument that is not carried at fair value because its fair value cannot be reliably measured, or on a derivative asset that is linked to and must be settled by delivery of such an unquoted equity instrument, the amount of the impairment loss is measured as the difference between the carrying amount of the financial asset and the present value of estimated future cash flows discounted at the current market rate of return for a similar financial asset). Such impairment losses are not reversed.

6. Investment property

Investment property is property (land or a building, or part of a building, or both) held by the Bank (acting as the owner or the lessee under a finance lease) to earn rentals or for capital appreciation or both. At the same time, such a real property is:

- occupied by the Bank only to a small extent,
- it is not for sale as part of the regular operations of the Bank.

Therefore, an investment property generates cash flows largely independent of the other assets held by the Bank.

An investment property is measured initially at its cost (purchase price and any directly attributable expenditure). After the initial entry, investment property assets are measured in accordance with requirements of the fair value model. A gain or loss arising from a change in the fair value of investment property is recognised in the profit and loss account for the period in which it arises. The fair value of investment property reflects market conditions at the balance sheet date.

7. Non-financial assets

7.1. Tangible fixed assets

7.1.1. Own tangible fixed assets

Tangible fixed assets consist of fixed assets and costs to construct such assets. Tangible fixed assets include fixed assets with an expected period of use above one year, maintained to be used to serve the Bank's needs or to be transferred to other entities, based on the lease contract or for administrative purposes.

Tangible fixed assets, with the exception of land and buildings, are recorded at historical costs reduced by depreciation/amortization and any impairment write-downs. The historical costs are made up of the purchase price/cost of creation and costs directly related to the purchase of assets.

Each component part of property, plant and equipment items, whose purchasing price or generation cost is material in comparison with the purchase price or generation cost of the entire item, is depreciated separately. The Bank allocates the initial value of the property, plant and equipment into its significant parts.

Lands and buildings are carried in accordance with the revaluation model, after initial recognition at a revalued amount, being its fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses. Revaluations are made with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the balance sheet date.

The revaluation effect is reflected in the revaluation reserve/ revaluation capital in case of the value increase, or carried through the income statement in case of the balance sheet asset's value decrease. However, the increase of value is recognised as income insofar as it reverses the decrease of value due to revaluation of the same asset that was previously recognised as costs of a given period. Similarly, the decrease of the asset's value resulting from revaluation shall be set off against the relevant surplus resulting from the previous revaluation of the same asset. The entire revaluation surplus shall be realised at the time of withdrawing from use or selling the asset.

7.1.2. Subsequent costs

The Bank recognizes under the balance sheet item property, plant and equipment the costs of replacement of certain elements thereof at the time they are incurred on proviso that the Bank is likely to earn any asset-related prospective economic benefits and the purchase price or the cost may be measured reliably. Other costs are recognised in the income statement at the time they are incurred.

7.2. Intangible assets

An intangible asset is an identifiable non-monetary asset without physical substance. Intangible assets are deemed to include assets which fulfil the following requirements:

- they can be separated from an economic entity and sold, transferred, licensed or granted for use for a fee to third parties, both separately, and together with their accompanying contracts, assets or liabilities,
- arise from contractual titles or other legal titles, irrespective of whether those are transferable or separable from the business entity or other rights and obligations.

7.2.1 Goodwill

Goodwill arising on acquisition of an entity is recognized at the acquisition price being the surplus of the aggregate of:

- provided payment,
- sums of all non-controlling shares in the acquired entity, and
- in the case of combining entities executed at fair value as at the day of acquiring share in the capital of the acquired entity, previously belonging to the acquiring entity,

over the net amount determined as at the day of acquiring values of the identifiable acquired assets and assumed liabilities.

The goodwill recognized in the financial statements of the Bank was recognized pursuant to the requirements binding on the day of first application of IFRS i.e. at acquisition price being a surplus of the cost of combining the business entities over the interest of the acquirer's in the fair value of all identifiable assets, liabilities and contingent liabilities. After the initial recognition, the goodwill is recognized at acquisition price less any accumulated impairment losses.

The test for impairment is conducted at the balance sheet date. Impairment is established by estimating residual value of cash generating units, to which goodwill is allocated. If the residual value of the cash generating unit is lower than the carrying value, the impairment is made.

7.2.2 Computer software

Purchased computer software licences are capitalised in the amount of costs incurred for the purchase and adaptation for use of specific computer software. Expenses attached to the development or maintenance of computer software are expensed when incurred.

7.2.3 Other intangible assets

Other intangible assets purchased by the Bank, are recognized at purchase price or production cost less depreciation and total amount of impairment losses.

7.2.4 Subsequent costs

Subsequent costs incurred after initial recognition of acquired intangible asset are capitalised when it is probable that such expenditures will ensure an inflow of economic benefits to the Bank. In other cases, costs are charged to the profit and loss in the reporting period in which they were incurred.

7.3. Depreciation and amortization charges

The depreciation charge of tangible and intangible fixed assets is applied using the straight line method, using defined depreciation rates throughout the period of their useful lives. The depreciable amount is the cost of an asset, or other amount substituted for cost, less its residual value. The useful life, amortization/ depreciation rates and residual values of tangible and intangible assets are reviewed annually. Conclusions of the review may lead to a change of depreciation periods recognized prospectively from the date of application (the effect of this change is in accordance with IAS 8 charged to profit and loss).

In case of buildings valued at fair value, the accumulated depreciation balance at the revaluation date is removed from the carrying value gross, and the net carrying value adjusted to the revalued value.

Depreciation and amortization charges are recognized in the profit and loss account. At each balance sheet date goodwill and other intangible assets with indefinite useful life are regularly tested for impairment. The depreciation periods are as follows:

➢ lands and buildings	50 years
➢ leaseholds improvements	rent and lease term of maximum 10 year
➢ vehicles and others	3 - 7 years
➢ equipment	5 years
➢ costs of development of software	3 years
➢ software licenses, copyrights	3 years

For ATMs and CDMs introduced for use after 1st January 2010 the Bank extended the use period to 7 years.

7.4. Impairment of other non- financial assets

For each balance sheet date, the Bank assesses the existence of objective evidence indicating impairment of a non-current asset. If such evidence exists, the Bank performs an estimation of the recoverable value. If, and only if, the recoverable amount of an asset is less than its carrying amount, the carrying amount of the asset shall be reduced to its recoverable amount.

If such evidence exists, the Bank performs an estimation of recoverable value. If, and only if, the recoverable amount of an asset is less than its carrying amount, the carrying amount of the asset shall be reduced to its recoverable amount. If there are indications of impairment of common property, i.e. assets which do not generate cash independently from other assets or groups of assets, and the recoverable value of the individual asset included among common property cannot be determined, the Bank determines the recoverable value at the level of the cash generating unit, to which the given asset belongs.

An impairment charge is recognized, if the book value of the asset or cash generating unit exceeds its recoverable amount. The impairment charge is recognized in the profit and loss account.

In case of a cash generating unit (group), impairment charges in the first place reduce goodwill attributable to cash generating units, and then reduce proportionally the book value of other assets of this cash generating unit (groups)

7.4.1. Measuring recoverable amount

The recoverable amount of an asset or a cash-generating unit is the higher of its fair value less costs to sell and its value in use.

In order to measure the value in use, estimated future cash flows are discounted to their present value by using a discount rate before taxation, which considers the current market assessment, time value of money and specific risk attributable to the underlying asset.

7.4.2. Reversing impairment loss

Goodwill impairment loss is not subject to reversal. An impairment loss of an asset other than goodwill is reversed if, and only if, there has been a change in the estimates used to determine the asset's recoverable amount.

An impairment loss can be reversed only up to the amount, at which the book value of impaired asset does not exceed its book value, which decreased by depreciation charge, would be established, if any impairment loss had not been recognized.

8. Leasing contracts

8.1. The Bank as lessor

The Bank is a party to lease contracts, on the basis of which it grants and is paid for the use on the benefits on the current assets. In case of lease contracts, which result in transferring substantially all the risks and rewards following the ownership of that asset under lease the subject of such lease agreement is derecognized from the balance sheet. A receivable amount is recognized, in an amount equal to the present value of minimum lease payments. Lease payments are divided into financial income and reduction of the balance of receivables in such a way as to achieve reaching a fixed rate of return from the outstanding receivables.

Lease payments for contracts which do not fulfil requirements of a finance lease are recognized as income in the profit and loss account, using the straight-line method, throughout the period of the lease.

8.2. The Bank as lessee

The Bank is also a party to lease contracts, under which it takes another party's non-current assets or intangible assets for an agreed period for paid use or other benefits.

In case of lease contracts, under which essentially all risks and rewards resulting from ownership of the leased assets are transferred, subject of such lease agreement is recognized as a non-current asset, and a liability is recognized in the amount equal to the present value of minimum lease payments as of the date of commencement of the lease. Lease payments are divided into financial costs and reduction of the balance of the liability in such way as to achieve obtaining a fixed rate of interest on the outstanding liability. Financial costs are recognized directly in profit and loss account.

Fixed assets which are the basis of the finance lease contract are depreciated in the manner defined for the Bank's non-current assets. However, if it is uncertain whether the ownership of an asset has been transferred, then non-current assets used pursuant to finance lease contracts are depreciated over the shorter of two: the expected useful life or the period of lease.

Lease payments for contracts which do not fulfil qualifications of a finance lease agreement are recognized as costs in the profit and loss account in a straight-line method throughout the period of the lease.

9. Other balance sheet items

9.1. Other trading receivables and other receivables

Trade and other receivables are recognized and carried at original invoice amount less an allowance for any uncollectible amounts. An estimate of allowance for doubtful debts is made when collection of the full amount is no longer probable.

If the effect of the time value of money is material, the value of receivable is determined by discounting the expected future cash flows to the current value, with applying the discount rate that reflects the current market assessments of time value of money. If the method consisting in discounting has been applied, the increase of receivables due to time lapse is recognized as financial revenues.

Trade and other receivables embrace in particular settlements with off-takers. Budgetary receivables are recognized as part of other non-financial assets, except for corporate income tax receivables, which are a separate item on the balance sheet.

9.2. Liabilities

Other financial liabilities comprise in particular: payables for the benefit of tax office due to goods and service tax, settlements with suppliers and payables due to received prepayments, which will be settled by means of delivering goods, services or tangible assets. Other financial liabilities are recognized in the amounts due.

9.3. Non current assets held for sale and discontinued operation

The Bank classifies a non-current asset (or disposal group) as held for sale if its carrying amount will be recovered principally through a sale transaction rather than through continuing use. For this to be the case, the asset (or disposal group) must be available for immediate sale in its present condition subject only to terms that are usual and customary for sales of such assets (or disposal groups) and its sale must be highly probable, i.e. the appropriate level of management must be committed to a plan to sell the asset (or disposal group), and an active programme to locate a buyer and complete the plan must have been initiated. Further, the asset must be actively marketed for sale at a price that is reasonable in relation to its current fair value. In addition, the sale should be expected to qualify for recognition as a completed sale within one year from the date of classification.

Non current assets held for sale are priced at the lower of two: its carrying value or fair value less cost to sell. Assets classified in this category are not depreciated.

Where the criteria for classification as non-current assets for sale are no longer met, the Bank will no longer classify that asset as an asset for sale (or a group of assets for sale) but reclassify it as appropriate. In such a case, the Group measures the asset that is no longer classified as an asset for sale (or that is no longer part of a group for sale) at the lower of the following amounts:

- its carrying amount from the period before the asset (or disposal group) was classified as held for sale, adjusted for any depreciation, amortisation or revaluations that would have been recognised had the asset (or disposal group) not been classified as held for sale,
- its recoverable amount at the date of the subsequent decision not to sell.

Discontinued operations are components of the Bank that either have been disposed of or are classified as held for sale and represent a separate major line of business or geographical area of operations, are a part of a single co-ordinated plan to dispose of a separate major line of business or geographical area of operations or are a subsidiary acquired exclusively with a view to resale. The classification to this category takes place at the moment of sale or when the operation meets criteria of the operation classified as held for sale, if this moment took place previously. Operations held for sale, which are to be no longer used, can be also classified as a discontinued operation.

9.4. Cash and cash equivalents

Cash and cash equivalents for the purposes of a Cash Flow statement include: Cash in hand and cash held at the Central Bank, cash equivalents e.g. balances on current accounts and overnight deposits held by the other banks.

10. Equity

Equity comprises of the share capital, share premium, revaluation reserve and retained earnings. All balances of capital and funds are recognized at nominal value.

10.1. Share capital

Share capital is presented at nominal value, in accordance with the charter and entry into the commercial register.

10.1.1. Own shares

If the Bank acquires its own shares, then the paid amount together with the costs directly attributed to such purchase is recognized as a change in the equity. Acquired own shares are treated as own shares and disclosed as reduction of the equity.

10.1.2. Dividends

Dividends for the financial year which have been approved by the General Shareholders' Meeting, but not paid as of the balance sheet day are disclosed under the balance sheet recognized in the balance *Other Liabilities*.

10.2. Share premium

Share premium is formed from agio obtained from the issue of shares reduced by the attributable direct costs incurred with that issue.

10.3. Revaluation reserve

Revaluation reserve is created as a result of:

- revaluation of financial instruments classified as available for sale,
- revaluation of cash flow hedge financial instruments,
- revaluation of tangible fixed assets carried at fair value.

The deferred tax resulting from above mentioned revaluation is included in the revaluation reserve. The revaluation reserve is not subject to profit distribution.

10.4. Retained earnings

Retained earnings are created from charges against profit and are allocated for purposes specified in the Articles of Association (the company's Charter) or other legal regulations. Retained earnings comprise of:

- other supplementary capital,
- other reserve capital,
- general banking risk fund,
- undistributed result from previous years,
- net result.

Other supplementary capital, other reserve capital and general banking risk fund are created from charges against profit and are allocated for purposes specified in the Articles of Association (the company's Charter) or other legal regulations.

General banking risk fund is created in accordance with the Banking Act dated 29th August 1997 with subsequent amendments, from profit after tax.

The net financial result represents the gross result under the performance statement for the current year, adjusted with the corporate income tax.

11. Prepayments and deferred income

11.1. Prepayments

Prepayments comprise of particular expenses which will be settled against the profit and loss as being accrued over the future reporting periods. Deferred costs include primarily provisions for material costs due to services provided for the Bank by counterparties, as well as insurance costs paid in advance to be settled in the future periods. Prepayments are presented in the balance sheet in *Other assets* caption.

11.2. Deferred income

This caption comprises mainly of fees amortized on a straight-line basis and other types of income collected in advance which will be settled against profit and loss account in future reporting periods. Deferred income is presented in *Other liabilities* balance sheet caption.

12. Employee benefits

12.1. Defined contribution plans

Expenses incurred due to a programme of certain contributions are recognised as costs in income statement.

12.2. Short-term employee benefits

Short-term employee benefits of the Bank (other than termination benefits) comprise of wages, salaries, paid annual leave and social security contributions.

The Bank recognizes the anticipated, undiscounted value of short-term employee benefits as an expense of an accounting period when an employee has rendered service (regardless of payment date) in correspondence with other on-balance liabilities.

The amount of short-term employee benefits on the unused holidays to which Bank employees are entitled is calculated as the sum of unused holidays to which particular Bank employees are entitled.

12.3. Long-term employee benefits

12.3.1. Benefits under the Labour Code regulations

Provisions for retirement severance pay granted under benefits due to regulations of the Labour Code are estimated on the basis of the actuarial valuation. The provisions being the result of an actuarial valuation are recognised and adjusted on an annual basis.

Provisions for long-term employee benefits are recognised in the balance sheet item *Provisions* in correspondence with costs of labour in the profit and loss account.

The Bank adopts a corridor approach to recognition of a determined portion of the cumulated net value of actuarial gains and losses. The details of the method used are presented in the item concerning estimates on retirement and pension benefits provision.

12.3.2. LEO long-term incentive system benefits

The Bank is a participant of a long-term LEO (or, the Long-term Equity Ownership) incentive system introduced by ING Group. This system motivates employees of ING Group units by linking additional benefits granted to them with financial results of the ING Group. LEO is addressed to Bank Management Board members, senior management and high-level specialists. The system operates in two variants:

- Standard – an employee may become a holder of ING shares or receive cash benefit; the following two instruments are offered in the Standard system:
  - Share options,
  - Performance shares,
- Phantom – an employee may receive cash benefit; the following two instruments are offered in the Phantom system:
  - Phantom option,
  - Performance units.

Both of the abovementioned options of the system have a 10-year maturity period and may be exercised after three years from their issue, provided that the option holder is a Bank employee (or employee of another unit of ING Group) or has retired. The exercise price is a difference between the exercise price determined by Euronext Amsterdam as at the exercise date in the so-called open period after the General Meeting of ING Group and the initial price guaranteed in option's strike price.

Performance shares/ Performance units are granted on a qualified basis. The number of received instruments depends on ING Group results at the end of a 3-year period. To this purpose, the so-called Total Shareholder Return (TSR), which is determined for each 3-year period, is compared with the ratio calculated for financial institutions similar to ING Group. Depending on the place of ING Group in the ranking, the number of Performance shares / Performance units available for exercise may total from 200% for a ranking within the top three (1-3) to 0% if ING is ranked on the 18-20 position. The exercise price is determined as for option instruments (Share options / Phantom options).

As at the balance sheet date, the Bank recognises in its books the measurement of options and performance shares held by the employees of the Bank.

12.4. Valuation of motivational programmes for employees

The fair value of options granted is recognised as an expense under staff expenses and is allocated over the vesting period of the options. The fair values of the option awards have been determined by using a Monte Carlo simulation. This model takes the risk free interest rate into account (2.02% to 4.62%), as well as the expected term of realisation of the options granted (5 to 9 years), the exercise price, the current share price (EUR 2.9 – EUR 26.05), the expected volatility of the certificates of ING Group shares (25% – 84%) and the expected dividends yield (0.94% to 8.99%).

The source for implied volatilities used for the valuation of the stock options is ING's trading system. The implied volatilities in this system are determined by ING's traders and are based on market data implied volatilities not on historical volatilities.

13. Principles of EU programmes settlement

The Bank participates in the *Human Capital* training programme taking advantage of EU funds. The funds received are recognised at the time when there are reasonable grounds to conclude that the terms of funds granting were met and the funds will be paid out. The funds obtained are recognised in the Bank's financial statements in the manner ensuring commensurability with the corresponding costs for which the plan is to set them off with the EU funds obtained.

If the funding concerns an asset item, then the fair value is recognised as the deferred income, and is subsequently carried through profit and loss – gradually in equal annual write-offs – during the expected use period of the related asset item.

14. Provisions

Provisions, including provisions for off-balance sheet commitments, are recognized in the balance sheet when the Bank has a legal or constructive obligation (common law) as a result of past events, as well as when it is probable that an outflow of resources will be required to settle the obligation. If the effect is material, the amount of provision is measured by discounted, expected cash flows using pre-tax rate that reflects current market assessments of the time value of money and those risks specific to the liability. This is also applicable for the recognition of provisions for risk-bearing off-balance sheet commitments including guarantees, letters of credit and irrevocable unused credit lines.

As the committed unused credit lines for wholesale exposures are treated as equivalent of balance sheet exposures, the provisions against the exposures of that type are established and recognised together with impairment loss.

The Bank establishes provisions for restructuring costs only on condition that the general criteria of recognising provisions under IAS 37 be fulfilled and in particular but not limited to the situation when the Bank is in possession of the specific, formal restructuring plan determining at least the operations or a part thereof, basic locations, place of employment, the functions and estimated number of employees entitled to compensation, the expenditure to be undertaken and the term of execution. The commencement of restructuring procedure or the public announcement thereof is the condition indispensable for establishing the provision. The established provisions comprise only the direct and necessary expenditures to be undertaken due to the restructuring procedure, which are not related to the current business operations nor cover the future operating costs.

The Bank maintains the detailed record of court cases and other amounts due of legal claims nature. Potential future settlements will be recognised under established provisions.

The Bank recognises the provisions for all estimated losses. In certain justified cases, despite the fact that the Bank is entitled to reimburse the funds due to the provisions established, because of the uncertainty whether the expected economic benefits be earned or not, the Bank may decide not to recognise the assets there under in the financial statements.

15. Profit and loss

15.1. Net interest income

Interest income on financial assets classified as available for sale, loans and advances and financial assets held to maturity are recognized in the profit and loss at amortized cost using the effective interest rate.

The effective interest method is a method of calculating the amortized cost of a financial asset or a financial liability (or group of financial assets or financial liabilities) and of allocating the interest income or interest expense over the relevant period. The effective interest rate is the rate that discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, an estimate of cash flows in made considering all contractual terms of the financial instrument but future credit losses are not considered. The calculation includes all fees and commissions paid or received (external) between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Interest income comprises interest and commission (received or due) recognized in the calculation of the effective interest rate due to: loans with repayment schedule, intrabanking deposits and securities held to maturity available for sale, held for trading and the ones which meet the definition of loans and cash loans, and are classified to cash loans and receivables.

In case impairment is recognized for a financial asset or group of similar financial assets, interest income is accrued based on the current amount of receivable (this is the value reduced by revaluation charge) with the use of the interest rate according to which future cash flows were discounted for impairment valuation.

Interest income on debt securities classified to trading portfolio or designated at fair value through profit and loss are recognized under the caption *Interest income*.

Interest revenue/ costs on interest rate derivatives and Interest revenue/ costs on current accrual of the swap/forward points on FX-derivatives classified as held for trading are recognized under *Interest result on derivatives.*

Interest revenue/ costs on derivatives designated as hedging instruments in the hedge accounting are recognized under *Net interest income.*

15.2. Net commission income

Commission income arises from providing financial services by the Bank and comprises fees for extending a loan, the Bank's pledge to extend a loan, cards issue, cash management services, brokerage services, insurance products-related services and asset management services. Commission income comprises also margins on FX derivatives transactions concluded with corporate clients.

Fees and commissions (both income and expenses) directly attributed to rise of financial assets with repayment schedule are recognised in the income statement as effective interest rate component and are part of the interest income.

Other fees and commissions attributed to rise of financial assets without the repayment schedule (e.g. commission on overdrafts) are settled using a straight-line method throughout the agreement term. Fees on pledge to extend a loan, which is likely to be taken, are deferred and as at the date of financial assets rise are settled as the component of effective interest rate or using straight-line method based on above mentioned criterion.

Other fees and commissions resulting from financial services provided by the Bank, such as cash management services, brokerage services, asset management services, insurance products-related services are recognised in the income statement at the time of service provision.

15.3. Net income on instruments measured at fair value through profit and loss and FX result

Net income on instruments measured at fair value through profit and loss and FX result includes gains and losses arising from disposal and change of fair value of assets and liabilities held for trading and designated at initial recognition at fair value through profit and loss account.

Result on financial instruments through profit and loss and FX result also includes adjustments of fair value due to risk for unexecuted FX-options transactions.

Result from accrued interest and settlement of discount or premium on debt securities held for trading or designated at fair value through profit and loss is recognized as interest income.

15.4. Net income on investments

The net income on investments comprises profits or losses resulting from sale of financial assets classified as available for sale and earnings from dividends. Dividend income is recognized in the profit and loss account when the shareholders' right to receive payment is established.

15.5. Net income on hedge accounting

This item includes the measurement of hedged and hedging transactions in fair value hedging accounting and the result on measurement of hedging instruments in the ineffective part of hedge relationship of cash flows hedge accounting.

15.6. Net income on other basic activities

Net income on other basic activities comprise of expense and income not attributed directly to Bank's banking and brokerage activity. These include in particular: the result due to holding an investment property, sale of assets (non-current assets and intangible assets), revenues from sales of other services, revenues due to recovered bad debts, received and paid damages, penalties and fines.

16. Taxes

16.1. Income tax

Income tax is recognized as current and deferred tax. Current income tax is recognized in the profit and loss account. Deferred income tax is recognized in profit and loss account or equity depending on type of temporary differences.

Current tax is a liability calculated based on taxable income at the binding tax rate at the balance sheet date including adjustments of prior year tax liability.

16.2. Deferred income tax

The Bank creates a provision for deferred tax in respect of all taxable temporary difference and deferred tax asset with regard to all deductible temporary differences to extent that it is probable that taxable profit will be available against which the deductible temporary differences can be utilised according to accounting regulations and according to legal regulations concerning corporate income taxation. A positive net difference is recognized in liabilities as _Deferred tax reserve_. A negative net difference is recognized under _Deferred tax assets_.

The deferred tax reserve is created by using the balance sheet method for all positive temporary differences as of the balance sheet date arising between tax value of assets and liabilities and their carrying value disclosed in the financial report, except for situations where deferred tax reserve arises from:

- initial recognition of goodwill;
- goodwill, which amortization has no taxable expense;
- initial recognition of an asset or liability with a transaction which does not constitute a merger of economic entities and which on its origination has no impact on the net financial profit or taxable income or loss.

Deferred tax assets are recognized with respect to all negative timing differences as of the balance sheet date between the tax value of assets and liabilities and their carrying value disclosed in the financial statement and unused tax losses. Deferred tax assets are recognized in such amount in which taxable income is likely to be achieved allowing to set off negative timing differences, except for the situations when the component of deferred tax assets arises from the initial recognition of an asset or liability with a transaction which does not constitute a merger of economic entities and on its origination have no impact on the net financial profit or taxable income or loss.

The carrying value of a deferred tax asset shall be verified for each balance sheet date and reduced if it is no longer likely to achieve taxable income sufficient for a partial or full realization of the deferred tax component.

Deferred tax assets and deferred tax reserves are estimated with the use of the tax rates which are expected to be in force when the asset is realized or reserve eliminated, assuming the tax rates (and tax provisions) legally or factually in force as of the balance sheet date.

Income tax pertaining to items directly presented in equity is presented in equity.

Deferred tax assets and reserves are recognized by the Bank in the balance sheet after offsetting at level of each entity included in consolidation. The Bank offsets deferred tax assets and deferred tax reserves, where it has legal title to effect such offsetting, and the deferred assets and reserves pertain to the same taxpayer.

16.3. Other taxes

Revenues, costs and assets are recognised less the value added tax, tax on civil law acts, and other taxes on sales, except where the tax on sale, paid upon purchase of goods and services, is not recoverable from the tax authorities; in that case, the sales tax is recognized accordingly as a part of the cost of acquisition of an asset, or as part of a cost item.

The net amount of sales tax recoverable from or payable to the tax authorities is recognized on the face of the balance sheet as a part of receivables or liability.

VI. Comparability of financial data

In the annual financial statements for the period from 1st January 2011 to 31st December 2011, the Bank did not change the principles of presentation, compared to the annual financial statements for the period started on 1st January 2010 to 31st December 2010.

VII. Notes to the financial statements

1. Segment reporting

Segments of operation

The management of ING Bank Śląski is conducted within the areas defined in the Bank's business model.

The Bank's business model, above all for the purpose of management reporting, includes division of clients into two main segments:

- retail customer segment,
- corporate banking segment.

The segments are separated based on the financial (especially turnover, level of collected assets) and subject-related criteria. The specific rules of putting clients to respective segments are governed by the clients segmentation criteria specified in the Bank's internal regulations.

Retail customers segment

Within the framework of retail banking, the Bank provides services for individual customers (segments of mass customers and wealthy customers) and for sole traders.

This activity is analysed by the leading products, including i.e.: credit products (overdraft on the savings and settlement account - ROR, loans related to cards, hire purchase loans, housing loans, mortgage loans, contract loans granted by the Building Society), deposit products (current accounts, term deposits, savings accounts), structured product, ING fund units and bank cards.

Corporate banking segment

Corporate banking area encompasses as follows:

- providing services to institutional clients,

- Financial Markets products.

Services to institutional clients encompasses strategic clients, large corporate entities and mid-sized companies. For corporate activity, the Bank provides reporting broken down by leading products covering i.e. loan products (working loans, investment loans), deposit products (current accounts, term deposits and negotiated deposits, savings accounts), financial markets products, trust services, capital market operations and operations of intermediation in lease services.

Financial Markets products encompass operations performed in money and capital markets, conducted both on the proprietary basis as well as for the customers' benefit. Within the framework of this activity, currency, money and derivative instrument market products and securities operations (treasury securities, shares and notes) are specified.

Measurement

The measurement of the segment's assets and liabilities, segment's revenue and costs is based on the accounting standards applied by the Bank, included in notes describing applied accounting standards. In particular, the internal and external interest revenue and costs for individual segments shall be established with the use of the transfer pricing system. Transfer prices are defined based on the yield curve for a given currency that is common for assets and liabilities. The transfer price that is determined for the products being assets and liabilities with the same position on the yield curve is identical. The original transfer price – coming from the product measurement regarding the yield curve can be modified and the factors adjusting the transfer price can be the following: a premium for obtainment of long-term liquidity, matching of the Bank's position, a hedging cost for sophisticated products and the pricing policy. Thereafter, based on quotation rates available at news services, yield curves are developed using mathematical equations.

Revenue, costs, results, assets and liabilities for a given segment account for elements that are directly attributable to the segment in question, as well as element that may be attributed to that segment based on reasonable premises.

The Bank presents segment's interest income reduced by the cost of the interest. This results from the fact that while evaluating the segment's results and assigning assets to the segment, the Management Board relies mainly on net interest income.

In 2011, the Bank modified the reporting area in terms of its operational segments. The current presentation of the segmentation note is the consequence of the modified reporting for the Management Board. The Bank is of the opinion that it reflects the essence of the operational division into segments.

When compared with the previous presentation, two segments were distinguished instead of the three presented earlier. The segments are: ”retail client segment” and ”corporate banking segment” (earlier comprising the ”corporate banking segment” and a sub-segment ”financial markets and ALM” from the segment of “proprietary operations”). The previous sub-segment ”ALCO” was divided into two parts: the one for retail is now presented in the retail client segment and the other in the corporate banking one. The manner of presentation of "unallocated values" also changed – since they referred to income tax, they were moved to the table bottom and presented in a separate column. Data for the 2010 presented herein was adjusted for comparability.

Geographical segments

The business activities of the Bank are performed on the territory of the Republic of Poland.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2011

	Retail customers segment	Corporate banking segment	TOTAL
Revenue total	**1,557.2**	**1,376.5**	**2,933.7**
Net interest income	957.3	881.5	1,838.8
Net commission income	467.0	500.5	967.5
Other income/expenses	132.9	-5.5	127.4
Expenses total	**1,028.1**	**601.5**	**1,629.6**
Operational expenses, including:	1,028.1	601.5	1,629.6
personnel expenses	*494.8*	*320.9*	*815.7*
depreciation	*93.2*	*38.1*	*131.3*
other	*440.1*	*242.5*	*682.6*
Result before risk	**529.1**	**775.0**	**1,304.1**
Risk cost	90.2	82.2	172.4
Result after risk cost (profit before tax)	**438.9**	**692.8**	**1,131.7**
CIT	-	-	**227.9**
Result after tax	**-**	**-**	**903.8**

2011

	Retail customers segment	Corporate banking segment	TOTAL
Revenue total	**1,351.4**	**1,271.3**	**2,622.7**
Net interest income	813.7	786.9	1,600.6
Net commission income	492.6	439.3	931.9
Other income/expenses	45.1	45.1	90.2
Expenses total	**996.3**	**547.7**	**1,544.0**
Operational expenses, including:	996.3	547.7	1,544.0
personnel expenses	*488.3*	*301.1*	*789.4*
depreciation	*88.7*	*30.6*	*119.3*
other	*419.3*	*216.0*	*635.3*
Result before risk	**355.1**	**723.6**	**1,078.7**
Risk cost	81.1	120.6	201.7
Result after risk cost (profit before tax)	**274.0**	**603.0**	**877.0**
CIT	-	-	174.7
Result after tax	-	-	**702.3**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of year 2011

	Retail customers segment	Corporate banking segment	TOTAL
Assets of the segment	14,872.1	53,498.2	68,370.3
Segment investments in subordinates	161.0	77.3	238.3
Other assets (not allocated to segments)	0.0	0.0	1,015.7
Total assets	**15,033.1**	**53,575.5**	**69,624.3**
Segment liabilities	35,234.8	27,170.7	62,405.5
Other liabilities (not allocated to segment)	0.0	0.0	987.3
Equity	0.0	0.0	6,231.5
Total liabilities	**35,234.8**	**27,170.7**	**69,624.3**

2011

	Retail customers segment	Corporate banking segment	TOTAL
Capital expenditure	247.9	145.1	393.0
Net cash flow from operating activities	179.4	-1,883.0	-1,703.6
Net cash flow from operating activities (not allocated to segment)	0.0	0.0	-321.8
Net cash flow from operating activities total	179.4	-1,883.0	-2,025.4
Net cash flow from investment activities	-30.9	1,479.5	1,448.6
Net cash flow from financial activities (not allocated to segment)	0.0	0.0	-195.2

end of year 2010

	Retail customers segment	Corporate banking segment	TOTAL
Assets of the segment	12,479.1	50,525.6	63,004.7
Segment investments in subordinates	291.1	160.6	451.7
Other assets (not allocated to segments)	0.0	0.0	972.0
Total assets	**12,770.2**	**50,686.2**	**64,428.4**
Segment liabilities	33,014.1	25,142.4	58,156.5
Other liabilities (not allocated to segment)	0.0	0.0	833.8
Equity	0.0	0.0	5,438.1
Total liabilities	**33,014.1**	**25,142.4**	**64,428.4**

2010

	Retail customers segment	Corporate banking segment	TOTAL
Capital expenditure	163.4	89.9	253.3
Net cash flow from operating activities	-1,393.6	569.4	-824.2
Net cash flow from operating activities (not allocated to segment)	0.0	0.0	-505.5
Net cash flow from operating activities total	-1,393.6	569.4	-1,329.7
Net cash flow from investment activities	-78.4	1,467.5	1,389.1

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2. Net interest income

Interest income

	2011	2010
Interest on loans and receivables to banks	127.4	102.3
Interest on loans and receivables to customers, of which:	2,285.6	1,776.1
- interest on entities from the financial sector other than banks	*135.0*	*108.8*
- interest on entities from the non-financial sector	*1,900.4*	*1,478.4*
- interest on entities from the government and self-government institutions' sector	*250.2*	*188.9*
Interest on debt securities held for trading	18.4	74.6
Interest on debt securities designated as fair value at initial recognition	1.7	11.6
Interest on available-for-sale debt securities*)	653.9	522.5
Interest on held-to-maturity debt securities	312.9	396.0
Interest result on derivatives	-16.8	48.3
Total interest income	**3,383.1**	**2,931.4**

*) Interest result on money bills classified as financial assets available for sale was reduced with the cost of that portfolio financing using sell-buy-back transactions.

With regard to interest revenue for the year 2011, the amount of PLN 46.7 million represents revenue from financial assets for which impairment loss was recognised. In the year 2010, the amount reached PLN 41.8 million. Interest revenue related to financial assets is calculated on the basis of the net exposure amounts; i.e. the amounts including effective impairment losses.

Interest expenses

	2011	2010
Interest on deposits from banks	162.9	92.7
Interest on deposits from customers, of which:	1,381.4	1,238.1
- interest on entities from the financial sector other than banks	*128.7*	*99.1*
- interest on entities from the non-financial sector	*1,203.4*	*1,101.9*
- interest on entities from the government and self-government institutions' sector	*49.3*	*37.1*
Total interest expenses	**1,544.3**	**1,330.8**

Net interest income	**1,838.8**	**1,600.6**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

3. Net commission income

	2011	2010
Commission income		
Commission related to keeping accounts	255.6	266.1
Commission related to payment and credit cards	208.4	185.0
Commission related to loans	178.5	154.0
Commission related to distribution of participation units	78.6	79.3
Fiduciary and custodian fees	31.2	28.3
Commission related to loans insurance	19.8	25.1
Foreign commercial business	14.4	13.0
Commission related to subscription of structured products	10.8	2.5
Commissions related to rendering the insurance available for deposit products	8.8	9.8
Commission related to sales of financial products	1.4	12.8
The transaction margin on currency exchange transactions	263.9	244.4
Other	20.2	19.4
Total comission income	**1,091.6**	**1,039.7**

Commission expenses		
Brokerage fees	4.8	2.4
Commission paid on intermediation in selling deposit products	20.3	24.4
Commission paid on electronic banking services	8.2	5.7
Commission paid on trading in securities	7.0	7.0
Commission paid on disclosing credit information	6.2	7.4
Commission paid on cards	0.0	9.6
Costs of the Bank Guarantee Fund (BFG)	36.5	15.5
Costs of the National Clearing House (KIR)	6.6	6.2
Other	34.5	29.6
Total commision expenses	**124.1**	**107.8**
Net commission income	**967.5**	**931.9**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

4. Net income on instruments measured at fair value through profit and loss and FX result

	2011	2010
Net income on financial assets and liabilities held for trading, of which:	**-130.0**	**-337.9**
- Net income on debt instruments	29.1	50.0
- Net income on derivatives, of which:	-159.1	-387.9
- Currency derivatives)*	*-161.3*	*-423.5*
*- Interest rate derivatives**)*	*-0.2*	*30.4*
- Securities derivatives	*2.4*	*5.2*
Net income on financial assets and liabilities measured at fair value upon initial recognition, of which	**-0.8**	**-3.9**
- Net income on debt instruments	-0.8	-3.9
FX result	**148.1**	**417.2**
Net income on instruments measured at fair value through profit and loss and FX result	**17.3**	**75.4**

Result on debt instruments includes net income on trading in treasury securities, commercial debt instruments and money market instruments (treasury bills) as well as result on fair value measurement of those instruments. Interest result on debt securities is presented as part of the overall interest result.

Result on derivatives includes net result on trading and fair value measurement of interest rate derivatives (FRA, IRS/CIRS, cap options), FX derivatives (swaps and options), as well as stock exchange index options.

*) Item Net income on derivatives - currency derivatives of the above note shows the impact of inclusion of credit risk in the fair value measurement for the transactions made on FX options concluded with the Bank clients. In 2011, a provision of PLN 25.9 million was made (in 2010, provisions worth PLN 0.8 million were released). In the year 2011 the Bank changed the methodology of estimation of value adjustment due to credit risk. Description of the changes in the methodology may be found in Chapter *Material Accounting Principles* in item 2.2. *Credit risk connected with derivative instruments*.

**) On account of the change to curves applied to valuation of IRS transactions observed on the market, the Bank estimated the impact of the changed approach to valuation of the said instruments on their fair value. As a result of conducted analyses, provision reflecting the expected impact of the changed valuation models on fair value of the measured instruments was presented in the financial result for the year 2011. Provision amounting to PLN -14.1 million was presented under item *net income on derivatives – interest rate derivatives*.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 _(PLN million)_

5. Net income on investments

	2011	2010
Dividend income	109.0	30.9
Net income on debt instruments available-for-sale	29.8	-2.8
Net income on equity instruments available-for-sale	1.4	0.2
Other*)	1.9	0.0
Net income on investments	**142.1**	**28.3**

*) The net income on sale of debt securities from the portfolio of held-to-maturity financial assets is presented in the item *Other*. The transaction was described in the chapter II. *Significant events in 2011* in the point no. 4 *Sale of securities from portfolio of financial assets held to maturity*.

6. Net income on hedge accounting

	2011	2010
Fair value hedge accounting for securities	**-35.7**	**-12.2**
- valuation of the hedged transaction	173.9	114.3
- valuation of the hedging transaction	-209.6	-126.5
Cash flow hedge accounting	**2.3**	**0.1**
- ineffectiveness that arises from cash flow hedges	2.3	0.1
Net income on hedge accounting	**-33.4**	**-12.1**

Detailed information on the hedge accounting applied in the Bank is provided in the subsequent part of the financial statements in note no. 38 *Hedge accounting.*

7. Net income on the other basic activities

	2011	2010
Result on disposal of fixed assets and intangible assets	2.1	-0.2
Banking activity-related compensations and losses	-1.8	-0.5
Impairment on other non-financial assets	-0.2	-9.2
Net income on the investment properties, of which:	0.0	4.6
- income from rental of the investment property	*0.0*	*8.4*
- maintenance expenses relating to the investment property	*0.0*	*-3.8*
Other	1.3	3.9
Total	**1.4**	**-1.4**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

8. General and administrative expenses

	2011	2010
Personnel expenses, of which:	**815.7**	**789.4**
wages and salaries, including:	*677.0*	*644.8*
special and retirement benefits	*2.2*	*1.6*
employee benefits, including:	*138.7*	*144.6*
training expenses	*22.1*	*23.3*
General and administrative expenses, of which:	**674.5**	**624.5**
maintenance and rental of buildings	192.6	185.3
equipment and other operating assets	107.9	98.0
consulting	97.6	81.2
communication services	51.2	55.2
refurbishment services	42.0	38.0
lease of computer resources	41.7	37.2
licences and patents	20.4	18.5
leasing services	19.2	16.5
taxes and charges	3.1	2.8
other external services	98.8	91.8
Depreciation and amortisation, of which:	**131.3**	**119.2**
on property, plant and equipment	72.6	69.5
on intangible assets	58.7	49.7
Total	**1,621.5**	**1,533.1**

8.1. Employee benefits

The Bank participates in the long-term incentive programme LEO (Long-term Equity Ownership), introduced by the ING Group. Description of system variants is included in the chapter no. V. *Material accounting principles* in the point no. 12 *Employee benefits.*

Option funding costs and system administration costs incurred by the Bank are recognized in item *Personnel expenses – wages and salaries*. The costs amounted to PLN 3.7 million in 2011 as compared to PLN 3.9 million in 2010.

The measurement of the awarded options at fair value is also recognized in the item. For the year 2011, the said measurement was minus PLN 9.7 million (as compared to minus PLN 5.2 million for the year 2010) and it encumbered the Bank's financial result.

The fair values of the option awards have been determined by using a Monte Carlo simulation. This model takes the risk free interest rate into account as well as the expected term of realisation of the options granted, the exercise price, the current share price, the expected volatility of the certificates of ING Group shares and the expected dividends.

The source for implied volatilities used for the valuation of the stock options is ING's trading system. The implied volatilities in this system are determined by ING's traders and are based on market data implied volatilities not on historical volatilities.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

The table below presents the parameters taken into account in the valuation model in the years 2011 and 2010:

	2011		2010	
	min	*max*	*min*	*max*
risk free interest rate	2.02%	4.62%	2.02%	4.62%
expected term of realisation	5 years	9 years	5 years	9 years
current share price	2.9 EUR	26.05 EUR	2.9 EUR	26.05 EUR
expected volatility of the certificates of shares	25 %	84%	25 %	84%
expected dividends	0.94%	8.99%	0.94%	8.99%

<u>Changes in option rights outstanding</u>

	Options outstanding (in numbers)		**Weighted average exercise price (in euros)**	
	2011	**2010**	**2011**	**2010**
Opening balance	**1,019,837**	**786,865**	**15.24**	**18.04**
- transferred	-7,041	15,262	17.64	20.68
- granted	0	271,972	0	7.35
- forfeited	111,382	19,570	14.73	12.90
- expired	106,766	34,692	26.37	21.86
Closing balance	**794,648**	**1,019,837**	**13.74**	**15.24**

As per 31 Dec 2011 total options outstanding consists of 189,185 options relating to equity-settled share-based payment arrangements and 605,463 options relating to cash-settled share-based payment arrangements (As per 31 Dec 2010 378,143 and 641,694 respectively).

Range of exercise price and weighted average remaining contractual life of options outstanding and exercisable are presented In table below:

2011

Range of exercise price in euros	**Options outstanding as at 31 Dec 2011**	Weighted average remaining contractual life	Weighted average exercise price (in EUR)	**Options excercisable as at 31 Dec 2011**	Weighted average remaining contractual life	Weighted average exercise price (in EUR)
0.00 - 5.00	99,417	7.22	2.90	0	-	-
5.00 - 10.00	283,334	7.27	7.67	38,025	1.17	9.71
10.00 - 15.00	25,794	2.86	14.36	25,794	2.86	14.36
15.00 - 20.00	181,996	5.15	17.10	181,996	5.15	17.10
20.00 - 25.00	136,579	3.57	23.99	136,579	3.57	23.99
25.00 - 30.00	67,528	4.24	25.18	67,528	4.24	25.18
	794,648			**449,922**		

2010

Range of exercise price in euros	**Options outstanding as at 31 Dec 2010**	Weighted average remaining contractual life	Weighted average exercise price (in EUR)	**Options excercisable as at 31 Dec 2010**	Weighted average remaining contractual life	Weighted average exercise price (in EUR)
0.00 - 5.00	**121,612**	8.22	2.90	**0**	-	-
5.00 - 10.00	**304,502**	8.34	7.64	**38,025**	2.17	9.71
10.00 - 15.00	**30,455**	3.76	14.39	**26,310**	3.14	14.39
15.00 - 20.00	**219,378**	6.19	17.08	**75,241**	4.25	17.88
20.00 - 25.00	**168,697**	4.33	23.88	**168,697**	4.33	23.88
25.00 - 30.00	**175,193**	2.34	26.52	**175,193**	2.34	26.52
	1,019,837			**483,466**		

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

The aggregate intrinsic value of options outstanding and exercisable as at 31 Dec 2011 was EUR 264,449 and EUR 0, repectively in comparision with EUR 532,661 and EUR 0 as at 31 Dec 2010.

9. Result on the other operating income and expenses

	2011	2010
Measurement of fixed assets at fair value	-5.9	-0.5
Donations made	-1.4	-2.0
Other operating expenses due to disputed claims	-1.5	-9.3
Other	0.7	0.9
Total	**-8.1**	**-10.9**

Other operating expenses due to disputed claims include expenses concerning disputes related to the improper performance of agreements, cases of criminal nature and cases pertaining to claims made by former employees. Specific information on provision for issues in dispute is presented later in the report in the note no. 31 *Provisions*.

10. Impairment losses and provisions for off-balance sheet liabilities

	2011	2010
Impairment losses on loans and other receivables	510.2	453.9
Reversed impairment losses on loans and other receivables	-336.9	-244.1
Net impairment losses on loans and other receivables, of which:	**173.3**	**209.8**
- losses on loans and other receivables at risk of impairment	*172.0*	*214.1*
- IBNR	*1.3*	*-4.3*
Increase of provisions for off-balance liabilities	7.5	9.4
Reversed provision for off-balance sheet liabilities	-8.4	-17.5
Net provisions for off-balance sheet liabilities recognized, of which:	**-0.9**	**-8.1**
- on the portfolio at risk of impairment	*-2.5*	*-6.6*
- IBNR	*1.6*	*-1.5*
Total increase of provisions	**517.7**	**463.3**
Total reversed impairment losses	**-345.3**	**-261.6**
Net impairment losses and provisions for off-balance sheet liabilities	**172.4**	**201.7**

The figures recognised under the item *Reversed impairment losses on loans and other receivables* include, among other things, the amounts related to the repayments of receivables previously written off the balance sheet, which in 2011 totalled PLN 20.2 million compared with PLN 24.6 million in 2010.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Amounts as to recognition and reversal of impairment losses on loans and other receivables broken down by clients are represented below.

Impairment losses on loans and other receivables by client's sector

	2011	2010
Impairment losses on loans and other receivables, of which:	**510.2**	**453.9**
- banks	*0.1*	*0.1*
- entities from the financial sector other than banks	*2.1*	*0.5*
- entities from the non-financial sector	*507.4*	*452.7*
- entities from the government and self-government institutions' sector	*0.6*	*0.6*
Reversed impairment losses on loans and other receivables, of which:	**-336.9**	**-244.1**
- banks	*0.0*	*0.0*
- entities from the financial sector other than banks	*-2.1*	*-0.3*
- entities from the non-financial sector	*-334.0*	*-239.3*
- entities from the government and self-government institutions' sector	*-0.8*	*-4.5*
Net impairment losses on loans and other receivables, of which:	**173.3**	**209.8**
- banks	*0.1*	*0.1*
- entities from the financial sector other than banks	*0.0*	*0.2*
- entities from the non-financial sector	*173.4*	*213.4*
- entities from the government and self-government institutions' sector	*-0.2*	*-3.9*

Impairment losses on loans and other receivables by client's segment

	2011	2010
Impairment losses on loans and other receivables, of which:	**510.2**	**453.9**
- corporate banking	*309.8*	*270.1*
- retail customers	*200.4*	*183.8*
Reversed impairment losses on loans and other receivables, of which:	**-336.9**	**-244,1**
- corporate banking	*-226.7*	*-140.7*
- retail customers	*-110.2*	*-103.4*
Net impairment losses on loans and other receivables, of which:	**173.3**	**209.8**
- corporate banking	*83.1*	*129.4*
- retail customers	*90.2*	*80.4*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

11. Income tax

Income tax recognised in the profit and loss account

	2011	2010
Current portion, of which:	**92.6**	**256.5**
Current year	83.0	264.0
Adjustment of last-year tax settlement	9.6	-7.5
Deferred tax, of which:	**135.3**	**-81.8**
Recognised and reversed temporary differences	135.3	-81.8
Total income tax recognised in the profit and loss account	**227.9**	**174.7**

Effective tax rate calculation

		2011	2010
A.	**Profit before tax**	**1,131.7**	**877.0**
B.	**19% of profit before tax**	**215.0**	**166.6**
C.	**Increases – non-deductible expenses, of which:**	**35.0**	**14.7**
	- expenses due to loan and non-loan receivables written off	13.8	0.5
	- thin capitalisation	8.8	4.6
	- setting up a provision against disputable debt claims and other assets	2.9	2.5
	- tax loss on the sale of the portfolio of receivables	1.6	0.0
	- representation expenses	1.5	1.2
	- PFRON	1.2	1.1
	- impairment on receivables in a part not covered with the deferred tax	0.4	0.7
	- expenses due to foreign payments	0.2	0.4
	- other	4.6	3.7
D.	**Decreases – tax exempt income, of which:**	**22.1**	**6.6**
	- dividends received	19.9	5.1
	- release of provisions against disputable debt claims	1.5	0.7
	- income exempt due to the entity	0.5	0.4
	- other	0.2	0.4
E.	**Income tax from profit and loss account (B+C-D)**	**227.9**	**174.7**
Effective tax rate (E : A)		**20.14%**	**19.92%**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

12. Earnings per ordinary share

Basic earnings per share

The calculation of basic earnings per one share of the parent company as for the year 2011 was based on net profit amounting to PLN 903.8 million (in the year 2010, it was PLN 702.3 million) and weighted average number of ordinary shares at the end of 2011, equalling 130,010,000.

In H2 2011, ING Bank Śląski S.A. executed shares face value split procedure. After the split, the share face value equals PLN 1.00 (it used to be PLN 10.00). The executed operation did not impact the amount of the share capital, which remained unchanged and totals PLN 130,100,000.00 In order to ensure the data comparability the value of profit per one share for 2010 was calculated taking into account the current number of shares.

	2011	**2010**
Net profit	903.8	702.3
Weighted average number of ordinary shares	130,100,000	130,100,000
Earnings per ordinary share (in PLN)	**6.95**	**5.40**

Diluted earnings per share

In 2011 as well as in 2010, there were no factors that would dilute the profit per one share. Within the described period ING Bank Śląski S.A. issued neither bonds convertible to shares nor options for shares. The share capital comprises of ordinary shares only (no privileged shares). Therefore, the diluted earnings per share is the same as the underlying profit per one share.

13. Dividends paid/proposed

The Management Board of ING Bank Śląski S.A. resolved to recommend the General Shareholders Meeting not to pay out the dividend for the year 2011 and earmark the entire 2011 net profit for equity.

On 07 April 2011, the General Meeting approved 2010 dividend payout of PLN 195.1 million. The dividend paid per share was PLN 15.00 gross. The dividend was paid out on 01 July 2011.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

14. Cash in hand and balances with the Central Bank

	end of 2011	end of 2010
Cash in hand	645.3	713.3
Balances with the Central Bank	847.8	1,680.9
Total	**1,493.1**	**2,394.2**

The Bank maintains a mandatory provision - at the level of 3,5% of the value of deposits received by the Bank - in its current account kept with the National Bank of Poland. The amount of the calculated provision is reduced by an equivalent of EUR 500,000, which represented:

- PLN 2.2 million as of 31 Oct 2011,
- PLN 2.0 million as of 30 Nov 2010.

The arithmetic mean of balances of the mandatory reserve that the Bank is obliged to maintain during a given period in the current account with NBP amounts to:

- PLN 1,829.9 million for the period from 30 Nov 2011 to 01 Jan 2012,
- PLN 1,727.3 million for the period from 31 Dec 2010 to 30 Jan 2011.

The Bank may utilise the credit limit with the National Bank of Poland representing 85% of the face value of Treasury securities subject to pledge, which as at 31 Dec 2011 represented PLN 4,918.0 million compared with PLN 3,085.7 million as at 31 Dec 2010.

15. Financial assets measured at fair value through profit and loss

	end of 2011	end of 2010
Financial assets held for trading	444.7	489.9
Financial assets designated as at fair value upon initial recognition	194.9	146.8
Total	**639.6**	**636.7**

Financial assets at fair value through profit and loss by maturity

	end of 2011	end of 2010
up to 1 month	258.9	90.1
over 1 month and up to 3 months	59.1	30.7
over 3 months and up to 1 year	30.7	437.9
over 1 year and up to 5 years	187.9	36.4
over 5 years	103.0	41.6
Total	**639.6**	**636.7**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Movements in financial assets at fair value through profit and loss

	end of 2011	end of 2010
Opening balance	**636.7**	**8,265.5**
Increases, of which:	**563,651.4**	**437,410.1**
- purchase of debt securities	*563,615.5*	*437,339.3*
- increase in the value of securities	*35.9*	*70.8*
Decreases, of which:	**563,648.5**	**445,038.9**
- sales of debt securities	*562,905.3*	*389,284.5*
- redemption of debt securities	*548.0*	*55,583.5*
- drop in the value of securities	*195.2*	*170.9*
Closing balance	**639.6**	**636.7**

Interest revenue from financial assets carried at fair value through profit and loss is recognised as part of interest result. Profits and losses due to movements in fair value of the said assets are recognised in item *Result on financial instruments carried at fair value through profit and loss and FX result.*

Financial assets held for trading

	end of 2011	end of 2010
Debt instruments, of which:	**444.7**	**489.9**
- Treasury bonds	*385.5*	*208.7*
- Treasury bills	*59.2*	*281.2*
Total financial assets held for trading, of which:	**444.7**	**489.9**
- listed instruments	*385.5*	*208.7*
- unlisted instruments	*59.2*	*281.2*

Financial assets designated as at fair value upon initial recognition

	end of 2011	end of 2010
Transactions with the buy-back commitment	**194.9**	**85.6**
Debt instruments, of which:	**0.0**	**61.2**
- Bonds issued by entity from non-financial sector, of which:	0.0	61.2
- unlisted instruments	*0.0*	*61.2*
Total financial assets designated as at fair value upon initial recognition	**194.9**	**146.8**

The Bank designated all buy-sell-back and sell-buy-back transactions for fair value measurement through profit and loss. As of the end of 2010 also debt securities in the form of bonds issued by 1 entity from non-financial sector were designated for fair value measurement through profit and loss.

A group of sell-buy-back and buy-sell-back transactions was designated for fair value measurement through profit and loss due to their classification to the portfolio managed by the Financial Markets Operations and Strategic Clients Department. According to the principles of risk management and the investment strategy in force at the Bank, financial assets and liabilities within this portfolio are measured and managed on the basis of fair value.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

For the transactions with the buy-back commitment, all benefits and risks related to assets and the option of their sale remain with the Bank.

By eliminating accounting mismatch, designation of the above mentioned bonds for fair value measurement through profit and loss allows the bank to obtain more useful information. The "mismatch" would involve inconsistencies in the recognition of the effects of measurement of an investment item in the form of above bonds and IRS transactions, which is measured as fair value through the financial result, and securing the interest rate risk from the transaction.

16. Valuation of derivatives

The below table shows face values for derivatives whose valuation is presented on the assets side (positive valuation) and liabilities side (negative valuation) of the Bank's statement of financial position.

end of 2011

	Valuation of derivatives		*Nominal value of instruments with the period remaining to maturity*			
	Assets	**Liabilities**	***up to 3 months***	***over 3 months and up to 1 year***	***over 1 year***	***TOTAL***
Interest rate derivatives, of which:	**1,133.9**	**1,055.9**	***9,907.1***	***16,701.9***	***41,863.9***	***68,472.9***
- Forward rate agreements (FRA)	2.7	1.7	*0.0*	*6,100.0*	*0.0*	***6,100.0***
- Interest rate swaps (IRS)	1,127.6	1,050.6	*9,727.0*	*10,496.4*	*40,339.6*	***60,563.0***
- CAP options	3.6	3.6	*180.1*	*105.5*	*1,524.3*	***1,809.9***
FX derivatives, of which:	**713.7**	**628.4**	***35,356.5***	***11,495.9***	***899.9***	***47,752.3***
- FX contracts (swap, forward)	597.9	394.7	*34,563.4*	*11,044.1*	*864.5*	***46,472.0***
- CIRS*)	107.6	143.6	*0.0*	*0.0*	*0.0*	***0.0***
- Currency options (purchased)	8.2	0.0	*375.2*	*106.7*	*17.7*	***499.6***
- Currency options (sold)	0.0	90.1	*417.9*	*345.1*	*17.7*	***780.7***
Current off-balance sheet transactions, of which:	**6.5**	**5.6**	***13,881.8***	***0.0***	***0.0***	***13,881.8***
- FX operations	6.2	4.2	*10,262.0*	-	-	***10,262.0***
- Securities operations	0.3	1.4	*3,619.8*	-	-	***3,619.8***
Stock market derivatives, of which:	**2.5**	**2.4**	***0.0***	***6.6***	***1,128.9***	***1,135.5***
- Options for stock market (buy)	2.5	0.0	*0.0*	*3.3*	*567.5*	***570.8***
- Options for stock market (sold)	0.0	2.4	*0.0*	*3.3*	*561.4*	***564.7***
Fair value measurement of other financial instruments	**1.8**	**1.8**	-	-	-	-
Total	**1,858.4**	**1,694.1**	***59,145.4***	***28,204.4***	***43,892.7***	***131,242.5***

*) CIRS derivatives with the value date preceding the date hereof are shown in the value being the total of fair value measurement and nominal differential. The so-determined value is presented in the statement of financial position in the item *Valuation of derivatives* on the assets side (positive valuation) or liabilities side (negative valuation).

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of 2010

	Valuation of derivatives		Nominal value of instruments with the period remaining to maturity			
	Assets	**Liabilities**	***up to 3 months***	***over 3 months and up to 1 year***	***over 1 year***	***TOTAL***
Interest rate derivatives, of which:	**677.7**	**869.1**	***45,695.3***	***14,789.9***	***21,026.5***	***81,511.7***
- Forward rate agreements (FRA)	1.2	3.5	*0.0*	*5,620.7*	*0.0*	***5,620.7***
- Interest rate swaps (IRS)	653.1	839.9	*45,583.3*	*8,330.3*	*19,974.3*	***73,887.9***
- CAP options	23.4	25.7	*112.0*	*838.9*	*1,052.2*	***2,003.1***
FX derivatives, of which:	**437.2**	**378.2**	***15,235.7***	***9,435.0***	***1,364.5***	***26,035.2***
- FX contracts (swap, forward)	239.0	161.0	*14,202.6*	*8,397.3*	*933.0*	***23,532.9***
- CIRS	185.9	119.6	*0.0*	*0.0*	*341.8*	***341.8***
- Currency options (purchased)	12.3	0.0	*424.8*	*578.8*	*4.7*	***1,008.3***
- Currency options (sold)	0.0	97.6	*608.3*	*458.9*	*85.0*	***1,152.2***
Current off-balance sheet transactions, of which:	**4.0**	**5.5**	***10,136.3***	***0.0***	***0.0***	***10,136.3***
- FX operations	2.1	4.0	*8,571.7*	-	-	***8,571.7***
- Securities operations	1.9	1.5	*1,564.6*	-	-	***1,564.6***
Stock market derivatives, of which:	**36.8**	**36.8**	***0.0***	***990.5***	***6.0***	***996.5***
- Options for stock market (buy)	36.8	0.0	*0.0*	*496.2*	*3.0*	***499.2***
- Options for stock market (sold)	0.0	36.8	*0.0*	*494.3*	*3.0*	***497.3***
Fair value measurement of other financial instruments	**3.2**	**3.1**	-	-	-	-
Total	**1,158.9**	**1,292.7**	***71,067.3***	***25,215.4***	***22,397.0***	***118,679.7***

Embedded derivatives

At the end of 2011 and 2010 the Bank had deposits in PLN with embedded derivatives. Embedded instruments are FX, stock exchange index, commodity market and participation in investment funds options. Valuation of embedded derivatives as per 31 Dec 2011 was PLN 8.4 million against PLN 8.8 million as per 31 Dec 2010.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

17. Investments

	end of 2011	end of 2010
Available-for-sale financial assets, including:	15,467.8	16,787.9
- fair value hedge - hedged items	*1,020.3*	*3,221.4*
Held-to-maturity financial assets	4,982.3	6,218.0
Total	**20,450.1**	**23,005.9**

Investments by maturity

	end of 2011	end of 2010
up to 1 month	5,995.9	4,796.7
over 3 months and up to 1 year	1,487.2	5,142.2
over 1 year and up to 5 years	9,606.2	8,708.5
over 5 years	3,360.8	4,358.5
Total	**20,450.1**	**23,005.9**

Movements in investments

	2011	2010
Opening balance	**23,005.9**	**14,166.0**
Increases, of which:	**365,964.6**	**171,840.8**
- purchase of debt securities	*364,748.8*	*170,802.8*
- increase in the value of securities	*1,213.5*	*1,035.4*
- release of provisions for shares	*2.3*	*0.0*
- purchase of shares in result of restructuring receivables	*0.0*	*2.6*
Decreases, of which:	**368,520.4**	**163,000.9**
- sales of debt securities	*18,623.2*	*3,480.9*
- redemption of debt securities	*349,078.6*	*158,679.9*
- drop in the value of securities	*816.3*	*833.3*
- sales of shares	*2.3*	*0.0*
- redemption of shares in result of restructuring receivables	*0.0*	*6.8*
Closing balance	**20,450.1**	**23,005.9**

In 2011 the Bank sold the debt securities from the portfolio of held-to-maturity financial assets. The transaction was described in the chapter II. *Significant events in 2011* in the point no. 4 *Sale of securities from portfolio of financial assets held to maturity*.

In 2011, the Bank sold shares of one company from its investment portfolio, the value of which at the acquisition price amounted to PLN 2.3 million whereas its balance-sheet value due to a recognized impairment loss was PLN 0. The net income on sale of those shares amounted to PLN 0.4 million.
In 2011, the Bank generated net income on redemption of some part of shares purchased under restructuring that amounted to PLN +1.0 million.

In 2010, the Bank did not sell any shares from the investment portfolio.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Available-for-sale financial assets

	end of 2011	end of 2010
Debt securities, of which:	**15,437.7**	**16,740.4**
- Fixed rate debt instruments, of which:	10,679.9	11,812.0
- Treasury bonds	*3,313.2*	*5,960.3*
- NBP bills	*5,995.8*	*4,796.7*
- BGK bonds	*1,370.9*	*1,055.0*
- Floating rate debt instruments, of which:	4,757.8	4,928.4
- Treasury bonds	*4,757.8*	*4,928.4*
Total debt instruments, of which:	15,437.7	16,740.4
- listed instruments	*9,441.9*	*11,943.7*
- unlisted instruments	*5,995.8*	*4,796.7*
Equity instruments	**30.1**	**47.5**
- Equity instruments at cost	*43.3*	*45.5*
- Market value evaluation	*5.3*	*4.3*
- Impairment	*-18.5*	*-2.3*
Equity instruments – carrying value, of which:	30.1	47.5
- listed instruments	*0.9*	*0.8*
- unlisted instruments	*29.2*	*46.7*
Total available-for-sale financial assets	**15,467.8**	**16,787.9**

The item *Equity Instruments* include stocks and shares of number of entities not quoted on stock exchange which are not presented as fair value. It is difficult or impossible to determine the fair value due to absence of active market for those instruments. The Bank is of the opinion that the purchase price is the best indicator of their value.

Moreover, the Bank hold series of shares of two companies not quoted on the stock exchange but it is carried based on the share price of series of shares on regulated market. The Bank purchased the shares of two companies under debt restructuring.

Due to the operations of its units, the Bank holds certain shares and participations such as the shares of the Warsaw Stock Exchange, the Polish Clearing Chamber, SWIFT and the Polish Credit Information Bureau, among others. Other shares are classified by the Bank for disposal (by sale or liquidation).

Held-to-maturity financial assets

	end of 2011	end of 2010
Fixed rate debt instruments, of which:	4,982.3	6,218.0
- Treasury bonds (listed)	*4,982.3*	*6,218.0*
Total held-to-maturity financial assets	**4,982.3**	**6,218.0**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Fair value hedge - hedged items

	end of 2011	end of 2010
Fixed rate debt instruments, of which:	1,020.3	3,221.4
- Treasury bonds	*1,020.3*	*3,221.4*
Total	**1,020.3**	**3,221.4**

Specific information on the hedge accounting applied in the Bank is presented later in the report in the note no. 38 *Hedge accounting*.

17.1. Reclassification of the debt securities

The Bank presents the disclosures of reclassification in connection with reclassification executed in 2008. The Bank reclassified then a part of the debt securities from the available-for-sale financial assets to the loans and other receivables category.

The reason for reclassification was the lack or inactiveness of the market, which in the opinion of the Bank makes the above securities classify as matching the definition of loans and receivables according to IAS, namely they "are financial assets other than derivatives, with the determined or possible to determine payments, and which are not quoted on active market", and the Bank's intention pertaining thereto, i.e. Bank's intention and possibility to hold them in a foreseeable future, did not change.

The reclassification resulted in the change of the principles of the debt securities measurement, that is from the securities measured at their fair value to the ones measured at amortised cost. Fair value of debt securities as of reclassification date constituted their new amortised cost.

Debt securities reclassified from available-for-sale category to loans and receivables

Name of security	Date of reclassification	Fair value as of the date of reclassification	end of 2011		end of 2010	
			carrying amount	fair value	carrying amount	fair value
T-eurobonds	01.10.2008	1,242.9	1,909.9	2,011.3	1,635.0	1,762.2
Corporate bonds	19.12.2008	294.2	92.0	92.0	93.9	93.7
Municipal bonds	19.12.2008	34.4	34.1	34.4	34.5	34.9
Pledge (mortgage) bonds	19.12.2008	20.2	0.0	0.0	20.0	19.8
Total		**1,591.7**	**2,036.0**	**2,137.7**	**1,783.4**	**1,910.6**

Upon reclassification, the above named securities are presented in the financial statements under the item *Loans and other receivables to customers.*

T-bonds denominated in EUR (T-eurobonds) classified as of their purchase date to the available-for-sale financial assets were the base instruments secured in the fair value hedge accounting against the interest rate risk. As of reclassification date, the original strategy of hedging the securities from the available-for-sale portfolio was closed. Due to the fact that the intention of the Bank was to sustain the hedging connection, as of the reclassification date a new hedging strategy was started, i.e. the strategy which hedged the fair value against the interest rate risk related to the securities classified to loans and other receivables category.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Fair value of gain or loss, which would be presented in revaluation reserve once reclassification is not performed

Name of security	Fair value recognised in equity	
	end of 2011	end of 2010
T-eurobonds	101.4	127.3
Corporate bonds	0.0	-0.1
Municipal bonds	0.3	0.4
Pledge (mortgage) bonds	0.0	-0.2
Total	**101.7**	**127.4**

Had the above securities not been re-classified to the category of loans and other receivables but left in the category of available-for-sale financial assets, the amounts of measurement at fair value would have been recognised in full in the revaluation reserve. The above figures have been estimated without including the impact that the further application of the fair value hedge accounting would have on the income statement or the capitals because in the opinion of the Bank such calculations would be prone to error and would rely on hypothetical assumptions that would be difficult to verify.

Costs and revenues included in the profit and loss account

end of 2011

Name of security	accrued interests (coupon)	amortised discount/ premium	depreciation of the revaluation reserve	carrying value of hedged instruments in FVH strategy adjustment *)
T-eurobonds	76.2	-2.8	1.9	81.5
Corporate bonds	4.5	0.0	0.6	0.0
Municipal bonds	4.4	0.1	-0.1	0.0
Pledge (mortgage) bonds	0.0	0.2	-0.2	0.0
Total	**85.1**	**-2.5**	**2.2**	**81.5**

end of 2010

Name of security	accrued interests (coupon)	amortised discount/ premium	depreciation of the revaluation reserve	carrying value of hedged instruments in FVH strategy adjustment *)
T-eurobonds	74.0	-2.7	1.8	47.4
Corporate bonds	7.5	-0.3	0.9	0.0
Municipal bonds	1.5	0.1	-0.1	0.0
Pledge (mortgage) bonds	0.8	-0.1	0.1	0.0
Total	**83.8**	**-3.0**	**2.7**	**47.4**

**) measurement due to the hedged interest rate risk*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

18. Assets securing liabilities

Nominal value of assets securing liabilities

	end of 2011	end of 2010
From the portfolio of financial assets measured at fair value through profit and loss:		
- treasury bonds collateralising the liabilities due to securities sold with a promise of repurchase (sell-buy-back transactions)	1,637.5	4,317.0
- treasury bonds collateralising the liabilities due to securities sold with a promise of repurchase (repo transactions)	37.5	0.0
From the portfolio of financial assets held-to-maturity:		
- treasury bonds constituting a collateral to Bank Guarantee Fund	865.5	865.5
- treasury bonds collateralising the liabilities due to securities sold with a promise of repurchase (repo transactions)	0.0	24.0
From the portfolio of available-for-sale financial assets:		
- treasury bonds collateralising the liabilities due to securities sold with a promise of repurchase (repo transactions)	169.1	280.0
- BGK bonds securing the receivables and liabilities of the merged subsidiary	93.0	0.0
From the portfolio of loans and receivables:		
- treasury bonds collateralising the liabilities due to securities sold with a promise of repurchase (repo transactions)	1,475.2	328.7

Securities are pledged on the terms provided for by:

– the Banking Guarantee Fund Act (Journal of Laws 84 of 2009, item 711),
– Commercial Companies Code, Article 495 (Journal of Laws of 2000, no. 94, item 1037 as amended),
– the basis of the transaction.

Besides the instruments indicated herein, assets limited as to use also include the obligatory reserve which the Bank has to maintain in the current account with NBP. For obligatory reserve details, see note no. 14 *Cash in hand and balances with the Central Bank*.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

19. Derivative hedge instruments

Positive valuation

	end of 2011	end of 2010
Balance sheet valuation of instruments hedging the cash flows, of which:	433.4	104.8
- Interest Rate Swap	*433.4*	*104.8*
Total	**433.4**	**104.8**

Negative valuation

	end of 2011	end of 2010
Balance sheet valuation of instruments hedging the fair value of securities, of which:	900.6	600.5
- Interest Rate Swap	*900.6*	*600.5*
Total	**900.6**	**600.5**

Positive amounts from this table are presented under *Derivative hedge instruments* in the assets whereas negative valuation is presented under *Derivative hedge instruments* in liabilities of the statement of financial position.

Specific information on the hedge accounting applied in the Bank is presented later in the report in the note no. 38 *Hedge accounting*.

20. Loans and receivables

Loans and other receivables portfolio

	end of 2011		
	gross value	impairment losses	net value
Loans and receivables to other banks, of which:	967.3	-0.2	967.3
- loans and advances	*120.7*	*-0.2*	*120.5*
Loans and receivables to customers, of which:	43,412.7	-1,114.0	42,298.7
- loans and advances	*37,379.0*	*-1,108.8*	*36,270.2*
Total, of which:	**44,380.0**	**-1,114.2**	**43,265.8**
- loans and advances	*37,499.7*	*-1,109.0*	*36,390.7*

	end of 2010		
	gross value	impairment losses	net value
Loans and receivables to other banks, of which:	1,521.6	-0.1	1,521.5
- loans and advances	*435.4*	*-0.1*	*435.3*
Loans and receivables to customers, of which:	35,041.6	-1,082.3	33,959.3
- loans and advances	*30,500.0*	*-1,077.1*	*29,422.9*
Total, of which:	**36,563.2**	**-1,082.4**	**35,480.8**
- loans and advances	*30,935.4*	*-1,077.2*	*29,858.2*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

20.1. Loans and receivables to other banks

	end of 2011	end of 2010
Current accounts	805.7	375.7
Interbank deposits, of which:	40.9	686.0
- overnight deposits	*6.9*	*303.3*
Loans and advances*)	120.7	435.4
Debt securities	0.0	20.0
Other receivables	0.0	4.5
Total (gross)	**967.3**	**1,521.6**
Impairment losses, of which:	-0.2	-0.1
- concerning loans and advances)*	*-0.2*	*-0.1*
Total (net)	**967.3**	**1,521.5**

*) The note 20.3. presented further provides detailed information about the quality of the loans and advances portfolio and impairment losses concerning loans and advances.

The amount presented at the end of 2010 in the item *Debt Securities* is related to mortgage bonds issued by another bank which were re-classified in 2008 from the portfolio of financial assets available-for-sale. In April 2011, the above securities were bought out. The detailed disclosures on re-classification made in 2008 have been presented in the note 17.1.

Loans and receivables to other banks by maturity

	end of 2011	end of 2010
up to 1 month	837.5	726.0
over 1 month and up to 3 months	11.0	70.4
over 3 months and up to 1 year	10.9	161.4
over 1 year and up to 5 years	107.9	520.5
over 5 years	0.0	43.3
Total	**967.3**	**1,521.6**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

20.2. Loans and receivables to customers

	end of 2011	end of 2010
Loans and advances*)	37,379.0	30,500.0
Debt securities**)	5,959.6	4,446.4
Other receivables	74.1	95.2
Total (gross)	**43,412.7**	**35,041.6**
Impairment losses, of which:	-1,114.0	-1,082.3
- concerning loans and advances) *	*-1,108.8*	*-1,077.1*
- concerning other receivables	*-5.2*	*-5.2*
Total (net), of which:	**42,298.7**	**33,959.3**
- Loans and other receivables to entities from the financial sector other than banks	*2,887.3*	*2,647.6*
- Loans and other receivables to entities from the non-financial sector	*31,626.4*	*24,692.8*
- Loans and other receivables to entities from the government and self-government institutions' sector	*7,785.0*	*6,618.9*

*) The note 20.3. presented further provides detailed information about the quality of the loans and advances portfolio and impairment losses concerning loans and advances.

**) The item *Debt securities* includes the value of T-eurobonds classified to loans and receivables portfolio. The T-eurobonds carrying value presented in above note amounted to PLN 3,872.6 million as of 31 Dec 2011 compared with PLN 3,268.5 million as of 31 Dec 2010.

Loans and other receivables to entities from the financial sector other than banks

	end of 2011	end of 2010
Loans and advances, of which:	2,821.8	2,585.0
- in the current account	*4.7*	*434.8*
- term ones	*2,817.1*	*2,150.2*
Other receivables	65.8	64.5
Total (gross)	**2,887.6**	**2,649.5**
Impairment losses, of which:	-0.3	-1.9
- concerning loans and advances	*-0.3*	*-1.9*
Total (net)	**2,887.3**	**2,647.6**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Loans and other receivables to entities from the non-financial sector

	end of 2011	end of 2010
Loans and advances granted to business entities, of which:	15,969.2	12,507.9
- in the current account	*4,316.1*	*3,724.3*
- term ones	*11,653.1*	*8,783.6*
Loans and advances granted to households, of which:	15,315.2	12,586.6
- in the current account	*1,311.3*	*1,255.8*
- term ones	*14,003.9*	*11,330.8*
Debt securities, of which:	1,446.1	646.6
- reclassified from available-for-sale portfolio in 2008)*	*92.0*	*93.9*
Other receivables	8.2	30.6
Total (gross)	**32,738.7**	**25,771.7**
Impairment losses, of which:	-1,112.3	-1,078.9
- concerning loans and advances	*-1,107.1*	*-1,073.7*
- concerning other receivables	*-5.2*	*-5.2*
Total (net)	**31,626.4**	**24,692.8**

Loans and other receivables to entities from the government and self-government institutions' sector

	end of 2011	end of 2010
Loans and advances, of which:	3,272.8	2,820.5
- in the current account	*34.7*	*8.4*
- term ones	*3,238.1*	*2,812.1*
Debt securities, of which:	4,513.5	3,799.8
- reclassified from available-for-sale portfolio in 2008)*	*1,944.0*	*1,669.4*
Other receivables	0.1	0.1
Total (gross)	**7,786.4**	**6,620.4**
Impairment losses, of which:	-1.4	-1.5
- concerning loans and advances	*-1.4*	*-1.5*
Total (net)	**7,785.0**	**6,618.9**

*) In 2008, the Bank reclassified a part of the debt securities from the available-for-sale financial assets to the loans and other receivables category. The said securities included, but were not limited to, T-bonds (euro-bonds), commercial papers, and municipal bonds that after reclassification are presented herein. T-bonds are hedged against IR risk in the fair value hedge accounting. Specific disclosures on reclassification are presented in the note no. 17.1.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Loans and receivables to customers by maturity

	end of 2011	end of 2010
up to 1 month	6,626.3	5,710.0
over 1 month and up to 3 months	1,906.9	1,848.7
over 3 months and up to 1 year	4,108.3	3,751.2
over 1 year and up to 5 years	12,628.5	9,554.6
over 5 years	16,564.5	12,622.6
overdue	1,578.2	1,554.5
Total	**43,412.7**	**35,041.6**

Fair value hedge - hedged items

Below table presents value of securities classified to the category of loans and advances and hedged within FVH accounting.

	end of 2011	end of 2010
Fixed rate debt instruments, of which:	3,872.6	3,268.5
- Treasury bonds	*3,872.6*	*3,268.5*
Total	**3,872.6**	**3,268.5**

Detailed information on the hedge accounting applied in the Bank is presented in the subsequent part of the report in note no. 38 *Hedge accounting*.

Repayment security

In line with the credit policy, the Bank accepts collateral to secure repayment of the loans extended in the form of blocked borrower's account funds and the borrower's assets. More information about collaterals is presented in the part "*Risk Management in ING Bank Śląski S.A.*", in the point no 4.4. *Repayment Security and Other Forms of Credit Risk Mitigation*.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

20.3. Quality of portfolio of loans and receivables

Loans and advances by client segment

	end of 2011		
	gross value	impairment losses	net value
Loans and advances to customers from corporate banking segment, of which:	22,490.8	-726.2	21,764.6
- loans and advances to strategic clients	*9,010.5*	*-166.7*	*8,843.8*
- other loans and advances	*13,480.3*	*-559.5*	*12,920.8*
Loans and advances to retail customers segment, of which:	15,008.9	-382.8	14,626.1
- mortgages	*10,926.8*	*-57.7*	*10,869.1*
- other loans and advances	*4,082.1*	*-325.1*	*3,757.0*
Total	**37,499.7**	**-1,109.0**	**36,390.7**

	end of 2010		
	gross value	impairment losses	net value
Loans and advances to customers from corporate banking segment, of which:	18,384.8	-772.9	17,611.9
- loans and advances to strategic clients	*7,606.8*	*-179.1*	*7,427.7*
- other loans and advances	*10,778.0*	*-593.8*	*10,184.2*
Loans and advances to retail customers segment, of which:	12,550.6	-304.3	12,246.3
- mortgages	*8,348.8*	*-40.3*	*8,308.5*
- other loans and advances	*4,201.8*	*-264.0*	*3,937.8*
Total	**30,935.4**	**-1,077.2**	**29,858.2**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Loans and receivables portfolio classified according to impaired / unimpaired

	end of 2011	end of 2010
Loans and advances to customers from corporate banking segment		
Gross value, of which:	**22,490.8**	**18,384.8**
- unimpaired (IBNR*))	21,357.5	17,207.2
- impaired, of which:	1,133.3	1,177.6
- measured individually (ISFA))*	*1,074.6*	*1,105.4*
- measured as the portfolio (INSFA))*	*58.7*	*72.2*
Impairment losses, of which:	**-726.2**	**-772.8**
- unimpaired (IBNR*))	-63.2	-60.1
- impaired, of which:	-663.0	-712.7
- measured individually (ISFA))*	*-622.6*	*-664.2*
- measured as the portfolio (INSFA))*	*-40.4*	*-48.5*
Loans and advances to retail customers		
Gross value, of which:	**15,008.9**	**12,550.6**
- unimpaired (IBNR*))	14,589.1	12,222.3
- impaired	419.8	328.3
Impairment losses, of which:	**-382.8**	**-304.4**
- unimpaired (IBNR*))	-96.9	-89.7
- impaired	-285.9	-214.7
Total gross value, of which:	**37,499.7**	**30,935.4**
- unimpaired (IBNR) portfolio	35,946.6	29,429.5
- impaired portfolio	1,553.1	1,505.9
Total impairment losses, of which:	**-1,109.0**	**-1,077.2**
- unimpaired (IBNR) portfolio	-160.1	-149.8
- impaired portfolio	-948.9	-927.4
Loans and advances (net)	**36,390.7**	**29,858.2**

**) IBNR – Incurred But Not Reported; ISFA – Individually Significant Financial Assets; INSFA – Individually Non- Significant Financial Assets*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Movements in impairment losses concerning loans and advances

	2011	2010
Opening balance	**1,077.2**	**871.6**
Movements in impairment losses, of which:	**31.8**	**205.6**
- Recognised during the period	*510.2*	*453.9*
- Reversed during the period	*-336.9*	*-244.1*
- Utilised writte-offs	*-171.3*	*-38.1*
- Amounts recovered from loans previously written off	*22.0*	*28.0*
- Unwinding interest	*-10.2*	*-13.1*
- Amount of previous FV adjustment for restructuring unmatured FM assets)*	*34.5*	*27.2*
- Other	*-16.5*	*-8.2*
Closing balance	**1,109.0**	**1,077.2**

**) FM assets – credit receivable arising from restructuring derivative transaction concluded by the Bank with its clients.*

The amount of established provisions was impacted, among others, by a charge for derivative transaction risk (mainly FX options). In 2011, the balance of provisions therefor amounted to PLN +4.6 million (provision release) compared to PLN - 25.3 million (provision establishment) in 2010.

Movements in impairment losses concerning loans and advances by client segments

2011

	impairment losses concerning loans and advances to customers from corporate banking segment			**impairment losses concerning loans and advances to retail customers**			**TOTAL**
	loans to strategic customers	other loans and advances	**Total**	mortgages	other loans and advances	**Total**	
Opening balance	**179.1**	**593.8**	**772.9**	**40.3**	**264.0**	**304.3**	**1,077.2**
Movements in impairment losses, of which:	**-12.4**	**-34.3**	**-46.7**	**17.4**	**61.1**	**78.5**	**31.8**
- Recognised and reversed during the period	*17.0*	*66.1*	***83.1***	*15.9*	*74.3*	***90.2***	***173.3***
- Utilised writte-offs	*0.0*	*-159.7*	***-159.7***	*-0.1*	*-11.5*	***-11.6***	***-171.3***
- Amounts recovered from loans previously written off	*0.0*	*9.9*	***9.9***	*0.0*	*12.1*	***12.1***	***22.0***
- Unwinding interest	*-0.1*	*-5.0*	***-5.1***	*0.2*	*-5.3*	***-5.1***	***-10.2***
- Amount of previous FV adjustment for restructuring unmatured FM assets)*	*-16.3*	*50.8*	***34.5***	*0.0*	*0.0*	***0.0***	***34.5***
- Other	*-13.0*	*3.6*	***-9.4***	*1.4*	*-8.5*	***-7.1***	***-16.5***
Closing balance	**166.7**	**559.5**	**726.2**	**57.7**	**325.1**	**382.8**	**1,109.0**

**) FM assets – credit receivable arising from restructuring derivative transaction concluded by the Bank with its clients.*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2010

	impairment losses concerning loans and advances to customers from corporate banking segment			impairment losses concerning loans and advances to retail customers			TOTAL
	loans to strategic customers	other loans and advances	Total	mortgages	other loans and advances	Total	
Opening balance	**131.4**	**516.6**	**648.0**	**38.8**	**184.8**	**223.6**	**871.6**
Movements in impairment losses, of which:	**47.7**	**77.2**	**124.9**	**1.5**	**79.2**	**80.7**	**205.6**
- Recognised and reversed during the period	*37.7*	*91.7*	***129.4***	*2.0*	*78.4*	***80.4***	***209.8***
- Utilised writte-offs	*-4.2*	*-29.0*	***-33.2***	*-0.4*	*-4.5*	***-4.9***	***-38.1***
- Amounts recovered from loans previously written off	*0.0*	*10.4*	***10.4***	*0.0*	*17.6*	***17.6***	***28.0***
- Unwinding interest	*-3.3*	*-3.6*	***-6.9***	*0.1*	*-6.3*	***-6.2***	***-13.1***
- Amount of previous FV adjustment for restructuring unmatured FM assets)*	*16.6*	*10.6*	***27.2***	*0.0*	*0.0*	***0.0***	***27.2***
- Other	*0.9*	*-2.9*	***-2.0***	*-0.2*	*-6.0*	***-6.2***	***-8.2***
Closing balance	**179.1**	**593.8**	**772.9**	**40.3**	**264.0**	**304.3**	**1,077.2**

**) FM assets – credit receivable arising from restructuring derivative transaction concluded by the Bank with its clients.*

Portfolio sale

In 2011 the Bank concluded two arrangements regarding to credit portfolio sale. Detailed information on total amount of receivables, contractual price, impact on impairment losses and net impact on Bank's financial result is included in chapter no. II. *Significant events in 2011*, in the point no. 6 *Portfolio sale*.

No such agreement was concluded by the Bank in 2010.

21. Investments in controlled entities

The Bank has shares in the subsidiared and associated entities:

Name of entity	Type of capital relation	Bank's percentage share in the business's equity	Carrying value of shares (at cost)	
			end of 2011	end of 2010
ING Securities S.A.	subsidiary	100.00%	30.2	30.2
Centrum Banku Śląskiego Sp. z o.o.	subsidiary	100.00%	160.2	160.2
Solver Sp. z o.o.	subsidiary	82.30%	7.9	7.9
ING Bank Hipoteczny S.A.	subsidiary	100.00%	0.0	213.4
ING Powszechne Towarzystwo Emerytalne S.A.	associated company	20.00%	40.0	40.0
Total			**238.3**	**451.7**

In 2011 the merger of ING Bank Śląski S.A. with its subsidiary - ING Bank Hipoteczny S.A.- occured. The details are described in the chapter no. II. *Significant events in 2011*, in the point no. 1. *Changes in the Capital Group structure.*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Overall financial information about acquired entity according to the values as shown in the consolidated financial statements of the acquiring entity for 2010 are presented in the table below:

Name of entity	ING Bank Hipoteczny S.A.

	end of 2010
Share in the equity	100%
Assets	610.0
Liabilities	397.1
Net assets	212.9
Result on basic activities	17.9
Net profit (loss)	6.1

In order to fulfil the obligations arising from Article 495 of the Commercial Companies Code consisting is securing potential claims of acquired company's creditors, ING Bank Śląski S.A. froze securities in the amount of PLN 93 million. Detailed information as to frozen securities may be found in note no. 18 *Assets securing liabilities*.

General financial information on an associated entity

Name of the entity	ING Powszechne Towarzystwo Emerytalne S.A.
Domestic	Poland
Type of activities	establishment and management of the open pension fund

	end of 2011	**end of 2010**
Share in the equity	20%	20%
Assets	553.3	826.6
Liabilities	24.9	37.1
Net assets	528.4	789.5
Revenues	344.7	391.9
Net profit (loss)	206.4	208.1

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

22. Investment real estates

	2011	2010
Value at the beginning of period	0.0	129.7
In-kind contribution to the subsidiary	0.0	-129.7
Value at the end of period	**0.0**	**0.0**

In 2010, the Bank made an in-kind contribution to the subsidiary Centrum Banku Śląskiego Sp. z o.o. in exchange for shares. The in-kind contribution was in the form of two investment real properties with the organised part of the enterprise consisting of the Commercial Property Management Section separated within the Bank internal structures. The Section was responsible for providing comprehensive service and settlement within the area of the said real properties management. The aim of the above actions was to centralise the management of the real property area within the Capital Group as well as to entrust the management to the Centrum Banku Śląskiego S.A., an entity responsible for professional management of real properties.

In 2010 on account of owning investment property the Bank generated income from rental amounted to PLN 8.3 million and incurred maintenance expenses amounted to minus PLN 3.8 million, which were presented in the income statement in the item *Net income on the other basic activities*.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 _(PLN million)_

23. Property, plant and equipment

	end of 2011	end of 2010
Real estate and leasehold improvements	314.1	330.6
Computer hardware	54.7	55.4
Other fixtures and fittings	134.6	109.8
Constructions in progress	59.0	34.9
Total	**562.4**	**530.7**

2011

	Real estate and leasehold improvements	Computer hardware	Other fixtures and fittings	Constructions in progress	**TOTAL**
Gross value at the beginning of period	662.5	188.9	400.9	34.9	**1,287.2**
Additions, due to:	36.9	24.5	51.7	127.1	**240.2**
- purchases	*0.0*	*7.5*	*0.5*	*127.1*	***135.1***
- investment take-overs	*35.8*	*16.4*	*50.9*	*0.0*	***103.1***
- other	*1.1*	*0.6*	*0.3*	*0.0*	***2.0***
Disposals, due to:	-47.7	-13.8	-49.1	-103.0	**-213.6**
- sale and liquidation	*-5.3*	*-13.8*	*-47.7*	*0.0*	***-66.8***
- investment take-overs	*0.0*	*0.0*	*0.0*	*-103.0*	***-103.0***
- reclassification to assets held for sale	*-42.3*	*0.0*	*-1.4*	*0.0*	***-43.7***
- other	*-0.1*	*0.0*	*0.0*	*0.0*	***-0.1***
Revaluation at the fair value	5.3	0.0	0.0	0.0	**5.3**
Gross value at the end of period	**657.0**	**199.6**	**403.5**	**59.0**	**1,319.1**
Accumulated depreciation at the begining of the period	-331.9	-133.5	-291.1	0.0	**-756.5**
Changes in the period (due to):	-11.0	-11.4	22.2	0.0	**-0.2**
- amortisation charges	*-22.4*	*-24.8*	*-25.4*	*0.0*	***-72.6***
- sale and liquidation	*5.2*	*13.8*	*46.8*	*0.0*	***65.8***
- reclassification to assets held for sale	*6.2*	*0.0*	*0.7*	*0.0*	***6.9***
- other	*0.0*	*-0.4*	*0.1*	*0.0*	***-0.3***
Accumulated depreciation at the end of the period	**-342.9**	**-144.9**	**-268.9**	**0.0**	**-756.7**
Net value at the end of period	**314.1**	**54.7**	**134.6**	**59.0**	**562.4**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2010

	Real estate and leasehold improvements	Computer hardware	Other fixtures and fittings	Constructions in progress	**TOTAL**
Gross value at the beginning of period	712.3	184.0	392.7	38.3	**1,327.3**
Additions, due to:	14.2	35.2	39.7	55.9	**145.0**
- purchases	*0.2*	*25.6*	*3.8*	*55.9*	***85.5***
- investment take-overs	*14.0*	*9.6*	*35.9*	*0.0*	***59.5***
Disposals, due to:	-19.9	-31.0	-27.1	-59.8	**-137.8**
- sale and liquidation	*-0.6*	*-31.0*	*-27.0*	*0.0*	***-58.6***
- investment take-overs	*0.0*	*0.0*	*0.0*	*-59.6*	***-59.6***
- in-kind contribution to the subsidiary	*-16.0*	*0.0*	*0.0*	*0.0*	***-16.0***
- reclassification to assets held for sale	*-3.3*	*0.0*	*0.0*	*0.0*	***-3.3***
- other	*0.0*	*0.0*	*-0.1*	*-0.2*	***-0.3***
Revaluation at the fair value	-16.0	0.7	-0.7	0.0	**-16.0**
Transfers	-28.1	0.0	-3.7	0.5	**-31.3**
Gross value at the end of period	**662.5**	**188.9**	**400.9**	**34.9**	**1,287.2**
Accumulated depreciation at the begining of the period	-353.4	-141.7	-297.6	0.0	**-792.7**
Changes in the period (due to):	-18.8	8.2	3.1	0.0	**-7.5**
- amortisation charges	*-24.8*	*-21.4*	*-23.3*	*0.0*	***-69.5***
- sale and liquidation	*0.1*	*29.6*	*26.4*	*0.0*	***56.1***
- in-kind contribution to the subsidiary	*5.5*	*0.0*	*0.0*	*0.0*	***5.5***
- reclassification to assets held for sale	*0.4*	*0.0*	*0.0*	*0.0*	***0.4***
Transfers	40.3	0.0	3.4	0.0	**43.7**
Accumulated depreciation at the end of the period	**-331.9**	**-133.5**	**-291.1**	**0.0**	**-756.5**
Net value at the end of period	**330.6**	**55.4**	**109.8**	**34.9**	**530.7**

The item *Real estate and leasehold improvements* comprises, among others, land whose value considering the fair value measurement as at 31 Dec 2011 was PLN 5.5 million (as at 31 Dec 2010, it was PLN 5.9 million).

As at 31 Dec 2011, PLN 34.8 million, which amount (including deferred tax) refers to the real properties assessed at fair value, is recognised in the revaluation reserve. As at 31 Dec 2010 the same item amounted to PLN 35.7 million.

Measurement of real properties at fair value

The Bank measures the owned real properties at fair value. The measurement is carried out in line with the applicable principles of the real property appraisal depending on the type of the building (for administrative buildings – replacement cost method was applied, and for operational buildings – the DCF method was applied).

In 2011, the following real properties were appraised:

– ING Bank Śląski S.A. Head Office in Katowice – as at 31 December 2011, the building's value totalled PLN 121.8 million; the change in the value of this real property for the year

2011 decreased the financial result by PLN 9.0 million (PLN 7.3 million upon including deferred tax) and

- 33 other real properties located across Poland; change in the value of the real properties for the year 2011 increased the revaluation surplus by PLN 5.8 million (PLN 4.7 million upon including deferred tax) and the 2011 financial result by PLN 8.4 million (PLN 6.8 million upon including deferred tax). Upon carrying out appraisals, seven of the real properties were reclassified to the portfolio of real properties held for sale.

The following appraisals were carried out in 2010:

- Head Office of ING Bank Śląski S.A. in Katowice – as at 31 December 2010, the value of the building was PLN 126,7 million; the change in the value of this property for 2010 decreased the financial result by PLN 9.0 million (or PLN 7.3 million upon including deferred tax), and
- 13 other properties located all over Poland; change in the value of the properties for 2010 increased the revaluation reserve with figure of PLN 4.5 million (or PLN 3.7 million upon including deferred tax) and the 2010 financial result by PLN 0.2 million. Upon carrying out appraisals, two of the real properties were reclassified to the portfolio of real properties held for sale.

The real properties results of appraisals were presented in the income statement in the item *Result on on the other operating income and expenses* (in the note no. 9 in detailed item *Measurement of fixed assets at fair value*).

The value of the appraised real properties estimated at the historical cost upon including impairment loss and depreciation charges would amount to PLN 271.1 million as at 31 Dec 2011 against PLN 286.6 million as at 31 Dec 2010.

There are no legal constraints on property, plant and equipment.

Contractual obligations to purchase property, plant and equipment

There were no agreements with counterparties regarding future purchase of fixed assets as at the end of 2011 .

In 2010, the Bank concluded agreements with counterparties regarding future purchase of non-current assets to the amount of PLN 3.0 million. The agreements were related to the general construction works, general workmanship, ventilation and A/C works, and furnishing purchase.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

24. Intangible assets

	end of 2011	end of 2010
Goodwill	223.3	223.3
Software	101.1	76.3
Outlays for intangible assets	36.4	41.3
Total	**360.8**	**340.9**

2011

	Goodwill	Software	Outlays for intangible assets	Other intangible assets	**TOTAL**
Gross value at the beginning of period	223.3	368.8	41.3	7.7	**641.1**
Additions, due to:	0.0	85.6	71.4	0.0	**157.0**
- purchases	*0.0*	*7.1*	*71.4*	*0.0*	***78.5***
- investment take-overs	*0.0*	*76.3*	*0.0*	*0.0*	***76.3***
- other	*0.0*	*2.2*	*0.0*	*0.0*	***2.2***
Disposals, due to:	0.0	0.0	-76.3	0.0	**-76.3**
- investment take-overs	*0.0*	*0.0*	*-76.3*	*0.0*	***-76.3***
Gross value at the end of period	**223.3**	**454.4**	**36.4**	**7.7**	**721.8**
Accumulated depreciation at the begining of the period	0.0	-292.5	0.0	-7.7	**-300.2**
Changes in the period (due to):	0.0	-60.8	0.0	0.0	**-60.8**
- amortisation charges	*0.0*	*-58.7*	*0.0*	*0.0*	***-58.7***
- other	*0.0*	*-2.1*	*0.0*	*0.0*	***-2.1***
Accumulated depreciation at the end of the period	**0.0**	**-353.3**	**0.0**	**-7.7**	**-361.0**
Net value at the end of period	**223.3**	**101.1**	**36.4**	**0.0**	**360.8**

2010

	Goodwill	Software	Outlays for intangible assets	Other intangible assets	**TOTAL**
Gross value at the beginning of period	223.3	322.2	23.8	7.9	**577.2**
Additions, due to:	0.0	47.6	60.7	0.0	**108.3**
- purchases	*0.0*	*5.2*	*60.7*	*0.0*	***65.9***
- investment take-overs	*0.0*	*42.4*	*0.0*	*0.0*	***42.4***
Disposals, due to:	0.0	-1.0	-43.2	-0.2	**-44.4**
- sale and liquidation	*0.0*	*-1.0*	*0.0*	*0.0*	***-1.0***
- investment take-overs	*0.0*	*0.0*	*-42.4*	*0.0*	***-42.4***
- other	*0.0*	*0.0*	*-0.8*	*-0.2*	***-1.0***
Gross value at the end of period	**223.3**	**368.8**	**41.3**	**7.7**	**641.1**
Accumulated depreciation at the begining of the period	0.0	-243.9	0.0	-7.6	**-251.5**
Changes in the period (due to):	0.0	-48.6	0.0	-0.1	**-48.7**
- amortisation charges	*0.0*	*-49.6*	*0.0*	*-0.1*	***-49.7***
- sale and liquidation	*0.0*	*1.0*	*0.0*	*0.0*	***1.0***
Accumulated depreciation at the end of the period	**0.0**	**-292.5**	**0.0**	**-7.7**	**-300.2**
Net value at the end of period	**223.3**	**76.3**	**41.3**	**0.0**	**340.9**

Contractual obligations to purchase intangible assets

At the end of 2011 the Bank had 1 agreement with the contractors for the future purchase of intangible assets to the amount of PLN 11.4 million refering to the purchase of licence and implementation of software

In 2010 the Bank concluded similar agreements amounting to PLN 29.6 million.

Impairment test of cash generating units with respective goodwill

The goodwill impairment test is carried out at least twice yearly, irrespective of detecting any objective evidence of impairment.

In the Bank, the impairment test is applied to the goodwill created as the result of the in-kind contribution of ING Bank NV. The smallest identifiable cash-generating units were determined and goodwill of total amount of PLN 223.3 million was assigned thereto. No other additional elements of intangible value and indefinite useful life were identified that could be assigned to the identified cash-generating units.

The input data for the test's needs cover the economic capital, risk-weighted assets and profit before tax per segments.

The test is performed based on the model that calculates and compares the current value of free cash flow of the unit to the estimated book value of the unit's funds. The free cash flows of the unit are defined as net profits less capital needed to maintain the solvency ratio at the required level. To discount the cash flows, 8% discount rate is used that represents the cost of capital calculated by the Bank. The remaining assumptions include: forecasts of income tax rate, nominal growth rate after the forecast period and predicted 3M WIBOR rate.

The recoverable value was determined based on the estimation of the useable value of the assets component taking into account the estimated forecast of expected future cashflow generated during the continued use. The cashflow forecasts are based on rational assumptions that reflect the most accurate appraisal of the management regarding all the conditions that will appear during the remaining lifetime of the assets. The cashflow forecasts are based on mid-term plan approved by the Bank and the strategy covering the maximum period of the next three years. The data regarding the subsequent two years are the result of extrapolation. Extrapolation assumes that the cashflow generating centre will maintain the gross profit to risk weighted assets ratio at the level from the last year of the Bank's forecast and its profits will increase by previously determined growth rate. Legitimacy of the assumptions made is verified periodically, and any divergence between the cashflows estimated based on the future cashflows and the actual ones is analysed as appropriate.

The test carried out as at 31 Dec 2011 showed the surplus of present value over the net book value of the cash-generating unit, totalling PLN 3.331 million; thus, no impairment thereof was determined.

For the discount rate lower by 1p.p. the surplus of present value of cash flows over the net book value of the cash-generating unit would amount to PLN 4.399 million; for the rate higher by 1p.p. the surplus of the present value of cash flows over the net book value of the cash-generating unit would be PLN 2.613 million.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

25. Property, plant and equipment held for sale

	2011	2010
Value at the beginning of period	3.1	0.2
Additions, due to:	37.1	2.9
- reclassification from property, plant and equipment	*36.7*	*2.9*
- takeover under the recovery process	*0.4*	*0.0*
Disposals, due to:	-15.8	0.0
- sale and liquidation	*-15.8*	*0.0*
Revaluation at the fair value	-2.0	0.0
Value at the end of period	**22.4**	**3.1**

As at 31 Dec 2011, the amount of *Property, plant and equipment held for sale* included:

- 13 real properties (buildings together with land), which were reclassified from Property, plant and equipment. The real properties are available to be immediately sold in their current condition. The Bank intends to sell the abovementioned real properties using services of a specialized company that searches for potential buyers with the use of various, available sources (advertisements, direct mailing, contact with other real property agencies, etc.). The real property should be sold within 12 months from the reclassification day.
- Assets acquired from debt collection including real properties (buildings and land) and means of transport. The Bank intends to sell the said assets by using available ways of selling, inclusive of among others: tender procedure.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

26. Deferred tax

Movements in temporary differences during the year

2011	Balance as of 01 Jan 2011	Changes charged to the financial result	Changes charged to equity	**Balance as of 31 Dec 2011**
Deferred tax assets				
Interest accrued	-18.0	-5.1	0.0	**-23.1**
Revaluation	-0.7	0.0	-17.6	**-18.3**
Provision for impairment losses	-76.6	-3.2	0.0	**-79.8**
Other provisions	-11.6	-0.7	0.0	**-12.3**
Employee benefits	-27.2	-1.2	0.0	**-28.4**
Correction due to effective interest rate	-12.3	0.0	0.0	**-12.3**
Other	-13.3	-0.8	0.0	**-14.1**
Total	**-159.7**	**-11.0**	**-17.6**	**-188.3**
Deferred tax provision				
Interest accrued	-40.6	137.8	0.0	**97.2**
Settlement of the difference between tax and balance sheet depreciation	12.3	-2.0	0.0	**10.3**
Settlement of prepayments/accruals due to depreciation/ amortisation resulting from the investment relief enjoyed	8.3	-0.2	0.0	**8.1**
Revaluation	10.6	0.0	30.4	**41.0**
Other	5.6	10.7	0.0	**16.3**
Total	**-3.8**	**146.3**	**30.4**	**172.9**
Deferred tax disclosed in the balance sheet	**-163.5**	**135.3**	**12.8**	**-15.4**

2010	Balance as of 01 Jan 2010	Changes charged to the financial result	Changes charged to equity	**Balance as of 31 Dec 2010**
Deferred tax assets				
Interest accrued	-29.3	11.3	0.0	**-18.0**
Revaluation	-1.9	0.0	1.2	**-0.7**
Provision for impairment losses	-68.9	-7.7	0.0	**-76.6**
Other provisions	-9.6	-2.0	0.0	**-11.6**
Employee benefits	-20.6	-6.6	0.0	**-27.2**
Correction due to effective interest rate	-12,3	0,0	0,0	**-12,3**
Other	-11,2	-2,1	0,0	**-13,3**
Total	**-153,8**	**-7,1**	**1,2**	**-159,7**
Deferred tax provision				
Interest accrued	33.0	-73.6	0.0	**-40.6**
Settlement of the difference between tax and balance sheet depreciation	10.0	2.3	0.0	**12.3**
Settlement of prepayments/accruals due to depreciation/ amortisation resulting from the investment relief enjoyed	10.0	-1.7	0.0	**8.3**
Revaluation	8.7	0.0	1.9	**10.6**
Other	7.3	-1.7	0.0	**5.6**
Total	**69.0**	**-74.7**	**1.9**	**-3.8**
Deferred tax disclosed in the balance sheet	**-84.8**	**-81.8**	**3.1**	**-163.5**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Unrecognised deferred tax assets

Unrecognised assets due to deffered tax are related to provisions whose recovery will not become probable. The amount of unrecognized temporary differences thereunder amounted as at the end of 2011 to PLN 1 million (expiry date of temporary differences: 2013) compared to PLN 0.9 million as at the end of 2010 (expiry date of temporary differences: 2012).

Deferred tax recognised directly in equity

	end of 2011	end of 2010
Revaluation of available-for-sale financial assets	1.0	1.4
Revaluation of property, plant and equipment	8.2	8.4
Revaluation of cash flow hedging instruments	13.5	0.1
Total	**22.7**	**9.9**

27. Other assets

	end of 2011	end of 2010
Prepayments, of which:	85.7	75.5
- accrued income	*35.0*	*34.4*
- commission-related settlements	*29.1*	*27.7*
- prepaid bank operating expenses	*14.6*	*7.8*
- expenses to be settled	*2.5*	*3.1*
- other	*4.5*	*2.5*
Other assets, of which:	109.7	130.6
- settlements due to purchase of materials	*19.4*	*5.0*
- interbank settlements	*11.2*	*10.8*
- settlements with off-takers	*5.9*	*10.9*
- public and legal settlements	*2.5*	*2.1*
- receivables from the non-settled FX transactions[*)]	*41.6*	*41.6*
- other	*29.1*	*60.2*
Total other assets (gross)	**195.4**	**206.1**
Impairment losses	-57.3	-48.9
Total other assets (net)	**138.1**	**157.2**

*) Receivables from Lehman Brothers Inc. and its related entities are presented in item *Receivables from the non-settled FX transactions.* A write-down was established in the full amount. The write-down amount was recognised in this note in item *Impairment losses.*

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

28. Liabilities due to other banks

	end of 2011	end of 2010
Current accounts	335.6	281.8
Interbank deposits	3,003.2	3,195.4
Repo transactions	1,594.6	657.8
Other liabilities	18.4	16.1
Total	**4,951.8**	**4,151.1**

Liabilities due to other banks by maturity

	end of 2011	end of 2010
up to 1 month	4,951.7	2,254.9
over 1 month and up to 3 months	0.0	552.4
over 3 months and up to 1 year	0.0	1,142.6
over 1 year and up to 5 years	0.1	201.2
Total	**4,951.8**	**4,151.1**

Interest accrued but unpaid on liabilities presented in this note are shown on the same terms of maturity as the main liabilities.

Repurchase transactions

Repurchase transactions (repo) are shown under the item "Repo transactions". The Bank acquires funds by selling financial instruments with the future buy-back commitment at the same price, increased with the interest determined upfront. Repurchase transactions are generally considered as a tool of short-term funding of interest assets, depending on the interest rates.

The following assets were sold under repo transactions concluded with other banks:

end of 2011

	Repurchase date	Nominal value	Carrying amount
Assets from available-for-sale portfolio	2012-01-05	55.0	57.8
Debt securities from loans and other receivables portfolio	2012-01-27	1,475.2	1,496.7
Financial assets measured at fair value through profit and loss	2012-01-30	37.5	40.1
Total		**1,567.7**	**1,594.6**

end of 2010

	Repurchase date	Nominal value	Carrying amount
Assets from available-for-sale portfolio	2011-01-05	80.0	81.2
Assets from available-for-sale portfolio	2011-01-18	200.0	204.6
Assets from held-to-maturity portfolio	2011-01-10	24.0	25.1
Debt securities from loans and other receivables portfolio	2011-01-24	130.7	136.9
Debt securities from loans and other receivables portfolio	2011-02-21	198.0	210.0
Total		**632.7**	**657.8**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

29. Financial liabilities measured at fair value through profit and loss

	end of 2011	end of 2010
Financial liabilities designated as at fair value upon initial recognition, of which:	1,629.5	4,323.7
Transactions with the buy-back commitment	*1,629.5*	*4,323.7*
Book short position in trading securities	185.2	357.7
Total	**1,814.7**	**4,681.4**

The Bank designated all buy-sell-back and sell-buy-back transactions for fair value measurement through profit and loss. As of the end of 2010 also debt securities in the form of bonds issued by 1 entity from non-financial sector were designated for fair value measurement through profit and loss.

A group of sell-buy-back and buy-sell-back transactions was designated for fair value measurement through profit and loss due to their classification to the portfolio managed by the Financial Markets Operations and Strategic Clients Department. According to the principles of risk management and the investment strategy in force at the Bank, financial assets and liabilities within this portfolio are measured and managed on the basis of fair value.

The measurement of financial assets and liabilities designated for fair value measurement on the basis of the profit and loss statement, as of the balance sheet date, did not include the value of liabilities to be attributed to the changes of credit risk, the source of which is the Bank as borrower. In the opinion of the Bank, the whole amount of the change of value of financial liabilities results from the changes of market conditions giving rise to market risk.

Financial liabilities measured at fair value through profit and loss by maturity

	end of 2011	end of 2010
up to 1 month	1,629.5	4,323.7
over 1 month and up to 3 months	100.6	53.0
over 1 year and up to 5 years	56.5	256.9
over 5 years	28.1	47.8
Total	**1,814.7**	**4,681.4**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

30. Liabilities due to customers

	end of 2011	end of 2010
Deposits	52,456.5	46,926.0
Repo transactions	116.1	0.0
Other liabilities	471.7	504.8
Total, of which:	**53,044.3**	**47,430.8**
- Liabilities due to entities from the financial sector other than banks	*3,250.7*	*2,816.4*
- Liabilities due to entities from the non-financial sector	*47,688.9*	*42,917.5*
- Liabilities due to entities from the government and self-government institutions' sector	*2,104.7*	*1,696.9*

Liabilities due to entities from the financial sector other than banks

	end of 2011	end of 2010
Deposits, of which:	3,080.5	2,722.0
- current accounts	*1,254.4*	*1,442.8*
- term deposit	*1,826.1*	*1,279.2*
Repo transactions	116.1	0.0
Other liabilities	54.1	94.4
Total	**3,250.7**	**2,816.4**

Liabilities due to entities from the non-financial sector

	end of 2011	end of 2010
Business entities' deposits , of which:	13,969.6	12,554.4
- current accounts	*10,225.9*	*9,154.7*
- term deposit	*3,743.7*	*3,399.7*
Households' deposits, of which:	33,303.8	29,954.6
- current accounts	*4,934.6*	*4,629.3*
- savings accounts	*22,766.6*	*20,496.9*
- term deposit	*5,602.6*	*4,828.4*
Other liabilities	415.5	408.5
Total	**47,688.9**	**42,917.5**

Liabilities due to entities from the government and self-government institutions' sector

	end of 2011	end of 2010
Deposits, of which:	2,102.6	1,695.0
- current accounts	*1,930.9*	*1,455.3*
- term deposit	*171.7*	*239.7*
Other liabilities	2.1	1.9
Total	**2,104.7**	**1,696.9**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Liabilities due to customers by maturity

	end of 2011	end of 2010
up to 1 month	46,844.0	41,876.1
over 1 month and up to 3 months	2,827.0	1,889.0
over 3 months and up to 1 year	2,676.5	3,519.9
over 1 year and up to 5 years	692.5	141.6
over 5 years	4.3	4.2
Total	**53,044.3**	**47,430.8**

Interest accrued but unpaid on liabilities presented in this note are shown on the same terms of maturity as the main liabilities.

Repurchase transactions

Repurchase transactions (repo) are shown under the item "Repo transactions". The Bank acquires funds by selling financial instruments with the future buy-back commitment at the same price, increased with the interest determined upfront. Repurchase transactions are generally considered as a tool of short-term funding of interest assets, depending on the interest rates.

The following assets were sold under repo transactions concluded with customers:

end of 2011

	Repurchase date	Nominal value	Carrying amount
Assets from available-for-sale portfolio	2012-01-02	76.6	78.0
Assets from available-for-sale portfolio	2012-01-05	27.6	28.1
Assets from available-for-sale portfolio	2012-01-12	9.8	10.0
Total		**114.0**	**116.1**

31. Provisions

	end of 2011	end of 2010
Provision for issues in dispute	21.0	20.2
Provision for off-balance sheet liabilities	10.6	11.1
Provision for retirement benefits	16.9	15.4
Provision for unused holidays	6.9	5.4
Provision for employment restructuring	1.2	2.3
Total	**56.6**	**54.4**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2011

	Provision for issues in dispute	Provision for off-balance sheet liabilities	Provision for retirement benefits	Provision for unused holidays	Provision for employment restructuring	**TOTAL**
Opening balance	20.2	11.1	15.4	5.4	2.3	**54.4**
- provisions recognised	*1.8*	*7.5*	*1.5*	*1.5*	*14.6*	***26.9***
- provisions applied	*-0.3*	*-8.4*	*0.0*	*0.0*	*-0.4*	***-9.1***
- provisions reversed	*-0.7*	*0.0*	*0.0*	*0.0*	*-15.3*	***-16.0***
- exchange rate changes	*0.0*	*0.4*	*0.0*	*0.0*	*0.0*	***0.4***
Closing balance	**21.0**	**10.6**	**16.9**	**6.9**	**1.2**	**56.6**
Expected provision settlement period:						
- up to 1 year	*3.0*	*0.0*	*1.1*	*6.9*	*1.2*	***12.2***
- more than 1 year	*18.0*	*10.6*	*15.8*	*0.0*	*0.0*	***44.4***

2010

	Provision for issues in dispute	Provision for off-balance sheet liabilities	Provision for retirement benefits	Provision for unused holidays	Provision for employment restructuring	**TOTAL**
Opening balance	11.7	20.1	14.0	4.7	3.6	**54.1**
- provisions recognised	*14.7*	*9.4*	*1.4*	*0.7*	*0.0*	***26.2***
- provisions applied	*-5.4*	*-17.5*	*0.0*	*0.0*	*0.0*	***-22.9***
- provisions reversed	*-0.8*	*0.0*	*0.0*	*0.0*	*-1.3*	***-2.1***
- exchange rate changes	*0.0*	*-0.9*	*0.0*	*0.0*	*0.0*	***-0.9***
Closing balance	**20.2**	**11.1**	**15.4**	**5.4**	**2.3**	**54.4**
Expected provision settlement period:						
- up to 1 year	*3.4*	*0.0*	*1.5*	*5.4*	*2.3*	***12.6***
- more than 1 year	*16.8*	*11.1*	*13.9*	*0.0*	*0.0*	***41.8***

Provision for issues in dispute

The recognised amount of provisions as at 31 Dec 2011 comprises:

1) disputable cases connected with negligent performance of agreements: PLN 19.1 million (PLN 18.2 million as of 31 Dec 2010),
2) criminal cases: PLN 1.7 million (PLN 1.7 million as of 31 Dec 2010),
3) cases relating to claims filed by former employees: PLN 0.2 million (PLN 0.3 million as of 31 Dec 2010).

The value of proceedings conducted in 2011 concerning liabilities and debt claims did not exceed 10% of the Bank equity.

In view of the Bank, none of the proceedings conducted in 2011 before court, competent authority for arbitrage proceedings or public administration authority, individually and in total, pose a risk to the Bank financial liquidity.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Provision for retirement benefits

Provisions for retirement severance pay are estimated on the basis of actuarial valuation with discount rate, which at the end of 2011 totalled 5.75% similarly as at the end of 2010. Provision being the result of actuarial valuation is recognised and reviewed per annum.

Provision for retirement benefits – a revision of the balance-sheet liability

	2011	2010
Opening balance	15.4	14.0
Costs included in the profit and loss account, out of which:	1.7	1.6
- regular employment costs	*0.9*	*0.8*
- costs of interest	*0.8*	*0.8*
Paid benefits	-0.2	-0.2
Closing balance, including:	**16.9**	**15.4**
- current value of the liability	*15.8*	*14.9*
- not included actuarial gains/ losses	*1.1*	*0.5*

32. Other liabilities

	end of 2011	end of 2010
Accruals, of which:	249.0	232.7
- due to employee benefits	*122.6*	*132.3*
- due to commission	*110.9*	*91.2*
- other	*15.5*	*9.2*
Other liabilities, of which:	681.7	408.4
- interbank settlements	*456.8*	*168.4*
- settlements with suppliers	*170.0*	*149.5*
- public and legal settlements	*37.7*	*33.2*
- other	*21.3*	*57.3*
Total	**930.7**	**641.1**

33. Share capital

The Bank's share capital is PLN 130,100,000 and is sub-divided into:

- 92,600,000 A-series ordinary bearer's shares with face value of PLN 1.00 each,
- 37,500,000 B-series ordinary bearer's shares with face value of PLN 1.00 each.

Each ordinary share entitles its owner to dividend and one vote during the general meeting of the Bank's shareholders.

In 2011, share face value was split. As a consequence of the split, the capital share of the Bank remained unchanged; however, now it divides into 130,100,000 shares of PLN 1 face value each, instead of 13,010,000 shares of PLN 10 face value each.

More details of the said split is presented in the chapter no. II. *Significant events in 2011* in point no. 3 *ING Bank Śląski S.A. share face value split*.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

34. Revaluation reserve

	end of 2011	end of 2010
Revaluation reserve from measurement of available-for-sale financial assets	20.4	8.1
- including deferred tax	*-1.0*	*-1.4*
Revaluation reserve from measurement of property, plant and equipment	34.8	35.6
- including deferred tax	*-8.2*	*-8.4*
Revaluation reserve from measurement of cash flow hedging instruments	58.2	0.4
- including deferred tax	*-13.5*	*-0.1*
Total	**113.4**	**44.1**

2011

	Revaluation reserve from measurement of available-for-sale financial assets	*including deferred tax*	Revaluation reserve from measurement of property, plant and equipment	*including deferred tax*	Revaluation reserve from measurement of cash flow hedging instruments	*including deferred tax*	TOTAL
Opening balance	**8.1**	***-1.4***	**35.6**	***-8.4***	**0.4**	***-0.1***	**44.1**
- gains/losses on remeasurement of available-for-sale financial assets charged to equity	36.8	*-5.3*	0.0	*0.0*	0.0	*0.0*	**36.8**
- reclassified to the financial result as a result of sale of available-for-sale financial assets	-24.2	*5.6*	0.0	*0.0*	0.0	*0.0*	**-24.2**
- correction of the measurement of the securities reclassified from the AFS portfolio to the loans and receivables one	-0.3	*0.1*	0.0	*0.0*	0.0	*0.0*	**-0.3**
- remeasurement of property, plant and equipment	0.0	*0.0*	4.7	*-1.1*	0.0	*0.0*	**4.7**
- effective part of cash flow hedging instruments revaluation	0.0	*0.0*	0.0	*0.0*	57.8	*-13.4*	**57.8**
- disposal of fixed assets	0.0	*0.0*	-5.5	*1.3*	0.0	*0.0*	**-5.5**
Closing balance	**20.4**	***-1.0***	**34.8**	***-8.2***	**58.2**	***-13.5***	**113.4**

2010

	Revaluation reserve from measurement of available-for-sale financial assets	*including deferred tax*	Revaluation reserve from measurement of property, plant and equipment	*including deferred tax*	Revaluation reserve from measurement of cash flow hedging instruments	*including deferred tax*	TOTAL
Opening balance	**-1.4**	***0.8***	**33.4**	***-7.8***	**-1.0**	***0.3***	**31.0**
- gains/losses on remeasurement of available-for-sale financial assets charged to equity	8.0	*-2.0*	0.0	*0.0*	0.0	*0.0*	**8.0**
- reclassified to the financial result as a result of sale of available-for-sale financial assets	2.3	*-0.4*	0.0	*0.0*	0.0	*0.0*	**2.3**
- correction of the measurement of the securities reclassified from the AFS portfolio to the loans and receivables one	-0.8	*0.2*	0.0	*0.0*	0.0	*0.0*	**-0.8**
- remeasurement of property, plant and equipment	0.0	*0.0*	3.7	*-0.9*	0.0	*0.0*	**3.7**
- effective part of cash flow hedging instruments revaluation	0.0	*0.0*	0.0	*0.0*	1.4	*-0.4*	**1.4**
- in-kind contribution of the organised part of the enterprise to the subsidiary	0.0	*0.0*	-1.4	*0.3*	0.0	*0.0*	**-1.4**
- disposal of fixed assets	0.0	*0.0*	-0.1	*0.0*	0.0	*0.0*	**-0.1**
Closing balance	**8.1**	***-1.4***	**35.6**	***-8.4***	**0.4**	***-0.1***	**44.1**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

35. Retained earnings

	end of 2011	end of 2010
Other supplementary capital	65.0	62.9
Reserve capital	3,109.9	2,662.7
General risk fund	910.1	850.1
Retained earnings	12.1	8.5
Result for the current year	903.8	702.3
Total	**5,000.9**	**4,286.5**

Supplementary capital

Supplementary capital is created from appropriations from profit after tax, from surpluses generated due to issue of shares above their face value and the extra contributions paid up by the shareholders to be used for covering balance-sheet losses. The decision on the use of the supplementary capital is taken at the General Meeting.

Reserve capital

Reserves are established regardless of the supplementary capital created from the appropriations from profit after tax, in the amount resolved at the General Meeting. The reserves are used for covering special losses and expenses. The decision on the use of the reserves is taken at the General Meeting.

The General Risk Fund

The General Risk Fund is established in accordance with the Banking Law Act from the after-tax profit and is used for unidentified risk related to banking activity. The decision on the use of the Fund is taken by the Management Board.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2011

	other supplemen-tary capital	reserve capital	general risk fund	retained earnings	result for the current year	TOTAL
Opening balance	**62.9**	**2,662.7**	**850.1**	**710.8**	**0.0**	**4,286.5**
- net result for the current period	0.0	0.0	0.0	0.0	903.8	**903.8**
- profit allocation, including:	0.0	447.2	60.0	-702.4	0.0	**-195.2**
- profit written off to reserve capital	*0.0*	*447.2*	*0.0*	*-447.2*	*0.0*	***0.0***
- profit written off to general risk fund	*0.0*	*0.0*	*60.0*	*-60.0*	*0.0*	***0.0***
- dividend paid	*0.0*	*0.0*	*0.0*	*-195.2*	*0.0*	***-195.2***
- merger with subsidiary	1.9	0.0	0.0	-2.6	0.0	**-0.7**
- disposal of fixed assets	0.2	0.0	0.0	6.3	0.0	**6.5**
Closing balance	**65.0**	**3,109.9**	**910.1**	**12.1**	**903.8**	**5,000.9**

2010

	other supplemen-tary capital	reserve capital	general risk fund	retained earnings	result for the current year	TOTAL
Opening balance	**62.8**	**2,140.6**	**790.1**	**588.6**	**0.0**	**3,582.1**
- net result for the current period	0.0	0.0	0.0	0.0	702.3	**702.3**
- profit allocation, including:	0.0	522.1	60.0	-582.1	0.0	**0.0**
- profit written off to reserve capital	*0.0*	*522.1*	*0.0*	*-522.1*	*0.0*	***0.0***
- profit written off to general risk fund	*0.0*	*0.0*	*60.0*	*-60.0*	*0.0*	***0.0***
- in-kind contribution of the organised part of the enterprise to the subsidiary	0.0	0.0	0.0	1.3	0.0	**1.3**
- disposal of fixed assets	0.1	0.0	0.0	0.7	0.0	**0.8**
Closing balance	**62.9**	**2,662.7**	**850.1**	**8.5**	**702.3**	**4,286.5**

36. Currency structure of statement of financial position and off-balance sheet items

Herein below, statement of financial position of the Bank and contingent liabilities were presented per base currencies. The following currency rates were applied to calculate values in original currency:

	31 Dec 2011	31 Dec 2010
EUR	4.4168	3.9603
USD	3.4174	2.9641
CHF	3.6333	3.1639

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of 2011

STATEMENT OF FINANCIAL POSITION	PLN	EUR		USD		CHF		other currencies (after translation into PLN)	TOTAL
		after translation into PLN	*in currency*	after translation into PLN	*in currency*	after translation into PLN	*in currency*		
A S S E T S									
- Cash in hand and balances with the Central Bank	1,278.4	190.4	*43.1*	14.5	*4.2*	1.7	*0.5*	8.1	**1,493.1**
- Loans and receivables to other banks	153.9	747.9	*169.3*	8.0	*2.3*	7.7	*2.1*	49.6	**967.1**
- Financial assets measured at fair value through profit and loss	599.1	40.5	*9.2*	0.0	*0,0*	0,0	*0,0*	0,0	**639.6**
- Valuation of derivatives	1,067.9	324.7	*73.5*	395.3	*115.7*	0.2	*0.1*	70.3	**1,858.4**
- Investments	20,442.3	1.1	*0.2*	6.7	*2,0*	0,0	*0,0*	0,0	**20.450.1**
- Derivative hedge instruments	433.4	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**433.4**
- Loans and receivables to customers	33,325.6	6,701.9	*1,517.4*	506.9	*148.3*	1,718.9	*473.1*	45.4	**42,298.7**
- Investments in controlled entities	238.3	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**238.3**
- Property, plant and equipment	562.4	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**562.4**
- Intangible assets	360.8	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**360.8**
- Property, plant and equipment held for sale	22.4	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**22.4**
- Current tax assets	146.5	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**146.5**
- Deferred tax assets	15.4	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**15.4**
- Other assets	133,0	4.9	*1.1*	0.1	*0,0*	0,0	*0,0*	0.1	**138.1**
T o t a l a s s e t s	**58,779.4**	**8,011.4**	***1,813.8***	**931.5**	***272.5***	**1,728.5**	***475.8***	**173.5**	**69,624.3**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of 2011

STATEMENT OF FINANCIAL POSITION	PLN	EUR		USD		CHF		other currencies (after translation into PLN)	TOTAL
		after translation into PLN	*in currency*	after translation into PLN	*in currency*	after translation into PLN	*in currency*		
E Q U I T Y A N D L I A B I L I T I E S									
LIABILITIES									
- Liabilities due to other banks	1,875.9	2,577.6	*583.6*	306,0	*89.5*	42.2	*11.6*	150.1	**4,951.8**
- Financial liabilities measured at fair value through profit and loss	1,814.3	0.4	*0.1*	0,0	*0,0*	0,0	*0,0*	0,0	**1,814.7**
- Valuation of derivatives	1,071.3	245.2	*55.5*	365.9	*107.1*	1.5	*0.4*	10.2	**1,694.1**
- Derivative hedge instruments	164.9	735.7	*166.6*	0,0	*0,0*	0,0	*0,0*	0,0	**900.6**
- Liabilities due to customers	46,869.7	4,071.6	*921.8*	1,954.3	*571.9*	4.5	*1.2*	144.2	**53,044.3**
- Provisions	53,0	2.6	*0.6*	1,0	*0.3*	0,0	*0,0*	0,0	**56.6**
- Other liabilities	921.7	8.3	*1.9*	0.6	*0.2*	0,0	*0,0*	0.1	**930.7**
T o t a l l i a b i l i t i e s	**52,770.8**	**7,641.4**	***1,730.1***	**2,627.8**	***769,0***	**48.2**	***13.2***	**304.6**	**63,392.8**
EQUITY									
- Share capital	130.1	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**130.1**
- Supplementary capital - issuance of shares over nominal value	956.3	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**956.3**
- Revaluation reserve from measurement of available-for-sale financial assets	11.6	2.1	*0.5*	6.7	*2,0*	0,0	*0,0*	0,0	**20.4**
- Revaluation reserve from measurement of property, plant and equipment	34.8	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**34.8**
- Revaluation reserve from measurement of cash flow hedging instruments	58.2	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**58.2**
- Revaluation of share-based payment	30.8	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**30.8**
- Retained earnings	5,000.9	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**5,000.9**
T o t a l e q u i t y	**6,222.7**	**2.1**	***0.5***	**6.7**	***2,0***	**0,0**	***0,0***	**0,0**	**6,231.5**
T o t a l e q u i t y a n d l i a b i l i t i e s	**58,993.5**	**7,643.5**	***1,730.6***	**2,634.5**	***771,0***	**48.2**	***13.2***	**304.6**	**69,624.3**

Contingent liabilities

Contingent liabilities granted	13,893.9	1,806.5	*409.0*	1,070.2	*313.2*	10.9	*3.0*	11.3	**16,792.8**
Contingent liabilities received	32,009.5	2,040.4	*462.0*	174.6	*51.1*	109.5	*30.1*	0.8	**34,334.8**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of 2010

STATEMENT OF FINANCIAL POSITION	PLN	EUR		USD		CHF		other currencies (after translation into PLN)	TOTAL
		after translation into PLN	*in currency*	after translation into PLN	*in currency*	after translation into PLN	*in currency*		
A S S E T S									
- Cash in hand and balances with the Central Bank	2,168.3	202.2	*51.1*	17,0	*5.7*	1,0	*0.3*	5.7	**2,394.2**
- Loans and receivables to other banks	157,0	1,097.5	*277.1*	13.2	*4.5*	120.3	*38,0*	133.5	**1,521.5**
- Financial assets measured at fair value through profit and loss	559.7	77,0	*19.4*	0,0	*0,0*	0,0	*0,0*	0,0	**636.7**
- Valuation of derivatives	555,0	376.4	*95,0*	178.7	*60.3*	0.1	*0,0*	48.7	**1,158.9**
- Investments	23,001.0	1,0	*0.3*	3.9	*1.3*	0,0	*0,0*	0,0	**23,005.9**
- Derivative hedge instruments	104.7	0.1	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**104.8**
- Loans and receivables to customers	26,767.3	5,286.2	*1,334.8*	335.8	*113.3*	1,532.8	*484.5*	37.2	**33,959.3**
- Investments in controlled entities	451.7	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**451.7**
- Property, plant and equipment	530.7	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**530.7**
- Intangible assets	340.9	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**340.9**
- Property, plant and equipment held for sale	3.1	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**3.1**
- Deferred tax assets	163.5	0,0	*0,0*	0,0	*0,0*	0,0	*0,0*	0,0	**163.5**
- Other assets	154.2	2.9	*0.7*	0.1	*0,0*	0,0	*0,0*	0,0	**157.2**
T o t a l a s s e t s	**54,957.1**	**7,043.3**	***1,778.4***	**548.7**	***185.1***	**1,654.2**	***522.8***	**225.1**	**64,428.4**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of 2010

STATEMENT OF FINANCIAL POSITION	PLN	EUR		USD		CHF		other currencies (after translation into PLN)	TOTAL
		after translation into PLN	*in currency*	after translation into PLN	*in currency*	after translation into PLN	*in currency*		
EQUITY AND LIABILITIES									
LIABILITIES									
- Liabilities due to other banks	2,224.2	643.0	*162.4*	13.3	*4.5*	1,134.4	*358.5*	136.2	**4,151.1**
- Financial liabilities measured at fair value through profit and loss	4,665.5	15.9	*4.0*	0.0	*0.0*	0.0	*0.0*	0.0	**4,681.4**
- Valuation of derivatives	706.6	271.5	*68.6*	261.3	*88.2*	5.0	*1.6*	48.3	**1,292.7**
- Derivative hedge instruments	136.4	464.1	*117.2*	0.0	*0.0*	0.0	*0.0*	0.0	**600.5**
- Liabilities due to customers	42,083.1	3,801.8	*960.0*	1,409.5	*475.5*	6.2	*2.0*	130.2	**47,430.8**
- Provisions	54.4	0.0	*0.0*	0.0	*0.0*	0.0	*0.0*	0.0	**54.4**
- Current income tax liabilities	138.3	0.0	*0.0*	0.0	*0.0*	0.0	*0.0*	0.0	**138.3**
- Other liabilities	639.1	1.4	*0.4*	0.5	*0.2*	0.0	*0.0*	0.1	**641.1**
Total liabilities	**50,647.6**	**5 197.7**	***1,312.6***	**1,684.6**	***568.4***	**1,145.6**	***362.1***	**314.8**	**58,990.3**
EQUITY									
- Share capital	130.1	0.0	*0.0*	0.0	*0.0*	0.0	*0.0*	0.0	**130.1**
- Supplementary capital - issuance of shares over nominal value	956.3	0.0	*0.0*	0.0	*0.0*	0.0	*0.0*	0.0	**956.3**
- Revaluation reserve from measurement of available-for-sale financial assets	1.9	2.2	*0.6*	4,0	*1,3*	0.0	*0,0*	0.0	**8.1**
- Revaluation reserve from measurement of property, plant and equipment	35.6	0.0	*0,0*	0.0	*0,0*	0.0	*0,0*	0.0	**35.6**
- Revaluation reserve from measurement of cash flow hedging instruments	0.4	0.0	*0,0*	0.0	*0,0*	0.0	*0,0*	0.0	**0.4**
- Revaluation of share-based payment	21.1	0.0	*0,0*	0.0	*0,0*	0.0	*0,0*	0.0	**21.1**
- Retained earnings	4,286.5	0.0	*0,0*	0.0	*0,0*	0.0	*0,0*	0.0	**4,286.5**
Total equity	**5,431.9**	**2.2**	***0.6***	**4,0**	***1,3***	**0,0**	***0,0***	**0,0**	**5,438.1**
Total equity and liabilities	**56,079.5**	**5,199.9**	***1,313.2***	**1,688.6**	***569.7***	**1,145.6**	***362.1***	**314.8**	**64,428.4**

Contingent liabilities

Contingent liabilities granted	12,936.2	1,204.8	*304.2*	810.2	*273.3*	17.4	*5.5*	15.4	**14,984.0**
Contingent liabilities received	15,270.9	1,719.5	*434.2*	132.5	*44.7*	29.4	*9.3*	1.3	**17,153.6**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

37. Contingent liabilities

37.1. Contingent liabilities granted

	end of 2011	end of 2010
Undrawn credit facilities	11,618.1	10,058.9
Guarantees	3,134.9	2,908.9
Undrawn overdrafts in current account	1,080.5	1,189.6
Credit card limits	637.4	653.4
Letters of credit	321.9	173.2
Total	**16,792.8**	**14,984.0**

The Bank discloses obligations to grant loans. These obligations include approved loans, credit card limits and overdraft limits in current accounts.

The Bank issues guarantees and letters of credits to secure fulfilment of obligations of the Bank's customers to third parties. The value of guarantees and letters of credit disclosed above reflects maximum loss that can be incurred, and that would be disclosed as at the balance sheet date should the customers fail to fulfil their obligations in full.

The Bank charges commissions for contingent liabilities granted, which are settled in line with the specific nature of the particular instrument.

Issued financial guarantee contracts by maturity

	end of 2011	end of 2010
up to 1 month	147.1	104.3
over 1 month and up to 3 months	703.3	195.9
over 3 months and up to 1 year	1,107.7	1,103.7
over 1 year and up to 5 years	1,104.1	1,454.7
over 5 years	72.7	50.3
Total	**3,134.9**	**2,908.9**

Information on issue guarantees granted to other issuers

At the end of 2011, the Bank held obligations to purchase bonds issued by two issuers. The total amount of the obligation (understood as the unused limit of the total nominal guarantee liabilities) amounted to PLN 47 million. At the end of 2010 Bank held obligations to purchase bonds issued by two issuers for the total amount of PLN 423.5 million.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

37.2. Contingent liabilities received

	end of 2011	end of 2010
Guarantee conditioned liabilities	34,135.8	17,123.2
Financing liabilities	199.0	30.4
Total	**34,334.8**	**17,153.6**

38. Hedge accounting

38.1. Fair value hedge accounting

In the financial statements for the year 2011 (similar to year 2010), the Bank used fair value hedge accounting for securities.

The hedged risk is the risk of the change of the fair value of the financial asset resulting from the change of the interest rates. The subject of hedging is the fair value of the fixed interest rate debt instrument, namely the position (or its part) on a given security in the available-for sale portfolio, that as of establishing of the hedging relationship has a specific fair value recognised in the revaluation reserve and position (or its part) on a given security in the loans and other receivables portfolio as the result of reclassification from the available-for-sale portfolio.
Interest Rate Swap is the hedging instrument that changes the fixed interest rate into variable one. The above leads to the situation that the fair value of the hedging instrument shows a trend reverse to the fair value of the hedged item. Thus, thanks to the established hedging relationship, we have the effect of the mutual set-off of the changes in the fair value of the hedging instrument and hedged item in the P&L under the hedged risk. As only one type of the risk is hedged (the risk of the interest rate change), the changes of the fair vale of the hedged item from the available-for-sale portfolio that result from other risks that are not hedged are recognised in the revaluation reserve.

The measurement of the hedging and hedged transactions is shown in the income statement under the *Net income on hedge accounting*.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 _(PLN million)_

Fair value of instruments under the fair value hedge accounting for securities

	end of 2011		end of 2010	
	Nominal value	Fair value	Nominal value	Fair value
Hedged items, of which:	**4,401.6**	**4,892.9**	**6,203.3**	**6,489.9**
- Debt securities from available-for-sale portfolio, of which:	983.0	1,020.3	3,138.0	3,221.4
- Treasury bonds	_983.0_	_1,020.3_	_3,138.0_	_3,221.4_
- Debt securities from loans and other receivables portfolio, of which:	3,418.6	3,872.6	3,065.3	3,268.5
- Treasury bonds	_3,418.6_	_3,872.6_	_3,065.3_	_3,268.5_
Hedging instruments, of which:	**8,253.1**	**-872.7**	**6,240.7**	**-571.8**
- Interest Rate Swap – positive valuation	667.0	5.0	430.0	14.9
- Interest Rate Swap – negative valuation	7,586.1	-877.7	5,810.7	-586.7

For the hedging instrument the fair value was given as the balance-sheet valuation.

38.2. Cash flow hedge accounting

In the financial statements for the year 2011 (similar to year 2010), the Bank applied the rules of accounting of cash flow hedges with regard to a specific portfolio of assets/ liabilities/ highly probable planned financial transactions of the Bank (e.g. extrapolation of cash flows arising from revolving deposits/ overdrafts) against the risk of changes to the future cash flows due to the interest rate risk. The hedged item is the specified portfolio of assets and/or financial liabilities or the portfolio of planned transactions, which includes financial instruments with variable interest rate (financial products based on the WIBOR / EURIBOR market interest rate) that are therefore exposed to the risk of future cash flows arising from the change of the WIBOR / EURIBOR market interest rate. Interest rate swaps of the type "pay variable, get fixed" are used as hedging instruments for assets, and interest rate swaps of the type "pay fixed, get variable" are used to hedge liabilities.

In 2011 and 2010, the Bank followed the rules of cash flow hedge accounting also with regard to payments arising from the Bank's internal administration agreements denominated in / indexed with foreign currencies against the risk of changes to the future cash flows due to both the interest rate risk and FX risk. The subject of hedging were FX cash flows / cash flows indexed with foreign currencies executed in specific months up to the level defined in line with the methodology of determining the hedged item. The hedging instrument was a series of FX Forward transactions maturing in specific months, on the dates compliant with the adopted risk hedging strategy. In line with the assumptions, the hedging strategy was effected during the fiscal year and finished before the year-end. The Bank intends to launch a similar strategy also in 2012.

As at 31 Dec 2011, the revaluation reserve included PLN 58.2 million (including deferred tax) related to the effective part of hedging relationship in the cash flow hedge accounting (PLN 0.4 million as at 31 Dec 2010). In 2011, the ineffective part of the hedging relationship resulting from the mismatch in compensating changes in fair value of the hedging instrument and hedged item recognised in the income statement totalled plus PLN 2.3 million compared with plus PLN 0.1 million in 2010.

Fair value of hedging instruments under the cash flow hedge accounting

	end of 2011		end of 2010	
	Nominal value	Fair value	Nominal value	Fair value
Hedging instruments, of which:	**18,432.5**	**405.5**	**6,600.7**	**76.1**
- Interest Rate Swap – positive valuation	15,770.5	428.4	4,513.8	89.9
- Interest Rate Swap – negative valuation	2,662.0	-22.9	2,086.9	-13.8

Periods when the Bank expects that the cash flows hedged in the hedge accounting will appear, by which they will have an impact on the P&L are presented below.

Future cash flows (PLN million)

end of 2011

	up to 1 year	*over 1 year and up to 3 years*	*over 3 years and up to 8 years*	*over 8 years*
Cash inflows (assets)	627.2	638.8	611.6	110.1
Cash outflows (liabilities)	-185.2	-211.4	-234.7	-22.6
Net cash flows	**442.0**	**427.4**	**376.9**	**87.5**

end of 2010

	up to 1 year	*over 1 year and up to 3 years*	*over 3 years and up to 8 years*	*over 8 years*
Cash inflows (assets)	205.3	267.7	154.9	13.3
Cash outflows (liabilities)	-2.2	-5.4	-14.7	-5.3
Net cash flows	**203.1**	**262.3**	**140.2**	**8.0**

Future cash flows (EUR million)

end of 2011

	up to 1 year	*over 1 year and up to 3 years*	*over 3 years and up to 8 years*	*over 8 years*
Cash inflows (assets)	1.5	2.1	2.6	0.3
Cash outflows (liabilities)	0.0	0.0	0.0	0.0
Net cash flows	**1.5**	**2.1**	**2.6**	**0.3**

end of 2010

	up to 1 year	*over 1 year and up to 3 years*	*over 3 years and up to 8 years*	*over 8 years*
Cash inflows (assets)	1.2	3.6	5.2	0.8
Cash outflows (liabilities)	0.0	0.0	0.0	0.0
Net cash flows	**1.2**	**3.6**	**5.2**	**0.8**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

39. Fair values

Fair value is the amount for which an asset could be exchanged, or a liability settled, between knowledgeable, willing parties in a direct transaction, other than forced sale or liquidation, which is best reflected by the market price, if available.

39.1. Fair value of financial assets and liabilities

Based on the employed methods of determining the fair value, financial assets/liabilities are classified to the following categories:

- Level I: financial assets/liabilities measured directly on the basis of prices quoted in the active market or measurement techniques based solely on market data.
- Level II: financial assets/liabilities measured on the basis of measurement techniques based on assumptions using data from an active market or market observations.
- Level III: financial assets/liabilities measured on the basis of measurement techniques commonly used by the market players, the assumptions of which are not based on data from an active market.

The table below presents the balance-sheet figures for financial assets and liabilities per individual measurement levels.

end of 2011

	Level I	Level II	Level III	Total
Financial assets, of which:	**10,023.2**	**8,353.7**	**22.3**	**18,399.2**
- Financial assets held for trading, of which:	385.5	59.2	0.0	444.7
- treasury bills	*385.5*	*0.0*	*0.0*	*385.5*
- treasury bonds	*0.0*	*59.2*	*0.0*	*59.2*
- Financial assets designated as fair value at initial recognition, of which:	194.9	0.0	0.0	194.9
- buy-sell-back transactions	*194.9*	*0.0*	*0.0*	*194.9*
- Valuation of derivatives	0.0	1,858.4	0.0	1,858.4
- Financial assets available-for sale, of which:	9,442.8	6,002.7	22.3	15,467.8
- treasury bonds	*8,071.0*	*0.0*	*0.0*	*8,071.0*
- NBP bills	*0.0*	*5,995.8*	*0.0*	*5,995.8*
- BGK bonds	*1,370.9*	*0.0*	*0.0*	*1,370.9*
- equity instruments	*0.9*	*6.9*	*22.3*	*30.1*
- Derivative hedge instruments	0.0	433.4	0.0	433.4
Financial liabilities, of which:	**1,814.7**	**2,594.7**	**0.0**	**4,409.4**
- Financial liabilities measured at fair value upon initial recognition, of which:	1,629.5	0.0	0.0	1,629.5
- sell-buy-back transactions	*1,629.5*	*0.0*	*0.0*	*1,629.5*
- Book short position in trading securities	185.2	0.0	0.0	185.2
- Valuation of derivatives	0.0	1,694.1	0.0	1,694.1
- Derivative hedge instruments	0.0	900.6	0.0	900.6

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

end of 2010

	Level I	Level II	Level III	Total
Financial assets, of which:	**12,236.3**	**6,348.4**	**103.6**	**18,688.3**
- Financial assets held for trading, of which:	208.7	281.2	0.0	489.9
- treasury bills	*0.0*	*281.2*	*0.0*	*281.2*
- treasury bonds	*208.7*	*0.0*	*0.0*	*208.7*
- Financial assets designated as fair value at initial recognition, of which:	83.1	2.5	61.2	146.8
- corporate bonds	*0.0*	*0.0*	*61.2*	*61.2*
- buy-sell-back transactions	*83.1*	*2.5*	*0.0*	*85.6*
- Valuation of derivatives	0.0	1,158.9	0.0	1,158.9
- Financial assets available-for sale, of which:	11,944.5	4,801.0	42.4	16,787.9
- treasury bonds	*10,888.7*	*0.0*	*0.0*	*10,888.7*
- NBP bills	*0.0*	*4,796.7*	*0.0*	*4,796.7*
- BGK bonds	*1,055.0*	*0.0*	*0.0*	*1,055.0*
- equity instruments	*0.8*	*4.3*	*42.4*	*47.5*
- Derivative hedge instruments	0.0	104.8	0.0	104.8
Financial liabilities, of which:	**4,681.4**	**1,893.2**	**0.0**	**6,574.6**
- Financial liabilities measured at fair value upon initial recognition, of which:	4,323.7	0.0	0.0	4,323.7
- sell-buy-back transactions	*4,323.7*	*0.0*	*0.0*	*4,323.7*
- Book short position in trading securities	357.7	0.0	0.0	357.7
- Valuation of derivatives	0.0	1,292.7	0.0	1,292.7
- Derivative hedge instruments	0.0	600.5	0.0	600.5

Unlike in 2010, in the year 2011, there were no movements among particular valuation levels.

Movements in financial assets / liabilities classified to the Level 3 of the measurement

2011	Financial assets designated as fair value at initial recognition	Financial assets available for sale
Opening balance	61.2	42.4
Increases, of which:	0.0	2.3
- purchase in result of restructuring process	*0.0*	*2.3*
Decreases, of which:	-61.2	-22.4
- sale / redemption	*-59.2*	*-2.3*
- impairment recognised in profit and loss account	*0.0*	*-18.5*
- measurement referred to revaluation reserves	*0.0*	*-1.6*
- decreasing the measure of securities	*-2.0*	*0.0*
Closing balance	**0.0**	**22.3**

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

2010	Financial assets designated as fair value at initial recognition	Financial assets available for sale	Financial liabilities measured at fair value upon initial recognition
Opening balance	196.4	47.1	9.9
Increases, of which:	0.0	2.6	0.0
- purchase in result of restructuring process	*0.0*	*2.6*	*0.0*
Decreases, of which:	-135.2	-7.3	-9.9
- sale / redemption	*-114.0*	*-0.5*	*0.0*
- settlement of buy-sell-back and sell-buy-back transactions	*-9.9*	*0.0*	*-9.9*
- redemption of shares in result of restructuring	*0.0*	*-6.8*	*0.0*
- measurement referred to profit and loss	*-4.0*	*0.0*	*0.0*
- decreasing the measure of securities	*-7.3*	*0.0*	*0.0*
Closing balance	**61.2**	**42.4**	**0.0**

The fair value measurement changes referring to the income statement are recognised in the item of the income statement *Result on instruments measured at fair value through profit and loss and FX result.*

Potential changes to the estimates of the measured financial instruments classified to the Level 3 of the measurement do not have significant impact on the financial statements of the Bank.

39.2. Financial assets and liabilities which are not carried at fair value in the statement of financial position

	end of 2011		**end of 2010**	
	Carrying value	**Fair value**	**Carrying value**	**Fair value**
Assets				
Cash in hand and balances with the Central Bank	1,493.1	1,493.1	2,394.2	2,394.2
Loans and receivables to other banks	967.1	967.1	1,521.5	1,506.2
Loans and receivables to customers, of which:	42,298.7	41,656.2	33,959.3	33,658.2
- to entities from the financial sector other than banks	*2,887.3*	*2,883.1*	*2,647.6*	*2,644.0*
- to entities from the non-financial sector	*31,626.4*	*30,941.9*	*24,692.8*	*24,294.8*
- to entities from the government and self-government institutions' sector	*7,785.0*	*7,831.2*	*6,618.9*	*6,719.4*
Held-to-maturity financial assets, of which:	4,982.3	5,065.6	6,218.0	6,338.3
- Treasury bonds	*4,982.3*	*5,065.6*	*6,218.0*	*6,338.3*
Other assets	52.4	52.4	81.7	81.7
Liabilities				
Liabilities due to other banks	4,951.8	4,951.8	4,151.1	4,151.1
Liabilities due to customers, of which:	53,044.3	53,042.6	47,430.8	47,426.9
- to entities from the financial sector other than banks	*3,250.7*	*3,250.7*	*2,816.4*	*2,816.4*
- to entities from the non-financial sector	*47,688.9*	*47,687.2*	*42,917.5*	*42,913.6*
- to entities from the government and self-government institutions' sector	*2,104.7*	*2,104.7*	*1,696.9*	*1,696.9*

The Bank discloses the data on the fair value of loans and deposits recognised respectively in the groups of financial assets and financial liabilities carried at amortised cost considering the effective interest rate.

In calculations, the yield curve is used; it takes account of the transfer prices calculated based on:

- PLN: up to 1Y – as the average of BID quotations (WIBID and brokers' BID listings) collected at 9.00am, 11.00am, 12.30pm and 2.00pm; above 1Y – the average of OFFER quotations for IRS contracts converted into the effective rate,
- USD and CHF: up to 1Y on the basis of adequate LIBOR quotations; from 1Y onwards – on the basis of OFFER quotations for IRS contracts converted into the effective rate,
- EUR: up to 1Y - on the basis of adequate EURIBOR quotations, from 1Y onwards – on the basis of OFFER quotations for IRS contracts converted into the effective rate.

Credit loss estimations reflect the loan loss provisioning model in place at the Bank.

In certain aspects, the model adopted by the Bank is based on the assumptions that do not confirm the prices of verifiable current market transactions referring to the same instrument – the model takes account of neither prepayments nor restructuring-based changes.

Loans and receivables

The credit portfolio is divided into sub-portfolios according to the registration system, the type of product, the client's segment and the currency. In case of loans without any repayment schedules and loans from the impaired group, it is assumed that the fair value for those loans equals their book value. In case of those sub-portfolios the discounting factor is used for each cashflow. The result is the fair value as the sum of the net present value of cashflows of a single loan. The sum of fair values of individual deposits represents the fair value of the portfolio of deposits reviewed.

For loans the discounting factor is assumed as a sum of:

- the market rate based on the yield curve as of the balance sheet date, and
- the average margin based on the portfolio of loans granted in the last six month period.

For that purpose the following assumptions are adopted:

- use of the loans granted in the last six months for calculation,
- division into the abovementioned product groups,
- the spot at the yield curve on the basis of which the relevant market rate is set is reflected by the revaluation date for each loan.

To estimate the fair value of CHF mortgage loans portfolio, an average margin used when extending EUR mortgage loans adjusted with swap instruments quotations for CHF/ EUR currencies was applied on account of active market dissaperance.

Liabilities due to other banks and to customers

The deposit portfolio is divided according to the type of product, the client's segment and the currency. For deposits paid on demand, it is assumed the fair value equals their book value.

Another phase involves the calculation of future cashflows as the sum of principal- and interest cashflows. After that, by applying the discounting factor for each cashflow one receives the fair value of individual deposits. The sum of fair values of individual deposits represents the fair value of the portfolio of deposits reviewed.

For deposits the discounting factor represents the sum of:

- the market rate based on the yield curve as at the balance sheet date, and

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

- the average margin based on the portfolio of deposits accepted in the last two months.

For that purpose the following assumptions are adopted:

- use of the deposits accepted in the last two months for calculation,
- division into the abovementioned product groups,
- the spot at the yield curve on the basis of which the relevant market rate is set is reflected by the revaluation date for each deposit.

Financial assets held to maturity

In case of assets classified into the held-to-maturity portfolio, the following approach was applied: to define the fair value the measurement parameters were adopted which would be used had those assets been included in the portfolio of available-for-sale financial assets.

Cash in hand and balances with the Central Bank. Other assets.

As the financial assets recognised in the above item are of short-term nature, it was assumed that the carrying value is approximately the same as the fair value.

Below presented is the comparison of the carrying value with the fair value concerning loans and advances granted to banks and clients as well as deposits of banks and clients by segment.

	end of 2011		end of 2010	
	Carrying value	**Fair value**	**Carrying value**	**Fair value**
Loans and advances, of which:	**36,390.7**	**35,646.6**	**29,858.2**	**29,414.3**
Loans and advances to customers from corporate banking segment, of which:	21,764.6	21,597.1	17,611.9	17,541.8
- loans and advances to strategic clients	*8,843.8*	*8,810.9*	*7,427.7*	*7,400.0*
- other loans and advances	*12,920.8*	*12,786.2*	*10,184.2*	*10,141.8*
Loans and advances to retail customers, of which:	14,626.1	14,049.5	12,246.3	11,872.5
- mortgages	*10,869.1*	*10,213.4*	*8,308.5*	*7,879.5*
- other loans and advances	*3,757.0*	*3,836.1*	*3,937.8*	*3,993.0*
Deposits, of which:	**55,795.3**	**55,793.6**	**50,403.2**	**50,399.3**
- Deposits of customers from corporate banking segment, of which:	21,582.4	21,582.7	18,434.9	18,435.1
- deposits of strategic clients	*13,384.0*	*13,384.0*	*11,584.9*	*11,584.9*
- other deposits	*8,198.4*	*8,198.7*	*6,850.0*	*6,850.2*
- Deposits of retails customers	34,212.9	34,210.9	31,968.3	31,964.2

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

40. Custody activities

As at 31 Dec 2011 the Bank maintained 3.198 (3.042 as at 31 Dec 2010) customer accounts used to hold customers securities. The accounts do not meet the definition of assets and are not recognised in the financial statements of the Bank.

As at the end of 2011 the Bank was the depository bank for 107 investment funds and 1 employee pension fund (as at 31 Dec 2010 respectively 105 and 1).

As at 31 Dec 2011 the Bank co-operated with 30 Polish brokerage houses (29 as at 31 Dec 2010).

41. Operating leases

41.1. Bank as a lessee

The Bank cooperates with lease company in respect to car leasing and fleet management. The Bank also incurs costs due to lease of dwelling units, which is recognised as operating leasing. Those agreements do not provide for any contingent fees to be paid by the lessee; no constraints arise from the provisions of the lease agreements. In some cases the agreements provide for the possibility of prolonging the agreement, using the possibility of purchase or price change.

Lease payments by maturity are disclosed in the table below:

	end of 2011	end of 2010
up to 1 year	108.2	106.3
over 1 year and up to 5 years	189.3	176.4
over 5 years – annual payment amount	39.4	27.6

41.2. Bank as a lessor

The Bank earns income from renting own real estate. Those agreements are treated as operating lease agreements. Those agreements do not provide for any contingent fees to be paid by the lessee; no constraints arise from the provisions of the lease agreements. In some cases the agreements provide for the possibility of prolonging the agreement or changing the price; however they do not provide for the possibility of purchase.

Lease payments by maturity are disclosed in the table below:

	end of 2011	end of 2010
up to 1 year	4.9	4.1
over 1 year and up to 5 years	10.9	8.6
over 5 years – annual payment amount	0.3	0.6

Lease payments include only the rent for the buildings. They do not include any payments due to the rent of parking spaces, additional rent for investment outlays, or fees for services and electric energy.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

42. Additional information on cash flow statement

42.1. Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents include cash disclosed in the statement of financial position as well as current accounts and overnight deposits in other banks.

	end of 2011	end of 2010
Cash in hand (presented in note 14)	645.3	713.3
Balances with the Central Bank (presented in note 14)	847.8	1,680.9
Current accounts in other banks (presented in note 20.1)	805.7	375.7
Overnight deposits in other banks (presented in note 20.1)	6.9	303.3
Other receivables (presented in note 20.1)	0.0	4.5
Total	**2,305.7**	**3,077.7**

42.2. Explanation of the classification of Bank's activities into operating, investment and financial activities in the cash flow statement

Operating activities include core activities of the Bank, not classified as investment or financial activities.

Investment activity involves purchase and disposal of shares in subordinate units, intangible assets, property plant and equipment, purchase and redemption of financial assets held-to-maturity. Furthermore, inflows from investment activity also include dividends received from the shares held in other entities.

Financial activity pertains to long-term financial transactions (over one year) with financial entities. Inflows from financial activity indicate sources of financing of the Bank, including for example long-term loans and cash loans from other banks, as well as financial entities other than banks. Outflows from financial activity refer mainly to repayment of long-term liabilities (e.g. repayment of received loans) by the Bank and payment of dividends to the owners and other outflows due to profit distribution. In 2011, dividend payout was recognised in the financial activity area. In 2010, the Bank did not report any cash flows under financial activity.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

42.3. The reasons for differences between changes in certain items recognised in statement of financial position and in cash flow statement

The reason for differences between changes recognised in statement of financial position and in cash flow statement are as follows:

1) Changes in the individual assets and liabilities were adjusted with interest disclosed in the position *Interest received/ paid*.
2) Change in the receivables being an equivalent of cash (current accounts and O/N deposits at other banks) was excluded from the position *Change in loans and other receivables to other banks*; it was disclosed in the position *Net increase / decrease in cash and cash equivalents*.
3) *Change in available-for-sale financial assets* does not account for the part of financial assets valuation that was carried through equity (revaluation reserve from measurement of available-for-sale financial assets).
4) In the position *Change in available-for-sale financial assets* and *Changes in loans and other receivables to customers* disclosed reclassification debt securities from category assets for sale to category loans and receivables.

end of 2011

	changes						
	in statement of financial position	in cash flow statement	*difference of which:*	*1)*	*2)*	*3)*	*4)*
- Change in loans and other receivables to other banks	554.4	676.9	***122.5***	*-6.6*	*129.1*		
- Change in financial assets at fair value through profit or loss	-2.9	-3.4	***-0.5***	*-0.5*			
- Change in available-for-sale financial assets	1,320.1	1,363.7	***43.6***	*31.2*		*12.7*	*-0.3*
- Change in loans and other receivables to customers	-8,339.4	-8,304.1	***35.3***	*35.3*			
- Change in liabilities due to other banks	800.7	796.5	***-4.2***	*-4.2*			
- Change in liabilities due to customers	5,613.5	5,639.4	***25.9***	*25.9*			

end of 2010

	changes						
	in statement of financial position	in cash flow statement	*difference of which:*	*1)*	*2)*	*3)*	*4)*
- Change in loans and other receivables to other banks	-27.4	288.5	***315.9***	*-6.0*	*321.9*		
- Change in financial assets at fair value through profit or loss	7,628.8	7,584.3	***-44.5***	*-44.5*			
- Change in available-for-sale financial assets	-9,952.3	-9,918.5	***33.8***	*24.4*		*10.3*	*-0.9*
- Change in loans and other receivables to customers	-3,982.7	-3,982.6	***0.1***	*0.1*			
- Change in liabilities due to other banks	200.0	201.7	***1.7***	*1.7*			
- Change in liabilities due to customers	-226.3	-288.7	***-62.4***	*-62.4*			

43. Related entities

Subsidiaries and Related Entities of ING Bank Śląski:

- ING Securities S.A.,
- Centrum Banku Śląskiego (CBS) Sp. z o.o.,
- Solver Sp. z o.o.,
- ING Powszechne Towarzystwo Emerytalne S.A.

as part of their business hold current accounts at ING Bank Śląski, via which they perform standard clearing operations and also invest cash funds using term deposits. Similarly, ING Bank Śląski maintains bank accounts of other members of ING Group, for instance ING Lease (Poland), ING Real Estate. The transactions with the above entities are performed on an arm's length basis.

ING Bank Śląski performs operations with ING Bank NV and its subsidiaries on the inter-bank market. These are both short-term deposits and loans, as well as operations in derivatives. The abovementioned transactions are carried out on an arm's length basis.

There were also other transactions between the related entities and ING Bank Śląski. They originated from agreements concluded as to co-operation, sublease of premises, lease of equipment, data processing, leasing of non-current assets and intangible assets as well as car fleet leasing, management and employees' insurance contributions.

In the period from 1st January 2011 to 31st December 2011 the following transactions were made of the total value exceeding EURO 500.000:

- in connection with execution of the Co-operation Agreement concluded by ING Bank Śląski S.A. and ING Bank NV the remuneration for the services provided as to financial consulting in 12 months of 2011 amounted to PLN 66.3 million versus PLN 52.9 million in the analogical period of the previous year (net amounts). Following the implementation of the agreement for provision of data processing and financial information analysis services, concluded by and between ING Bank Śląski S.A. and ING Bank NV, the fee for data processing and financial information analysis services used by ING Bank Śląski amounted to PLN 9.3 million versus PLN 12.3 million in the analogical period of the previous year (net amounts).
- ING Services Polska provides services to ING Bank Śląski with regard to lease of hardware resources. The costs of service were PLN 40.0 million versus PLN 35.1 million in the analogical period of the previous year (gross amounts).
- ING Bank Śląski made a transaction with ING Lease due to sublease of functional rooms totalling PLN 18.0 million versus PLN 16.8 million in the analogical period of the previous year (gross amounts).
- ING Bank Śląski co-operated with ING Car Lease with regard to car leasing and car fleet management. In September 2011, the Company was sold to an entity outside ING Group. The cost of services in the period commencing 1st January 2011 until the sale date was PLN 13.3 million compared to PLN 16.6 million within 12 months of 2010 (gross amounts).

As at 31st December 2011, the total exposure of ING Bank Śląski S.A. towards the members of its Supervisory Board and the entities related thereto in terms of equity and organisation was PLN 51.3 million, in which PLN 35.8 million related to balance sheet exposure and PLN 15.5 million - to off-balance sheet one.

Transactions with related entities (in PLN million)

2011

	ING Bank NV	Other ING Group entities	Subsidiary undertakings*	Associated undertakings*
Receivables				
Deposits placed	3.6	-	-	-
Nostro accounts	10.2	-	-	-
Loans	-	1,720.1	-	-
Positive valuation of derivatives	648.2	0.7	-	-
Other receivables	23.7	0.2	0.2	-
Liabilities				
Deposits received	1,565.7	1,267.8	252.8	13.3
Loro accounts	33.1	1.0	-	-
Negative valuation of derivatives	702.3	4.2	-	-
Repo	1,594.5	-	-	-
Other liabilities	39.0	-	1.4	-
Off-balance-sheet operations				
Contingent liabilities	316.1	545.8	15.1	-
FX transactions	8,773.9	0.7	-	-
Forward transactions	70.6	-	-	-
IRS	16,994.3	13.4	-	-
Options	1,502.3	712.3	-	-
Revenue and costs**				
Revenue	-23.1	87.3	-10.4	-1.7
Costs	67.6	69.1	3.7	-

2010

	ING Bank NV	Other ING Group entities	Subsidiary undertakings*	Associated undertakings*
Receivables				
Deposits placed	677.3	-	-	-
Nostro accounts	45.6	4.0	-	-
Loans	-	1,746.3	362.2	-
Securities	-	-	20.0	-
Positive valuation of derivatives	151.1	190.4	-	-
Other receivables	45.0	3.2	0.2	-
Liabilities				
Deposits received	2,778.9	316.7	364.1	75.6
Loro accounts	15.3	3.5	-	-
Negative valuation of derivatives	525.5	259.9	-	-
Repo	657.8	-	-	-
Other liabilities	13.5	-	1.1	-
Off-balance-sheet operations				
Contingent liabilities	206.0	844.8	458.1	-
FX transactions	2,618.0	42.7	-	-
Forward transactions	34.2	124.7	-	-
IRS	47,468.8	5,998.8	-	-
FRA	474.3	-	-	-
Options	240.5	889.7	-	-
Revenue and costs**				
Revenue	-55.6	60.5	-6.1	-4.8
Costs	66.0	41.3	2.7	-

*/ Includes transactions between ING Bank Śląski S.A. affiliates of ING Bank Śląski S.A. Group
**/ Revenues and costs are presented in the uniform setting as in the financial statements. The revenues include, among others, the result on valuation of derivatives.

44. Transactions with the management staff and employees

Loans to employees and Bank management

Employees of the ING Bank Śląski S.A. are granted loans on the same terms and conditions as the customers of the Bank (no preferential loans for employees exist). Loans for employees disclosed in the amount of loans for customers as of 31.12.2011 amounted to PLN 121.4 million (without loans from the Internal Social Benefits Fund). As at 31.12.2010, their value amounted to PLN 110.1 million.

Granting of a loan, cash advance, bank guarantee and surety for the Bank's management staff members is regulated in a separate procedure and monitored in accordance with the Ordinance of the President of ING Bank Śląski S.A.

The financial statements for 2011 contain the loans, cash advances, bank guarantees and sureties for the Bank's management staff (within the meaning of Article 79 of the Banking Law) amounting to PLN 34.9 million. As at 31.12.2010, their value amounted to PLN 34.6 million.

Internal Social Benefit Funds

The employees may use various forms of social assistance within the framework of Internal Social Benefit Funds. The balance of money advances granted from the Internal Social Benefit Funds as of 31.12.2011 amount to PLN 11.2 million versus PLN 13.6 million as at 31.12.2010.

The balance of the Internal Social Benefits Fund as at 31.12.2011 was PLN 4.1 million versus PLN 4.0 million as at 31.12.2010.

Remuneration to the Members of the Management Board (in PLN million)

	2011	2010
Remuneration and bonuses	9.2	7.7
Benefits	1,6	3.8
TOTAL	**10.8**	**11.5**

The total amount of remuneration and bonuses paid or due for 2011 presented above constitutes the gross amount of remuneration paid or due and payable for the period from January to December 2011.

The members of the Management Board have signed non-competition agreements after they stop holding their function on the Bank's Management Board. In the event that a Management Board is not renominated for another term of office or is recalled from his/ her function, he or she is entitled to severance pay. Information on allowances owing to the Management Board Members is contained in their employment contracts and shall be paid only in case of termination of the employment contract by the Bank due to other reasons than those giving rise to termination without notice.

Remuneration paid to the Members of the Supervisory Board of ING Bank Śląski S.A.(in PLN million)

	2011	2010
Remuneration and bonuses	0.5	0.5
Benefits	0.0	0.0
TOTAL	**0.5**	**0.5**

The Management Board Members and other persons employed by ING Bank Śląski S.A. do not receive any remuneration for performing functions in the governing bodies of subsidiaries and associates of the ING Bank Śląski S.A. Group.

Volume of ING Bank Śląski shares held by Bank Management Board and Supervisory Board Members

As at 31st December 2011, as regards the Supervisory Board members, Mr. Wojciech Popiołek held 60 shares of the Bank. Other Supervisory Board members as well as the Management Board members held no shares of ING Bank Śląski S.A. In February 2012, Mr. Wojciech Popiołek sold all shares of ING Bank Śląski S.A. he held.

45. Headcount

The headcount in the ING Bank Śląski S.A. was as follows:

Headcount	end of year 2011	end of year 2010
Individuals	8,211	8,224
FTEs	8,068.7	8,092.3

46. Approval of financial statements

These annual financial statements of the ING Bank Śląski S.A. for the period from 1st January 2011 to 31st December 2011 has been approved by the Bank Management Board on 28th February 2012.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Risk Management in ING Bank Śląski S.A.

All of the Bank's operations involve the analysis, assessment and management of certain types of risk or their combination. The most important types of risk generated by financial assets include: the credit risk, liquidity risk and market risk that incorporates the FX risk, interest rate risk and pricing risk. Presented below is a description of management of all the risk types that are significant from the Bank's perspective.

I. Credit Risk Management

1. Definition of Credit Risk

Credit risk is the possibility of non-collection of amounts due to the Bank under extended credit and credit-related facilities, leading to lack of income and/or a financial loss.

The credit losses are a derivative of risk and actions taken by the Bank to reduce them. The Bank influences the level of losses by the level of risk it accepts, the amount of exposure at risk, the security against the risk borne and also – in case of risk materialisation – by direct actions taken to minimise the losses.

In view of the above, credit risk management covers the following elements:

- risk identification and assessment,
- risk measurement and monitoring,
- risk mitigation and prevention,
- development of tools supporting risk identification and measurement,
- provisioning policy.

The credit risk management area refers to: the preparation and launch of a credit product, the end-to-end lending process and all units involved in those processes.

Maximum exposure to credit risk

	end of 2011	**end of 2010**
Loans and receivables to other banks	967.1	1,521.5
Financial assets measured at fair value through profit and loss	639.6	636.7
Valuation of derivatives	1,858.4	1,158.9
Investments	20,450.1	23,005.9
Derivative hedge instruments	433.4	104.8
Loans and receivables to customers	42,298.7	33,959.3
Receivables presented in other assets	52.4	81.7
Off-balance sheet liabilities granted, including:	16,792.8	14,984.0
- credit card limits	*11,618.1*	*10,058.9*
- unutilised credit lines	*3,134.9*	*2,908.9*
- unutilised overdraft facilities	*1,080.5*	*1,189.6*
- guarantees	*637.4*	*653.4*
- letters of credit	*321.9*	*173.2*
Total	**83,492.5**	**75,452.8**

2. Organisational Structure of Risk Management

For credit risk management, the organisational structure of the Bank includes the following organisational units:

- Supervisory Board of the Bank,
- Management Board of the Bank together with the Credit Policy Committee that approve certain internal credit risk-related normative acts as part of their powers,
- Corporate Credit Portfolio Management Department,
- Corporate Credit Risk Modeling & Reporting Department,
- Strategic Clients Credit Risk Department
- Corporate Clients Credit Risk Department,
- Retail Credit Risk Management Department,
- Monitoring and Collection Department,
- Corporate Credit Restructuring Department,
- Credit Risk Inspection Department,
- Operational units and credit analysts,
- Internal Audit Department.

The mission of these units is to ensure proper balance between the commercial objectives of the Group and a risk appetite level that is acceptable for the Group, while taking account of the existing economic environment.

This objective is achieved by taking the following actions:

- developing the principles of credit policy, as well as processes and procedures for acceptance of the permissible credit risk level towards entrepreneurs and business partners; supporting the development of tools for risk identification and measurement; enforcing the implementation of credit decisions; establishing provisions for credit risk, and initiating changes that may be necessary to manage the credit process,
- conducting credit analysis and taking credit decisions,
- raising the level of credit- and counterparty risk awareness among the Bank's employees in order to mitigate those risks,
- managing problem loans to minimize the risk and losses of the Bank,
- conducting an independent and objective assessment of the effectiveness, appropriateness and efficiency of the Bank's internal audit system, while ensuring the identification of weaknesses or gaps in its organisation and functioning.

The commercial functions are separated from the functions assessing the transaction- and client risk (the four-eye control principles).

Presented below in more detail are the roles and responsibilities of the individual organisational units involved in the credit risk management process at ING Bank Śląski S.A.

2.1. Supervisory Board

The Supervisory Board assess on a periodic basis the accomplishment by the Management Board of the Bank's credit risk management assumptions and strategy.

2.2. Management Board

The Management Board of ING Bank Śląski S.A.:

– approves the Credit Policy that defines the strategic approach to credit risk and the acceptable risk level,
– appoints and approves the composition of the Credit Policy Committee through which it ensures ongoing oversight of the credit risk management process,
– provides periodic reports, at least once a year, to the Bank's Supervisory Board regarding the risk level and profile, as well as amendments to the Credit Policy,
– promotes implementation and execution of the Credit Policy by actions taken by the individual members of the Management Board in charge of their respective subordinate areas; among the members of the Management Board, there is a Chief Risk Officer who oversees the credit- and market risk management,
– reviews the efficiency of methods used for identifying impaired credit exposures and defining the related write-offs; assesses the adequacy and sensitivity of the methods to changes of external conditions,
– reviews the processes and the methods of monitoring the quality of credit exposures.

2.3. Committees

The following permanent committees are in place at the Bank and their powers include the credit risk areas:

– Credit Policy Committee (or KPK) whose key objective is to oversee the implementation and control the adherence of the organisational units of ING Bank Śląski S.A. to the "Credit Policy Rules",
– Credit Committees:
    – of ING Bank Śląski S.A. (the Bank Credit Committee),
    – the Restructuring Committee.

In the strategic clients area decisions are taken by two individuals authorised by the KPK.

2.4. Credit- and Market Risk Management Division

There is a separate division for the credit- and market risk management in the organisational structure of the Bank.

The mission of the Corporate Credit- and Market Risk Management Division is to maintain an adequate level of the credit- and market risk at the Bank. The division is headed by the Bank Executive Director subordinated and reporting to the Chief Risk Officer.

The Bank Executive Director oversees departments whose function includes system management of the Bank's corporate credit risk:

– Corporate Credit Portfolio Management Department,
– Corporate Credit Risk Modeling & Reporting Department,
– Strategic Clients Credit Risk Department
– Corporate Clients Credit Risk Department,
– Corporate Credit Restructuring Department.

With regard to the department responsible for retail credit risk management (Retail Credit Risk Management Department) reporting is performed directly to the Chief Risk Officer.

Within the above departments, there are units/ teams responsible for the policy and procedures, examination and modelling of the credit risk, as well as the monitoring and reporting of the credit risk of the portfolio.

The tasks of the individual Departments involved in the credit risk management process are as follows:

2.5. Corporate Credit Portfolio Management Department

- to develop effective systems for credit risk management by maintenance and expansion of the credit policy principles and description of processes and procedures in order to ensure a proper balance between the current commercial objectives of the Bank and the adequate awareness level/ risk appetite level, while taking account of the market conditions in Poland,
- to ensure effective functioning of the risk area and process, in line with the current conditions, by management, participation in projects, modelling the organisation, review of processes, reacting to the needs of the front office, operations, implementation of the requests of the Bank Management Board and ING Group Head Office.

2.6. Corporate Credit Risk Modeling & Reporting Department

- to define and produce management reporting in the risk area,
- to support the management of the client and counterparty credit risk and the transaction risk by developing tools used for the risk identification and measurement, monitoring and reporting in respect of the credit portfolio quality, making recommendations concerning the provisions for credit risk; supporting the units managing the client and counterparty credit risk and the transaction risk in regard to the legal and administration items.

2.7. Strategic Clients Credit Risk Department, Corporate Clients Credit Risk Department

- to manage the credit risk related to client funding by providing advice in respect of the risk in the process of taking credit decisions, executing credit decisions, recommending required changes in the credit process management,
- to supply important data for the credit policy principles as well as processes and procedures in order to accept the acceptable level of the wholesale client risk,
- to raise the level of credit- and counterparty risk awareness among the Bank's employees in order to mitigate those risks,
- to recommend the level of provisions and necessary changes in the management of credit processes and defining products and credit policy in order to mitigate the risk.

2.8. Retail Credit Risk Management Department

- managing the credit risk via: measurement of risk level, defining the criteria of risk acceptance, monitoring the quality of credit portfolio, evaluating potential losses, recommending the financial provisions and necessary changes in managing the credit process, definitions of products, credit policy having in view decreasing the risk,
- valuing current and expected risk level for fixing the risk appetite,
- development and up-dating calculation models of credit capacity,
- initiating the preparing and up-dating of statistic acceptance models (scoring cards for retail credits) and its implementation,

- creating and implementing the impairment rules,
- increasing, among Bank employees, credit risk consciousness, possibilities and methods of its reducing.

2.9. Monitoring and Collection Departament

- collection of the delinquent retail loans to minimize credit risk and losses for all retail segments by conducting collection actions for delinquent customers,
- cooperation with Retail Credit Risk Management to identify adverse trends and non-performing segments in retail asset portfolios,
- supervision of outsourced collection entities and legal agencies.

2.10. Corporate Credit Restructuring Department

- management of corporate problem loans oriented on minimising the risk and Bank's losses resulting from the irregular debt portfolio, i.e.:
  - comprehensive debt restructuring and collection,
  - loan loss provisioning for the biggest impaired exposures,
  - rating assigning for irregular clients,
- participation in the Watch List portfolio reviews,
- defining policies related to problem loans management in order to mitigate risks and reduce losses,
- analysis and reporting on corporate problem loans portfolio,
- co-operation with the auditor, banking supervision authorities, inter-bank organizations and appropriate organisational units of the ING Group in respect of problem loans management and loan loss provisioning,
- participation in the projects connected with credit risk management, especially referring to problem loans management and loan loss provisioning, including issuing opinions and recommendations for changes in the areas.

2.11. Credit Risk Inspection Department

- to verify on a regular basis the credit documentation and assess the functioning of the credit process at ING Bank Śląski S.A. at the front-office and back-office levels (the ability to recommend changes to the existing policies and processes to the Credit Policy Committee),
- to analyse selected loans and adequacy of local Risk Management during regular inspections at the Bank organisational units,
- to identify potentially problematic areas and respond to the signals coming from the organisation,
- to control the adherence to the transaction approval criteria, the process of loan disbursement; behaviour patters / statistics regarding repayments, statistics of overdue repayments, adequacy of monitoring of exposures and risk categories and correctness of the credit data entered in the IT system and debt collection.

2.12. Operational Units and Credit Analysts

They represent expert knowledge on the risk characteristics of clients.

2.13. Internal Audit Department (IAD)

The key mission of IAD is to provide the Bank Management Board with an independent and objective assessment of the appropriateness and efficiency of the Bank's internal audit system, ensuring the identification of weaknesses or gaps in its organisation and functioning.

The Internal Audit Department carries out regular audits of the Corporate Governance Model, credit risk policy and procedures. Its observations (together with the proposed changes to the policy and procedures) are then translated into a plan of actions that need to be taken before approval by the Credit Policy Committee.

The predominant objective of IAD is to identify the risks existing in the Bank's operations and to assess and propose actions enhancing control and management of those risks. By its activities, IAD contributes to improving the organisation and management of the Bank and to accomplishing the objectives set by the Bank.

The scope of IAD operations covers the whole business operations conducted by ING Bank Śląski S.A., all of its organisational cells and units, as well as the organisational units of the capital group of ING Bank Śląski S.A.

3. Credit Decision – Making Process

Decision-taking powers in the individual credit cases (credit committees at different levels) are separated from the decisions concerning the credit policy and risk management.

The credit decisions in credit process for regular portfolio are exercised by two Approval Signatories (SAP) and taken in Signatory Approval Process (SAP) shown in Credit Manual. Some exceptions apply to:

– decisions taken by Bank Credit Committee (KKB) – applying to the largest credit exposures mentioned in Credit Manual,
– decisions taken by one Approval Signatory – applying to "FAST TRACK" credit process.

The delegated authority level is co-related with the level of credit risk arising from the client risk and from the transaction risk. As the credit risk rises, the decisions are taken by collective individuals who – by their nature – have more extensive experience, and thus the ability of broad and thorough risk identification.

Decision-taking level for credit decisions concerning regular credit exposures is determined based on the client's risk grade and the following elements:

– the total exposure of ING Group towards the debtor and the members of the capital group (within Article 3 paragraph 1 item 44 of the Accounting Act of 29 September 1994) of which the debtor is also the member, as well as entities related to the debtor by personal ties by spouses (only when the Bank funds an entrepreneur who is a private individual),
– the subject matter of the credit decision in question.

4. Structure of credit exposure portfolio

Credit exposure portfolio*)	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
Credit exposure to corporate clients , of which:	**22,466.6**	**15,006.4**	**18,386.6**	**12,818.3**
- **IBNR** *(Incurred But Not Reported)*	21,322.5	14,925.7	17,205.3	12,788.6
- **Impaired**, of which:	1,144.1	80.7	1,181.3	29.7
*- **ISFA** (Individually Significant Financial Asset)*	*1,046.2*	*33.4*	*1,058.4*	*24.7*
*- **INSFA** (Individually Non-Significant Financial Asset)*	*97.9*	*47.3*	*122.9*	*5.0*
Credit exposure to retail clients , of which:	**14,965.4**	**2,349.1**	**12,515.6**	**2,434.7**
- **IBNR** *(Incurred But Not Reported)*	14,525.4	2,343.5	12,162.6	2,426.1
- **Impaired**, of which:	440.0	5.6	353.0	8.6
*- **INSFA** (Individually Non-Significant Financial Asset)*	*440.0*	*5.6*	*353.0*	*8.6*
Total credit exposure	**37,432.0**	**17,355.5**	**30,902.2**	**15,253.0**

**) The exposures do not inlcude the interest accrued or adjustments under the effective interest rate*

Reconciliation to financial statements

The on-balance exposures taken for analysis from the credit risk perspective, are presented as outstanding capital and do not inlcude the interest accrued or adjustments under the effective interest rate. The table below presents the loans and advances portfolio per gross value presented in the note 20.3 *The quality of loans and advances portfolio* per capital as well as other elements comprising the gross value calculation in the financial statements.

Loans and advances portfolio	gross value in PLN million	
	end of 2011	end of 2010
Loans and advances to customers from corporate banking segment, of which:	22,490.8	18,384.8
- capital	***22,466.6***	***18,386.6***
- interest accrued and adjustments under the effective interest rate	*24.2*	*-1.8*
Loans and advances to retail customers segment, of which:	15,008.9	12,550.6
- capital	***14,965.4***	***12,515.6***
- interest accrued and adjustments under the effective interest rate	*43.5*	*35.0*
Total, of which:	**37,499.7**	**30,935.4**
- capital	***37,432.0***	***30,902.2***
- interest accrued and adjustments under the effective interest rate	*67.7*	*33.2*

4.1. Credit exposure to corporate clients

Credit exposure to corporate clients by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
03	0.0	0.3	0.0	215.1
04	0.0	4.2	0.0	5.5
05	1,973.4	921.1	1,976.9	917.8
06	547.5	234.6	254.9	19.1
07	2,997.7	1,910.8	2,553.3	1,367.4
08	767.2	429.3	618.7	700.0
09	635.6	1,090.7	395.1	1,017.6
10	1,549.7	2,913.9	1,874.9	2,504.5
11	2,951.0	2,856.3	2,066.8	2,239.3
12	3,047.1	1,382.3	1,424.8	1,156.9
13	3,238.7	1,791.8	2,352.8	1,501.4
14	1,175.2	429.2	1,400.8	309.4
15	1,528.5	662.7	1,303.7	549.2
16	367.8	131.9	350.1	105.8
17	231.8	75.6	267.7	124.0
18	144.2	25.7	158.4	14.1
19	167.1	65.3	206.4	41.5
20	637.6	77.6	658.5	26.5
21	0.0	0.0	2.4	0.0
22	506.5	3.1	520.4	3.2
Total	**22,466.6**	**15,006.4**	**18,386.6**	**12,818.3**

Credit exposures to corporate clients by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
0	21,808.7	14,987.4	17,587.6	12,817.0
1-30	60.5	18.9	36.7	1.3
31-60	6.4	0.1	64.5	0.0
61-90	11.6	0.0	21.5	0.0
91-180	22.6	0.0	35.7	0.0
181-365	49.7	0.0	84.2	0.0
>365	507.1	0.0	556.4	0.0
Total	**22,466.6**	**15,006.4**	**18,386.6**	**12,818.3**

Exposure toward corporate customers rated 01-19 is covered by Incurred But Not Reported (IBNR) provisions. Exposure toward rating 20-22 is covered by Individually Significant Financial Assets (ISFA) or Individually Non-Significant Financial Assets (INSFA) provisions.

4.1.1. IBNR portfolio

Credit exposure to corporate clients under IBNR (Incurred But Not Reported) impairment provisions by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
03	0.0	0.3	0.0	215.1
04	0.0	4.2	0.0	5.5
05	1,973.4	921.1	1,976.9	917.8
06	547.5	234.6	254.9	19.1
07	2,997.7	1,910.8	2,553.3	1,367.4
08	767.2	429.3	618.7	700.0
09	635.6	1,090.7	395.1	1,017.6
10	1,549.7	2,913.9	1,874.9	2,504.5
11	2,951.0	2,856.3	2,066.8	2,239.3
12	3,047.1	1,382.3	1,424.8	1,156.9
13	3,238.7	1,791.8	2,352.8	1,501.4
14	1,175.2	429.2	1,400.8	309.4
15	1,528.5	662.7	1,303.7	549.2
16	367.8	131.9	350.1	105.8
17	231.8	75.6	267.7	124.0
18	144.2	25.7	158.4	14.1
19	167.1	65.3	206.4	41.5
Total	**21,322.5**	**14,925.7**	**17,205.3**	**12,788.6**

Credit exposure to corporate clients under IBNR (Incurred But Not Reported) impairment provisions by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
0	21,265.4	14,906.7	17,128.8	12,787.3
1-30	46.7	18.9	30.0	1.3
31-60	4.2	0.1	36.9	0.0
61-90	3.2	0.0	5.4	0.0
91-180	2.1	0.0	0.3	0.0
181-365	0.2	0.0	0.1	0.0
>365	0.7	0.0	3.8	0.0
Total	**21,322.5**	**14,925.7**	**17,205.3**	**12,788.6**

Credit quality of corporate cliens' credit portfolio that is neither past due nor impaired

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
03	0.0	0.3	0.0	215.1
04	0.0	4.2	0.0	5.5
05	1,968.5	921.1	1,976.9	917.8
06	547.5	234.6	254.9	19.1
07	2,989.4	1,910.8	2,553.3	1,367.4
08	767.2	429.3	614.4	700.0
09	635.3	1,090.3	395.1	1,017.6
10	1,545.0	2,913.8	1,874.8	2,504.3
11	2,949.9	2,840.9	2,063.8	2,239.1
12	3,045.3	1,381.8	1,423.7	1,156.9
13	3,228.6	1,790.3	2,334.8	1,500.5
14	1,168.8	428.9	1,380.4	309.4
15	1,521.2	662.1	1,299.7	549.2
16	365.9	131.9	346.5	105.8
17	231.5	75.6	267.1	124.0
18	142.7	25.6	157.5	14.1
19	158.6	65.2	185.9	41.5
Total	**21,265.4**	**14,906.7**	**17,128.8**	**12,787.3**

Analysis of the age of corporate cliens' credit portfolio that is past due as at the end of reporting period but not impaired

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
1-30	46.7	18.9	30.0	1.3
31-60	4.2	0.1	36.9	0.0
61-90	3.2	0.0	5.4	0.0
91-180	2.1	0.0	0.3	0.0
181-365	0.2	0.0	0.1	0.0
>365	0.7	0.0	3.8	0.0
Total	**57.1**	**19.0**	**76.5**	**1.3**

4.1.2. ISFA portfolio

Credit exposure to corporate clients under ISFA (Individually Significant Financial Asset) impairment provision by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
20	604.8	33.3	628.9	23.7
21	0.0	0.0	1.2	0.0
22	441.4	0.1	428.3	1.0
Total	**1,046.2**	**33.4**	**1,058.4**	**24.7**

Credit exposure to corporate clients under ISFA (Individually Significant Financial Asset) impairment provision by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
0	527.7	33.4	454.0	24.7
1-30	0.7	0.0	6.4	0.0,
31-60	0.3	0.0	24.9	0.0
61-90	6.9	0.0	14.7	0.0
91-180	12.7	0.0	28.9	0.0
181-365	40.2	0.0	65.0	0.0
>365	457.7	0.0	464.5	0.0
Total	**1,046.2**	**33.4**	**1,058.4**	**24.7**

4.1.3. INSFA portfolio

Credit exposure to corporate clients under INSFA (Individually Non-Significant Financial Asset) impairment provision by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
20	32.8	44.3	29.6	2.8
21	0.0	0.0	1.2	0.0
22	65.1	3.0	92.1	2.2
Total	**97.9**	**47.3**	**122.9**	**5.0**

Credit exposure to corporate clients under INSFA (Individually Non-Significant Financial Asset) impairment provision by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
0	15.6	47.3	4.8	5.0
1-30	13.1	0.0	0.3	0.0
31-60	1.9	0.0	2.7	0.0
61-90	1.5	0.0	1.4	0.0
91-180	7.8	0.0	6.5	0.0
181-365	9.3	0.0	19.1	0.0
>365	48.7	0.0	88.1	0.0
Total	**97.9**	**47.3**	**122.9**	**5.0**

4.2. Credit exposure to retail clients

Credit exposure to retail clients by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
08	30.5	129.0	27.0	128.4
09	10,728.7	879.6	8,299.2	824.8
10	473.4	329.6	466.2	341.1
11	244.3	141.5	257.4	148.1
12	785.5	173.8	810.5	198.9
13	531.6	44.0	554.7	50.7
14	547.5	131.8	587.7	139.3
15	581.5	457.7	613.8	536.6
16	98.9	41.5	109.5	41.3
17	332.4	8.6	274.9	8.8
18	95.4	3.3	86.3	3.7
19	75.7	3.1	75.4	4.4
20	256.1	5.4	209.4	7.9
22	183.9	0.2	143.6	0.7
Total	**14,965.4**	**2,349.1**	**12,515.6**	**2,434.7**

Credit exposure to retail clients by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
0	14,045.3	2,330.5	11,760.1	2,414.0
1-30	422.7	15.8	359.3	17.0
31-60	93.9	2.1	84.2	2.8
61-90	38.2	0.4	27.8	0.5
91-120	17.4	0.1	15.1	0.1
121-150	12.5	0.0	16.2	0.2
151-180	13.4	0.0	11.7	0.0
>180	322.0	0.2	241.2	0.1
Total	**14,965.4**	**2,349.1**	**12,515.6**	**2,434.7**

4.2.1. IBNR portfolio

Credit exposure to retail clients under IBNR (Incurred But Not Reported) impairment provision by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
08	30.5	129.0	27.0	128.4
09	10,728.7	879.6	8,299.2	824.8
10	473.4	329.6	466.2	341.1
11	244.3	141.5	257.4	148.1
12	785.5	173.8	810.5	198.9
13	531.6	44.0	554.7	50.7
14	547.5	131.8	587.7	139.3
15	581.5	457.7	613.8	536.6
16	98.9	41.5	109.5	41.3
17	332.4	8.6	274.9	8.8
18	95.4	3.3	86.3	3.7
19	75.7	3.1	75.4	4.4
Total	**14,525.4**	**2,343.5**	**12,162.6**	**2,426.1**

**IBNR – Incurred But Not Reported*

Credit exposure to retail clients under IBNR (Incurred But Not Reported) impairment provision by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
0	14,005.4	2,325.7	11,720.4	2,406.3
1-30	405.7	15.4	346.0	16.7
31-60	84.1	2.0	76.1	2.7
61-90	30.2	0.4	20.1	0.4
Total	**14,525.4**	**2,343.5**	**12,162.6**	**2,426.1**

Credit quality of retail cliens' credit portfolio that is neither past due nor impaired

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
08	30.5	128.9	27.0	128.4
09	10,728.6	879.4	8,294.4	829.8
10	473.2	329.3	466.0	340.8
11	243.8	141.1	256.9	147.7
12	777.0	171.9	803.9	197.3
13	523.7	43.1	547.2	49.8
14	525.2	129.6	565.7	137.2
15	569.5	456.4	606.1	527.6
16	78.0	39.6	89.4	39.4
17	33.3	3.8	38.2	4.6
18	11.3	1.6	12.9	2.1
19	11.3	1.0	12.7	1.6
Total	**14,005.4**	**2,325.7**	**11,720.4**	**2,406.3**

Analysis of the age of retail cliens' credit portfolio that is past due as at the end of reporting period but not impaired

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
1-30	405.7	15.4	346.0	16.7
31-60	84.1	2.0	76.1	2.7
61-90	30.2	0.4	20.1	0.4
Total	**520.0**	**17.8**	**442.2**	**19.8**

4.2.2. INSFA portfolio

Credit exposure to retail clients under INSFA (Individually Non-Significant Financial Asset) impairment provision by risk grades

risk rating	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
20	256.1	5.4	209.4	7.9
22	183.9	0.2	143.6	0.7
Total	**440.0**	**5.6**	**353.0**	**8.6**

Credit exposure to retail clients under INSFA (Individually Non-Significant Financial Asset) impairment provision by overdue days

number of days overdue	exposure in PLN million			
	end of 2011		end of 2010	
	on-balance	*off-balance*	*on-balance*	*off-balance*
<90	74.7	5.3	68.8	8.2
91-120	17.4	0.1	15.1	0.1
121-150	12.5	0.0	16.2	0.2
151-180	13.4	0.0	11.7	0.0
>180	322.0	0.2	241.2	0.1
Total	**440.0**	**5.6**	**353.0**	**8.6**

5. Rules and process of corporate credit risk management

5.1. Reviews and Credit Risk Rating

Commercial functions who grant credits are separated from the process of transaction- and client risk rating (four-eye control principle). Credit risk is rated (by the Risk Manager) based on the principle of separation from the commercial functions (Relationship Manager).

The following parties are involved in the process of risk rating: Rating Owner (Relationship Manager) and Risk Manager.

The Rating Owner inputs the financial data related to the client and has exclusive responsibility for the correctness of the risk rating, including Review.

There is only one owner of a borrower's risk rating. The risk management unit responsible for restructuring and debt collection (i.e. Corporate Credit Restructuring Department) becomes a rating owner for borrowers rated 18 to 22.

The final rating is determined by the Risk Manager, or by the Appeal Judge if an appeal has been made.

The Risk Manager is responsible for:

- verifying that the appropriate rating model has been used for the borrower,
- verifying that financial and non-financial data entered are correct,
- challenging unaudited financial data,
- finalizing the rating.

The outcomes of specific models may be subjects to arbitrary adjustments in that the ultimate rating grades are determined as part of the appeal process.

A one notch difference (positive or negative) between the rating calculated by the rating model and the view of the appellant (the person initiating an appeal) is sufficient to start a rating appeal.

Reasons for a rating appeal are for example:

- the rating model is not appropriate for the borrower,
- circumstances that may not (yet) be captured by the rating model but which are likely to have a (usually negative) effect on the borrower's PD, especially if:
    - borrower has or is expected to default on any financial obligation to any party,
    - major disruption of activities,
    - change in legislation that will seriously impact the financial performance.

IT system in Bank, used also in whole ING Group, supports credit risk assessment process and enables, as well, centralized gathering data on risk rating grades of clients.

5.2. Frequency of Risk Rating Reviews and Updates (if any)

Only the Rating Owner can review the risk rating. The following rules will apply to rating reviews:

- a risk rating must be reviewed at least annually; a risk rating is considered overdue after 12 months from the last approval date of the risk rating,
- the Rating Owner should take appropriate action to either review or cancel the risk rating if the Bank has terminated the relationship with the Borrower and no credit risk remains; the Rating Owner should perform an interim re-rating when the value of one or more risk drivers has materially changed. Events that could cause a consideration for a re-rating are for example a change of risk rating of the influencing parent or a change of any of the qualitative risk drivers,
- without a review till the end of 18 months from the last approval date of the risk rating, a risk rating will automatically expire (not applicable for irregular borrowers whose ratings do not expire).

5.3. Concentration Limits

To mitigate the concentration risk, the Bank in 2011 observes the following exposure concentration limits as defined in Article 71 of the Banking Law Act:

- 25% of the Bank's own funds – for exposures to entities related to the Bank (increase from 20% of Bank's own founds due to the Banking Law Act changing in July 2011),
- 25% of the Bank's own funds – for exposures to other entities,
- 800% of the Bank's own funds – for the aggregate amount of the Bank's "large" exposures, i.e. exposures exceeding 10% of the Bank's own funds (eliminated due to the Banking Law Act changing in July 2011).

Furthermore, in keeping with the statutory rules and recommendations of the Banking Regulator, the Bank sets internal concentration limits for exposures to specific sectors, the collaterals accepted, and it monitors on a regular basis the concentration levels in the geographical areas of its operations (the Regions).

The Bank sets the statutory concentration limits on a monthly basis. Based on the data verified, the Bank prepares a report covering the up-to-date balance of the Bank's own funds and the individual statutory limits. The report is then distributed among the Bank units concerned, including among others: the Corporate Banking Centres, the Regional Branches, the departments of the Credit Division, Risk Division and the Internal Audit Department. The Regional Branches redistribute the report among their respective subordinate units.

The Bank monitors the utilisation of limits by preparing a specification of clients and groups of related clients, and by comparing their existing exposure to the current limits.

On the operational level, the control of concentration limits is performed during the writing of credit applications, approving specific transactions and periodic reviews.

Both over the year 2011 and 2010, the exposure concentration limits were not overrun.

Bank's greatest exposures (exceeding 10% of own funds)

In 2011 there was a significant change in data sources and methodology for grouping of related entities. It uses the economic dependence, which in effect has increased the number of presented groups and the total value of their exposures. The following table presents a breakdown of clients with exposure exceding 10% of the Bank's equity in the new layout.

	exposure in PLN million	
	end of 2011	end of 2010
Bank's own funds	**_5,270.8_**	**_4,441.1_**
Client 1 (Group)	4,884.5	3,013.8
Client 2 (Group)	1,985.6	2,019.3
Client 3 (Group)	1,551.6	712.4
Client 4	1,409.0	1,131.7
Client 5 (Group)	915.0	435.7
Client 6 (Group)	704.0	176.5
Client 7 (Group)	675.9	68.6
Client 8 (Group)	630.9	604.2
Client 9 (Group)	583.5	586.8
Client 10 (Group)	579.7	477.4
Client 11 (Group)	573.4	415.0
Client 12 (Group)	549.1	522.6

To avoid excessive credit risk concentration in the sectors, the Bank monitors the exposures in the individual economy sectors. Based on analyses, the Bank sets the desired directions where its exposure should increase, and the sectors with unfavourable development perspectives in which the exposure should be lowered.

The above tasks also include among other things the determination of limits for groups of sectors with a material share in the Bank's portfolio, i.e. whose total share in the entire credit portfolio is around 60%. Limits for the individual sectors are determined by the Credit Policy Committee.

Industry concentration of exposures to corporate clients

industry	exposure (on-balance and off-balance)			
	end of 2011		end of 2010	
	exposure in PLN million	*share in total exposure (%)*	*exposure in PLN million*	*share in total exposure (%)*
wholesale trade	6,507.4	17.4%	4,729.6	15.2%
financial intermediation (including banks)	4,281.8	11.4%	3,975.8	12.7%
public administration and national defense	3,438.4	9.2%	3,196.9	10.2%
real estate service	2,531.9	6.8%	1,385.5	4.4%
constructions industry	2,519.0	6.7%	1,855.8	5.9%
retail trade	1,809.4	4.8%	1,674.7	5.4%
power industry	1,726.5	4.6%	860.9	2.8%
foodstuff and beverage production	1,622.1	4.3%	1,372.2	4.4%
remaining services connected with running business	1,512.6	4.0%	1,826.7	5.9%
ready-made metal goods productions	851.5	2.3%	688.2	2.2%
mechanikal vehicles sale , repair and service	798.1	2.1%	752.6	2.4%
chemicals and chemical goods production	787.3	2.1%	551.9	1.8%
fuel industry	780.5	2.1%	515.2	1.7%
rubber industry	753.1	2.0%	536.8	1.7%
remaining non-metal raw materials industries	736.3	2.0%	708.9	2.3%
engineering industry	588.8	1.6%	664.1	2.1%
metals productions	541.8	1.4%	446.1	1.4%
computer industry and associated service	527.5	1.4%	344.7	1.1%
means of transport industry	506.1	1.4%	334.0	1.1%
equipment rent	404.2	1.1%	302.6	1.0%
other	4,248.7	11.3%	4,481.7	14.3%
Total	**37,473.0**	**100.0%**	**31,204.9**	**100.0%**

Exposure concentration in the geographical areas is monitored according to the regional division into the branch network. A 20% limit of the Bank's total portfolio is adopted for controlling concentration at the level of Regions. Exceeding this limit may trigger setting a geographical limit.

However, since geographical concentration is minor and does not increase the credit risk, so far there has been no need for ING Bank Śląski to set geographical limits.

Considering the potential risk level, the Bank introduced limits for mortgage loans in accordance with Recommendation S of the Banking Supervision Commission for the following types of facilities:

– loans with low down-payment (insured),
– newly granted loans indexed to foreign exchange rate,
– loans secured with mortgage,
– housing loans.

Adherence to the statutory and internal concentration standards is the subject of a monthly risk report distributed among the Management Board, Credit Policy Committee and Regional Managers. The report is also presented to the Supervisory Board of the Bank on a periodic basis.

5.4. Repayment Security and Other Forms of Credit Risk Mitigation

Even though repayment security is a major factor that allows the Bank to mitigate the lending risk, it is the Group's policy to extend loans in amounts and on terms that allow for regular repayment without the need to recover the receivables by liquidating the security.

The Bank accepts all types of repayment security permitted by the law; however, the choice in specific cases is conditioned by various factors, including in particular:

– the client's ability to offer specific types of security,
– the type and duration of exposure,
– the level of client's risk,
– the level of transaction's risk
– the liquidity of security offered (the ability to cash it easily),
– the collateral value.

The Bank *Collateral Policy* covers, among others, the following areas:

– indications of the criteria for accepting the collateral in the capital requirement for credit risk calculation process,
– setting the general rules for the Bank when choosing the collateral forms, inclusive of the acceptable credit risk level,
– adjustment to the collateral-related procedures to the requirements of the new LGD models that are in harmony with the advanced internal ratings' method (the so-called AIRB).

Moreover the Collateral Policy of the Bank takes into account in particular those aspects of the Resolution No. 76/2010 with subsequent amendments, which concern the application of LGD models, legal reliability of security and its monitoring.

The LGD models developed for corporate assets are based on statistically estimated recovery ratios for specific groups of security. The estimations are based on an analysis of historical recovery processes at the Bank. The rates of recover for specific types of security determine their fair value.

The recovery rate for a specific type of security depends on the character of the security item, the legal form of the security and the efficiency of the security liquidation process. The final level of the recovery is also influenced by the costs of debt-collection and the costs of keeping a classified exposure in the Bank's books (until the debt is recovered or cancelled).

Apart from the classic types of security (tangible and personal), the Bank also applies additional instruments to mitigate the risk of loss, namely additional covenants in loan agreements. As part of the basic or standard covenants, the Bank applies protective and financial clauses. The scope of the covenant or combination of covenants to be applied depends on: the term, type of lending product, the specific organisational and legal form or the business objects of the borrower, the risk rating of the client. By including certain covenants in the credit agreements, the Bank is sometimes able to give up some or all of the repayment security.

The structure of individual security types is diversified. The following types of collateral have the biggest share:

- suretyships and corporate guarantees – there are guarantors from different industry sectors with different economic and financial standing within this group. Therefore, there is no significant risk in terms of concentration. In case of assuming a specific recovery ratio from collateral, greater than 0%, it is necessary to examine the economic and financial standing of the guarantor and determine the risk rating as investment or speculative.
- mortgages – this is due to the fact that mortgages usually secure long-term investment loans. Furthermore, mortgages are the main security for loans to finance commercial real estate.

5.5. Exposure Classification Methodology

5.5.1. Credit Impairment Recognition

The events that provide the basis for credit impairment recognition are the events that occurred in respect of a certain asset or a group of assets and that affected in a negative manner the amount of expected cash flows. The Bank adopted the following list of impairment events for corporate credit receivables:

- bankruptcy / threat of bankruptcy: the Borrower was announced or will soon be announced bankrupt (whether by the Bank, by third party or on its own initiative), which will result in failure to repay or delay in repayment;
- default in repayment: the Borrower stopped to repay the principal or interest/ commission and the said default lasts:
  - for corporate clients (apart from financial institutions) – above 90 days;
  - for financial institutions and government authorities – 0 days or more; however, in that case a 14-day explanation term is applied to determine whether the default in payment is caused by deterioration of the financial institution’s credit standing or operational reasons. Default in payment for operational reasons is not considered an impairment event.
- the Bank assesses that the borrower will face difficulty in repaying the debt: the Borrower has such material financial problems that they can be of a negative impact (probability of at least 50%) on future cash flows under a given credit receivable (the 1Y perspective is considered in the assessment);
- credit receivable restructuring not resulting for commercial reasons: due to the borrower’s financial problems, the Bank restructured the credit exposure, by granting facilities and exceptions to the borrower, which resulted in reduction of the present value of expected future cash flows from the credit receivable below its balance value.

The case where occurrence of at least one of the aforementioned events is declared stands for appearance of impairment.

5.5.2. Customer Risk Class Determination in case of regular portfolio

Each entity with the Bank's credit exposure must have a rating assigned as is used in a standard manner at the Bank. Determination of the customer risk class forms an integral part of the Bank's credit risk evaluation process for corporate clients.

For entrepreneurs' exposures, the Bank uses a 22 grade rating, employed throughout ING Group. Its classes present the debtor-related risk. The customer is assigned to a given risk class based on the:

- financial model, using the data from the debtors' financial reports,
- evaluation of qualitative factors,
- financial standing of the parent company.

Investment Grade 1-10

Investment grade comprises the entities which we assess as encumbered with a relatively low risk; however, in making risk classification, we take account of the threats arising from economic and business conditions.

Speculative Grade 11 - 17

It is a group of a relatively large bucket of risk levels, and thus the characteristics of extreme classes within this group varies considerably. In general, we may say that:

- the entities from top classes under this group are fulfilling their financial obligations at present, however the debt cover ratio (principal and interest) over a longer term is not certain, and thus the safety margin is limited; there is real threat of credit risk growth due to unfavourable business or economic conditions;
- the borrowers assigned to the top risk classes (the worst classes from that group) can be characterised by uncertain income perspectives, worse quality of assets and over a longer term the risk of equity mismatch and possibility of loss occurrence.

Problem Loan Grade 18 - 22

This risk group comprises the Borrowers who showed explicit symptoms of problems with debt service or who are in the default situation.

Borrowers from this risk group are rated only by risk units managing a given client exposure.

For:

- strategic clients - the global ING Group model PD is applied – the debtor is assigned to one of 17 corporate client risk classes in the brackets from 1 to 17,
- corporate clients - the local SME PD model is applied – the debtor is assigned to one of 9 corporate client risk classes in the brackets from 9 to 17.

5.5.3. Corporate Credit Risk Management Tools

In 2011 Bank initiated number of activities within credit risk management area aiming at implementation of KNF resolution 258/2011 on detailed rules for the functioning of risk management and internal control system and detailed conditions for estimating banks' internal capital and reviewing the process of assessing and maintaining internal capital policies and rules for determining the variable components of remuneration of managers in the bank

Following the ING Group's decision to implement the Advanced Internal Rating Based Approach (or AIRB), the Bank prepared and implemented local and global models for basic risk parameters:

- PD (probability of default),
- LGD (loss given default),
- EAD (exposure at default)

for various classes of assets in line with AIRB.

The Bank obtained the final approval to apply AIRB method for the corporate credit portfolio from the Dutch National Bank (DNB) and the Polish Financial Supervision Authority on 6 October 2011.

As far as enterprises exposures are concerned, the following models, among others, are applied at the Bank:

- for the strategic clients segment covering businesses with annual income above EUR 100 million:
  - global PD (expert and statistical) ING Group rating model developed at the ING Group level accounting for the local data and monitored regularly on the said data.
  - global LGD and EAD (hybrid expert and statistical models) models also developed at ING Group level accounting for the local data and monitored regularly based on the said data.
- for the local mid-sized and mid-corporate segments (SME assets class) covering clients with annual income from EUR 1.2 to 100 million:
  - local PD (expert and statisitcal) rating model developed under the supervision of the ING Group based on the Bank's internal data, applied at ING also as a regional model for Central and Eastern European states,
  - local LGD and EAD models (hybrid expert and statistical models) developed under the supervision of ING based on the Bank's internal data and applied at ING as regional models for the Central and Eastern European states.

Besides above, the Bank uses also global models for exposures to banks and other financial institutions and to sovereigns and local governments.

The models are employed to calculate the economic capital allowing its level to be optimised. They contribute to a better quantification of the credit risk for the Bank's portfolio. It is on their basis that the provisions under IFRS, the efficiency of Bank's performance (RAROC, economic profit, goodwill management) and credit prices are estimated, among other positions.

While employing the risk models, the Bank makes use of advanced IT systems supporting the client and transaction risk rating process. An integrated ING Group's environment is the primary IT tool used to manage credit risk. As this tool combines all applications needed to fully meet the New Capital Accord requirements, it enables the Bank to manage risk effectively not only on the Bank's Branch level, but also on the level of individual relationship manager's portfolio.

5.6. Restructuring of credit exposures

In some cases, ING Bank Śląski S.A. will work with an obligor and its other creditors (if any) to restructure the obligor's business and its financial obligations in order to minimize any financial losses to the creditors as a whole, and ING Bank Śląski S.A. in particular. This can be accomplished through many means available to the creditors, the most common of which are:

– extending the repayment period,
– selling assets,
– selling business lines of the obligor,
– forgoing part of the financial obligations,
– a combination of the above.

The decision to enter into such a restructuring is done only after careful internal assessment and approval by the appropriate (internal) delegated authorities. Once a restructuring is completed, the obligor is again subject to normal credit risk monitoring procedures.

6. Rules and process of retail credit risk management

The Bank regards all the retail receivables (from individual and entrepreneur clients) as individually non-significant as well as calculates and makes relevant charges and provisions pursuant to the collective approach.

The expert methodology for estimation of charges and provisions, inclusive of parameters used for their calculation, is admissible if one of the following prerequisites arises:

- the portfolio size and age and/or number of cases subject to impairment in the period under analysis is not sufficient for statistical or mathematical estimation,
- the data quality is insufficient for adequate estimation of charges or provisions,
- an essential change took place in the Bank's economic environment, level of risk appetite, strategies adopted for receivables recovery,
- adopted statistical or mathematical methods of estimation do not correspond to the regulatory requirements or those set by ING Group.

The justification behind the expert methodology and assessment of its results is verified separately for each case and is subject to approval by the Credit Policy Committee. The same principles are applied for the use of data and observations obtained from other institutions, inclusive of the data source acceptance.

6.1. Loan impairment triggers

- the Borrower has stopped repaying the principal or interest/ commission and the delay in repayment continues over 90 days. In case of overdraft facilities (personal accounts and current accounts of entrepreneurs) this condition is applicable only for exposures over PLN 200;
- with regard to consumer loans: the Borrower (individual) has exposures other than the exposure in question, which demonstrate the premises of impartment under item 1 and all these exposures belong to the group of consumer loans (non-housing/ mortgage);
- with regard to housing/mortgage loans: the Borrower (individual) has exposures other than the exposure in question, which demonstrate the premises of impartment under item 1 and all these exposures belong to the group of housing/mortgage loans (non-consumer);
- the Borrower (entrepreneur) has exposures other than the exposure in question, which demonstrate the premises of impartment under item 1;
- upon impairment the Borrower correctly services the debt; however, the period of correct service is shorter than 3 months (for debt overdue by no longer than 6 months);

– upon impairment the Borrower correctly services the debt; however, the period of correct service is shorter than 6 months (for debt overdue by longer than 6 months);
– the Borrower has been or will be declared bankrupt soon, which shall result in the failure to repay the debt or delay in its repayment (the premise applies in particular to the borrowers from entrepreneurs);
– the credit agreement has been terminated;
– financial and economic situation indicates that the customer from entrepreneurs segment will not repay their loans in full and on time;
– the credit receivables are covered with restructuring. Due to financial difficulties experienced by the borrower, the Bank restructured the credit exposure by providing the borrower with convenient solutions or concessions which result in reducing the current value of expected future cash flows due to the credit receivables to the level below the balance sheet value of these receivables. On the other hand, the revision of lending terms for commercial reasons (inclusive of interest rate change due to market conditions) does not constitute the premise for impairment. The restructuring principles and method of their treatment from the point of view of impairment charges (provisions) are determined by separate procedures.

The starting point for grouping exposures into portfolios pursuant to the collective approach are the principles introduced by the New Capital Accord (the so-called Basel II with appropriate modifications for impairment calculations), which distinguish three basic groups of retail products: renewable, mortgage and consumer loans. The risk drivers contingency within a group constitutes the basis for grouping. The product and its features function as the basic grouping criteria. Criteria of the premises for impairment based on the Basle concept of "default" derive from the product definition. Since the Bank applies the scoring cards (statistical acceptance models), the existing acceptance model constitutes an additional premise for grouping.

Additionally, the grouping is based on:
– type and definition of product,
– type of collateral,
– business positioning of product (e.g. separation of products not offered),
– other elements of acceptance model,
– organisation of credit process.

The separated portfolio should be characterised by a relevant number of cases to ensure the statistical recurrence of phenomena.

For each portfolio we distinguish:
– IBNR part,
– impaired part,
– impaired – non risk part, also referred to as the B portfolio (no further recovery expected).

The Bank applies the following criteria for distinguishing the B portfolio:
– default event has occurred and delinquency exceeded 810 days for consumer lending segment and entrepreneurs segment

- default event has occurred and delinquency exceeded 1,170 days for mortgage exposures
- there are no premises of the debtor having either the income sufficient to repay arrears or assets from which the Bank could recover the receivables and there are no premises that this situation would change in foreseeable future,
- the debtor is covered with bankruptcy procedures and there are justified premises that the Bank shall not recover any amount or shall recover insignificant amounts within this process.

The collective approach to estimation and creation of charges (provisions) is based on the principles introduced by the New Capital Accord (so-called Basel II with appropriate modifications for the impairment calculation) and the concept of expected loss. In view of the fact that pursuant to IAS the provisions are established for the actually incurred loss and not the expected one, the Basel model parameters are subject to modification. The following parameters are used for calculating the provisions:

- PD, or probability of default by the client determined for each sub-portfolio of retail and enterpreneurs receivables,
- LGD, or loss given default recorded for receivables as a result of their incomplete recovery, determined for each sub-portfolio of retail and entrepreneurs receivables,
- EAD, or exposure at default – the amount of current balance sheet exposure increased by the balance sheet equivalents of unutilised credit lines.

The parameter modification derives from the fact that the Basel model defines the probability of expected loss in the period of next 12 months, whereas pursuant to IAS the provisions are established for actual losses. The modification is related to the period assumed for the loss to be recognised (revealed, identified).

PD parameter is modified based on the concept of emergence period, which generally is shorter than 12 months. The emergence period depends among others on the following factors:

- segment to which the borrower is classified,
- type of product.

Adjustment of PD to the IAS requirements consists in reducing the parameter's time horizon and pushing it closer to the current balance sheet date. The emergence period for all retail customers and entrepreneurs is equal 9 months.

According to Basel II, LGD parameter signifies the loss to be incurred by the Bank at a given credit exposure in case of the borrower's solvency. LGD is given as a percentage of the exposure at the moment of the borrower becoming insolvent (EAD). LGD is a derivative of the adopted legal collateral, i.e. type of collateral its value (liquidation) and values recovered directly from customer.

LGD for the retail portfolio is calculated based on the quotient of discounted cash flows on account from default event till next 24 months (36 months for mortgage) to exposure at default moment (EAD).

The LGD parameter calculated in this manner is adjusted by the estimated debt collection costs that the Bank will have to incur due to the collateral realisation or collection activities.

Cash flows upon the impairment date are discounted with interest rate adopted for the entire portfolio.

EAD in the Basel Model stands for the value of credit exposure that shall arise in case of the client's insolvency. In calculation of the expected loss pursuant to Basel II, EAD means the sum of current balance sheet exposure and statistically estimated part of the off balance sheet exposure that the client shall draw by the insolvency date.

For needs of IAS, EAD at the client's level is a current balance sheet exposure at the balance sheet date, increased by the balance sheet equivalents of current off balance sheet items.

The provisions value depends on the amount of exposure as well as PD and LGD parameters (PD for the impaired portfolio is 100% and LGD for the B portfolio is 100 %).

7. Compliance Reviews

The basic compliance reviews in the credit risk management area are performed by:

- Credit Risk Inspection Department,
- Internal Audit Department,

in the scope defined under items 2.11 and 2.13.

8. Identification of Credit Risk Connected with Derivatives

Each client concluding a derivative transaction with the Bank must be assigned a relevant transaction limit by the Bank. The transaction limits are assigned pursuant to the credit procedures and authorities binding in the Bank, as for all other credit exposures.

ACR system (Adaptiv Credit Risk) is used to monitor the risk connected with transactions concluded by the Bank's counterparties. ACR is a global system, used by the entire ING Group in which all the FM ("Financial Markets") limits and transactions concluded by dealers are registered.

The transactions that generate risk on the counterparty's side (settlement and pre-settlement risk), and that are input to the Bank systems, require registration in ACR.

The risk connected with the Treasury Department products, such as derivatives, deposits and transactions in securities, is monitored online at the Bank.

From the perspective of risk measurement, it may be divided into:

- pre-settlement – arising for FX and derivative transactions as well as transactions in securities as a result of exchanging the transaction on the market at a potentially unfavourable price,
- credit risk – connected with placing money on the market (deposits).

8.1. Pre-settlement Risk

The pre-settlement risk derives from a breach of transaction terms by the Counterparty, before its settlement, which makes necessary to exchange this transaction with a transaction with another Counterparty, according to the market price (potentially unfavourable).

To control the Counterparty's risk, not only the cost of exchange in case of breach is determined (current market value "MtM"), but also the growth of MtM during the transaction duration.

Since the financial markets are not fully predictable and one cannot be 100% sure about the set maximum MtM, the statistical models are used to define the level of trust. Pursuant to the policy of ING Group, this trust level is 97.5%.

8.2. Money Market Risk

The Money Market Risk arises when the Bank places deposits with another counterparty (bank). The Bank loses funds in case of terms being breached by the counterparty. Due to this, the risk is measured simply as the deposit face value.

8.3. Settlement Risk

The settlement risk is a risk at which the counterparty will not deliver the assets that they are obliged to deliver due to the transaction settlement and the Bank may lose up to 100% of the expected value. This risk arises when the exchange of value is to take place (funds or other instruments) on the same or different delivery date and this delivery is unchecked or expected till the moment when the Bank delivers an irrevocable instruction of payment or the Bank has paid itself or delivered its part of the liability deriving from the transaction.

Some products always generate the settlement risk, some never do, and there are also such products for which the occurrence of this risk is connected with the mechanism of settlements. The settlement risk always arises when the transaction involves a bilateral exchange of funds/ securities but this exchange is not made on the DVP basis (Delivery Versus Payment).

8.4. Risk Connected with Securities Purchase/ Sales

The risk connected with securities purchase/sales emerges when the exchange of funds into securities does not take place on the DVP basis. Then the settlement risk arises on the day of transaction settlement, unless the settlement is made in such a way that the Bank can control the transactions so as not to allow the flow of funds/ securities before confirming the obligation execution by the Counterparty.

8.5. Risk Weights

Risk Weights used to monitor the utilisation of individual limits are defined for single products, currencies and transaction duration at the level of ING Group. Risk Weights constitute an estimation of the potential future exposure (PFE) for the "at-the-money" contract, as a part of the transaction face value in the period of time remaining till its settlement.

Pre-settlement risk at the transaction level is calculated as:

Pre-settlement risk = Market Value + Face Value x Risk Weight,

where risk weight is based on the period of time remaining till the transaction settlement.

Risk weights are "used" by ACR system to monitor the level of the counterparty limits utilisation.

The portfolio of transactions concluded with the Bank's counterparties, covered by ACR (unsettled transactions), is as follows (all data in EUR million):

	end of 2011	end of 2010
Money Market	44.3	171.6
MtM	519.9*	303.4*
Present Value + FM Value	1,138.7	983.6

** Gross amount - transactions where the Bank is "at-the-money" only.*

8.6. Credit risk connected with derivative instruments

In view of a considerable credit risk in derivatives transactions (mainly FX options) made by the Bank with clients, the Bank regularly reviews the portfolio of those instruments.

The approach adopted by the Bank to estimation of the credit risk generated by derivative instruments is described in the chapter V. *Significant accounting policies* in the point 2.2. *Credit risk connected with derivative instruments*.

Valuation adjustment of unmatured derivatives with Bank's customers for 2011 was amounted to PLN -25.9 million (against PLN +0.8 million in 2010) and was presented in the financial statements in *Net income on instruments measured at fair value through profit and loss and FX result*.

In addition, for transactions matured or terminated and unsettled as at the balance sheet date, the Bank made charges using the methodology for assessing the risk of impaired loans. In 2011, the balance of provisions therefor amounted to PLN +4.6 million (provision release) compared to PLN - 25.3 million (provision establishment) in 2010 and was included in the financial statements as *Impairment losses and provisions for off-balance sheet liabilities*.

The item *Loans and receivables to customers* in the statement of financial position presents receivables resulting from restructuring of derivative transactions made by the Bank with customers. The due amounts equaled to PLN 302.6 million as at 31 Dec 2011 against PLN 359.3 million as at 31 Dec 2010. The carrying value of impairment losses connected with transactions on derivatives amounted to PLN 256.8 million as at 31 Dec 2011 against PLN 288.2 million as at 31 Dec 2010.

II. Market Risk Management

1. General Information

The main goals of Market Risk Management in ING Bank Śląski are to ensure that the Bank's exposure to market risk is understood, properly managed, and - where applicable - within approved limits.

The Bank defines market risk as the potential loss due to unfavourable changes in market prices (e.g. yields, FX rates, equity prices, etc.) and/or market parameters (e.g. volatility of market prices and the correlation between moves in market prices) and/or customer behaviour (e.g. early loan repayments).

The market risk management process within the Bank covers the identification, measurement, monitoring and reporting of risk. The MRM department provides FM Management, selected Board and ALCO Committee members with regular risk updates. Additionally ALCO, Management Board and Supervisory Board receive periodic updates containing the most important market risk metrics. The MRM department is staffed with trained specialists and the independence of this department is ensured by its separation from the Bank units which generate market risk. An important consultative role in the market risk management process is performed by the Bank's majority shareholder – ING Bank NV.

The market risk management process in the Bank also includes the Product Control function which assures correctness of Financial Markets products valuation. It covers independent assessment (comparison to market) of revaluation prices and parameters used for fair market value calculation and proper P&L and valuation reporting in financial system. Decisions about issues related to valuation process e.g. sources of market data used, pricing model reserves calculation etc. are taken by the Parameters Committee which is chaired by Product Control and also includes representatives from the Financial Markets and Finance divisions.

The management of market risk in the Bank is primarily focused on potential changes in the economic result of the Bank (i.e. changes in the present value of expected future cash flows) but attention is also paid to cases where – due to accounting asymmetries – the effect of market rate changes on reported financial results is different from the effect of such changes on economic results.

2. Bank's Book Structure in Context of Market Risk Management

The Bank maintains an intention-based book structure which drives many processes, including the management of market risk. The book structure reflects what kind of market risk is expected and acceptable in different parts of the Bank and where market risk should be internally transferred/hedged within the Bank. Specifically, books are categorized based on intention as *"trading"* (positions taken in expectation of short-term financial gain from market movements) or *"banking"* (all other positions). A high-level view of the Bank's book structure is as follows:

Whole Bank
    |___ Trading Books
    |___ Banking Books
        |___Commercial Banking Books
        |___ FM Banking Books

Trading Books

These are Financial Markets ("FM") books: FX, FX Options and Interest Rate Trading. These books include positions held intentionally for short-term resale and/or with the intent of benefiting from actual or expected short-term price movements or to lock in arbitrage profits, and include, for example, proprietary positions, positions arising from client servicing and/or market making. The market risks of open positions in trading books are limited by various Trading VaR and positions/sensitivities limits.

Commercial Banking Books

These are Retail and Wholesale Banking books containing commercial loans and deposits. The risk of these positions is internally hedged as well as possible to FM Banking books via internal contracts, which ensures that these books do not contain material levels of economic market risk. However, as described later in more detail, the short-term financial results of these books *are* sensitive to changes in market rates.

FM Banking Books

These are Liquidity Management & Funding ("LMF") and ALM ("ALM") books. Their primary responsibility is the liquidity and interest rate management of the positions of Commercial Banking Books. Open positions are allowed within approved VaR limits. Like in Commercial Banking books, there is usually a difference between the sensitivity of economic and financial results to changes in market rates.

3. Value at Risk ("VaR") Concept

The Value at Risk (VaR) is the main methodology used to calculate market risk in FM books, both "Trading" and "Banking". The VaR gives the potential loss that is expected not to be exceeded assuming certain confidence (probability) level. The Bank calculates VaR separately for individual interest rate, FX and FX options portfolios. The following assumptions for VaR calculation are taken: one-day period of holding position, 99% confidence interval and 250 daily market observations are used for volatility and correlation calculation. For the individual interest rate and FX portfolios the Bank uses the variance-covariance method, for the FX options portfolio the historical simulation method is used. The VaR measurements done by the Bank are performed in accordance to market best practice. The VaR model accuracy for "Trading" books is checked in daily back-testing process. P&L figures, both "actual" and "hypothetical or theoretical P&L" (change in end-of-day market value of the positions in a trading portfolio over 1 day, so excluding all intra-day activities that occurred during that day) are compared to the VaR. Any model outliers (large positive and all negative) are investigated and explained.

Event VaR ("stress-tests")

The Bank is aware that normal VaR does not present a full picture of market risk of a portfolio as it does not give an indication of potential losses in extreme cases. Therefore event risk (stress testing) calculations are performed. They cover evaluation of the Bank portfolios against a number of stress scenarios for one or more of the market parameters that determine the value of the portfolios. The worst result from the scenarios is reported as the final event VaR number.

Moreover, on quarterly basis Bank-wide stress test is performed covering market risk and credit risk under regulatory, long-term recession, mild-term recession and Poland crisis scenarios.

Trading Books Market Risk (VaR statistics)*

VaR numbers in 2011 (in PLN thousand)

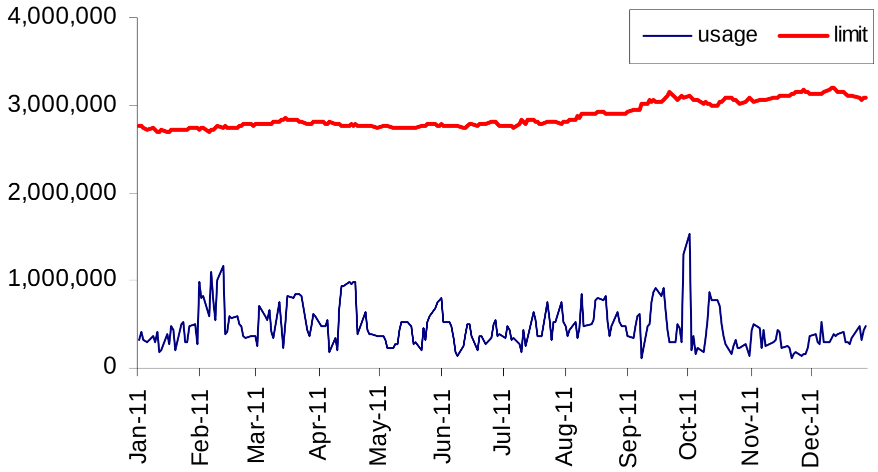
Area	Limit	As at 31 Dec 2011	Average	Min	Max
Interest Rate	3,091.8	473.4	470.1	110.5	1,537.0
FX	4,196.0	1,486.9	1,053.0	23.8	2,512.4
FX Options	3,091.8	518.8	525.3	187.9	1,665.4

VaR numbers in 2010 (in PLN thousand)

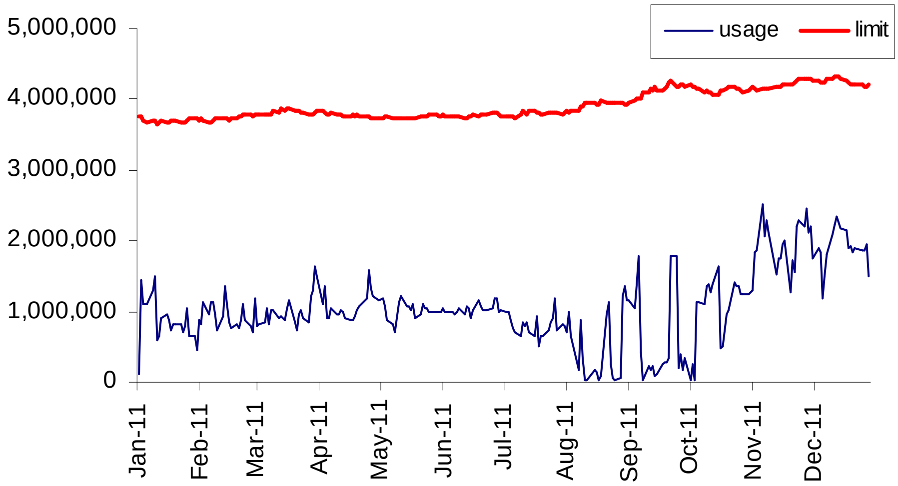
Area	Limit	As at 31 Dec 2010	Average	Min	Max
Interest Rate	2,772.2	386.3	561.2	153.1	2,114.1
FX	3,762.3	173.9	875.3	21.1	3,053.7
FX Options	2,772.2	1,837.6	903.1	224.2	2,586.4

** All VaR limits and their usage in ING Bank Śląski are denominated in EUR. Limit levels and their usage in tables and graphs for the purpose of this document were converted into PLN using daily NBP fixing rate, in column "Limit" numbers are presented using end of year fixing*

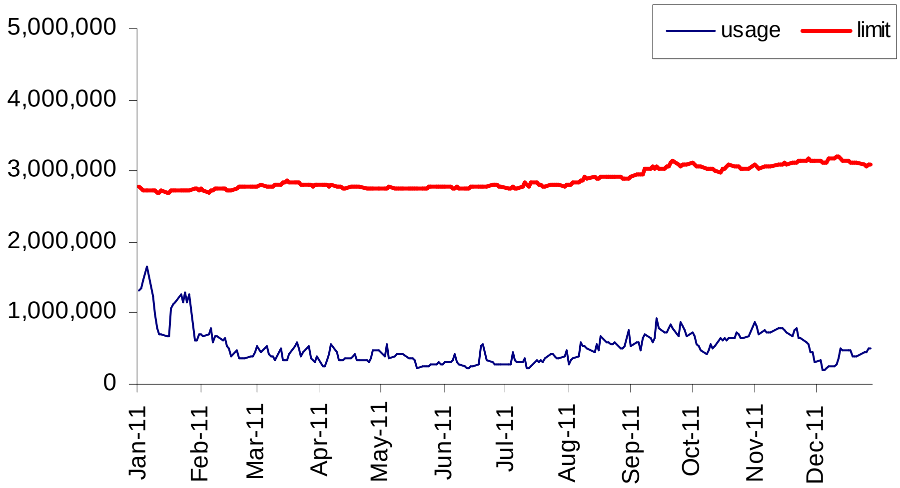
Interest Rate VaR (PLN)



FX VaR (PLN)



FX Options VaR (PLN)



Financial Markets kept their trading exposures at reasonable levels comparing to approved limits. The average usage of limits in 2011 was respectively: 16% for Interest rate trading, 27% for FX Spot and 18% for FX options. No VaR limit breaches within trading portfolio were reported in 2011.

Financial Markets Banking Books Market Risk (VaR statistics)*

VaR numbers in 2011 (in PLN thousand)

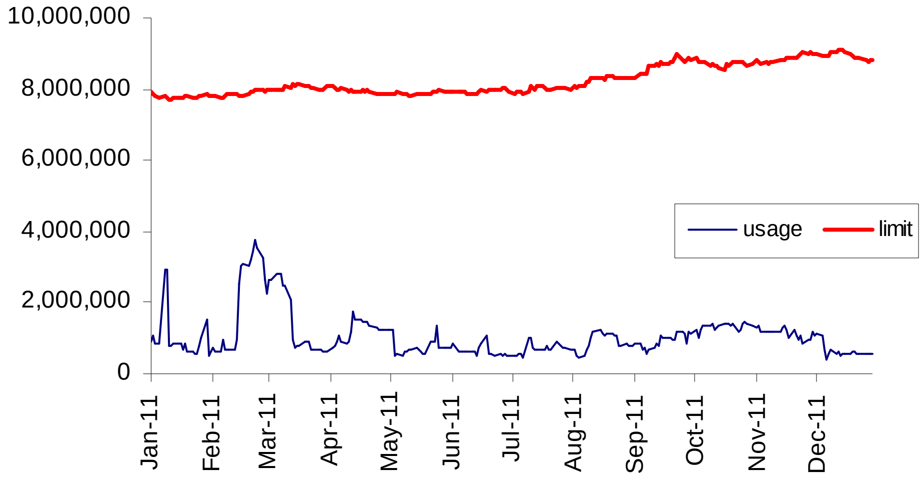
Area	Limit	As at 31 Dec 2011	Average	Min	Max
LMF&ALM	8,833.6	542.9	1,046.1	381.6	3,764.1
LMF	4,416.8	380.4	484.3	155.9	1,025.8
ALM	4,416.8	506.9	837.4	313.2	3,053.0

VaR numbers in 2010 (in PLN thousand)

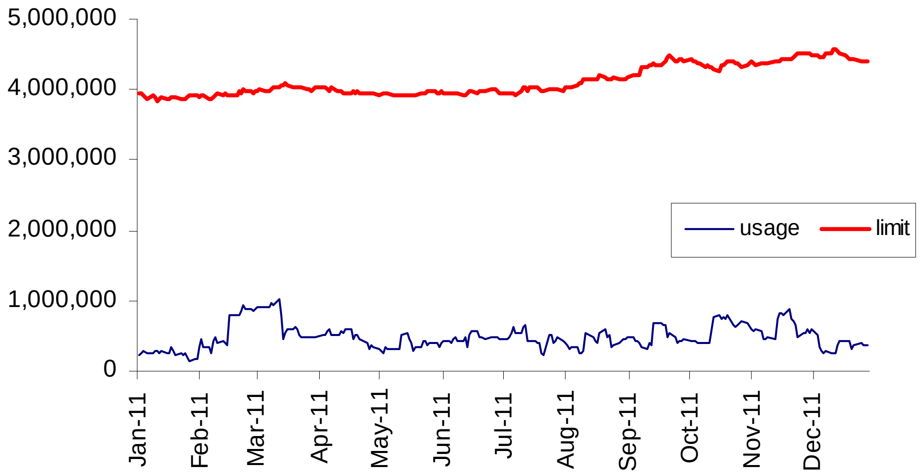
Area	Limit	As at 31 Dec 2010	Average	Min	Max
LMF&ALM	7,920.6	958.7	1,398.7	569.8	3,707.8
LMF	3,960.3	298.8	527.4	173.8	1,001.1
ALM	3,960.3	905.6	1,240.2	310.8	3,782.8

** In case of LMF (Liquidity Management & Funding) and ALM numbers represent Delta VaR as this measure is formally limited. The delta measurement is based on variance-covariance method. The measurement takes into account only levels and shape of underlying curve (swap) showing the risk of negative impact on the result of underlying curve changes. The spread and its potential change between underlying curve and other profitability curves (for example curve for treasury securities) is not taken into account in measurement.*

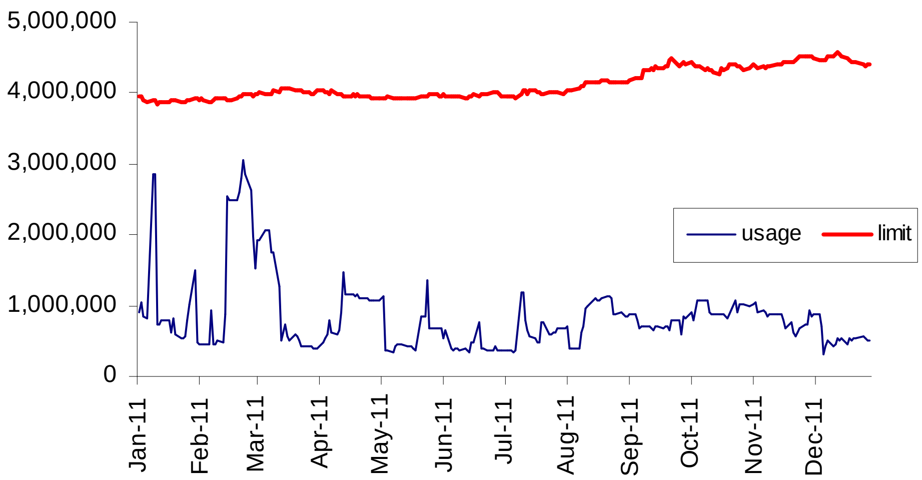
LMF & ALM VaR (PLN)



LMF VaR (PLN)



ALM VaR (PLN)



Financial Markets kept their exposures in banking book at reasonable levels comparing to approved limits. The average usage of limits in 2011 was respectively: 13% for FM banking combined, 12% for LMF and 20% for ALM. No VaR limit breaches within banking portfolio were reported in 2011.

Non Financial Markets Banking Books VaR statistics

VaR numbers in 2011 (in PLN thousand)

Area	**Limit**	**As at 31 Dec 2011**	**Average**	**Min**	**Max**
Interest Rate	662.5	216.0	198.0	170.1	241.0

VaR numbers in 2010 (in PLN thousand)

Area	**Limit**	**As at 31 Dec 2010**	**Average**	**Min**	**Max**
Interest Rate	594.0	143.3	115.9	79.4	143.3

Commercial Banking Books Market Risk

As these books are materially hedged against changes in economic results, the main indication of the interest rate exposure of Commercial Banking books are Earnings at Risk “EaR” measurements (results of these measurements are presented later in the interest rate sensitivity analysis tables). The positions in Commercial Banking books are also subject to measurements of non-linear interest rate risk. Specifically, the Bank measures optionality risk (the potential losses on these positions given early-withdrawal of deposits and/or early re-payment of loans) and basis risk (the potential losses on these positions arising from non-standard rate-setting mechanisms). The Bank is of the opinion that both of these risks are not material (potential losses typically represent a very small share of historical or projected results).

FX position generated from banking books is transfered in whole to trading book and managed there.

4. Earnings at Risk (EAR) Concept

EaR measurements are used for the banking book positions which are accrual-accounted. Two approaches are used, as detailed below; both approaches cover a 1-year time horizon and provide the possible changes in accrual results given shock changes of +/-1% and +/-2%. The two approaches taken are as follows:

– A “basic” approach is used for positions comprised of term transactions and/or small volumes of demand positions. This approach assumes that any future funding gaps or surpluses will be financed or invested with a tenor of one month.

– An “advanced” approach is used for material volumes of demand positions. At present it is the Bank’s PLN demand deposit base and its internal investment into FM banking books. The measurements simulate the changes in the Bank’s results coming from the combination of:

- Current (internal) investment of these funds and replenishment of these investments as previous investments mature and/or new volumes are attracted. Future (re-) investments are predicted based on continued use of current investment rules.
- An assessment of the relation between changes in market rates and the rates that the Bank must pay its clients in order to maintain volumes.

Overall Interest Rate Sensitivity

The following tables provide a good overview of the sensitivity of the Bank to changes in interest rates. The first table shows the sensitivity of the Bank's results to changes in interest rates; the following should be noted:

– Positions are divided into banking book vs. trading book. Positions include all material currencies; PLN positions represent the vast majority of the interest rate sensitivity of the Bank.
– A basis point value ("BPV") is shown for each (sub-) position; by BPV we mean the change in the economic value of a position for a 0.01% parallel yield curve shift.
– Positions are further split where relevant by accounting method: accrual or MTM. MTM positions' economic and financial sensitivity to a given change in market rates is the same; changes in the market value are fully and immediately reflected in reported results. Accrual-accounted positions display an asymmetry between the economic and financial effect of a given yield curve shift; this is an unavoidable result of accounting regulations. The financial effects of yield curve shifts are calculated in line with the definition of EaR presented earlier. The "advanced" EaR approach is used for PLN demand deposits; the "basic" EaR approach is used for all other accrual-accounted positions. The economic result shown is the predicted change in the present value of future earnings, calculated over a long time horizon.
– As can be seen in the table in case of banking book there is a large difference between the economic and financial sensitivity. Although the bank is aware of the sensitivity of its short-term financial results to changes in interest rates, the most important metric is – in line with the ING Group's "Managing For Value" approach – the sensitivity of the long-term economic results of the bank.

The second table shows the sensitivity of the Bank's capital base to changes in the market value of debt securities classified as Available-for-Sale ("AFS") in FM (the vast majority of AFS-classified securities in the Bank). It is important to note that the potential changes in capital base shown here are relevant only for the Bank's *regulatory* capital base. The Bank's calculations of its *economic* capital base do not include positive or negative revaluations of AFS-classified debt securities. This is because AFS-classified debt securities positions largely arise from the investment of portions of PLN demand deposit volumes in line with the Bank's economic modelling of these demand deposits.

Sensitivity of results to Changes in Interest Rates (PLN million)

end of 2011

Book	Accounting Category	BPV	Change in Economic Result for Yield Curve Move				Change in Reported Financial Result for Yield Curve Move			
			-2%	-1%	1%	2%	-2%	-1%	1%	2%
BANKING	MTM	-0.11	18.51	6.35	-11.16	-22.68	18.51	6.35	-11.16	-22.68
	Accrual	0.57	-113.39	-56.95	55.38	108.20	135.80	70.35	-78.37	-156.74
	Total	0.46	-94.88	-50.60	44.22	85.52	154.31	76.69	-89.53	-179.42
TRADING	MTM	0.05	-9.74	-4.87	4.87	9.74	-9.74	-4.87	4.87	9.74
BANK TOTAL	MTM	-0.06	8.77	1.47	-6.29	-12.94	8.77	1.47	-6.29	-12.94
	Accrual	0.57	-113.39	-56.95	55.38	108.20	135.80	70.35	-78.37	-156.74
TOTAL		**0.51**	**-104.62**	**-55.47**	**49.09**	**95.27**	**144.56**	**71.82**	**-84.65**	**-169.67**

end of 2010

Book	Accounting Category	BPV	Change in Economic Result for Yield Curve Move				Change in Reported Financial Result for Yield Curve Move			
			-2%	-1%	1%	2%	-2%	-1%	1%	2%
BANKING	MTM	-0,13	21.46	11.26	-13.54	-27.17	21.46	11.26	-13.54	-27.17
	Accrual	0,54	-103.61	-53.62	53.58	105.36	142.19	74.96	-79.32	-158.64
	Total	0,41	-82.15	-42.36	40.04	78.19	163.65	86.22	-92.86	-185.81
TRADING	MTM	0,07	-13.60	-6.80	6.80	13.60	-13.60	-6.80	6.80	13.60
BANK TOTAL	MTM	-0,06	7.86	4.46	-6.74	-13.57	7.86	4.46	-6.74	-13.57
	Accrual	0,54	-103.61	-53.62	53.58	105.36	142.19	74.96	-79.32	-158.64
TOTAL		**0,48**	**-95.75**	**-49.16**	**46.84**	**91.79**	**150.05**	**79.42**	**-86.06**	**-172.21**

Sensitivity of Capital Accounts to Changes in Interest Rates (PLN million)

end of 2011

Position	BPV	Approximate Change in Regulatory Capital Base for Yield Curve Move			
		-2%	-1%	+1%	+2%
FM AFS Portfolio	-1.83	365.01	182.50	-182.50	-365.01
IRS classified to macro cash flow hedge portfolio	-2.63	525.65	262.83	-262.83	-525.65
TOTAL	**-4.45**	**890.66**	**445.33**	**-445.33**	**-890.66**

end of 2010

Position	BPV	Approximate Change in Regulatory Capital Base for Yield Curve Move			
		-2%	-1%	+1%	+2%
FM AFS Portfolio	-1.88	376.00	188.00	-188.00	-376.00
IRS classified to macro cash flow hedge portfolio	-1.08	215.39	107.70	-107.70	-215.39
TOTAL	**-2.96**	**591.39**	**295.70**	**-295.70**	**-591.39**

III. Liquidity Risk Management

Liquidity Risk is understood by ING Bank Śląski as the risk of not being able to meet at a reasonable price the cash obligations arising from on- and off-balance sheet positions. It is the policy of the Bank to maintain its liquidity positions in such a way that the cash obligations of the Bank may always be met by cash on hand, inflows from maturing transactions and/or from the liquidation of marketable assets.

This policy is ensured by the following processes, as defined in detail in the *ING Bank Śląski's Liquidity and Funding Policy:*

- production and review of internally-defined reports on liquidity, monitoring of funds concentration according to clients segment and products reports, and adherence to any formal limits placed thereupon.
- existence of a clear governance structure assigning roles and responsibilities in normal and stressed liquidity circumstances.
- production and review of regulatory liquidity reports defined by the Polish and Dutch national Banks ("NBP", "DNB") and adherence to any formal limits placed thereupon.
- activities ensuring proper supply of banknotes at branches, and
- activation, in certain defined circumstances, of a contingency funding plan.

The main changes in *ING Bank Śląski's Liquidity and Funding Policy* related to:

- update of the contingency funding plan (CFP),
- to further develop approach to stress testing, including review of scenarios, adequacy of liquidity buffers etc.,
- to review assumptions in the liquidity reporting (In particular related to further works on liquidity modelling).

The formal limits are placed by regulators or the Bank on the various reported metrics. ALCO may decide to include metrics in its KRI (Key Risk Indicators) report wherein liquidity metrics are classified as "acceptable", "under observation" or "not acceptable" based on pre-defined thresholds. The ALCO KRI report is also presented to the Bank's Management and Supervisory Boards.

In case of excesses of hard limits and/or KRI liquidity metrics classified as "unacceptable", the following actions are performed:

- MRM – with help from other departments as necessary – ensures that a real breach has occurred (and not a reporting error).
- MRM informs local and regional ALCO of the limit or KRI breach, the cause of the breach, and proposed remedial actions.
- An ad hoc ALCO meeting is held to agree on remedial actions and responsibilities for carrying out these actions.

One of the most imported processes of the management liquidity risk is the contingency funding plan. The Bank's Contingency Funding Plan (CFP) serves to provide guidance as regards identifying a liquidity crisis and, in case such identification is made, as regards the actions to be taken to survive the crisis. The actions taken in line with the CFP depend on the nature and severity of the liquidity crisis. According to the ING Bank Śląski Liquidity and Funding policy the test of CFP is done on annual basis and is presented on ALCO meeting.

Additionally we use stress testing to evaluate Banks liquidity position under defined stress events. The Bank applies set of stress tests, in particular the mixed one defined as the 'cocktail' approach – stress both in external markets and for INGBSK specific. Under such stress scenarios Bank is expected to survive minimum defined survival period. It is achieved by desired balance-sheet structure liquidity buffer portfolio built of highly liquid assets.

The year 2011 was an important year for management of liquidity, taking into account the volatile international market situation, ongoing financial credit and sovereign debt crisis. It was an important year for a proper assessment of the Bank's liquidity and solvency situation and taking relevant decisions to reduce liquidity risk. The bank took part in preliminary exercise in the calculation of the new liquidity ratios according to Basel III requirements organized by Polish Financial Supervision Authority and Polish Bankers Association. The level of new ratios were on very good level.

The Polish Financial Supervision Authority regulation requires banks to calculate the 4 liquidity measures: short term liquidity gap (minimum: zero), short term liquidity ratio (minimum amount: 1.00), own funds to non-liquid assets ratio (minimum amount: 1.00) and own funds and core deposits to non-liquid and semi-liquid assets ratio (minimum amount: 1.00). The bank is obliged to monitor the ratios above on daily basis and keep these ratios with limits predefined in the KNF regulation. In 2011 the bank kept all liquidity measures over their minimum amounts. As of 31 December 2011 liquidity measures of ING Bank Śląski amounted as follows:

Liquidity measurement		Minimum	Amounts 31.12.2011	Amounts 31.12.2010
M1	Short term liquidity gap (in PLN million)	0.00	6,882.86	13,345.07
M2	Short term liquidity ratio	1.00	1.25	1.72
M3	Own Funds to Non-Liquid Assets Ratio	1.00	5.45	5.01
M4	Own Funds and Core Deposits to Non-Liquid and Semi-Liquid Assets Ratio	1.00	1.36	1.57

It is worthwhile to expand on the internally-defined reports as this gives good insight into the Bank's approach to measuring and managing risk. Bank models the liquidity profile of both assets & liabilities to reflect the real customer behaviour. The analysis is done based on mixed approach i.e. analysis of historic data and expert approach..

Funding structure

The main resource of funding in ING BSK relates to the client deposits (retail and corporate). The bank monitors the funding structure observing diversification by type of products, client segments, currencies, type of funding, concentration of big ticket deposits. The Bank funding structure is well diversified. Please find below the funding structure as of the end of 2010 and 2011 with the split between direct and reciprocal funding.

Direct funding (PLN million)

	end of 2011		end of 2010	
General customer type	**direct funding**	**percentage share**	**direct funding**	**percentage share**
Banks	3,027	5%	3,197	6%
Corporate clients	18,759	31%	15,344	28%
Retail clients	34,219	56%	31,984	58%
Equity	5,328	9%	4,736	8%

Reciprocal funding (PLN million)

	end of 2011		end of 2010	
General customer type	**reciprocal funding**	**percentage share**	**reciprocal funding**	**percentage share**
Banks	23,943	96%	7,818	92%
Corporate clients	1,219	4%	705	8%
Retail clients	0	0%	0	0%

A maturity analysis for financial liabilities by remaining contractual maturities

The table below presents financial liabilities by remaining contractual maturities. The amounts include future interest payments.

end of 2011 *(PLN million)*

	1 M	*1- 3 M*	*3 - 12 M*	*Over 1Y*
- Liabilities due to other banks	4,953.4	0.0	0.0	0.1
- Financial liabilities measured at fair value through profit and loss	1,629.5	0.0	100.6	84.6
- Valuation of derivatives	220.6	457.3	174.4	1,483.8
- Derivative hedge instruments	-9.0	71.9	13.5	1,508.8
- Liabilities due to customers	46,847.6	2,840.5	2,729.7	751.1
- Contingent liabilities granted	1,974.2	1,201.1	3,944.9	9,672.6

end of 2010 *(PLN million)*

	1 M	*1- 3 M*	*3 - 12 M*	*Over 1Y*
- Liabilities due to other banks	2,255.2	554.4	1,145.1	214.2
- Financial liabilities measured at fair value through profit and loss	4,324.1	0.0	53.0	304.7
- Valuation of derivatives	164.3	532.5	284.5	590.0
- Derivative hedge instruments	-1.7	52.1	344.2	600.0
- Liabilities due to customers	41,880.2	1,898.6	3,574.5	148.7
- Contingent liabilities granted	2,068.1	615.5	3,537.1	8,763.3

IV. Regulatory and Economic Capital Management

ING Bank Śląski S.A. is managing its capital in accordance with Banking Law, KNF Resolutions and relevant internal rules. There are two basic internal documents on capital management:

– "Capital Management and ICAAP Process Policy at ING Bank Śląski S.A.";
– "Capital Management Procedure at ING Bank Śląski S.A."

These documents include department's scope of responsibilities and regulations connected to capital requirements and capital base calculation, allocation, planning, monitoring and reporting.

On the basis of capital adequacy metrics calculated for Bank purposes we can say that it is maintaining a sufficient capital to facilitate efficiently and effectively development plan and conduct current operations.

Banks' organisational structure and the model of management are in line with the guidelines of the New Capital Accord (NUK/Basel II). Resolutions of NUK are fully implemented and Bank performs its activity in accordance with three pillars:

- Pillar I – Regulatory Capital
- Pillar II – Economic Capital
- Pillar III – Disclosure Requirements

Regulatory capital (Pillar I)

For the purpose of 2011 reporting, Bank is calculating credit risk requirement using Standardised Approach (SA). Bank got an agreement by the Polish Supervisory Authority and De Nederlandsche Bank on implementation of AIRB methodology for corporate portfolio provided that reported requirement should be not lower then calculated according to SA. Credit risk is managed and monitored by the Corporate Credit Risk Modelling and Reporting Department and the Retail Credit Risk Management Department.

In the area of Operational Risk Bank uses BIA (Basic Indicator Approach) methodology. This area is managed and monitored by Operational Risk, Compliance Department and Anti-fraud Department.

In Market Risk area Bank uses standard methods following regulatory requirements of KNF. This area is managed and monitored by Market Risk Management Department.

The table below presents the detailed calculation of basic figures of regulatory capital and solvency ratio.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

Regulatory capital base and solvency ratio

	31 Dec 2011	31 Dec 2010
Own funds components		
Share capital	130.1	130.1
Issue premium	956.3	956.3
Other supplementary capital	65.0	62.9
Capital reserve including retained profit of past years	3,122.0	2,670.8
Net profit of current period in audited part	501.3	361.8
General risk fund	910.2	850.2
Revaluation reserve	17.1	7.6
Funds adjustment by intangibles	-360.8	-340.9
Funds adjustment by capital commitments in financial institutions	-70.2	-283.7
Short-term capital	41.4	26.0
Total own funds	**5,312.4**	**4,441.1**
Capital requirements		
Capital requirements for credit risk, credit counterparty, dilution and delivery of instruments for future settlement	3 160.3	2 549.1
Capital requirement for the risk of settlement - delivery	7.9	5.1
Capital requirements for the capital securities rate risk, debt instruments rates risk, FX risk and commodity rates risk	8.7	1.3
Capital requirement for operational risk	357.9	324.5
Capital requirement for general interest rate risk	24.8	19.7
Capital requirement due to exposure concentration limit and large exposures limit overrun	0.0	12.0
Total capital requirement	**3,559.6**	**2,911.7**
Solvency ratio	**11.94%**	**12.20%**

Economic capital (Pillar II)

Economic capital is used by the Bank as description of internal capital defined as amount of capital required to cover all kinds of risk in Bank's activity. Amount of economic capital should cover assumed level of unexpected losses which bank is endangered to in the future. During calculation of capital required to cover unfavorable influence of risk a year time horizon and confidence level corresponding to Bank's rating are assumed. For the economic capital calculations Bank is using ING Group N.V. methodologies, which were adjusted to local market specifics and to fulfill ING Group N.V. requirements.

Bank identifies and measures economic capital consisting of:

- capital to cover credit risk (risk of lack of liabilities repayments),
- capital to cover transfer risk (risk of lack of contractual repayments on deals in foreign currencies),
- capital to cover market risk (risk of loss sue to negative changes in financial market, like: interest rate risk, exchange rate risk, etc),
- capital to cover operational risk (risk of direct or indirect loss resulting inappropriate or wrong internal processes, employees and systems, IT risk, reputation risk and legal risk),
- capital to cover business risk (risk of loss in value of banking portfolio due to internal and external events).

Total economic capital figure is the sum of the above capitals adjusted for diversification effect. Diversification is based on the assumption that all of the above risks are not likely to realize at the same moment in time.

The value of capital requirements differs depending on the regulatory or economic approaches. Two key reasons for differences may be distinguished:

– The methods used for assessment and measurement of regulatory capital requirements are determined by KNF, whereas the methodology of measurement of the economic capital requirements is based on internal Bank's models.
– The legal regulations precisely define the risks for which the regulatory capital requirement should be calculated; this does not apply to the estimations of the economic capital calculated in a manner defined by the Bank. Thus, the economic capital covers a broader scope of risks, including those that are significant (material), but not included in regulatory capital.

Currently Bank maintains an adequate capital level which is illustrated by the solvency ratio (calculated based on economic capital) above 8%. During the 2011 as well as previous years the solvency ratio did not drop below required level.

Disclosure requirements (Pillar III)

Regulatory disclosure are performed by Corep and Finrep as well as publication of additional qualitative and quantitative information, based on Resolution 385/2008 by KNF dated on 17th December 2008 with following changes, within Policy of disclosing qualitative and quantitative information.

Annual financial statements for the period from 1st January 2011 to 31st December 2011 (PLN million)

SIGNATURES OF THE MANAGEMENT BOARD MEMBERS OF ING BANK ŚLĄSKI S.A.

2012-02-28	**Małgorzata Kołakowska**	President	(signed on the Polish original)
2012-02-28	**Mirosław Boda**	Vice-President	(signed on the Polish original)
2012-02-28	**Michał Bolesławski**	Vice-President	(signed on the Polish original)
2012-02-28	**Justyna Kesler**	Vice-President	(signed on the Polish original)
2012-02-28	**Oscar Edward Swan**	Vice-President	(signed on the Polish original)
2012-02-28	**Ignacio Juliá Vilar**	Vice-President	(signed on the Polish original)

SIGNATURE OF THE PERSON RESPONSIBLE FOR ACCOUNTS

2012-02-28	**Tomasz Biłous**	Director of Accounting Department Chief Accountant	(signed on the Polish original)

ING