ING Bank Śląski S.A. Group

Disclosures relating to the capital adequacy published for H1 2025

Contents

Introduction

Pursuant to the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 as amended (Regulation CRR) and the Banking Law Act of 29 August 1997 as amended (Banking Law Act), ING Bank Śląski S.A., hereinafter referred to as the Bank, is obliged to make qualitative and quantitative disclosures relating to the capital adequacy, excluding information immaterial, proprietary or confidential.

Pursuant to the "Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A.", disclosures relating to the ING Bank Śląski S.A. Group, hereinafter referred to as the Group, are published.

Disclosures in this document are based on the data as of the reporting date, i.e. 30 June 2025, unless otherwise indicated. The presented values have been prepared in Polish zlotys (PLN). Unless provided for otherwise, all values were given rounded up to PLN million. Therefore, there may be cases of mathematical inconsistency in the summaries or between individual tables.

For the disclosure of information, templates of forms included in the Commission Implementing Regulation (EU) 2024/3172 were used, hence the letter markings of the table columns and the numbering of lines.

In accordance with the proposal of the European Banking Authority (EBA), presented in the consultation paper published on 22 May 2025, on amendments to Commission Implementing Regulation (EU) 2024/3172, allowing for the deferral of the mandatory disclosure obligation under Article 13(1) of the Regulation CCR (for large subsidiaries) until 31 December 2026, and the positive opinion of the Polish Financial Supervision Authority in this regard expressed in a letter dated on 10 July 2025, the Group waives the obligation to disclose the information required by Articles 449a (Information on ESG risks) and 449b (Information on aggregate exposure to shadow banking entities) of the Regulation CRR as of 30 June 2025.

1. Own funds

1.1. Full reconciliation of own fund items to the reviewed financial statement

The capital comprises: the share capital, the supplementary capital - issuance of shares over nominal value, accumulated other comprehensive income, retained earnings and own shares repurchased for the purposes of the employee incentive scheme. All capitals and funds are recognised at their face value.

The share capital is recognised at its face value, in accordance with the charter and entry into the National Court Register.

The share premium account comprises the share premium earned from the issue of shares less the direct costs thereof.

Other comprehensive income is created as a result of:

- valuation of financial instruments classified for measurement at fair value through other comprehensive income,
- valuation of derivatives for the element being the effective cash flow hedge,
- valuation of non-current assets at fair value,
- actuarial gains and losses.

The deferred tax assets and liabilities resulting from above mentioned valuations are included in the other comprehensive income. The other comprehensive income is not subject to profit distribution.

Retained earnings are created from profit write-offs 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,
- valuation of share-based payments,
- undistributed result from previous years,
- net result attributable to Parent entity.

Other supplementary capital, other reserve capital and general banking risk fund are created from profit write-offs 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 from profit after tax, in accordance with the Banking Law Act.

Revaluation of share-based payments - this item is presented as the fair value valuation of options granted under the Group's incentive schemes addressed to employees.

The net financial result attributable to the Parent entity represents the gross result under the statement of profit or loss for the current year, adjusted with the corporate income tax and the result attributable to the minority shares.

Own shares for the purposes of the incentive program include own shares purchased to fulfill the obligations arising from the incentive program, variable remuneration components.

The own funds include profit in the process of approval and the net profit of the current reporting period less expected charges and dividend in the amount not exceeding profit as verified by the chartered accountant.

As at 30 June 2025 in the own funds of the Group was recognized net profit in the amount of PLN 1,093 million for the period from 1 January 2024 to 31 December 2024, after deducting the expected charges and dividend, based on General Shareholders' Meeting of 29 April 2025.

Unrealised gains and losses on debt and equity instruments available for sale are recognized in own funds in accordance with the guidelines contained in the Regulation CRR and the Banking Law Act. In accordance with the article 171a of the Banking Law Act, unrealised gains and unrealised losses are included in own funds in 100%.

The Group adjusts own funds by the following values:

- goodwill and other intangible assets (accordance with Regulation CRR),
- difference between the amount of provisions and the amount of expected losses - the value computed for the bank calculating risk-weighted exposure amounts using IRB approach (accordance with Regulation CRR),
- value adjustment due to the requirements for prudent valuation (accordance with Regulation CRR),
- adjustment to the deduction of software assets (accordance with Commission Delegated Regulation (UE) 2020/2176 of 12 November 2020 amending Delegated Regulation (EU) No 241/2014 as regards the deduction of software assets from Common Equity Tier 1),
- adjustment for insufficient coverage of non-performing exposures (accordance with Regulation CRR).

The table below presents reconciliation of regulatory own funds to balance sheet in the reviewed financial statement of the Group in accordance with Article 437 of Regulation CRR and according to the template presented in the Commission Implementing Regulation (UE) 2024/3172. The scope of subsidiaries covered by prudential consolidation does not differ from the scope of subsidiaries covered by financial consolidation carried out in accordance with International Financial Reporting Standards (IFRS).

In column c of the template below, the Group has included a cross-reference between the own funds items presented in Table EU CC1 and the corresponding balance sheet items for the purpose of showing the source of each significant input parameter for the information on own funds. A reference in column c of template EU CC2 is linked to a reference in column b of template EU CC1.

Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
		30 Jun 2025	30 Jun 2025	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and cash equivalents	8,828	8,828	
2	Loans and other receivables to other banks	23,105	23,105	
3	Financial assets measured at fair value through profit or loss	1,675	1,675	
4	Derivative hedge instruments	47	47	
5	Investment securities	56,162	56,162	
6	Transferred assets	16,431	16,431	
7	Loans and other receivables to customers measured at amortised cost	173,321	173,321	
8	Investments in associates accounted for using the equity method	175	175	
9	Property, plant and equipment	967	967	
10	Intangible assets	486	486	(a)
11	Current income tax assets	4	4	
12	Deferred tax assets	615	615	(c)
13	Other assets	164	164	
14	**Total assets**	**281,980**	**281,980**	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Liabilities to other banks	14,671	14,671	
2	Financial liabilities measured at fair value through profit or loss	839	839	
3	Derivative hedge instruments	57	57	
4	Liabilities to customers	241,938	241,938	
5	Liabilities from debt securities issued	509	509	
6	Subordinated liabilities	1,487	1,487	(b)
7	Provisions	589	589	
8	Current income tax liabilities	455	455	
9	Deferred tax liabilities	0	0	(c)
10	Other liabilities	3,819	3,819	
11	**Total liabilities**	**264,364**	**264,364**	
Shareholders' Equity				
1	Share capital	130	130	(d)
2	Share premium	956	956	(d)
3	Accumulated other comprehensive income	-3,131	-3,131	(e)
4	Retained earnings	19,667	19,667	(f)
5	Own shares for the purposes of the incentive program	-6	-6	(g)
6	**Total shareholders' Equity**	**17,616**	**17,616**	

1.2. Information on the nature and amount of certain own fund items

The Group's equity is composed of:

- core capital Tier 1 which as at 30 June 2025 was PLN 18,036 million,
- core capital Tier 2 which as at 30 June 2025 was PLN 1,184 million,

As at 30 June 2025, the Group did not identify additional Tier 1 capital (AT1).

The table below presents nature and amount of certain own funds items required by Article 437 of Regulation CRR. The presentation complies with the requirements of the Commission Implementing Regulation (UE) 2024/3172. The table lines that don't relate to the Group's own fund have been omitted.

Template EU CC1 - Composition of regulatory own funds

		a	b
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	1,086	(d)
	of which: Ordinary shares	130	(d)
	of which: Agio	956	(d)
2	Retained earnings	41	(f)
3	Accumulated other comprehensive income (and other reserves)	13,131	(e)
EU-3a	Funds for general banking risk	1,215	(f)
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	0	
5	Minority interests (amount allowed in consolidated CET1)	0	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	0	(f)
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**15,473**	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-41	
8	Intangible assets (net of related tax liability) (negative amount)	-473	(a)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	3,296	(e)
12	Negative amounts resulting from the calculation of expected loss amounts	-450	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-6	(g)
27a	Other regulatory adjustments	237	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	**2,563**	
29	**Common Equity Tier 1 (CET1) capital**	**18,036**	
Additional Tier 1 (AT1) capital: instruments			
36	Additional Tier 1 (AT1) capital before regulatory adjustments	0	
Additional Tier 1 (AT1) capital: regulatory adjustments			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	0	
44	Total regulatory adjustments to Additional Tier 1 (AT1) capital	0	
45	Additional Tier 1 (AT1) capital	**18,036**	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	1,184	(b)
50	Credit risk adjustments	0	
51	**Tier 2 (T2) capital before regulatory adjustments**	**1,184**	
Tier 2 (T2) capital before regulatory adjustments			
57	Total regulatory adjustments to Tier 2 (T2) capital	0	
58	Tier 2 (T2) capital	1,184	
59	**Total capital (TC = T1 + T2)**	**19,220**	
60	**Total Risk exposure amount**	**122,739**	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	14.69%	
62	Tier 1 capital	14.69%	
63	Total capital	15.66%	
64	Institution CET1 overall capital requirements	8.01%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement	0.0086%	
67	of which: systemic risk buffer requirement	0.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0.00%	
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	**7.66%**	
Amounts below the thresholds for deduction (before risk weighting)			
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	615	(c)
Applicable caps on the inclusion of provisions in Tier 2			
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	354	

2. Regulatory capital requirements calculation

The Group is required to maintain Tier 1 and TCR ratios at least at the level of 9.51% and 11.51% respectively.

The requirement arises from the provisions of Regulation CRR, i.e.:

- for Common Equity Tier 1 ratio - CET1 – 4.5%,
- for Tier 1 ratio - T1 - 6.0%, and,
- for total capital ratio (TCR) - 8.0%,

and the capital buffers determined in accordance with the Act on macroprudential supervision over the financial system and crisis management in the financial system of 5 August 2015 in the total amount of 3.51%.

The capital requirement for credit risk represents approx. 87% of the Group's overall capital requirement and has the greatest impact on capital adequacy calculation.

The Group uses the Internal Ratings Based Approach (IRB) and the Standardised Approach (SA) to calculate the capital requirement for credit risk. The Group obtained the approval of the Polish Financial Supervision Authority (PFSA) and the National Bank of Netherlands for the use of advanced internal ratings method (A-IRB) for the exposure classes: corporates and credit institutions for the Bank and ING Lease (Polska) Sp. z o.o. At the beginning of 2025, after the implementation of the Regulation CRR3, some credit exposures were covered by the Foundation Internal Ratings Based Approach (F-IRB). In the area of operational risk, the Group uses the business indicator approach. In the area of market risk, the Group uses the basic method and the updated average return period method (depending on the type of risks). The Group also determines capital requirements for concentration risk, settlement risk and credit valuation adjustment risk (CVA). In all cases, the requirements are determined in accordance with the Regulation CRR.

Quantitative information on the risk-weighted exposure amount and capital requirements for individual risk types in accordance with the requirements of Article 438 of the Regulation CRR, according to the following templates contained in Commission Implementing Regulation (EU) 2024/3172, is presented below:

- Template EU OV1 – Overview of total risk exposure amounts,
- Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level,
- Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level,
- Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach,
- Template EU CR5 – standardised approach– the table presents the regulatory exposure values after the application of credit conversion factors and risk mitigation techniques for that part of the portfolio for which the Group applies the standardized approach,
- Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range– the table presents the exposures values, the average CCF, PD and LGD values in percentage terms and risk-weighted exposures amount for each exposures class in the portfolio for which the Group uses the internal ratings method (IRB).

The Group does not disclose the information required in templates EU CVA4 – RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA) because the Group calculates capital requirements for credit valuation adjustment risk under the basic approach in accordance with Article 384 of the Regulation CRR.

Template EU OV1 – Overview of total risk exposure amounts

		a	b	c
		Total risk exposure amounts (TREA)		Total own funds requirements
		30 Jun 2025	31 Mar 2025	30 Jun 2025
1	**Credit risk (excluding CCR)**	**105,628**	**102,763**	**8,450**
2	Of which the standardised approach	47,182	45,092	3,775
3	Of which the Foundation IRB (F-IRB) approach	16,974	16,958	1,358
4	Of which slotting approach	0	0	0
EU-4a	Of which equities under the simple risk weighted approach	0	0	0
5	Of which the Advanced IRB (A-IRB) approach	28,025	28,336	2,242
6	**Counterparty credit risk - CCR**	**630**	**511**	**50**
7	Of which the standardised approach	517	451	41
8	Of which internal model method (IMM)	0	0	0
EU-8a	Of which exposures to a CCP	59	60	5
9	Of which other CCR	54	0	4
10	**Credit valuation adjustments risk - CVA risk**	**447**	**376**	**36**
EU 10a	Of which the standardised approach (SA)	0	0	0
EU 10b	Of which the basic approach (F-BA and R-BA)	447	376	36
EU 10c	Of which the simplified approach	0	0	0
15	**Settlement risk**	**0**	**0**	**0**
16	**Securitisation exposures in the non-trading book (after the cap)**	**384**	**367**	**31**
17	Of which SEC-IRBA approach	0	0	0
18	Of which SEC-ERBA (including IAA)	0	0	0
19	Of which SEC-SA approach	384	367	31
EU-19a	Of which 1250% / deduction	0	0	0
20	**Position, foreign exchange and commodities risks (Market risk)**	**1,194**	**1,346**	**96**
21	Of which the Alternative standardised approach (A-SA)	0	0	0
EU 21a	Of which the Simplified standardised approach (S-SA)	1,194	1,346	96
22	Of which Alternative Internal Model Approach (A-IMA)	0	0	0
EU-22a	**Large exposures**	**0**	**0**	**0**
23	**Reclassifications between the trading and non-trading books**	**0**	**0**	**0**
24	**Operational risk**	**14,456**	**14,456**	**1,156**
EU 24a	**Exposures to crypto-assets**	**0**	**0**	**0**
25	**Amounts below the thresholds for deduction (subject to 250% risk weight)**	**1,706**	**1,677**	**136**
26	**Output floor applied (%)**	**50.00%**	**50.00%**	
27	**Floor adjustment (before application of transitional cap)**	**0**	**0**	
28	**Floor adjustment (after application of transitional cap)**	**0**	**0**	
29	**Total**	**122,739**	**119,819**	**9,819**

*) table rows (11-14) that do not apply to the Group have been omitted.

Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	58,446	47,182	105,628	114,829	105,956
2	Counterparty credit risk	577	53	630	1,036	1,036
3	Credit valuation adjustment		447	447	447	447
4	Securitisation exposures in the banking book	0	384	384	384	384
5	Market risk	0	1,194	1,194	1,194	371
6	Operational risk		14,456	14,456	14,456	14,456
7	Other risk weighted exposure amounts		0	0	0	4,564
8	**Total**	**59,023**	**63,716**	**122,739**	**132,346**	**127,214**

Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

		a	b	c	d	EU d
		Risk weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks	0	0	1,779	1,779	1,779
EU 1a	Regional governments or local authorities	26	3	736	713	713
EU 1b	Public sector entities	402	0	402	0	0
EU 1c	Categorised as Multilateral Development Banks in SA	0	0	0	0	0
EU 1d	Categorised as International organisations in SA	0	0	0	0	0
2	Institutions	1,506	1,861	1,507	1,862	1,862
3	Equity	0	0	932	932	932
4	Not applicable					
5	Corporates	27,979	36,871	33,049	50,813	41,940
5.1	Of which: F-IRB is applied	10,256	15,416	10,256	19,089	15,416
5.2	Of which: A-IRB is applied	14,837	17,316	14,837	20,974	17,316
EU 5a	Of which: Corporates - General	25,132	34,995	30,202	47,762	40,065
EU 5b	Of which: Corporates - Specialised lending	2,847	1,876	2,847	3,051	1,875
EU 5c	Of which: Corporates - Purchased receivables	0	0	0	0	0
6	Retail	0	0	12,162	12,162	12,162
6.1	Of which: Retail - Qualifying revolving	0	0	0	0	0
EU 6.1a	Of which: Retail - Purchased receivables	0	0	0	0	0
EU 6.1b	Of which: Retail - Other	0	0	12,162	12,162	12,162
6.2	Of which: Retail - Secured by residential real estate	0	0	0	0	0
7	Not applicable					
EU-7a	Categorised as secured by immovable properties and ADC exposures in SA	12,202	17,479	36,031	41,308	41,308
EU 7b	Collective investment undertakings (CIU)	0	0	0	0	0
EU-7c	Categorised as exposures in default in SA	2,884	2,561	3,682	3,359	3,359
EU 7d	Categorised as subordinated debt exposures in SA	0	0	0	0	0
EU 7e	Categorised as covered bonds in SA	0	0	0	0	0
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	0	0	0	0	0
8	Other non-credit obligation assets	13,447	0	15,348	1,901	1,901
9	**Total**	**58,446**	**58,775**	**105,628**	**114,829**	**105,956**

Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

		a
		Risk weighted exposure amount
1	**Risk weighted exposure amount as at the end of the previous reporting period**	**55,971**
2	Asset size (+/-)	706
3	Asset quality (+/-)	-336
4	Model updates (+/-)	0
5	Methodology and policy (+/-)	0
6	Acquisitions and disposals (+/-)	0
7	Foreign exchange movements (+/-)	126
8	Other (+/-)	210
9	**Risk weighted exposure amount as at the end of the reporting period**	**56,677**

The amount of risk-weighted exposures resulting from the use of internal models increased by PLN 706 million in the second quarter of 2025 compared to the first quarter of 2025. This increase is due to an increase in the loan portfolio resulting from newly granted loans and the revaluation of existing exposures due to changes in exchange rates between the reporting dates. Other changes also contributed to this increase, such as client reclassification and related changes in the application of the supporting factor for SME clients and for exposures related to infrastructure projects. The increase in the amount of risk-weighted exposures resulting from the use of internal models was partially offset by changes in the quality of the loan portfolio (client rating migration).

Template EU CR5 – standardised approach

	Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa
		Risk weight																									Total	Of which unrated
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Other		
1	Central governments or central banks	61,953	0	2,071	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	678	0	0	0	0	**64,702**	64,619
2	Non-central government public sector entities	8,842	0	0	0	3,551	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**12,393**	12,393
EU 2a	Regional governments or local authorities	0	0	0	0	3,551	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**3,551**	3,551
EU 2b	Public sector entities	8,842	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**8,842**	8,842
3	Multilateral development banks	9,725	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**9,725**	9,725
EU 3a	International organisations	2,086	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**2,086**	2,086
4	Institutions	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**2**	2
5	Covered bonds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
6	Corporates	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5,446	0	0	0	0	0	0	0	0	0	**5,446**	5,446
6.1	Of which: Specialised Lending	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
7	Subordinated debt exposures and equity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	373	0	0	0	0	**373**	373
EU 7a	Subordinated debt exposures	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
EU 7b	Equity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	373	0	0	0	0	**373**	373
8	Retail exposures	0	0	0	0	0	0	0	0	0	0	0	0	17,846	0	0	0	0	0	0	0	0	0	0	0	0	**17,846**	17,846
9	Secured by mortgages on immovable property and ADC exposures	0	0	0	0	48,417	81	0	0	23	0	1	0	18,559	0	11	0	0	7	0	33	0	0	0	0	212	**67,344**	67,344
9.1	Secured by mortgages on residential immovable property - non IPRE	0	0	0	0	48,417	81	0	0	23	0	1	0	18,559	0	0	0	0	0	0	0	0	0	0	0	0	**67,081**	67,081
9.1.1	no loan splitting applied	0	0	0	0	0	0	0	0	0	0	0	0	15,208	0	0	0	0	0	0	0	0	0	0	0	0	**15,208**	15,208
9.1.2	loan splitting applied (secured)	0	0	0	0	48,417	81	0	0	23	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**48,522**	48,522
9.1.3	loan splitting applied (unsecured)	0	0	0	0	0	0	0	0	0	0	0	0	3,351	0	0	0	0	0	0	0	0	0	0	0	0	**3,351**	3,351
9.2	Secured by mortgages on residential immovable property - IPRE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
9.3	Secured by mortgages on commercial immovable property - non IPRE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	7	0	0	0	0	0	0	212	**230**	230
9.3.1	no loan splitting applied	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
9.3.2	loan splitting applied (secured)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	7	0	0	0	0	0	0	212	**230**	230
9.3.3	loan splitting applied (unsecured)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
9.4	Secured by mortgages on commercial immovable property - IPRE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
9.5	Acquisition, Development and Construction (ADC)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	33	0	0	0	0	0	**33**	33
10	Exposures in default	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	551	0	0	0	165	0	0	0	0	0	**716**	716
EU 10a	Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
EU 10b	Collective investment undertakings (CIU)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	0
EU 10c	Other items	794	0	0	0	347	0	0	0	0	0	0	0	0	0	0	1,833	0	0	0	0	0	0	0	0	0	**2,974**	2,974
11	Not applicable																											
12	**Total**	**83,400**	**0**	**2,071**	**0**	**52,316**	**82**	**0**	**0**	**23**	**0**	**1**	**0**	**36,405**	**0**	**11**	**7,830**	**0**	**7**	**0**	**198**	**1,051**	**0**	**0**	**0**	**212**	**183,607**	**183,524**

Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

A-IRB	a	b	c	d	e	f	g	h	i	j	k	l
PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
Corporates Specialised lending												
0.00 to <0.15	2,198	16	0.94	2,213	0.12	67	23.64	3	425	19.21%	1	0
0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
0.10 to <0.15	2,198	16	0.94	2,213	0.12	67	23.64	3	425	19.21%	1	0
0.15 to <0.25	1,859	69	0.59	1,888	0.19	42	10.69	2	170	9.00%	0	0
0.25 to <0.50	3,213	1,620	0.49	3,868	0.35	126	34.55	4	2,227	57.57%	5	-6
0.50 to <0.75	1,321	1	1.00	1,321	0.55	16	14.62	2	246	18.58%	1	0
0.75 to <2.50	684	137	0.45	747	1.46	98	30.10	3	591	79.15%	3	-8
0.75 to <1.75	455	19	0.49	465	0.99	53	26.67	3	226	48.57%	1	-1
1.75 to <2.5	229	118	0.45	282	2.26	45	35.76	4	365	129.59%	2	-7
2.50 to <10.00	192	170	0.97	357	4.96	11	32.49	3	338	94.97%	5	-3
2.5 to <5	43	140	0.96	178	3.56	2	52.02	5	274	154.07%	3	-2
5 to <10	149	30	1.00	179	6.35	9	13.04	2	64	36.08%	2	-1
10.00 to <100.00	570	4	0.20	571	31.46	24	8.38	1	245	42.90%	16	0
10 to <20	4	4	0.20	5	16.32	14	5.52	4	1	21.72%	0	0
20 to <30	183	0	0.00	183	21.92	3	6.11	1	56	30.66%	2	0
30 to <100	383	0	0.00	383	36.23	7	9.51	1	188	49.02%	14	0
100.00 (Default)	396	0	1.00	395	100.00	8	46.81	1	331	83.82%	181	-136
Subtotal	**10,433**	**2,017**	**0.53**	**11,360**	**5.55**	**392**	**24.90**	**3**	**4,573**	**40.26%**	**212**	**-153**
Corporates Other												
0.00 to <0.15	52	3	0.94	52	0.12	8	28.77	3	8	14.56%	0	0
0.00 to <0.10	0	3	0.00	0	0.08	2	45.00	1	0	0.00%	0	0
0.10 to <0.15	52	0	0.94	52	0.12	6	28.77	3	8	14.56%	0	0
0.15 to <0.25	3,068	3,239	0.59	3,979	0.19	1,221	30.48	2	1,029	25.85%	2	-1
0.25 to <0.50	5,756	4,151	0.49	6,675	0.33	1,394	33.10	2	2,483	37.19%	7	-3
0.50 to <0.75	6,194	3,503	1.00	6,708	0.63	1,371	33.93	2	3,389	50.51%	14	-7
0.75 to <2.50	6,365	3,394	0.45	6,407	1.60	1,758	33.47	2	4,315	67.34%	34	-16
0.75 to <1.75	5,876	3,159	0.49	5,897	1.56	1,648	33.60	2	3,948	66.96%	31	-13
1.75 to <2.5	489	235	0.45	510	2.06	111	31.93	2	367	71.82%	3	-3
2.50 to <10.00	6,936	2,465	0.97	6,319	5.01	1,957	34.87	2	6,030	95.42%	110	-68
2.5 to <5	4,340	1,761	0.96	3,979	3.67	1,253	34.70	2	3,388	85.16%	50	-30
5 to <10	2,596	704	1.00	2,340	7.30	704	35.17	2	2,642	112.87%	60	-38
10.00 to <100.00	2,892	685	0.20	2,461	22.78	2,505	35.41	2	3,650	148.32%	203	-127
10 to <20	1,878	527	0.20	1,618	12.56	2,190	34.92	2	2,263	139.89%	70	-50
20 to <30	440	78	0.00	376	25.95	112	35.19	2	681	181.02%	34	-22
30 to <100	574	80	0.00	467	55.61	203	37.27	2	706	151.15%	99	-55
100.00 (Default)	2,269	89	1.00	2,021	100.00	1,204	51.77	2	2,548	126.23%	1,153	-974
Subtotal	**33,532**	**17,529**	**0.53**	**34,622**	**8.87**	**11,418**	**34.60**	**2**	**23,452**	**67.74%**	**1,523**	**-1,196**
Total	**43,965**	**19,546**	**0.36**	**45,982**		**11,810**		**2**	**28,025**	**60.95%**	**1,735**	**-1,349**

Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

F-IRB	a	b	c	d	e	f	g	h	i	j	k	l
PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
Corporates Specialised lending												
0.00 to <0.15	76	0	0.00	76	0.12	1	20.00	2	9	12.29%	0	0
0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
0.10 to <0.15	76	0	0.00	76	0.12	1	20.00	2	9	12.29%	0	0
0.15 to <0.25	-	-	-	-	-	-	-	-	-	-	-	-
0.25 to <0.50	61	3	0.40	63	0.31	2	40.00	5	47	73.45%	0	0
0.50 to <0.75	112	0	0.00	111	0.69	1	21.13	2	36	32.62%	0	0
0.75 to <2.50	105	10	0.40	110	1.45	1	24.17	1	50	45.82%	0	0
0.75 to <1.75	105	10	0.40	110	1.45	1	24.17	1	50	45.82%	0	0
1.75 to <2.5	-	-	-	-	-	-	-	-	-	-	-	-
2.50 to <10.00	-	-	-	-	-	-	-	-	-	-	-	-
2.5 to <5	-	-	-	-	-	-	-	-	-	-	-	-
5 to <10	-	-	-	-	-	-	-	-	-	-	-	-
10.00 to <100.00	-	-	-	-	-	-	-	-	-	-	-	-
10 to <20	-	-	-	-	-	-	-	-	-	-	-	-
20 to <30	-	-	-	-	-	-	-	-	-	-	-	-
30 to <100	-	-	-	-	-	-	-	-	-	-	-	-
100.00 (Default)	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	**354**	**13**	**0.40**	**360**	**0.73**	**5**	**25.11**	**2**	**142**	**39.47%**	**0**	**0**
Corporates Other												
0.00 to <0.15	1,652	2,385	0.33	4,678	0.09	40	39.67	2	1,185	25.33%	2	-1
0.00 to <0.10	1,334	186	0.39	3,287	0.08	15	40.12	2	762	23.17%	1	0
0.10 to <0.15	318	2,199	0.32	1,391	0.12	25	38.63	2	423	30.45%	1	0
0.15 to <0.25	3,810	6,550	0.10	4,497	0.20	115	37.37	2	1,516	33.71%	3	-1
0.25 to <0.50	6,133	5,687	0.21	7,184	0.40	216	34.91	2	3,377	47.02%	10	-6
0.50 to <0.75	966	878	0.16	1,105	0.62	63	30.65	2	639	57.82%	2	-1
0.75 to <2.50	5,541	3,914	0.28	6,450	1.13	331	31.27	2	3,946	61.17%	23	-12
0.75 to <1.75	5,539	3,906	0.28	6,444	1.13	326	31.26	2	3,940	61.13%	23	-12
1.75 to <2.5	2	8	0.40	6	2.28	5	35.94	3	6	102.41%	0	0
2.50 to <10.00	1,092	960	0.34	1,379	3.66	151	29.42	2	1,131	82.09%	15	-8
2.5 to <5	1,001	860	0.34	1,257	3.33	95	29.37	2	995	79.21%	12	-7
5 to <10	91	100	0.37	122	7.02	56	29.90	2	136	111.83%	3	-1
10.00 to <100.00	413	60	0.28	431	25.34	108	27.13	2	618	142.97%	29	-20
10 to <20	99	35	0.23	109	18.16	93	36.52	2	203	186.21%	7	-7
20 to <30	296	22	0.34	303	27.44	13	23.93	1	389	127.97%	20	-13
30 to <100	18	3	0.40	19	32.85	2	24.27	1	26	133.96%	2	0
100.00 (Default)	1,644	4	0.36	1,644	100.00	25	38.58	1	0	0.00%	633	-607
Subtotal	**21,251**	**20,438**	**0.21**	**27,368**	**7.03**	**1,049**	**34.92**	**2**	**12,412**	**45.35%**	**717**	**-656**

Institutions												
0.00 to <0.15	8,781	3,244	0.12	6,954	0.10	86	44.96	2	2,352	33.82%	4	-3
0.00 to <0.10	6,412	2,605	0.14	4,908	0.09	67	44.95	2	1,574	32.07%	3	-1
0.10 to <0.15	2,369	639	0.06	2,046	0.13	19	44.99	3	778	38.02%	1	-1
0.15 to <0.25	1,560	142	0.05	1,568	0.21	20	45.00	1	642	40.93%	1	0
0.25 to <0.50	3,627	443	0.24	3,736	0.34	27	45.00	2	692	18.51%	3	-2
0.50 to <0.75	100	0	0.26	100	0.64	5	45.00	4	94	94.22%	0	0
0.75 to <2.50	20	504	0.26	154	1.98	21	45.00	4	234	151.92%	1	-4
0.75 to <1.75	5	224	0.15	40	0.85	19	45.00	1	30	73.76%	0	0
1.75 to <2.5	15	280	0.35	114	2.37	2	45.00	4	204	179.55%	1	-4
2.50 to <10.00	0	9	0.20	2	7.24	2	45.00	3	4	209.21%	0	0
2.5 to <5	-	-	-	-	-	-	-	-	-	-	-	-
5 to <10	0	9	0.20	2	7.24	2	45.00	3	4	209.21%	0	0
10.00 to <100.00	0	9	0.47	4	16.74	51	6.51	1	1	36.55%	0	0
10 to <20	0	9	0.47	4	16.32	51	5.56	1	1	31.81%	0	0
20 to <30	-	-	-	-	-	-	-	-	-	-	-	-
30 to <100	-	-	-	-	-	-	-	-	-	-	-	-
100.00 (Default)	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	**14,088**	**4,351**	**0.15**	**12,518**	**0.22**	**212**	**44.96**	**2**	**4,019**	**32.10%**	**9**	**-9**
Public sector entities												
0.00 to <0.15	1,825	0	0.00	1,824	0.10	1	45.00	1	401	22.00%	1	0
0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
0.10 to <0.15	1,825	0	0.00	1,824	0.10	1	45.00	1	401	22.00%	1	0
0.15 to <0.25	-	-	-	-	-	-	-	-	-	-	-	-
0.25 to <0.50	-	-	-	-	-	-	-	-	-	-	-	-
0.50 to <0.75	-	-	-	-	-	-	-	-	-	-	-	-
0.75 to <2.50	-	-	-	-	-	-	-	-	-	-	-	-
0.75 to <1.75	-	-	-	-	-	-	-	-	-	-	-	-
1.75 to <2.5	-	-	-	-	-	-	-	-	-	-	-	-
2.50 to <10.00	-	-	-	-	-	-	-	-	-	-	-	-
2.5 to <5	-	-	-	-	-	-	-	-	-	-	-	-
5 to <10	-	-	-	-	-	-	-	-	-	-	-	-
10.00 to <100.00	-	-	-	-	-	-	-	-	-	-	-	-
10 to <20	-	-	-	-	-	-	-	-	-	-	-	-
20 to <30	-	-	-	-	-	-	-	-	-	-	-	-
30 to <100	-	-	-	-	-	-	-	-	-	-	-	-
100.00 (Default)	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	**1,825**	**0**	**0.00**	**1,824**	**0.10**	**1**	**45.00**	**1**	**401**	**22.00%**	**1**	**0**
Total	**37,518**	**24,802**	**0.20**	**42,070**		**1,267**		**2**	**16,974**	**40.35%**	**727**	**-665**

Risk weighted assets for equity exposures are calculated as follows:

- using the standardised approach (for risk weights of 100%, 250% and 400%),
- using exemption thresholds for deductions from own funds items (for the risk weight of 250%).

Detailed information on equity exposure as at 30 June 2025 is presented in the table below.

Template EU CR10.5: Equity exposures

	On balance sheet exposure	Off balance sheet exposure	Risk weight	Exposure value	Risk weighted exposure amount
	a	b	c	d	e
With the use standardised approach	0	0	100%	0	0
With the use standardised approach	306	0	250%	306	763
With the use standardised approach	0	0	400%	0	2
With the use of threshold exclusions	67	0	250%	67	167
Total	**373**	**0**		**373**	**932**

3. Capital buffers

The provisions of the CRD IV, in particular on regulatory capital buffers were implemented to the domestic regulations in 2015 by adopting the Act on macroprudential supervision over the financial system and crisis management in the financial system and relevant amendment of the Banking Law Act. The Act set out the capital buffers that will need have been observed by banks in Poland starting from January 2016.

As at 30 June 2025, the Group accounts for the following values in the calculation of capital buffers:

- capital conservation buffer which equals 2.5%,
- other systemically important institution buffer (O-SII) at 1.0% imposed by the PFSA through a decision received on 11 December 2024,
- countercyclical buffer applied to exposure to which such buffer was imposed by competent authorities. The countercyclical buffer varies over time depending on the structure of the relevant exposures and the levels of countercyclical buffer rates imposed on the relevant exposures (as at 30 June 2025 the countercyclical buffer was effectively equal to 0.0086%),
- systemic risk buffer according to the Regulation of the Minister of Finance repealing previous regulation on systemic risk buffer published on 18 March 2020 equals 0%.

19 December 2024 a letter from the Polish Financial Supervision Authority on non-determination of the additional capital add-on (P2G) so as to absorb potential losses resulting from occurrence of stress conditions. The PFSA decision means that the P2G is not applicable for the Group as at 30 June 2025.

The tables below present information on: the geographical distribution of the relevant credit exposures and the amount of the institution-specific countercyclical capital buffer– according to Article 440 of Regulation CRR and in accordance with templates of the Commission Implementing Regulation (UE) 2024/3172.

Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures - Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010 **Breakdown by country:**													
Poland	94,598	71,465	0	0	0	166,063	7,844	0	0	7,844	98,050	0.99	0.00
Australia	1	0	0	0	0	1	0	0	0	0	0	0.00	0.01
Belgium	4	0	0	0	0	4	1	0	0	1	13	0.00	0.01
Cyprus	1	8	0	0	0	9	0	0	0	0	0	0.00	0.01
Czech Republic	14	33	0	0	0	47	3	0	0	3	38	0.00	0.01
Germany	13	1,102	0	0	0	1,115	20	0	0	20	250	0.00	0.01
Denmark	1	1	0	0	0	2	0	0	0	0	0	0.00	0.03
Estonia	0	6	0	0	0	6	1	0	0	1	13	0.00	0.02
France	1	0	0	0	0	1	0	0	0	0	0	0.00	0.01
Great Britain	9	205	0	0	0	214	7	0	0	7	88	0.00	0.02
Hungary	0	86	0	0	0	86	3	0	0	3	38	0.00	0.01
Ireland	2	0	0	0	0	2	0	0	0	0	0	0.00	0.02
Luxembourg	2	540	0	0	0	542	19	0	0	19	238	0.00	0.01
Netherlands	23	191	0	0	0	214	7	0	0	7	88	0.00	0.02
Norway	1	1	0	0	0	2	0	0	0	0	0	0.00	0.03
Romania	1	11	0	0	0	12	1	0	0	1	13	0.00	0.01
Sweden	2	493	0	0	0	495	3	0	0	3	38	0.00	0.02
Other	24	272	0	0	0	296	14	0	0	14	175	0.00	0.00
020 Total	**94,697**	**74,414**	**0**	**0**	**0**	**169,111**	**7,923**	**0**	**0**	**7,923**	**99,038**	**1.00**	

Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer

		a
1	Total risk exposure amount	122,739
2	Institution specific countercyclical capital buffer rate	0.0086%
3	Institution specific countercyclical capital buffer requirement	11

4. Leverage ratio

The calculation of regulatory leverage ratio in the ING Bank Śląski S.A. Group as at 30 June 2025 was based on provisions of Regulation CRR. Leverage ratio is calculated as Tier 1 capital measure divided by the total exposure measure and expressed as a percentage. Total exposure measure is the sum of the exposure value calculated in accordance with the Regulation CRR of all assets and off-balance sheet items not deducted when calculating the Tier 1 capital measure.

The table below presents the reconciliation of total exposure to the calculation of the leverage ratio with the value of assets in the published semi-annual financial statements in accordance with the requirements of Article 451 of Regulation CRR and according to template of Commission Implementing Regulation (UE) 2024/3172.

Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

		a
		Applicable amount
1	Total assets as per published financial statements	281,980
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential	0
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk	0
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	0
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	0
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	0
7	Adjustment for eligible cash pooling transactions	0
8	Adjustment for derivative financial instruments	1,237
9	Adjustment for securities financing transactions (SFTs)	377
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	25,507
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	0
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	0
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	0
12	Other adjustments	-670
13	**Leverage ratio total exposure measure**	**308,431**

The table below presents information on the financial leverage ratio and the breakdown of the total exposure measure comprising the leverage ratio in accordance with the Commission Implementing Regulation (UE) 2024/3172:

- Template EU LR2 - LRCom: Leverage ratio common disclosure,
- Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures).

Template EU LR2 - LRCom: Leverage ratio common disclosure

		a	b
		CRR leverage ratio exposures	
		30 Jun 2025	31 Dec 2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	257,734	237,444
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	0	0
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	0	-13
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	0	0
5	(General credit risk adjustments to on-balance sheet items)	0	0
6	(Asset amounts deducted in determining Tier 1 capital)	-733	-507
6	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**257,001**	**236,924**
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	780	665
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	0	0
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	1,313	1,261
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	0	0
EU-9b	Exposure determined under Original Exposure Method	0	0
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	0	0
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	0	0
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	0	0
11	Adjusted effective notional amount of written credit derivatives	0	0
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	0	0
13	**Total derivatives exposures**	**2,093**	**1,926**
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	23,454	22,326
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	0	0
16	Counterparty credit risk exposure for SFT assets	377	133
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	0	0
17	Agent transaction exposures	0	0
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	0	0
18	**Total securities financing transaction exposures**	**23,831**	**22,459**
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	59,498	55,124
20	(Adjustments for conversion to credit equivalent amounts)	-33,911	-39,858
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)	-80	-78
22	**Off-balance sheet exposures**	**25,507**	**15,188**
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	0	0
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	0	0
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	0	0
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	0	0
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	0	0
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	0	0
EU-22g	(Excluded excess collateral deposited at triparty agents)	0	0
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	0	0
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	0	0
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	0	0
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	0	0
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	0	0
EU-22m	**(Total exempted exposures)**	**0**	**0**
Capital and total exposure measure			
23	Tier 1 capital	18,036	18,237
24	**Total exposure measure**	**308,431**	**276,497**
Leverage ratio			
25	**Leverage ratio (%)**	**5.85%**	**6.60%**
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.85%	6.60%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	5.85%	6.60%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	transitional	transitional

Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

		a
		CRR leverage ratio exposures
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	**257,734**
EU-2	Trading book exposures	734
EU-3	Banking book exposures, of which:	257,000
EU-4	Covered bonds	0
EU-5	Exposures treated as sovereigns	76,117
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	4,716
EU-7	Institutions	14,082
EU-8	Secured by mortgages of immovable properties	65,732
EU-9	Retail exposures	18,214
EU-10	Corporate	66,240
EU-11	Exposures in default	3,479
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	8,420

For internal purposes, the desired leverage ratio level applicable as of 30 June 2025 was determined to ensure compliance with the regulatory level of 3%. In order to limit the risk of the ratio falling below the required level, the Risk Integration Department monitors the level of the ratio in relation to the internal limit.

Moreover, the Group monitored the level of the leverage ratio at 5%, in accordance with the conditions specified by the Polish Financial Supervision Authority for the payment of dividends by banks.

In the first half of 2025 the leverage ratio has been above internal and regulatory limit. The main influencing factors have been:

- dynamics of asset value (denominator) – internal strategic decision related with the implementation of the Bank's strategy, having a direct impact on the growth of assets,
- a temporary increase in the deficit of credit risk adjustments for expected losses under the IRB method - a regulatory factor indirectly resulting from the decision not to recognize interim profits.

5. Information on liquidity

ING Bank Śląski S.A. Group recognises the process of stable management of liquidity and funding risk as a major process at the Group.
Liquidity and funding risk is understood by the Group as the risk of the lack of ability to perform financial liabilities under on- and off-balance sheet items at reasonable prices. The Group maintains liquidity so that the Group's financial liabilities can always be repaid with the available funds, inflows from maturing transactions, available funding sources at market prices and/or liquidation of negotiable assets.

Liquidity Coverage Ratio (LCR) information

In compliance with the duties and principles set out in Regulation CRR and of the Council and Commission Delegated Regulation's (EU) No 2015/61, 2018/1620 and Commission Implementing Regulation (EU) 2022/1994, the Group calculates the following regulatory liquidity measures - short-term liquidity measures (LCR – Liquidity Coverage Ratio) – this is to ensure that the Group holds an adequate level of high quality liquid assets to cover its liquidity needs within 30 calendar days under stressed conditions. In the first half year of 2025 a regulatory limit of 100% applied. The Group is obliged to report the liquidity measures to the regulator on a monthly basis.
As at 30 June 2025 Liquidity Covered Ratio for the Group was 243%.

The LCR ratio as of 30 June 2025 increased by 2 percentage points compared to 31 March 2025. This is primarily the result of an increase in inflows, coupled with a decrease in liquid assets. The increase in inflows (+2,963 million) was mainly driven by reverse repo transactions secured by non-HQLA securities (+4,684 million), offset by a decrease in other inflows (-746 million) and a decrease in principal and interest payments (-933 million). The decrease in liquid assets (-6,568 million) resulted mainly from a decrease in the volume of unencumbered government bonds (-8,050 million).

LCR

	30 Jun 2025		31 Mar 2025		30 Jun 2025 vs 31 Mar 2025	
	243%		241%		+2 p.p.	
	Value	Weighted value	Value	Weighted value	Value	Weighted value
Liquid assets	54,991	54,991	61,559	61,559	-6,568	-6,568
Outflows	302,533	41,190	287,834	41,158	14,699	32
Inflows	22,843	18,534	22,646	15,571	197	2,963

The LCR ratio as of 30 June 2025 increased by 46 percentage points compared to 30 June 2024, which is mainly the effect of a decrease in outflows and an increase in liquid assets, partially offset by a decrease in inflows. The decrease in outflows (-4,937 million) was mainly due to a decrease in other outflows (-5,519 million), which was partially offset by an increase in outflows from deposits (+777 million). The increase in liquid assets (+2,515 million) was primarily due to an increase in the volume of exposures to the central bank (+6,656 million) and an increase in the volume of EIB bonds (+926 million), and was partially offset by a decrease in unencumbered government bonds (-5,162 million). The decrease in inflows (-985 million) was mainly due to a decline in other inflows (-2,840 million), partially offset by an increase in reverse repo transactions secured by non-HQLA securities (+1,380 million) and an increase in principal and interest payments (+495 million).

LCR	30 Jun 2025		30 Jun 2024		30 Jun 2025 vs 30 Jun 2024	
	243%		197%		+46 p.p.	
	Value	Weighted value	Value	Weighted value	Value	Weighted value
Liquid assets	54,991	54,991	52,476	52,476	2,515	2,515
Outflows	302,533	41,190	278,963	46,127	23,570	-4,937
Inflows	22,843	18,534	22,516	19,519	327	-985

In compliance with the Guidelines on the disclosure of the net outflow coverage ratio, in addition to the disclosure of information on liquidity risk management issued by EBA, the Group is obliged to disclose components of the LCR in the form as specified in the table EU LIQ1 (net outflow coverage ratio – total). It contains the following information:

- high quality liquid assets – a “weighted” amount subject to value reduction,
- cash outflows – weighted and unweighted outflows,
- cash inflows – weighted and unweighted inflows.

Such weighted inflows and outflows are calculated as values after application of inflow and outflow ratios. The numbers cover the values for each of the four calendar quarters preceding the report date. Those are average observed values at the end of each month in the 12-month period preceding the end of each quarter.

The information covers all positions irrespective of the denomination currency and are presented in PLN. The net outflow coverage ratio contains all important elements for the Group's liquidity profile.

Apart from the values of the net outflow coverage ratio calculated for all currencies, the Group also monitors ratios calculated for major currencies – PLN and EUR.

The detailed information on LCR required by Article 451a of the CRR Regulation is presented below, based on the EU LIQ1 template set out in Commission Implementing Regulation (EU) 2024/3172.

Template EU LIQ1 - Quantitative information of LCR

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a		30 Jun 2025	31 Mar 2025	31 Dec 2024	30 Sep 2024	30 Jun 2025	31 Mar 2025	31 Dec 2024	30 Sep 2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					**56,921**	**55,916**	**55,958**	**55,754**
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	162,723	158,943	155,934	152,541	10,970	10,772	10,627	10,453
3	Stable deposits	121,027	117,212	113,944	110,479	6,051	5,861	5,697	5,524
4	Less stable deposits	41,696	41,731	41,990	42,062	4,919	4,911	4,930	4,929
5	Unsecured wholesale funding	52,404	52,561	52,615	52,834	19,634	19,643	19,512	19,488
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	20,011	20,362	20,716	20,848	4,995	5,083	5,172	5,206
7	Non-operational deposits (all counterparties)	32,393	32,199	31,899	31,976	14,639	14,560	14,340	14,272
8	Unsecured debt	0	0	0	10	0	0	0	10
9	Secured wholesale funding					0	0	0	0
10	Additional requirements	24,877	24,665	24,819	24,923	3,393	3,524	3,697	3,830
11	Outflows related to derivative exposures and other collateral requirements	829	907	1,091	1,271	829	907	1,091	1,271
12	Outflows related to loss of funding on debt products	36	36	35	35	36	36	35	35
13	Credit and liquidity facilities	24,012	23,722	23,693	23,617	2,528	2,581	2,571	2,524
14	Other contractual funding obligations	6,345	7,018	8,474	9,267	5,775	6,455	7,916	8,718
15	Other contingent funding obligations	32,624	31,995	31,325	31,156	1,737	1,698	1,654	1,234
16	**TOTAL CASH OUTFLOWS**					**41,509**	**42,092**	**43,406**	**43,723**
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	12,156	11,586	11,106	11,207	10,196	9,706	9,711	9,173
18	Inflows from fully performing exposures	6,978	6,912	7,000	7,137	4,112	4,049	4,082	4,173
19	Other cash inflows	2,275	2,425	2,376	2,268	2,275	2,425	2,376	2,268
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					0	0	0	0
EU-19b	(Excess inflows from a related specialised credit institution)					0	0	0	0
20	**TOTAL CASH INFLOWS**	**21,409**	**20,923**	**20,482**	**20,612**	**16,583**	**16,180**	**16,169**	**15,614**
EU-20a	Fully exempt inflows	0	0	0	0	0	0	0	0
EU-20b	Inflows subject to 90% cap	0	0	0	0	0	0	0	0
EU-20c	Inflows subject to 75% cap	21,409	20,923	20,482	20,612	16,583	16,180	16,169	15,614
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					56,921	55,916	55,958	55,754
22	TOTAL NET CASH OUTFLOWS					24,926	25,912	27,237	28,109
23	**LIQUIDITY COVERAGE RATIO**					**2.30**	**2.19**	**2.09**	**2.00**

Explanations on the actual concentration of funding sources

Once a year, the Group determines the overall business strategy and the resulting 3-years financial plan with a general risk strategy. Financial plan is an indispensable element of the strategy which provides for an effective diversification of funding sources and tenors.

Asset and Liability Committee (ALCO) actively manages the funding base. Additionally, it monitors funding sources in order to:

- verify compliance with the strategy and financial plan,
- identify potential risks related to funding.

Customers' deposits (retail and corporate) are the core funding source for ING Bank Śląski S.A. Group. The Group monitors the funding structure and thus verifies concentration risk by analysing its deposit base split into:

- type of financing,
- customer segment,
- product type,
- currencies,
- geographical region, and
- concentration of large deposits.

Periodical analyses also monitor the risk generated by related customers (within Groups).

In accordance with the Commission Implementing Regulation (EU) 2022/1994, the Group reports a set of additional monitoring indicators for the purposes of reporting on liquidity. The reports include, inter alia, reports on the concentration of funding sources:

- concentration of financing by counterparty,
- concentration of funding by product type.

As at 30 June 2025, in accordance with the principles set out in the Commission Implementing Regulation (EU) 2022/1994, the following were reported:

- concentration of financing by counterparty, includes information on the funds of the two largest clients. Here, the Group includes the non-concessional senior loan (NPS) received. The funds raised exceed the threshold of 1% of total liabilities,
- concentration of financing by product type, confirms that the main source of financing at the Group there are customer deposits. The most important are current and savings accounts of retail clients. Unsecured wholesale financing is only 27% of the financing indicated in reporting in accordance with the EU Commission Regulation. The information includes the total amount of funding received for each product category.

The existing funding structure is well diversified. The funding structure as at 30 June 2025 split into direct and mutual funding is presented below. Direct funding is provided mainly by retail and corporate customers while mutual funding comprised primarily funds acquired from other banks.

Direct funding	value	% share
Retail customers	132,316	51.6%
Corporate customers	91,591	35.7%
Equity	21,048	8.2%
Own issues (including NPS)	10,935	4.3%
Banks	448	0.2%

Mutual funding	value	% share
Banks	23,144	55.7%
Corporate customers	18,441	44.3%

High-level description of the composition of the institution`s liquidity buffer

Maintenance of an adequate liquidity buffer is a major element in managing the Group's liquidity. The liquidity buffer presents the available liquidity, required to cover the gap between cumulated outflows and inflows within a relatively short time. It covers assets that are "unencumbered" and easily available to acquire liquidity. Unencumbered assets are understood as assets that are free of any legal, regulatory, contractual restrictions to have them disposed of by the Group. The liquidity buffer is crucial in the times of a crisis when the Group has to obtain liquidity in a short time when the standard funding sources are unavailable or insufficient.

The liquidity buffer is maintained as a safeguard against materialisation of various extraordinary scenarios, providing for needs of additional liquidity which may arise at any time in extraordinary circumstances and in normal conditions.

The table below presents the structure of the liquid asset buffer as at 30 June 2025.

Structure of the liquidity buffer	value	% share
Treasury bonds or bonds issued by the central bank (PLN)	53,247	73.8%
Treasury bonds or bonds issued by the central bank (EUR)	7,205	10.0%
bonds of BGK , PFR and EIB	11,725	16.2%

The Group provides for realistic reductions due to impairment of securities with the level thereof being regularly reviewed and approved by ALCO. The reductions are assessed inter alia on the basis of market liquidity and depth, volatility of market prices, requirements of the central bank.

The Group also observes asset concentrations ensuring their safe diversification in terms of issuer, maturity and currency.

Level 1 liquid assets cover assets characterised with very high liquidity and credit quality. Here below there is a breakdown of level 1 liquid assets used by the Group to calculate the LCR ratio (as defined in the Commission Delegated Regulation (EU) No 2015/61) as at 30 June 2025.

Level 1 liquid assets	
Cash	795
Cash in nostro accounts with the Central Bank net of the required reserve	4
Other exposures to the Central Bank (O/N deposit, cash bills)	9,490
Unencumbered Treasury bonds	32,151
Assets constituting exposures to public sector entities	2,029
Unencumbered BGK bonds	1,792
Unencumbered bonds of the European Investment Bank	8,730
Total	**54,991**

In level 1 liquid assets, securities are presented by their market value. The Group's liquidity position is reduced by encumbered securities (constituting collateral, blocked) and increased by securities received as collateral in reverse-repo or buy-sell-back transactions.

Currency mismatch in the LCR

The Group runs an active liquidity management policy with regard to the main currencies in which the Group settles most of the number (value) of transactions. From the point of view of liquidity management, the Group considers the main (significant) currencies PLN, EUR, USD and CHF.

Net Stable Funding Ratio (NSFR) information

In compliance with the duties and principles set out in Regulation CRR and of the Council and Commission Delegated Regulation's (EU) No 2015/61, 2018/1620 and Commission Implementing Regulation (EU) 2022/1994, the Group calculates the following regulatory liquidity measures - long-term liquidity measures (NSFR – Net Stable Funding Ratio) – this is to ensure a minimum level of available funding in medium- and long-term. In the first half year of 2025 a regulatory limit of 100% applied. The Group is obliged to report the NSFR measure to the regulator on a quarterly basis. As at 30 June 2025 Net Stable Funding Ratio for the Group was 180% and increased by 1.84 percentage points compared to 31 December 2024. This increase was driven by an increase in available stable funding (+11,280 million), primarily due to an increase in stable funding from retail deposits (+5,683 million) and an increase in stable funding from non-financial customers (+6,660 million), with a simultaneous increase in items requiring stable funding (+5,027 million), primarily due to an increase in required stable funding from loans (+4,939 million).

The detailed information on NSFR required by Article 451a of the CRR Regulation is presented below, based on the EU LIQ2 template set out in Commission Implementing Regulation (EU) 2024/3172. The table contains the following information:

- available stable funding,
- required stable funding, including: high-quality total liquid assets (HQLA), performing loans and securities, interdependent assets, other assets and off-balance sheet items,
- required stable funding.

Template EU LIQ2: Net Stable Funding Ratio

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	**Capital items and instruments**	**18,764**	**0**	**0**	**1,184**	**19,948**
2	Own funds	18,764	0	0	1,184	19,948
3	Other capital instruments		0	0	0	0
4	**Retail deposits**		**170,068**	**0**	**0**	**159,466**
5	Stable deposits		128,098	0	0	121,693
6	Less stable deposits		41,970	0	0	37,773
7	**Wholesale funding:**		**72,431**	**643**	**12,530**	**44,741**
8	Operational deposits		18,692	0	0	9,346
9	Other wholesale funding		53,739	643	12,530	35,395
10	**Interdependent liabilities**		**0**	**0**	**0**	**0**
11	**Other liabilities:**	**297**	**4,965**	**1,599**	**1,192**	**1,991**
12	NSFR derivative liabilities	297				
13	All other liabilities and capital instruments not included in the above categories		4,965	1,599	1,192	1,991
14	**Total available stable funding (ASF)**					**226,146**
Required stable funding (RSF) Items						
15	**Total high-quality liquid assets (HQLA)**					**1,685**
EU-15a	**Assets encumbered for a residual maturity of one year or more in a cover pool**		**14**	**12**	**524**	**468**
16	**Deposits held at other financial institutions for operational purposes**		**0**	**0**	**0**	**0**
17	**Performing loans and securities:**		**63,149**	**10,160**	**118,119**	**113,025**
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		1,218	0	0	0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		27,516	493	3,714	5,600
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		26,678	8,487	46,944	57,228
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		107	67	1,288	924
22	Performing residential mortgages, of which:		1,711	1,079	62,787	45,471
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		1,014	868	46,465	31,143
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		6,026	101	4,674	4,726
25	**Interdependent assets**		**0**	**0**	**0**	**0**
26	**Other assets:**	**0**	**13,431**	**573**	**4,672**	**8,152**
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		0	0	972	826
29	NSFR derivative assets		284	0	0	284
30	NSFR derivative liabilities before deduction of variation margin posted		388	0	0	19
31	All other assets not included in the above categories		12,759	573	3,700	7,023
32	**Off-balance sheet items**		**9,709**	**7,616**	**23,131**	**2,104**
33	**Total RSF**					**125,434**
34	**Net Stable Funding Ratio (%)**					**180%**

Derivative exposures and potential collateral calls

Financial Institutions (FI) with which the Group concludes derivative transactions have signed collateral agreements (VMCSA - Variation Margin Credit Support Annex) which are an annex to the ISDA agreement. Some counterparties outside the FI may have regular CSA contracts, but as a rule they are not required to have them. In this case, the decision regarding the CSA is each time an element of the credit decision.

They regulate the issues of securing the portfolio of derivative transactions. They give the right to demand a security deposit to the party whose portfolio valuation for a given day is positive (the party's portfolio is in-the-money) and the right to demand the release of the collateral in the event of a change in this valuation.

As part of the collateral strategy for each CSA counterparty, a portfolio of transactions is valued daily against the maturity of the collateral.

6. Quantitative information on credit risk

6.1. Credit risk adjustments

Estimation of the impairment loss is based on the expected credit loss. This approach shall be applied to financial assets measured at amortised cost and financial assets measured at fair value through other comprehensive income, lease receivables, contract assets, irrevocable loan commitments and financial guarantees, except for investment in equity securities.

At each reporting date, the Group measures the impairment for expected credit losses for a financial asset at an amount equal to the lifetime expected credit losses if the credit risk on that financial asset has increased significantly since initial recognition. If at the reporting date, the credit risk on the financial asset has not increased significantly since initial recognition, the Group measures the impairment for expected credit losses for that financial asset at an amount equal to 12-month expected credit losses.

The Group estimates expected credit losses in a way that takes account of:

- an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes,
- the time value of money,
- reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

The Group applies the definition of exposures in default status, impaired exposures and non-performing exposures in accordance with regulatory requirements. A debtor or an exposure is assessed as default is also identified as an impaired and non-performing exposure.

The tables below present detailed quantitative information on credit risk adjustments required by Article 442 of Regulation CRR and in accordance with the following templates set out in Commission Implementing Regulation (EU) 2024/3172:

- Template EU CR1: Performing and non-performing exposures and related provisions,
- Template EU CR1-A: Maturity of exposures,
- Template EU CR2: Changes in the stock of non-performing loans and advances,
- Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry,
- Template EU CQ7: Collateral obtained by taking possession and execution processes.

Ratio between the gross carrying amount of loans and advances classified as non-performing exposition and the total gross carrying amount of loans and advances in the Group is lower than 5 %, therefore the Group does not disclose the information required in templates EU CR2a- Changes in the stock of non-performing loans and advances and related net accumulated recoveries, EU CQ2- Quality of forbearance, EU CQ6- Collateral valuation - loans and advances and EU CQ8- Collateral obtained by taking possession and execution processes – vintage breakdown.

The Group does not disclose also the information required by template EU CQ4: Quality of non-performing exposures by geography because of the Group's primary foreign exposures in all "external" countries in all exposure categories are less than 10% of the Group's total primary exposure (domestic and foreign).

Template EU CR1: Performing and non-performing exposures and related provisions

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions							Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumulated partial write-off	On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	Cash balances at central banks and other demand deposits	7,946	7,946	0	0	0	0	0	0	0	0	0	0	0	0	0
010	**Loans and advances**	**189,674**	**175,244**	**14,419**	**6,719**	**0**	**6,719**	**-752**	**-226**	**-526**	**-3,470**	**0**	**-3,470**	**0**	**110,786**	**1,668**
020	Central banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
030	General governments	1,971	1,659	312	0	0	0	-3	-1	-2	0	0	0	0	316	0
040	Credit institutions	23,192	23,192	0	0	0	0	0	0	0	0	0	0	0	505	0
050	Other financial corporations	11,745	11,369	376	23	0	23	-18	-15	-3	-15	0	-15	0	3,140	4
060	Non-financial corporations	69,404	59,885	9,512	4,905	0	4,905	-333	-82	-251	-2,356	0	-2,356	0	43,621	1,326
070	Of which SMEs	35,571	30,009	5,555	2,855	0	2,855	-239	-63	-176	-1,634	0	-1,634	0	18,156	641
080	Households	83,362	79,139	4,219	1,791	0	1,791	-398	-128	-270	-1,099	0	-1,099	0	63,204	338
090	**Debt securities**	**76,670**	**76,401**	**269**	**0**	**0**	**0**	**-25**	**-23**	**-2**	**0**	**0**	**0**	**0**	**0**	**0**
100	Central banks	9,492	9,492	0	0	0	0	0	0	0	0	0	0	0	0	0
110	General governments	49,892	49,623	269	0	0	0	-23	-21	-2	0	0	0	0	0	0
120	Credit institutions	11,538	11,538	0	0	0	0	0	0	0	0	0	0	0	0	0
130	Other financial corporations	5,693	5,693	0	0	0	0	-2	-2	0	0	0	0	0	0	0
140	Non-financial corporations	55	55	0	0	0	0	0	0	0	0	0	0	0	0	0
150	**Off-balance-sheet exposures**	**59,431**	**45,933**	**4,631**	**155**	**0**	**131**	**-52**	**-22**	**-18**	**-33**	**0**	**-25**	**0**	**1,868**	**22**
160	Central banks	0	0	0	0	0	0	0	0	0	0	0	0		0	0
170	General governments	1,346	1,337	1	0	0	0	0	0	0	0	0	0		0	0
180	Credit institutions	1,253	131	0	0	0	0	0	0	0	0	0	0		0	0
190	Other financial corporations	2,460	1,976	29	0	0	0	-3	-3	0	0	0	0		0	0
200	Non-financial corporations	46,883	35,249	4,362	130	0	107	-37	-12	-12	-30	0	-22		1,844	19
210	Households	7,489	7,240	239	25	0	24	-12	-7	-6	-3	0	-3		24	3
220	**Total**	**333,721**	**305,524**	**19,319**	**6,874**	**0**	**6,850**	**-829**	**-271**	**-546**	**-3,503**	**0**	**-3,495**		**112,654**	**1,690**

Template EU CR1-A: Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	**Total**
1	Loans and advances	16,934	44,882	49,696	78,774	1,885	**192,171**
2	Debt securities	0	15,915	52,413	8,317	0	**76,645**
3	**Total**	**16,934**	**60,797**	**102,109**	**87,091**	**1,885**	**268,816**

Template EU CR2: Changes in the stock of non-performing loans and advances

		a
		Gross carrying amount
010	**Initial stock of non-performing loans and advances**	**6,462**
020	Inflows to non-performing portfolios	2,292
030	Outflows from non-performing portfolios	-564
040	Outflows due to write-offs	-36
050	Outflow due to other situations	-1,435
060	**Final stock of non-performing loans and advances**	**6,719**

Template EU CQ7: Collateral obtained by taking possession and execution processes

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	0	0
020	Other than PP&E	0	0
030	Residential immovable property	0	0
040	Commercial Immovable property	0	0
050	Movable property (auto, shipping, etc.)	0	0
060	Equity and debt instruments	0	0
070	Other collateral	0	0
080	**Total**	**0**	**0**

Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

		a	b	c	d	e	f
		Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which non-performing		Of which loans and advances subject to impairment		
				Of which defaulted			
010	Agriculture, forestry and fishing	1,413	75	75	1,406	-50	0
020	Mining and quarrying	1,029	10	10	1,029	-10	0
030	Manufacturing	23,003	2,316	2,316	23,003	-1,115	0
040	Electricity, gas, steam and air conditioning supply	2,398	115	115	2,398	-114	0
050	Water supply	855	42	42	855	-30	0
060	Construction	3,609	310	310	3,609	-222	0
070	Wholesale and retail trade	16,084	658	658	16,084	-467	0
080	Transport and storage	5,572	485	485	5,572	-142	0
090	Accommodation and food service activities	834	26	26	834	-22	0
100	Information and communication	3,294	67	67	3,294	-53	0
110	Financial and insurance activities	907	0	0	907	-1	0
120	Real estate activities	8,900	476	476	8,900	-200	0
130	Professional, scientific and technical activities	1,366	184	184	1,366	-152	0
140	Administrative and support service activities	3,741	76	76	3,741	-53	0
150	Public administration and defence, compulsory social security	0	0	0	0	0	0
160	Education	88	10	10	88	-7	0
170	Human health services and social work activities	583	16	16	583	-17	0
180	Arts, entertainment and recreation	111	15	15	111	-12	0
190	Other services	522	24	24	522	-22	0
200	**Total**	**74,309**	**4,905**	**4,905**	**74,302**	**-2,689**	**0**

6.2. Use of credit risk mitigation techniques

Collateral is an essential tool for limiting credit risk, however it may not replace a financed entity's creditworthiness which is the determinant of credit exposure award.

The Group applies the following credit risk mitigation techniques:

- funded credit protection linked to tangible collateral,
- unfunded credit protection linked to personal collateral items.

The tables below present detailed quantitative information regarding the use of credit risk mitigation techniques required by Article 453 of Regulation CRR and in accordance with the following templates set out in Commission Implementing Regulation (EU) 2024/3172:

- Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques,
- Template EU CR4 – standardised approach – Credit risk exposure and CRM effects,
- Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques,
- Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques.

Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

		a	b	c	d	e
			Secured carrying amount			
					Of which secured by financial guarantees	
		Unsecured carrying amount		Of which secured by collateral		Of which secured by credit derivatives
1	Loans and advances	79,717	112,454	100,073	12,381	0
2	Debt securities	76,645	0	0	0	
3	**Total**	**156,362**	**112,454**	**100,073**	**12,381**	**0**
4	Of which non-performing exposures	1,581	1,668	1,205	463	0
EU-5	Of which defaulted	1,581	1,668			

Template EU CR4 – standardised approach – Credit risk exposure and CRM effects

		a	b	c	d	e	f
		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	Exposure classes	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density (%)
1	Central governments or central banks	64,306	0	64,636	66	1,779	2.75
2	Non-central government public sector entities	2,891	1,649	9,767	2,626	710	5.73
EU 2a	Regional governments or local authorities	2,891	1,649	2,891	660	710	20.00
EU 2b	Public sector entities	0	0	6,876	1,966	0	0.00
3	Multilateral development banks	9,725	0	9,725	0	0	0.00
EU 3a	International organisations	2,086	0	2,086	0	0	0.00
4	Institutions	2	0	2	0	1	44.27
5	Covered bonds	0	0	0	0	0	0.00
6	Corporates	5,232	5,194	5,081	365	5,070	93.08
6.1	Of which: Specialised Lending	0	0	0	0	0	0.00
7	Subordinated debt exposures and equity	373	0	373	0	932	250.16
EU-7a	Subordinated debt exposures	0	0	0	0	0	0.00
EU 7b	Equity	373	0	373	0	932	250.16
8	Retail	18,214	4,237	16,212	1,634	12,162	68.15
9	Secured by mortgages on immovable property and ADC exposures	65,731	4,029	65,730	1,614	23,829	35.38
9.1	Secured by mortgages on residential immovable property - non IPRE	65,487	3,985	65,487	1,594	23,656	35.27
9.2	Secured by mortgages on residential immovable property - IPRE	0	0	0	0	0	0.00
9.3	Secured by mortgages on commercial immovable property - non IPRE	210	44	210	20	127	55.16
9.4	Secured by mortgages on commercial immovable property - IPRE	0	0	0	0	0	0.00
9.5	Acquisition, Development and Construction (ADC)	34	0	33	0	46	150.00
10	Exposures in default	874	7	714	2	798	111.46
EU-10a	Claims on institutions and corporates with a short-term credit assessment	0	0	0	0	0	0.00
EU 10b	Collective investment undertakings (CIU)	0	0	0	0	0	0.00
EU 10c	Other items	2,974	0	2,974	0	1,901	63.94
11	Not applicable						
12	**Total**	**172,408**	**15,116**	**177,300**	**6,307**	**47,182**	**25.70**

Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

		a	b
		Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
1	Central governments and central banks - F-IRB	0	0
EU 1a	Regional governments and local authorities -F-IRB	0	0
EU 1b	Public sector entities - F-IRB	401	401
2	Central governments and central banks - A-IRB	0	0
EU 2a	Regional governments and local authorities A-IRB	0	0
EU 2b	Public sector entities A-IRB	0	0
3	Institutions – F-IRB	4,809	4,019
4	Not applicable		
5	Corporates – F-IRB	11,824	12,554
EU 5a	Corporates - General	11,682	12,412
EU 5b	Corporates - Specialised lending	142	142
EU 5c	Corporates - Purchased receivables	0	0
6	Corporate – A-IRB	28,097	28,025
EU 6a	Corporates - General	23,501	23,452
EU 6b	Corporates - Specialised lending	4,596	4,573
EU 6c	Corporates - Purchased Receivables	0	0
7	Not applicable		
8	Not applicable		
EU-8a	Retail - A-IRB	0	0
9	Retail – Qualifying revolving (QRRE)	0	0
10	Retail – Secured by residential immovable property	0	0
EU10a	Retail – Purchased receivables	0	0
EU10b	Retail – Other retail exposures	0	0
17	**Exposures under F-IRB**	**17,034**	**16,974**
18	**Exposures under A-IRB**	**28,097**	**28,025**
19	**Total Exposures**	**45,131**	**44,999**

*) table rows (11-16) that do not apply to the Group have been omitted.

Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

A-IRB		a	b	c	d	e	f	g	h	i	j	k	l	m	n
			Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs	
			Funded credit Protection (FCP)									Unfunded credit Protection (UFCP)			
		Total exposures	Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)	RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
1	Central governments and central banks	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional governments and local authorities	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Corporates	**45,982**	0.38	44.56	31.11	13.36	0.08	0.00	0.00	0.00	0.00	0.10	0.00	33,699	28,025
5.1	Corporates – General	**34,622**	0.41	42.00	24.26	17.63	0.10	0.00	0.00	0.00	0.00	0.13	0.00	28,958	23,452
5.2	Corporates – Specialised lending	**11,360**	0.27	52.36	52.00	0.36	0.00	0.00	0.00	0.00	0.00	0.01	0.00	4,741	4,573
5.3	Corporates - Purchased Receivables	**0**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
6	Retail	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
6.1	Retail – Qualifying revolving	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
6.2	Retail – secured by residential immovable property	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
6.3	Retail - Purchased Receivables	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
6.4	Retail - Other retail exposures	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
7	**Total**	**45,982**	**0.38**	**44.56**	**31.11**	**13.36**	**0.08**	**0.00**	**0.00**	**0.00**	**0.00**	**0.10**	**0.00**	**33,699**	**28,025**

Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

	F-IRB	a	b	c	d	e	f	g	h	i	j	k	l	m	n
			Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs	
			Funded credit Protection (FCP)									Unfunded credit Protection (UFCP)			
				Part of exposures covered by Other eligible collaterals (%)				Part of exposures covered by Other funded credit protection (%)							
		Total exposures	Part of exposures covered by Financial Collaterals (%)		Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)		Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)	RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
1	Central governments and central banks	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Regional governments and local authorities	**-**	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Public sector entities	**1,824**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	401	401
4	Institutions	**12,518**	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,299	4,019
5	Corporates	**27,728**	0.46	27.35	13.33	13.87	0.15	0.00	0.00	0.00	0.00	0.08	0.00	12,093	12,554
5.1	Corporates – General	**27,368**	0.47	26.65	12.78	13.72	0.15	0.00	0.00	0.00	0.00	0.08	0.00	11,951	12,412
5.2	Corporates – Specialised lending	**360**	0.00	80.67	55.41	25.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	142	142
5.3	Corporates - Purchased Receivables	**0**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
6	**Total**	**42,070**	**0.32**	**18.02**	**8.79**	**9.14**	**0.10**	**0.00**	**0.00**	**0.00**	**0.00**	**0.05**	**0.00**	**19,793**	**16,974**

6.3. Exposure to the counterparty credit risk

Counterparty credit risk is the risk of a counterparty defaulting on a transaction before the cash flows associated with that transaction are finally settled.

Counterparty credit risk exposure relates to exposures from derivatives, repo transactions, securities or commodities lending or borrowing transactions, transactions with long settlement dates and transactions with the obligation to supplement the credit collateral.

The Group presents its exposure to counterparty credit risk mainly due to hedging derivatives, derivative instruments resulting from contracts concluded with customers and repo transactions.

The tables below present detailed quantitative information on counterparty credit risk exposure required by Article 439 and 452 of Regulation CRR and in accordance with the following templates set out in Commission Implementing Regulation (EU) 2024/3172:

- Template EU CCR1 - Analysis of CCR exposure by approach,
- Template EU CCR4 - IRB approach – CCR exposures by exposure class and PD scale.

Template EU CCR1 - Analysis of CCR exposure by approach

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)	0	0		1.4	0	0	0	0
EU-2	EU - Simplified SA-CCR (for derivatives)	0	0		1.4	0	0	0	0
1	SA-CCR (for derivatives)	125	149		1.4	426	1,629	1,629	518
2	IMM (for derivatives and SFTs)			0	0	0	0	0	0
2a	Of which securities financing transactions netting sets			0		0	0	0	0
2b	Of which derivatives and long settlement transactions netting sets			0		0	0	0	0
2c	Of which from contractual cross-product netting sets			0		0	0	0	0
3	Financial collateral simple method (for SFTs)					0	0	0	0
4	Financial collateral comprehensive method (for SFTs)					507	507	507	53
5	VaR for SFTs					0	0	0	0
6	**Total**					**933**	**2,136**	**2,136**	**571**

Template EU CCR4 – IRB approach - CCR exposures by exposure class and PD scale

	a	b	c	d	e	f	g
PD scale	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts
Institutions							
0.00 to <0.15	1,414	0.08	24	45.00	1	191	13.61%
0.15 to <0.25	99	0.16	9	45.00	1	27	26.80%
0.25 to <0.50	122	0.38	14	45.00	1	37	29.87%
0.50 to <0.75	0	-	-	-	-	0	-
0.75 to <2.50	2	1.03	10	45.00	1	2	89.19%
2.50 to <10.00	0	4.39	2	45.00	1	1	137.74%
10.00 to <100.00	0	16.32	1	45.00	1	1	241.47%
100.00 (Default)	0	-	-	-	-	0	-
Subtotal	**1,637**	**0.11**	**60**	**45.00**	**1**	**259**	**15.80%**
Corporates Specialised lending							
0.00 to <0.15	30	0.12	21	35.45	1	5	16.80%
0.15 to <0.25	24	0.17	17	37.22	1	5	20.70%
0.25 to <0.50	106	0.37	27	43.34	1	60	55.80%
0.50 to <0.75	2	0.67	5	35.25	1	1	43.58%
0.75 to <2.50	15	2.22	37	40.84	1	16	112.52%
2.50 to <10.00	2	4.00	2	52.44	1	2	97.58%
10.00 to <100.00	0	22.10	3	44.29	1	0	223.77%
100.00 (Default)	0	-	-	-	-	0	-
Subtotal	**179**	**0.51**	**112**	**41.01**	**1**	**89**	**49.63%**
Corporates Other							
0.00 to <0.15	27	0.09	3	42.76	1	4	15.98%
0.15 to <0.25	74	0.20	39	40.49	1	20	26.55%
0.25 to <0.50	327	0.39	77	40.09	1	137	41.82%
0.50 to <0.75	32	0.62	52	41.61	1	17	54.15%
0.75 to <2.50	57	1.13	51	40.29	1	38	67.78%
2.50 to <10.00	8	4.53	47	41.50	1	8	101.85%
10.00 to <100.00	1	40.90	8	41.47	1	3	190.24%
100.00 (Default)	0	100.00	1	54.31	1	2	780.70%
Subtotal	**526**	**0.67**	**278**	**40.43**	**1**	**229**	**43.59%**
Total	**2,342**	**0.27**	**450**	**43.67**	**1**	**577**	**24.63%**

6.4. Quantitative information on forborne exposures

The Group provides supports to its clients at each stage of financing. The Bank and subsidiaries offer products suited to their needs; should delays occur in repayment, the Group propose flexible repayment schedules. In case of more serious problems in repayment, the Group may offer to restructure the debt. Then, jointly with the client, the Bank or subsidiaries set the best form of support or a settlement.

Forbearance occurs when the Group determines that the client is not able to comply with their financial obligations due to financial difficulties (identified or expected) and decides to grant him amenities.

Forbearance is identified if all of the following conditions are satisfied:

- the customer is unable to meet its financial obligations under the loan agreement at the Bank or subsidiaries due to existing or expected financial difficulties,
- the Bank or subsidiaries shall grant a relaxation facility that would not have been granted if the customer had not experienced financial difficulties.

Financial difficulties are understood as the situation of a client who is experiencing or will soon begin to experience difficulties in fulfilling his financial obligations.

The table below presents detailed quantitative information on restructured exposures required by Article 442 of Regulation CRR, in accordance with requirements of the Commission Implementing Regulation (UE) 2024/3172.

Template EU CQ1: Credit quality of forborne exposures

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
005	Cash balances at central banks and other demand deposits	0	0	0	0	0	0	0	0
010	**Loans and advances**	**2,631**	**3,330**	**3,330**	**3,330**	**-92**	**-1,479**	**2,758**	**785**
020	Central banks	0	0	0	0	0	0	0	0
030	General governments	0	0	0	0	0	0	0	0
040	Credit institutions	0	0	0	0	0	0	0	0
050	Other financial corporations	1	8	8	8	0	-6	1	1
060	Non-financial corporations	2,058	2,697	2,697	2,697	-76	-1,103	2,231	682
070	Households	572	625	625	625	-16	-370	526	102
080	**Debt Securities**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
090	**Loan commitments given**	**383**	**35**	**35**	**35**	**0**	**-15**	**4**	**3**
100	**Total**	**3,014**	**3,365**	**3,365**	**3,365**	**-92**	**-1,494**	**2,762**	**788**

7. Impact of transitional provisions on capital adequacy

In the calculation of capital ratios, the Group applied the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in accordance with Article 468 of the Regulation CRR. As at 30 June 2025 the total capital ratio and Tier 1 ratio would be 15.46% and 14.50%, respectively, if the Group did not use this provision. In addition, until the end of 2024, in the calculation of capital ratios, the Group used transitional provisions to mitigate the impact of the implementation of IFRS 9 on the level of own funds.

IFRS 9/Article 468-FL: Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR

		30 Jun 2025	31 Mar 2025	31 Dec 2024	30 Sep 2024
Available capital (amounts)					
1	CET1 capital	18,036	18,098	18,237	16,794
2	CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,036	18,098	18,220	16,759
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied	17,768	17,855	18,005	16,590
3	Tier 1 capital	18,036	18,098	18,237	16,794
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,036	18,098	18,220	16,759
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	17,768	17,855	18,005	16,590
5	Total capital	19,220	19,338	19,601	18,212
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19,220	19,338	19,584	18,177
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	18,952	19,096	19,370	18,008
Risk-weighted assets (amounts)					
7	Total risk-weighted assets	122,739	119,819	125,111	121,580
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	122,739	119,819	125,085	121,570
Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	14.69%	15.10%	14.58%	13.81%
10	CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.69%	15.10%	14.57%	13.79%
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	14.50%	14.92%	14.41%	13.66%
11	Tier 1 (as a percentage of risk exposure amount)	14.69%	15.10%	14.58%	13.81%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.69%	15.10%	14.57%	13.79%
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	14.50%	14.92%	14.41%	13.66%
13	Total capital (as a percentage of risk exposure amount)	15.66%	16.14%	15.67%	14.98%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.66%	16.14%	15.66%	14.95%
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	15.46%	15.96%	15.50%	14.83%
Leverage ratio					
15	Leverage ratio total exposure measure	308,431	293,750	276,497	270,968
16	Leverage ratio	5.85%	6.16%	6.60%	6.20%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5.85%	6.16%	6.59%	6.18%
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	5.77%	6.08%	6.52%	6.12%

8. Disclosures in the area of the minimum requirement for own funds and eligible liabilities

The Bank is obliged to meet the MREL (minimum requirement for own funds and eligible liabilities) requirements, pursuant to Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms.

On 5 June 2025, the Bank received a letter from the Bank Guarantee Fund (BFG) regarding a joint decision of the resolution authorities, i.e. Single Resolution Board (SRB) and the BFG, on the minimum level of own funds and write-down/conversion liabilities. This decision is based on the ING Group's 'Single Point of Entry' forced restructuring strategy (SPE). The BFG, in consultation with the SRB, set the MREL requirement for the Bank at 19.76% of the total risk exposure amount (TREA) - taking into account the combined buffer requirement of 3.51% as at 30 June 2025 and 5.91% of the total exposure measure (TEM), both at the individual level.

As at 30 June 2025, the Bank had three non-preferred senior loans (NPS) from ING Bank N.V. with a nominal value of EUR 2,110 million. The loans are part of the ING Group's SPE strategy. The Bank includes NPS loan funds in eligible liabilities for the purposes of the Minimum Requirement of Own Funds and Eligible Liabilities. The value of held eligible liabilities instruments results from the expectation that the part of MREL corresponding to the recapitalisation amount should be satisfied in the form of the following instruments: additional Tier 1 (AT1), Tier 2 instruments (T2) and other subordinated eligible liabilities acquired directly or indirectly by the parent entity. The Bank estimates that the part of the MREL requirement regarding the recapitalisation amount is 8.25% TREA and 2.91% TEM. As at 30 June 2025, the carrying amount of liabilities due to NPS loans was PLN 8,981 million.

The scope of disclosures regarding the MREL requirement results from the fact that the Bank is not a resolution entity.

The quantitative data in terms of the MREL requirement are presented in the table below (in accordance with the EU ILAC template presented in Commission Implementing Regulation (EU) 2021/763). Column b does not apply to Bank.

EU ILAC - Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs

		a	b	c
		Minimum requirement for own funds and eligible liabilities (internal MREL)	Non-EU G-SII requirement for own funds and eligible liabilities	Minimum requirement for own funds and eligible liabilities (internal MREL)
Applicable requirement and level of application				
EU-1	Is the entity subject to a non-EU G-SII requirement for own funds and eligible liabilities? (Y/N)			N
EU-2	If EU-1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			-
EU-2a	Is the entity subject to an internal MREL? (Y/N)			Y
EU-2b	If EU-2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			I
Own funds and eligible liabilities				
EU-3	Common Equity Tier 1 capital (CET1)	18,200		
EU-4	Eligible Additional Tier 1 capital	0		
EU-5	Eligible Tier 2 capital	1,184		
EU-6	Eligible own funds	19,384		
EU-7	Eligible liabilities	9,282		
EU-8	of which permitted guarantees	0		
EU-9a	(Adjustments)	0		
EU-9b	Own funds and eligible liabilities items after adjustments	28,666		
Total risk exposure amount and total exposure measure				
EU-10	Total risk exposure amount (TREA)	112,202		
EU-11	Total exposure measure (TEM)	290,221		
Ratio of own funds and eligible liabilities				
EU-12	Own funds and eligible liabilities as a percentage of the TREA	25.55%		
EU-13	of which permitted guarantees	0.00%		
EU-14	Own funds and eligible liabilities as a percentage of the TEM	9.88%		
EU-15	of which permitted guarantees	0.00%		
EU-16	CET1 (as a percentage of the TREA) available after meeting the entity's requirements	9.30%		
EU-17	Institution-specific combined buffer requirement			
Requirements				
EU-18	Requirement expressed as a percentage of the TREA	16.25%		
EU-19	of which part of the requirement that may be met with a guarantee	0.00%		
EU-20	Requirement expressed as percentage of the TEM	5.91%		
EU-21	of which part of the requirement that may be met with a guarantee	0.00%		
Memorandum items				
EU-22	Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013			

Statement

Based on Article 431 (3) of Regulation CRR, Lead of Centre of Expertise Accounting Policy and Financial Reporting of ING Bank Śląski S.A. declares that:

- information contained in the disclosure document is adequate to the facts,
- information required by the provisions of part eight of the Regulation CRR was disclosed in accordance with the *"Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A."* and internal procedures, systems and controls described in the above-mentioned Policy and the *"Instruction of verification of the Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A."*, which has been included in annex to this Policy.

2025-07-30

Jolanta Alvarado Rodriguez
Lead of Centre of Expertise Accounting Policy and Financial Reporting

The original Polish document is signed with a qualified electronic signature