Management Board Report

on Operations of the ING Bank Śląski S.A. Group in 2025

ING

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Introduction

In 2025, heightened geopolitical tensions and international trade uncertainty persisted, largely due to shifts in U.S. policy and strategic focus on the western hemisphere. With weakening demand from the U.S., China has increased exports to other markets, which has translated into disinflationary pressures. Despite pressure from the U.S. administration, the prospects for an end to Russia's war in Ukraine remain uncertain. The new global order has prompted European Union countries to increase defence spending and expand the capacity of the arms sector. The new geopolitical context presents risks for Poland, but at the same time creates significant opportunities for NATO's eastern flank and makes it easier to finance defence spending. Poland once again recorded GDP growth of more than 3% in 2025, while regional countries underperformed expectations, with the exception of the Czech Republic. Private consumption remained the main driver of Polish growth, driven by solid real income growth and supported by public investment. Towards the end of last year, there were also signs of economic recovery in Germany, which bodes well for Polish GDP growth prospects in 2026.

The Management Board Report on Operations of the ING Bank Śląski Group is our response to our stakeholders' expectations for information about us, how we operate and what the results are – including in difficult circumstances such as those cited above.

Since 2016, we have prepared our annual Management Report based on the Integrated Reporting Guidelines *International <IR> Framework*. These guidelines continue to be an important reference point for us – especially in the context of presenting our strategy, value creation model and how we integrate financial and non-financial information to show a complete picture of the organisation's performance.

We begin the report by presenting our Group, indicating where we are in the sector, identifying the trends we face and our response to them through our operating strategy and our value creation model.

We pay special attention to our new long-term business strategy "ING. In the Beat of Life", published in November 2025, which extends until 2035. It is based on ING's three core values, five business pillars and six supporting areas.
We then move on to our activities in relation to clients and the community. In the following sections, we provide information about the environment in which we operate and the results we achieve. Corporate governance is a key focus for us and we devote a significant part of the report to it. We then outline our approach to managing the security of the bank and our clients, describing the management of capital and the various risks (both financial and non-financial).

Since 2024, in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD), we have also been preparing a Sustainability Statement as a separate section of the Management Report. This section is developed based on the European Sustainability Reporting Standards (ESRS), the structure and requirements of which allow us to more comprehensively and systematically demonstrate how sustainability issues are integrated into the daily operations of the ING Bank Śląski Group.

The extent of the information presented in this section of the report results from our double materiality assessment. Through it, we identify topics that are key both from the perspective of ING's impact on the environment – environmental, social and economic – and those that may be financially significant for our business. As a result, we can comprehensively show how we integrate sustainability into our decisions and processes: how we take care of our employees, how we respond to our clients' needs, how we manage our climate impact and how we develop a corporate culture based on responsibility and long-term value.

Although the Sustainability Statement is a separate section of the report, we maintain the integrated nature of the entire report – so that it reflects our approach to managing the organisation as a whole and to building value over the long term.

The auditing firm for the financial statements for 2025 and the attestation of the sustainability statement for 2025 was Forvis Mazars Audyt Spółka z ograniczoną odpowiedzialnością.

Letter from the President

Ladies and Gentlemen,

with its financial results and commercial performance for 2025, ING Bank Śląski is among the most profitable banks in Poland. Clients' needs, quality service, innovative products and services – those have been the key areas of our attention as we keep strengthening our competitive position.

Changes that help adapt the bank to the market situation and new challenges are an integral feature of ING Bank Śląski. In November, we announced our new strategy "ING. In the Beat of Life" which is our response to the megatrends: demographics, economic transformation and technology revolution.

Our approach is a strategy of continuation, while reflecting changes in the world that occur faster than ever before. Our new strategy provides for strengthening our market position in the key areas of our business. We want to offer clients top quality service, including the best digital solutions, the mobile app and AI-based technologies, while supporting clients in their development, investment projects and day-to-day financial decisions. Shifting the emphasis from saving to long-term investing is an important pillar of our plans. We will be a partner for businesses as they implement projects that shape the future of the Polish economy, including infrastructural projects, projects relating to energy transformation and defence.

Together with the presentation of our strategy, we also announced the decision to take over of Goldman Sachs TFI, the second largest mutual funds company in Poland. It was not only a historical transaction on the investment market, but it also helped us considerably strengthen our competitive position. As we watch the growing wealth of Polish clients and the major demographic changes, we see more and more often that clients are looking for alternatives to traditional saving products. That is why we will offer a comprehensive array of solutions under ING brand, starting from deposits to investment products.

We will also continue to develop a modern product offer and new technologies based on artificial intelligence, among other things, implementing innovative additional services, including the subscription model, modern voicebots and chatbots, highly automated processes, intuitive mobile apps or virtual assistant. We want to be the most loved, the most impactful and the most valued bank in Poland, both among retail- and corporate clients.

2025 also saw changes on the Management Board. We have built a strong team that will implement the new strategy in the coming years.

At the end of December 2025, ING Bank Śląski earned PLN 4,633 million in consolidated net profit, up by 6 percent from a year earlier. Return on equity (ROE), upon accounting for MCFH, was 20.8 percent. We recorded solid financial results driven by an increase in client numbers, deposits, loans and investment products. The credit portfolio and the deposit base grew by, respectively, 8 percent and 7 percent. Concurrently, the number of retail clients reached 4.7 million, and the number of corporate banking clients is nearly 600,000. Last year, we also recorded record-high mortgage sales at PLN 19.2 billion, up by 32 percent, which gives us the second place on the market. We achieved a good result in the consumer credit segment, where new sales went up by more than 19 percent to PLN 6.9 billion. In 2025, we were also active on the corporate market. The value of loans in that area grew by 5 percent year on year, which helped strengthen our market share at 11.9 percent. Those figures prove our strong competitive position.

I am confident that our bank is well prepared to embrace any challenges future may bring. Further expansion on a competitive market will be possible in that we keep the innovative nature of our organisation which knows how to translate growing customer requirements into modern and reliable processes and top quality service.

I wish to thank all employees and the Supervisory Board for their efforts and the development of our bank.

I encourage you to read the report and review a detailed description of our operations.

Yours faithfully,

Michał Bolesławski, President of the Bank Management Board

2025 events

The price of ING Bank Śląski S.A. shares in 2025 (PLN)

1. **6 February** – publication of preliminary non-audited consolidated financial results for Q4 2024 (link)
2. **5 March** – Bank Management Board decision on dividend payout proposal (link)
3. **7 March** – publication of the annual report for 2024 (link)
4. **21 March** – launching a public debate on imposing a windfall tax on banks (link *in Polish only*)
5. **26 March** – information on the amount of annual contribution to the compulsory resolution fund of the BGF in 2025 (link)
6. **31 March** – increase in the share in the total number of votes above 5% at the Bank General Meeting by Nationale-Nederlanden PTE S.A. (link)
7. **1 April** – convocation of the Ordinary General Meeting and draft resolutions (link)
8. **29 April** – appointing the Bank Management Board for the new term of office (link)
9. **29 April** – notice on dividend payout for 2024 (link)
10. **8 May** – publication of interim report for Q1 2025 (link)
11. **5 June** – update of information on the MREL requirement for ING Bank Śląski S.A. (link)
12. **27 June** – resignation of a Member of the ING Bank Śląski S.A. Supervisory Board (link)
13. **10 July** – increase in the share in the total number of votes above 5% at the Bank General Meeting by Nationale-Nederlanden PTE S.A. (link)
14. **31 July** – publication of interim report for H1 2025 (link)
15. **11 August** – registration of amendments to the Charter of ING Bank Śląski S.A (link)
16. **14 August** – launching the Building Energy Efficiency Calculator (link)
17. **21 August** – publication by the Ministry of Finance of assumptions concerning changes to CIT and banking tax for the banking sector (link)
18. **19 September** – launching the individual carbon footprint calculator (link)
19. **24 September** – resignation of a Member of the ING Bank Śląski S.A. Supervisory Board (link)
20. **26 September** – subscription for a four-year pledge bond issue worth PLN 1 billion by ING Bank Hipoteczny (link)
21. **14 October** – conclusion of a subordinated loan agreement (link)
22. **30 October** – publication of interim report for Q3 2025 (link)
23. **6 November** – adoption by the Sejm of the final version of the amendment to the act changing the amount of CIT and bank tax for banks (link *in Polish only*)
24. **18 November** – announcement of ING Bank Śląski S.A. Strategy “ING. In the Beat of Life” (link)
25. **18 November** – concluding agreements aimed at taking control over Goldman Sachs TFI S.A. (link)
26. **18 November** – dividend policy update (link)
27. **27 November** – signing by the President of the RP of an amended act changing the amount of CIT and bank tax for banks (link *in Polish only*)
28. **11 December** – extension of ING Bank Śląski S.A. offering to include ING Group’s Luxembourg funds (link)
29. **12 December** – resignation of a Member of the ING Bank Śląski S.A. Management Board (link)
30. **12 December** – appointment of Vice-President of the ING Bank Śląski S.A. Management Board (link)

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In this chapter you will find out who we are, the history behind us and how we operate as a group in Poland. What's more, you will find information about the scale of our operations, our market shares and the awards and distinctions we have received. You will also learn about our integrated business strategy and how ING Bank Śląski creates value for its stakeholders. In line with the motto of our new strategy, "ING. In the Beat of Life", our goal is to be the financial partner for individual and corporate clients at all stages of their lives. We are committed to community engagement with our community partners and corporate foundations: ING for Children Foundation and the ING Polish Art Foundation.

Who we are

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Our history goes back to 1988. It was in that year, exactly on 11 April, that the Council of Ministers issued a regulation on the establishment of Bank Śląski in Katowice, and this is where our head office is still located today. Less than a year later, at the beginning of February 1989, Bank Śląski began its operations. In 1991, our bank was transformed from a state-owned bank into a public limited company. In 1993, we received approval from the Securities Commission to list our shares to the public. In January 1994, ING acquired 2.4 million shares in our bank which corresponded to 25.9% of the share capital. On 25 January 1994, the shares of Bank Śląski made their debut on the Warsaw Stock Exchange.

Since 6 September 2001 – following the merger of Bank Śląski with the ING branch – we have been operating under our current name, ING Bank Śląski S.A. At that time, ING Bank N.V. became the majority shareholder in our bank (with a stake of 87.77%, which was reduced to 75.00% in March 2005).

The bank is effectively growing organically. The bank's mission is to inspire and assist clients in making the right life decisions. Achieving this requires a committed and responsive workforce. We pursue this mission through our bank, its subsidiaries and, above all, through our group of 7,693 employees (as at 2025 yearend).

After more than 30 years of continuous development, we are now ranked 3rd in terms of the volume of loans and deposits in the Polish commercial banking sector. Our scale of operation contributes to the development of the Polish economy, but it also brings with it an awareness of the enormous responsibility for our employees, clients, society and the environment.

We are a universal bank that serves both retail clients and businesses. The Internet is the primary channel of communication with our over 5 million clients, with mobile banking playing a rapidly growing role. We also serve our clients through a network of 150 meeting points and 64 ING Express outlets. These are places where our clients can ask for advice and talk about their financial needs.

In 2025, ING BSK ranked a strong second on brand power (Demand Power) (Kantar Polska[1], global survey). The high level of brand strength indicates the role of the ING brand and its perception in building our market share. The ING brand stands out for its strong growth potential in the banking category. We are seen as a trend-setting brand in banking in Poland and constantly introducing new solutions for clients. Its particularly strong image dimensions are the perception of ING as a brand for entrepreneurial people, which is reflected in the brand's strong positioning among companies. The strong image has also translated into consumers' preference for ING when choosing a savings account and a company account. The ING brand is in second place when it comes to choosing personal accounts, mortgage loans, pension and investment products, among others. Conducting ESG activities, including educating entrepreneurs and children about cyber security, has translated into the bank being perceived as a brand that supports clients in their sustainability initiatives.

How we operate as the ING Group in Poland

ING Bank Śląski S.A. is the parent company of the ING Bank Śląski S.A. Group. As a group, we have established ourselves as one of the largest financial institutions in Poland over our more than 30 years of operation. Our core business is banking, i.e., inter alia, including taking risk on funds entrusted to us by our clients (this is indicated in detail in paragraph 8 of our charter). As a bank, together with our subsidiaries, we form a group in which we are also active in, among other things:

- leasing,
- factoring,
- payroll and accounting services,
- sales and implementation of business process robotisation software,
- the provision of payment services for the processing of e-commerce transactions.

Group companies are also founders of the ING for Children Foundation and the ING Polish Art Foundation.

In 2025 the bank and its subsidiaries did not enter into any transactions with related parties on terms other than market terms.

[1] In previous reports, the results were based on a local tracking survey, which ended in March 2025. The current global tracking study, which appears for the first time in the report, has been implemented since May 2023. The differences in the research are mainly based on the expansion of the sample. Due to these changes, the results of the local survey cannot be compared with the current global survey.

ING Bank Śląski conducts interbank market operations with ING Bank N.V. and its subsidiaries. These include deposits, loans, advances and derivative operations. The bank also maintains the bank accounts of ING Group N.V. entities, as well as providing outsourcing and advisory services. All of the above transactions take place on an arm's length basis.

The operating expenses incurred by the bank for the parent company result primarily from agreements for consultancy and advisory services, operational support and data processing and analysis, the purchase of IT services and the provision of software licences. In terms of costs incurred by the bank for other related entities, outsourcing agreements for the provision of system resource hosting services for various applications and IT security monitoring and penetration testing play a dominant role. You can read more about related party transactions in the "Related entities" note in the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group for 2025.

Composition of the ING Bank Śląski Group

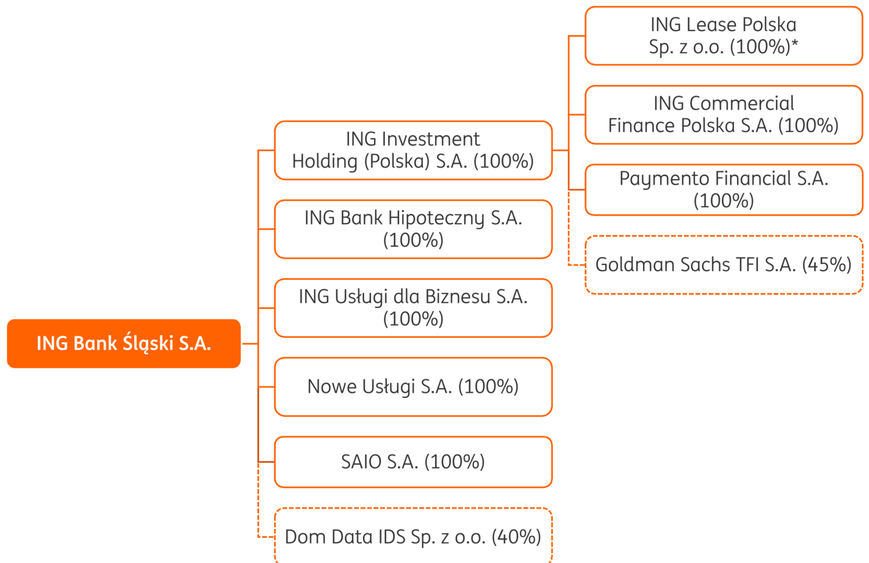
At the date of publication of the annual report, the bank holds a 40% stake in Dom Data IDS Sp. z o.o. and – through ING Investment Holding (Polska) S.A. – holds 45% of the shares in Goldman Sachs TFI S.A. and treats these companies as associates. Subsidiaries are consolidated by our bank using the full consolidation method, and the associates (Dom Data IDS Sp. z o.o. and Goldman Sachs TFI S.A.) are accounted for using the equity method. In addition to its subsidiaries and associates, the bank holds minority equity investments in the following companies, among others:

- Biuro Informacji Kredytowej S.A. (9.0% of shares),
- Krajowa Izba Rozliczeniowa S.A. (5.7% of shares),
- Polski Standard Płatności S.A. (14.3% of shares).

On 18 November 2025 the bank signed a preliminary purchase agreement with Goldman Sachs Asset Management International Holdings B.V, pursuant to which the bank agreed to acquire 115,500 shares in Goldman Sachs TFI S.A. (GS TFI), representing 55% of the shares in the share capital of GS TFI and 55% of the total number of votes at the general meeting of GS TFI. Implementation of the transaction will be subject to the fulfilment of conditions precedent, the key ones being (1) the issuance of a decision by the Polish Financial Supervision Authority stating that there are no grounds for objecting to the bank's acquisition of a number of GS TFI shares which would ensure that the bank's shareholding in GS TFI exceeds 50% and the total number of votes at the general meeting of GS TFI, and (2) the issuance of a decision by the European Commission stating that there are no objections to the notified concentration and that it is deemed to be compatible with the internal market. The bank expects to close the transaction in the first half of 2026.

On February 17, 2026, the European Commission approved the Bank's acquisition of sole control over Goldman Sachs Towarzystwo Funduszy Inwestycyjnych S.A.

Subsidiaries and associates within the ING Bank Śląski S.A. Group as at 31 December 2025



*A solid frame line indicates a subsidiary and a dashed frame line indicates an associate; *the ING Lease (Polska) Group comprises an additional 5 subsidiaries in which ING Lease (Polska) Sp. z o.o. holds 100% of the shares.*

ING Investment Holding (Polska) S.A.

ING Investment Holding (Poland) is a holding company. through which the Bank holds interests in four companies: ING Lease Polska Sp. z o.o. (100%), ING Commercial Finance Polska S.A. (100%), Paymento Financial S.A. (100%) and Goldman Sachs TFI S.A. (45%).

ING Lease (Polska) Sp. z o.o.

ING Lease (Poland) has been present on the market since 1995 and has been part of the ING Bank Śląski Group since 2012. ING Lease (Polska) offers leasing to finance both movables (in the form of cars, vans, heavy transport vehicles, machinery and equipment, construction, medical, equipment and IT equipment) and real estate. ING Lease (Polska) focuses on modern solutions, digital sales channels and tailoring offers to individual client needs.

The ING Lease (Polska) Group comprises an additional five subsidiaries in which ING Lease (Polska) Sp. z o.o. holds 100% of the shares. The company addresses its services to all groups of companies: large, medium-sized and small companies, as well as micro (entrepreneurs).

In 2025 the company's new leasing production amounted to PLN 6.5 billion (+5.3% y/y). As at 2025 yearend, the company served 38,800 clients (up 3.9% y/y), with a portfolio value of PLN 14.5 billion (+3.4% y/y).

ING Commercial Finance Polska S.A.

ING Commercial Finance Polska offers factoring and receivables financing services. The company was founded in 1994 under the name Handlowy Heller. Since 2006, it has been operating under the name ING Commercial Finance, having been integrated into ING Group N.V. Since 2012, it has been part of the ING Bank Śląski Group.

In 2025, ING Commercial Finance Polska's turnover amounted to PLN 75.4 billion (+18.6% y/y), representing around 14.5% of the turnover of the entire market. As at 2025 yearend, the company had 9.7 thousand clients (up 11.6% y/y) and purchased 4.0 million invoices (down 1.4% y/y).

Paymento Financial S.A.

Paymento Financial was founded in 2016 as an initiative by private individuals and an equity infusion by venture capital funds. The company became part of the ING Bank Śląski Group on 31 March 2023 through the acquisition by ING Investment Holding (Polska) S.A. 100% of the shares from existing shareholders.

The aim of the company is to provide e-commerce transaction processing services to financial market players, particularly in the white-label formula. The company is a regulated entity authorised by the Polish Financial Supervision Authority to provide payment services as a National Payment Institution.

The company entered into a partnership with ING Bank Śląski in 2017. The subject of the cooperation is the development and transaction handling of the imoje payment gateway, the cooperation is being gradually developed. The company also provides services to entities outside our group.

ING Bank Hipoteczny S.A.

ING Bank Hipoteczny's strategic objective is to acquire and then increase the share of long-term funding on the ING Bank Śląski Group S.A.'s balance sheet by issuing mortgage bonds.

The achievement of the set goal will support:

- strengthening the funding stability in the ING Bank Śląski Group,
- diversification of funding sources for the existing retail mortgage portfolio,
- the alignment of the asset and liability term structure in the ING Bank Śląski Group's balance sheet,
- lowering the cost of financing the conducted lending activity in the part of the loan portfolio financed with other long-term instruments.

In 2025, ING Bank Hipoteczny carried out its third mortgage bond issue. As at 2025 yearend, the nominal value of the mortgage bonds issued by the bank and outstanding amounted to PLN 1.5 billion. Mortgage bonds issued by the bank are listed on the Luxembourg and Warsaw Stock Exchange. The bank's mortgage bonds can serve as collateral for lombard loan, technical loan and repo operations conducted by the National Bank of Poland.

ING Usługi dla Biznesu S.A.

ING Usługi dla Biznesu was founded in 2012 and offers innovative business services that go beyond traditional banking. The company's main objective is to provide tools that make running a business easier. ING Usługi dla Biznesu currently offers the following solutions:

- ING Księgowość - an invoicing and payment management platform as well as accounting and payroll services for entrepreneurs,
- Firmove.pl (available in Polish only) - a service supporting aspiring and beginner entrepreneurs in preparing for business start-up and company registration,
- ALEO.com - online database of companies (registration data, financial data).

In 2025, ING Usługi dla Biznesu consistently expanded its competences in supporting the acquisition of ING Bank Śląski S.A.'s companies through a number of initiatives aimed at promoting banking products, mainly a company account for sole proprietorships. Initiatives included both remote promotion through channels belonging to ING Usługi dla Biznesu, cooperation with external partners and processes with telephone assistance to help clients set up a business and a company account with ING Bank Śląski S.A.

Nowe Usługi S.A.

Nowe Usługi S.A. conducts educational and marketing activities. In terms of education, it runs the portal edukacjagieldowa.pl (available in Polish only). This is a site about investing and the stock market, for both novice and advanced investors. The website publishes investment-related material on an ongoing basis and a knowledge base is available.

Marketing activities are carried out to popularise ING Turbo certificates in the Polish market. These are instruments listed on the Warsaw Stock Exchange, of which ING Bank N.V. is the issuer. The company's main activities include the organisation of marketing campaigns, the provision of training courses, the operation of the ING Turbo helpline or technical support for the running of the website ingturbo.pl (available in Polish only).

SAIO S.A.

SAIO was founded in 2022. It specializes in the sale and implementation of business process automation solutions based on proprietary software – the SAIO Platform, which the company develops in-house. We offer the platform to companies across numerous industries – it is successfully used in areas such as sales, finance, accounting, purchasing processes, and HR. SAIO provides clients with a full range of automation services, and the product guarantees security, rapid implementation, and full control over implemented solutions. SAIO also supports companies in the integration and implementation of artificial intelligence (AI) and other modern technologies, enabling them to effectively utilize them in their daily business operations. The company also provides ongoing automation services to ING Bank Śląski, companies within the bank's capital group, and selected ING Group entities worldwide. SAIO's business development is based on its own resources and collaboration with partners.

Goldman Sachs TFI S.A.

Goldman Sachs TFI is the second largest TFI on the Polish market in terms of assets in capital market funds. It is also one of the longest-established investment fund companies in Poland. It has been operating in the local market since 1997. It is authorised by the Polish Financial Supervision Authority to operate. According to data as at the end of December 2025, the company served almost 778,000 individuals and institutions and managed assets worth almost PLN 56 billion.

Dom Data IDS Sp. z o.o.

Dom Data IDS Sp. z o.o. is a special purpose vehicle jointly created by ING Bank Śląski S.A. and Dom Data AG Sp. z o.o. (now Dom Data S.A.) to provide services in a new, expanded formula, which offers much wider opportunities for co-operation. As at 2025 yearend, Dom Data IDS Sp. z o.o. ceased operations.

Dom Data S.A. – a Polish company operating on the IT market and implementing projects both in Poland and in the countries of the European Union. Among other things, it is the author of the Ferryt BPM process platform and additionally provides comprehensive solutions for the banking sector. As at 2025 yearend, the company acquired a strategic investor, Kulczyk Investments.

Changes in the Group's structure

There were no changes to the composition and structure of the ING Bank Śląski S.A. Group in 2025.

Business model and value creation

Our business model

ESRS SBM-1.40

We are a universal bank which, together with other companies in its group, serves both retail and corporate clients as part of its operations. We want to be seen as **the bank of the future for entrepreneurial people** – a bank that provides its clients with the practical solutions they need and are happy to use. We want people to be able to achieve their goals with our support.

Our mission is **to support and inspire people to be one step ahead in life and business**. As a bank, we support our clients in their financial decisions by, inter alia, providing knowledge and tools as well as simple, useful and tailored solutions and services.

Our core business is, on the one hand, to enable our clients you to save money safely and efficiently and, on the other hand, to finance loans and advances. The financing granted supports purchases of housing, opening business activity or development of companies. In this way, our activities support the development of the economy and society.

We also offer our clients products and services in the area of *beyond banking,* i.e. not related to traditional banking. Our expertise allows us to build a positive client experience. It is not solely insurance products, accounting services or investment products. We offer our clients a broad range of tools for financial management.

As the bank of the future, **we implement innovations** to meet the needs of our clients. We also use big data and artificial intelligence and cooperate with fintechs to reach beyond. We take care that our payment and transactional systems are effective. At the same time – with the growing popularity of cashless trading – an efficient electronic payment system is becoming increasingly important. We provide our clients with transactional banking, processing transfers, card, phone or BLIK payments and developing tools for cashless payments. To this end, we have provided specific solutions to support the development of e-commerce, such as the imoje payment gateway – the first online payment for online shops offered by a bank in Poland.

For us electronic and mobile banking are the core interaction channel with both retail and corporate clients. We want our clients to have tools that enable them to make modern payments and remotely deal with simple issues such as paying for public transport tickets, parking and motorway journeys. Our electronic banking also allows you to deal with official matters more conveniently.

We also note the changing role of bank branch offices. That is why, for several years now, we have no longer been talking about branches, but about meeting places. These are places where our advisers help clients to make important decisions – whether in everyday banking, improving their living conditions, growing their business, or securing their financial future. For corporate clients, we also provide a service at their company's premises,

depending on their needs. The task of our employees is to support them in taking financial decisions, inter alia, by analysing their financial needs and goals, financial condition or risk levels of investments.

We integrate sustainability into our business

We are aware that, as a financial institution and a large organisation, we influence many economic processes and individual choices. Guided by our principles and values, we strive to respond to the challenges of the modern world. This is why we integrate sustainability principles into our business and non-business decisions – ESG goals are part of our strategy, this applies to the areas of climate and environment (E), society (S) and corporate governance (G). We support our clients in environmental transformation, entrepreneurship, and financial management. We work towards equal social opportunities and we care for the health of our employees. Our foundation is to operate ethically based on values, principles and processes and in accordance with regulations and with reference to market best practice.

We manage risk

As a public trust institution, we are aware of the importance of stability and an effective risk management system for the banking sector and the entire economy. In our bank, it is structured in accordance with the best market standards, based on the principles of the three lines of defence. The first line consists of business management, the second line includes risk and financial management, and the third line comprises internal audit and compliance. We manage ESG risks as an integral part of each group of risks, both financial (e.g. credit risk or market risk) and non-financial (e.g. operational risk). We also care for optimum management of the asset and liability structure of our balance sheet in line with our risk appetite limits.

Integrated thinking and value creation model

ESRS 2 SBM-1.42

Our business model and strategy are firmly rooted in the concept of integrated thinking. As a bank, we contribute more than just our financial value to society. The role of a financial institution is to support and promote economic, social and environmental progress leading to a better quality of life for people in society, while generating adequate profits and growth.

Capitals
Inputs, dependencies

Human
Employees and other workforce and their competencies

Intellectual
Risk models, algorithms, IT architecture, and other know-how

Financial
Equity capital, deposits, and liquidity

Social and relationship
Brand, industry partnerships, and relationships with suppliers, employees, clients, and regulators

Natural capital
Energy and water

Manufactured
Branch network, headquarters, and IT infrastructure

Business model

Our strategy and corporate governance

Primary activities

- Marketing and sales of products and services
- Asset and liability management
- Processing of financial transactions
- Lending and credit operations
- Customer service and technical support
- Fraud prevention and transaction security

Support activities

- Building corporate culture
- Development of information technologies
- Risk management and regulatory compliance
- Human capital management
- Supply chain management
- Facilities management

Outputs

- Financial products and services
- Emissions and waste

Key Outcomes
Value generated for capitals and stakeholders

For our clients
(+) Access to financing, investments, business development, protection against financial fraud, security of entrusted funds, and increased knowledge in finance and sustainable development

For employees
(+) A good working environment, development of knowledge and competencies, compensation

For organisation
(+) Increased know-how, increase in equity capital, and strengthened brand trust

For the economy
(+) Economic growth, financial system stability, and protection against financial fraud

For the environment
(-) CO_2 emissions
(+) Financing renewable energy sources and energy-efficient real estate

For shareholders
(+) Increase in the value of the ING Bank Śląski Group and dividend distribution

Key sections in the report

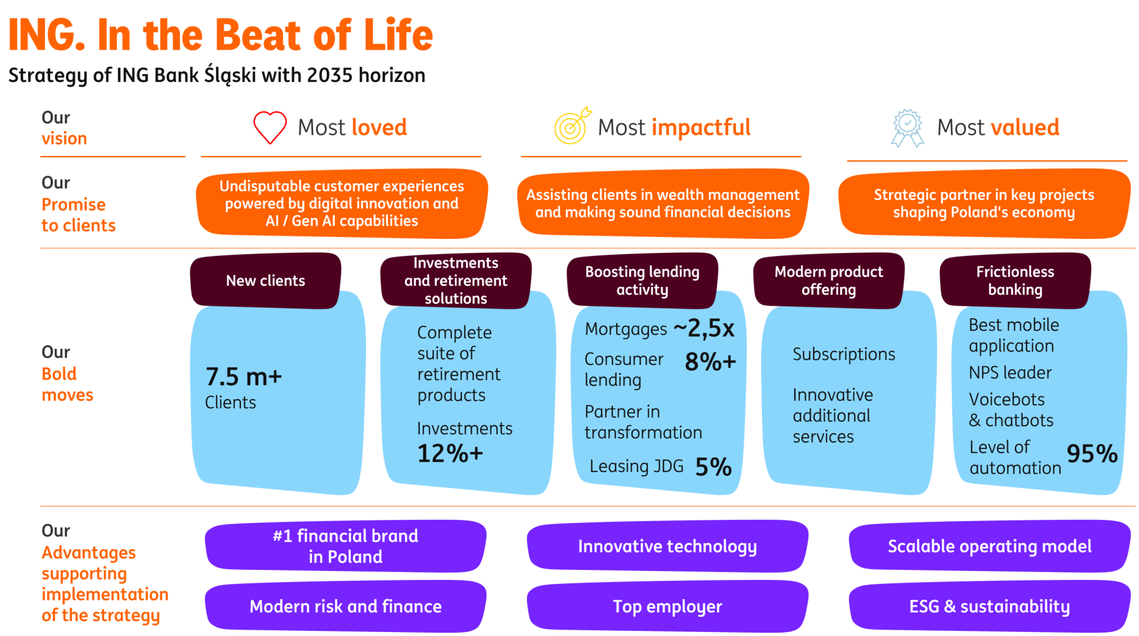
- Who we are
- The scale of our operations
- Bank and clients security
- S4 Consumers and end users
- S1 Own workforce
- Who we are
- Technological development
- We improve, develop, and support
- Customer experience, including NPS
- The environment in which we operate
- Bank and clients security
- E1 Climate change
- E4 Biodiversity
- Corporate governance
- Financial performance
- Risk and equity management system

Business strategy

ESRS 2 SBM-1.40

With 2024, we have completed the strategic perspective adopted in 2022. In anticipation of the strategy update, we have set financial and business ambitions for 2025 that are an extension of the 2022-2024 strategy. In November 2025, we published our new long-term business strategy, "ING. In the Beat of Life", which extends until 2035.

The strategy we have adopted is a continuation strategy and builds on the strengths and directions taken in previous strategic perspectives, while relying more on long-term trends. In developing the strategy, we paid particular attention to the demographic, social, economic and technological trends that we believe will shape the reality around us in the next ten years.



Our vision and promises to clients

Our strategy is guided by a vision that is based on three key values within the ING Group: *Most loved, Most impactful, Most valued*.

In the layer of promises we want to:

1. Create an unparalleled client experience.
2. Be an assistant to clients in wealth management and good financial decisions.
3. Play the role of a strategic partner in key projects for Poland.

The implementation of our strategy is based on five business pillars and six supporting areas that will enable us to achieve our business priorities.

Our activities for the key business pillars

New clients

By 2035, we want to be a bank with 7.5 million clients, including more than 6.6 million individual clients and more than 800,000 corporate clients. We focus on effective acquisition based on our strong brand and on effectively preventing clients from leaving for competitors.

Investments and pensions

We are aiming for an investment market share of more than 12% by 2035, as measured by the volume of investment and pension products. Priorities in this area include increasing the breadth and depth of the product offering and an effective sales and service model. To this end, we introduced ING Solutions Investment Management (ISIM) foreign funds at the beginning of 2026, and we plan to expand the range in the next steps:

- leading foreign stock exchanges;
- voluntary pension products within a brokerage firm;
- for private banking clients: advanced service models such as DPM (portfolio management), succession planning advice, and family foundation services.

Increasing lending

We are planning significant volume increases in all aspects of our lending and financing activities. In the individual client area, we will increase the volume of mortgage loans by around 2.5 times by 2035, with a focus on further simplification of the process, including a fully digital mortgage process and an efficient sales and service model. We will significantly increase our market share in consumer loans – from around 5% in 2025 to over 8% in 2035). To this end, we will, among other things, expand our product offering and improve our lending process. In the corporate

segment, we plan to more than double loan volumes by 2035. We will be a partner in Poland's economic transformation – particularly in infrastructure, defence and energy transition. Particular attention will be given to leasing (planned 5-fold increase in market share) and factoring (planned significant increase in volume).

Modern offer :

- For retail clients including attractive additional products (e.g. insurance) in a simple flat billing model.
- For clients in the corporate segment, we want to be a one-stop shop, comprehensively enabling business operations and easing the burden on entrepreneurs.

Convenient banking

Not only will we remain the leading bank in Poland in terms of client satisfaction, but we will increase the gap between us and our competitors. In our application, we will introduce a conversational interface to include people at risk of digital exclusion. We will increase the catalogue of things that can be done without the bank and enable new interaction models, including intelligent chatbots and voice bots. We will also achieve a 95% process automation rate by 2035.

Our advantages to support strategy implementation

The #1 financial brand in Poland

We are consistently building a brand with the highest potential for business support in the Polish financial sector, appealing to parents' trust, reinforcing good financial habits and saving for the future, and adapting communication channels and content to the *next-gen* generation.

Innovative technology

We are pursuing a multi-year programme to transform *core banking* systems and move to cloud infrastructure, maintaining the best availability and failure prevention rates in the sector. We are adapting the bank's technology enabling further AI and GenAI implementations.

Scalable operating model

We are simplifying, digitalising and automating internal and service processes, increasing our operational efficiency. We are building new ways for the client to interact with the bank, including through intelligent chatbots and voice bots providing another service channel available 24/7.

Modern Risk and Finance

We continue to evolve the Risk and Finance function, providing efficient, digital processes and modern systems based on the best quality data. We aim to further align IRB methods to optimise our capital position.

Best employer

We are strengthening our employee benefits offering, focusing on our priority areas of well-being, health and pensions. At the same time, we are focusing on building strong bonds between employees and teams by establishing a Department of Organisational Culture and strengthening the hybrid working model.

Sustainable development

We integrate ESG into our business and operations at all levels. We are building a strong culture of responsibility among employees, caring for our clients and communities, managing our climate impact and developing the long-term value of the organisation. Our ESG priorities, supporting the delivery of our business strategy, and the actions we are taking are presented in a dedicated section „Sustainability Statement".

The full presentation summarising our strategy to 2035 is available at this link.

Summary of our business and financial ambitions to 2035

With the adoption of the new strategy, "ING. In the Beat of Life", we have set measurable business goals for the key areas of the strategy. The ambitions for 2035 and their realisation in 2025, which will serve as a starting point in subsequent years, are presented in the table below:

Business strategy goals for 2035 compared to the results for 2024-2025				
Key business priorities	Measurements	2024	2025	2035
Key business pillars of the strategy				
New clients	Number of individual clients (million)	4.5	4.7	6,6m +
	including primary mobile clients (million)	2	2.2	3,4m +
	Number of private banking clients (thousand)	15	17.4	50+
	Number of corporate clients (thousand)	573	594.3	800+
Investments and pensions	Investment market share (%)*	6.6%	6.9%	12% +
	Number of clients investing with ING (thousand)**	324	365	1 m +
Increasing lending	Volume of mortgage loans (gross, billion)	61	69	~2,5x
	Consumer loan market share (%)	~5%	5%	8% +
	Corporate loan volume (gross, billion)	96	101	~2x
	Market share in the leasing of sole proprietorships (%)	~1%	1.6%	5%
	Market position in factoring by the value of financed invoices (#)	#3	#3	#1
Convenient banking	Balance of retail clients deposits (billion)	126	136	>2x
	Retail clients NPS and market position	38	40	Position #1 (30-40% higher rate than player #2)
	NPS of business clients and market position	42 (entrepreneurs) 46 (medium-sized companies) 44 (large companies)	38 (entrepreneurs) 43 (medium-sized companies) 48 (large companies)	Strengthening results and maintaining leadership position
Selected competitive advantages indicated in the strategy				
Innovative technology	Availability of ING services	99.94% for Moje ING 99.89% for ING Business	99.97% for Moje ING 100.00% for ING Business	Minimum 99.94% for Moje ING and ING Business
	Progress of migration to the cloud (%)	31%	44%	100%
Scalable operations	Level of process automation (STP)	not applicable***	80%	95%
	Commercial volumes per operational position in the Operations Division (million)****	283	350	>3x
Sustainability	RES financing (cumulative value from 2024; billion)	0.5	2.6	PLN 5 billion (by 2030)
	Share of energy-efficient properties in new mortgage sales (%)	7.2%	13.2%	50%
	Number of clients saving for retirement (thousand)	176	231.8	1 m +

**Defined as the amount of funds accumulated by ING clients in investment funds and brokerage accounts to the total value of public assets; **defined as clients with investment fund-based products (including IKE, IKZE) and/or individual brokerage accounts and a fund balance of at least PLN 100; ***until 2024, the ING Digi Index was reported, indicating the percentage of customer journeys handled without any manual intervention and relating to 33 selected customer journeys common to the ING Group. With the announcement of the new strategy, we are introducing a new indicator covering a wider range of operational processes relevant to ING Bank Śląski S.A. Due to the introduction of the indicator in 2025, we are not providing its value for 2024; ****defined as the sum of loans and deposits divided by the number of full-time equivalents (FTE) in the Operations Division.*

Long-term strategic ambitions published in 2025 against the background of results for 2024-2025

Indicator	2024	2025	2035	Comments on achieving ambitions in 2025
Return on equity (MCFH adjusted)	20.4%	20.8%	~19%	6% y/y increase in net income translated into continued high profitability.
Cost-to-income ratio*	35.1%	36.1%	~37%	Y/y ratio maintained at similar level to 2024, increase due to slightly lower income dynamics (+5% y/y) vs cost dynamics (+8% y/y).
Risk Cost Margin Index**	0.58%	0.45%	<60 pbs	The cost of risk margin fell y/y, mainly as a result of lower risk costs of the corporate segment.
NPS (both retail and corporate)	#1	#1	#1	In 2025, we strengthened our NPS scores in the retail and large enterprise segments, while recording slight declines in the enterprise and small business segments. We maintain our leadership position in all segments and will continue to strengthen this position in the coming years.
Dividend payout ratio	75%	75%	up to 75%	The Management Board recommends maximum dividend allowed by the PFSA.

**Income including share of profits of associates, expenses excluding bank tax; **excluding legal risk costs of foreign currency mortgage loans.*

Opportunities for the implementation of the business strategy in 2026

Economic growth	• GDP growth expected to accelerate. • High potential for investment growth. • Additional potential impetus related to the reconstruction of Ukraine.
High government investment	• Expected high government investment in infrastructure, energy transition and defence with the potential to trigger demand for long-term funding for private investment.
Increasing affluence of society	• An increase in average disposable income, combined with the stabilisation of inflation, expanding the bank's target client group for investment and pension products (both savings and investment) and offerings targeted at more affluent client segments (e.g. private banking).
Growing public awareness of the need to save for retirement	• Increased public awareness fuelled by sector-wide marketing and the more frequent appearance in public discussion of the future problems of the first pillar of the pension system increasing demand for voluntary pension products.
Stability of the financial sector	• All fundamental risks to the financial sector remain moderate or low. • High level of provisions made for the risk of foreign currency mortgage loans. • High level of capital buffers and meeting the MREL target. • High dividend-paying capacity.
Accelerating AI development and adoption	• Technological advances in artificial intelligence, including generative AI, with the potential to accelerate the digitalisation and automation of the bank's service processes.
Structural changes in the Polish financial sector	• Ownership changes at rival banks at risk of retaining clients and employees. • ING Bank Śląski Group's planned acquisition of Goldman Sachs TFI with the potential to accelerate ING Group's growth in Poland in the area of investments and pensions.

Risks in the implementation of the business strategy in 2026	
Accelerated path of interest rate cuts	• Faster and/or deeper than expected interest rate cuts by the MPC, affecting financial sector profitability.
Geopolitical tensions	• High number of conflicts, including armed conflicts. • The timing, manner and effects of the end of the war in Ukraine. • Strained economic and territorial relations between the US, China, the EU and other partners. Dividing the world into spheres of influence. • Uncertainty about the shape of global trade and supply chains.
Demographic risks	• Risk of acceleration of the depopulation of Poland (gradual deepening of the fertility decline in relation to earlier projections). • Risk of labour unavailability as a result of adverse demographic changes, uncompensated by immigration hampering the rate of growth of the economy.
Overregulation of the economy and regulatory uncertainty in the financial sector	• At the level of the overall economy in Poland and Europe, over-regulation inhibiting business investment. The risk of widening the unfavourable gap with China, India and the United States, among others. • In the financial sector, a large number of regulatory changes announced or implemented at European level (e.g. 6th AML Directive, DORA, ESG, AI Act, MiFiD III, Accessibility Act) and locally (increased CIT for banks, local implementation of MiCa). • High volatility of sector regulation. Interpretative challenges (including mutual conflicts) in regulatory provisions requiring rapid implementation.
Reform of the benchmarks	• Difficult and complicated process of implementing benchmark reform.
Increased competitive pressure	• All of ING Bank Śląski's main competitors with growth strategies published between 2024 and 2025. • Increased competition for clients and price competition.
Persistent structural over-liquidity of the sector	• Inflow of deposits and funding from the professional market. • Limited demand for company loans in the face of regulatory and geopolitical uncertainty and the economic crisis in Germany (Poland's key economic partner). • Increased levels of investment in Treasury securities.
Climate crisis	• Risk of natural disasters and the occurrence of extreme weather conditions. • The rising costs of the climate crisis.
Sovereign debt	• High costs incurred to resolve military conflicts (including the war in Ukraine).
Cyber security	• The availability of modern technology (including AI) that can be used by cybercriminals, leading to lower thresholds of entry into cybercriminal activity. • Advanced criminals relying on cloud-based solutions to try to negatively impact the financial market, looking for the weakest link. • A growing – along with the number of attacks on clients, banks and suppliers – number of cybercriminal activities.
Overvaluation of securities	• Risk of capital outflow from the investment market towards products with a lower risk profile and consequently lower returns on off-balance sheet savings.

Evaluation of the previous strategy

In 2025, we completed the implementation of the bank's previous strategic outlook. The table below shows the performance of the 2025 strategy compared to the ambition and previous years:

Our financial ambitions for 2025 and an assessment of the extent to which they have been achieved

Area	Indicator	2021	2022	2023	2024	Ambition 2025	2025	Comments on the implementation of the strategy in 2025
Growth area	Gross loan portfolio growth (y/y)	16%	7%	1%	6%	+8% r/r	8%	The higher growth rate of the loan portfolio in 2025 is mainly the result of higher volumes on the retail side.
	Average annual growth in net fee and commission income (y/y)	21%	14%	3%	6%	>5% r/r	3%	The increase in net fee and commission income was supported by growth in commissions from account management, distribution of units and from the sale of insurance products. The slower than expected growth was due to market conditions and the decision, made during the development of "ING. In the Beat of Life" strategy, to introduce subscription packages in the first half of 2026, which resulted in the abandonment of other, previously planned changes to the Table of Fees and Commissions in the second half of 2025.
Performance area	Cost-to-income ratio*	43.0%	47.2%	34.7%	35.1%	<40%	36.1%	Y/y ratio maintained at similar level to 2024, slight increase due to slightly lower income dynamics (+5% y/y) vs cost dynamics (+8% y/y).
	Risk cost margin ratio**	23 bps	48 bps	32 bps	58 bps	<60 bps	45 bps	The cost of risk margin fell y/y, mainly as a result of the decline in the corporate segment's cost of risk.
Area of stability	Total capital ratio	16.05%	16.22%	17.41%	15.67%	>15%	14.98%	The total capital ratio decreased by 0.69 p.p. year on year, mainly as a result of an increase in risk-weighted assets due to, among other things, changes in credit volumes.
	Loan-to-deposit ratio	85.9%	80.4%	76.3%	75.3%	75-80%	77%	Credit growth was slightly higher than deposit growth, resulting in a 1.3 p.p. y/y increase in this indicator.
Area of profitability	Return on equity (adjusted for MCFH)	14.4%	10.2%	22.9%	20.4%	>15%	20.8%	6% y/y increase in net income translated into continued high profitability.
	Dividend payout ratio from profit	30%	-	75%	75%	50%	75%	We recommend a dividend payment of 75% of net profit for 2025.

**Income including share of profits of associates, expenses excluding bank tax; **excluding legal risk costs of foreign currency mortgage loans.*

With a mission to support and inspire people to be one step ahead in life and business, our strategy for 2022-2024 included ambitious growth in lending and commission income, while maintaining high profitability, solvency and a low cost of risk. The year 2025 was a continuation of the strategic objectives set in 2022 and also ended with the achievement of the set results.

The scale of our activity

ESRS 2 SBM-1.40

Our clients

In 2025, we acquired 309,5 thousand new retail clients (293,5 thousand in 2024), 62,9 thousand entrepreneurs (57,0 thousand in 2024) and 4,4 thousand medium-sized and large business companies (4,6 thousand in 2024).

At the end of December 2025, the number of clients was 5.3 million (up by 155.1 thousand y/y) and was divided into the following business segments:

- 4.70 million retail clients (up by 133.5 thousand y/y), including:
  - 4,682.5 thousand individual clients (up by 131,4 thousand y/y),
  - 17,4 thousand private banking clients (up by 2,1 thousand y/y),
- 594 thousand corporate clients (up by 21.6 thousand y/y), including:
  - 551 thousand entrepreneurs (up by 20.1 thousand y/y),
  - 39 thousand medium and large companies (up by 1.4 thousand y/y),
  - 3.7 thousand strategic clients (up by 142 clients y/y).

The growth of our client base is better described by the number of *primary* clients, i.e. those for whom we are the bank of first choice and who have several (specific) products. As at 2025 yearend, we had 2.68 million such clients in total, i.e. 101.3 thousand more than as at 2024 yearend, including:

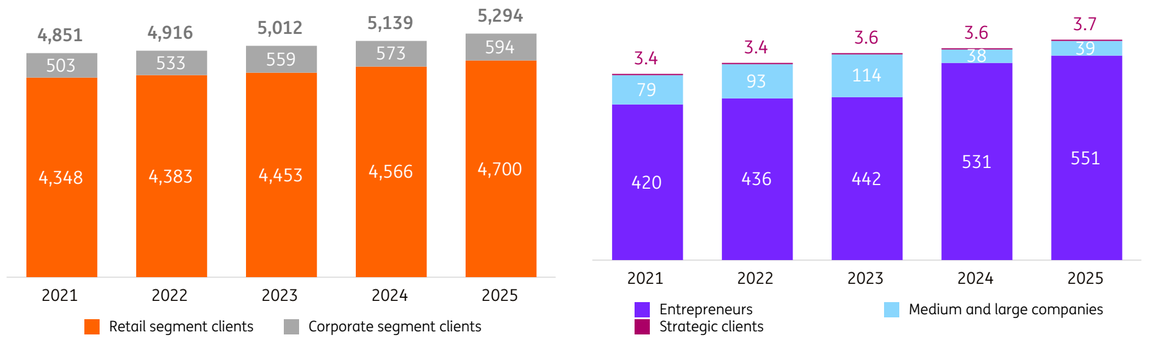
- 2.37 million retail clients (up by 89.3 thousand y/y), including 12,4 thousand private banking clients,
- 283 thousand entrepreneurs (up by 11.4 thousand y/y) and
- 24 thousand corporate clients (excluding strategic clients; up by 0.6 thousand y/y).

Primary clients accounted for 51% of our total clients as at 2025 yearend (50% as at 2024 yearend).

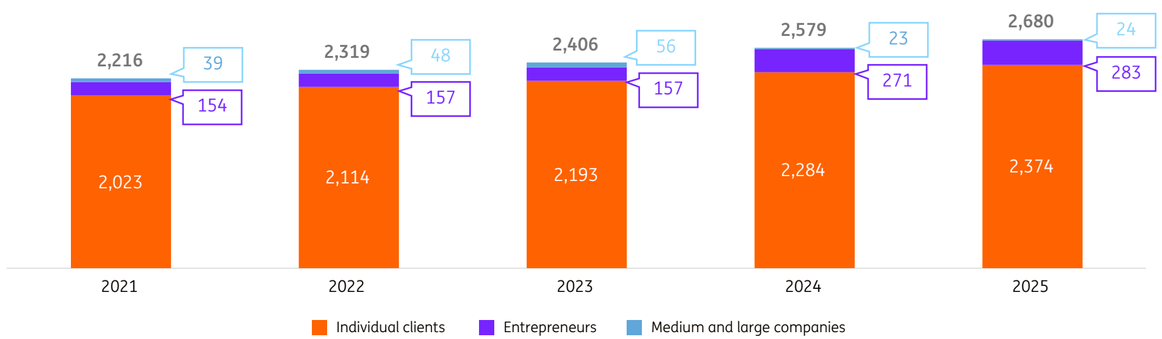
The constantly growing number of clients is the result of the activities pursued by us to foster long-term relationships with clients. These relationships are based on the trusted brand, transparent and flexible product offer and a continuously developed modern distribution and client service system.

From the beginning of 2025, the eligibility criteria for corporate clients (including primary) have changed. The figures for 2024 have also been recalculated according to the new methodology.

Number of clients of the ING Bank Śląski Group (thousand, end of year)

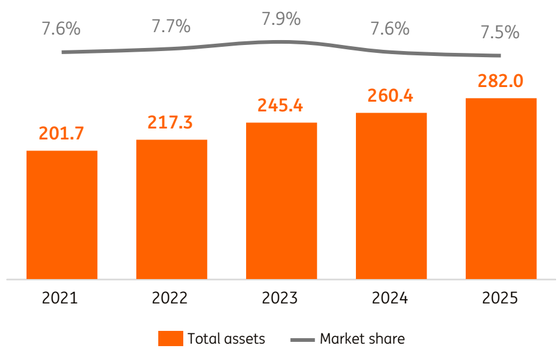


***Primary* clients (thousands, end of year)**



Asset value and market share

The ING Bank Śląski Group assets (PLN billion) and market share in sector assets



The value of our assets as at 2025 yearend was PLN 282.0 billion. This was 8% higher than as at 2024 yearend. Compared to the end of 2021, our balance sheet total increased by 40% (by PLN 80.4 billion). The dynamics of total assets in the sector were respectively 9% y/y in 2025 and 41% relative to 2021.
Our bank's share of the sector's assets was 7.5% as at 2025 yearend. As at 2025 yearend, we were the fourth bank in the market by asset value.

Source: Market data – NBP (Aggregate balance sheet of other monetary financial institutions.

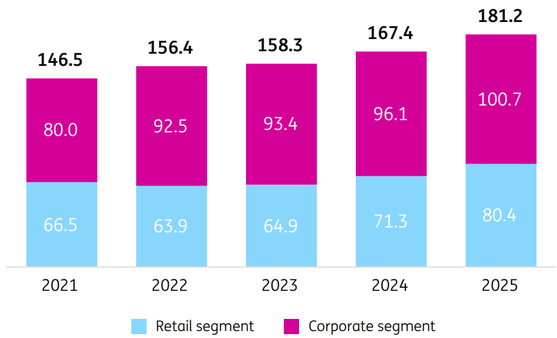
Value of receivables from clients and market share

The volume of gross receivables (including loans measured at fair value) from our clients as at 2025 yearend amounted to PLN 181.2 billion and was by 8% higher than as at 2024 yearend. This translated into a 0.3 p.p. increase in our market share in loans, to 11.1% by the end of 2025.

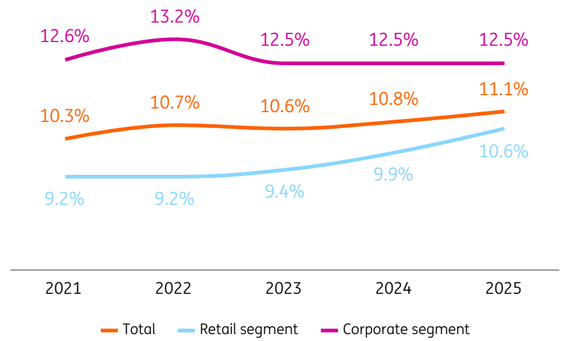
The most significant part of the gross receivables portfolio continues to be receivables from corporate clients, with a share of 55.6% (-1.8 p.p. y/y) in 2025.

In terms of the size of the total client receivables portfolio, we were the third bank in the market as at 2025 yearend.

Gross receivables from clients of the ING Bank Śląski Group (PLN billion)



Market share in gross receivables



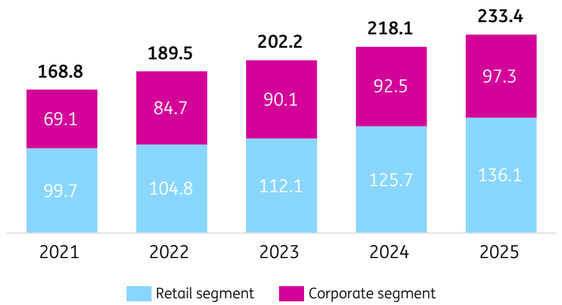
Value of deposits and market share

Our clients' savings (excluding off-balance-sheet savings of the retail banking segment) amounted to PLN 233.4 billion as at 2025 yearend, up by 7% y/y. Our market share as at 2025 yearend was 10.0%, down from 10.2% a year earlier (-0.2 p.p.).

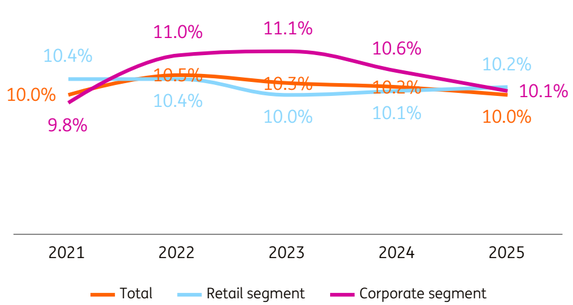
Liabilities to the retail segment remain the predominant part of our clients' balance sheet savings (they accounted for 58.3% of total deposits as at 2025 yearend, compared to 57.6% as at 2024 yearend).

In terms of the size of our total client liabilities portfolio, we were the third bank in the market as at 2025 yearend.

Liabilities to clients of the ING Bank Śląski Group (PLN billion)



Market share in deposits



Business segments

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In 2025, we divide our business activities into two segments – the retail banking segment and the corporate banking segment. Other business areas, including, for example, treasury activities, are allocated between the two segments.

Within the retail banking segment, we serve individual clients (including premium clients) and private banking clients:

Individual clients with assets of **less than PLN 1 million**

Private banking clients with assets of **more than PLN 1 million**

Within the corporate banking segment, we serve entrepreneurs and companies run on a full accounting basis. We divide the corporate banking segment into three client groups:

Entrepreneurs with an annual turnover of **up to PLN 10 million**

Entrepreneurs with an annual turnover of **between PLN 10 million and PLN 1 billion**

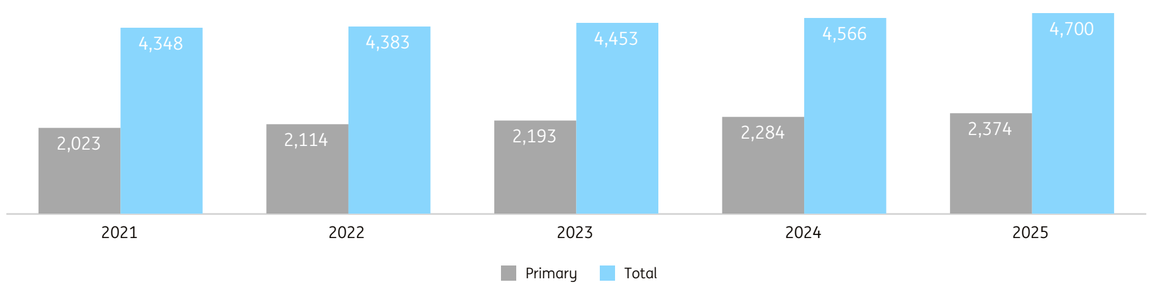
Strategic clients with an annual turnover in **excess of PLN 1 billion**

Entrepreneurs and medium-sized and large companies are served in the Business Banking division and strategic clients in the Wholesale Banking division.

Retail segment

Within the retail segment, we serve individual clients and private banking clients – in total 4.70 million, of which 2.37 million are primary clients for whom we are the bank of first choice.

Number of clients (thousands)



Commentary on segment performance

The gross profit of the retail segment amounted to PLN 2,657 million in 2025, up by PLN 125 million (5%) y/y. The improved performance of the retail segment was mainly driven by growth:

- net interest income (PLN +201 million y/y),
- other income (PLN +144 million y/y) and

- commission income (PLN +47 million y/y),

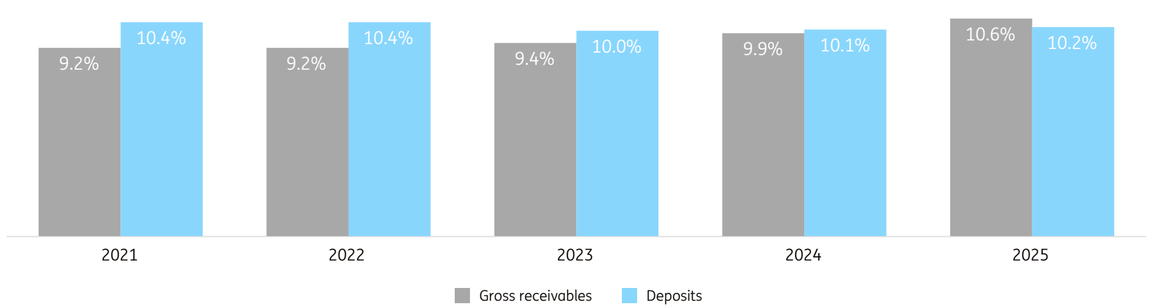
with a +10% y/y increase in operating expenses and a +36% increase in the risk cost.

Profit and loss account

(PLN million)	2021	2022	2023	2024	2025	y/y (PLN million)	y/y (%)
Net interest income	2,716	1,912	3,779	4,153	4,354	+201	+5%
Net fee and commission income	558	581	589	671	718	+47	+7%
Other income*	31	88	100	110	254	+144	+131%
Income	3,305	2,581	4,468	4,934	5,326	+392	+8%
Operating expenses	-1,543	-2,094	-1,954	-1,978	-2,178	-200	+10%
Result before impairment for expected credit losses	1,762	487	2,514	2,956	3,148	+192	+6%
Risk cost**	-135	-587	-111	-121	-165	-44	+36%
Bank tax	-232	-247	-231	-303	-326	-23	+8%
Gross result	**1,395**	**-347**	**2,172**	**2,532**	**2,657**	**+125**	**+5%**

*Including share of profit of associates; **Including legal risk costs of foreign currency mortgage loans.*

Market shares

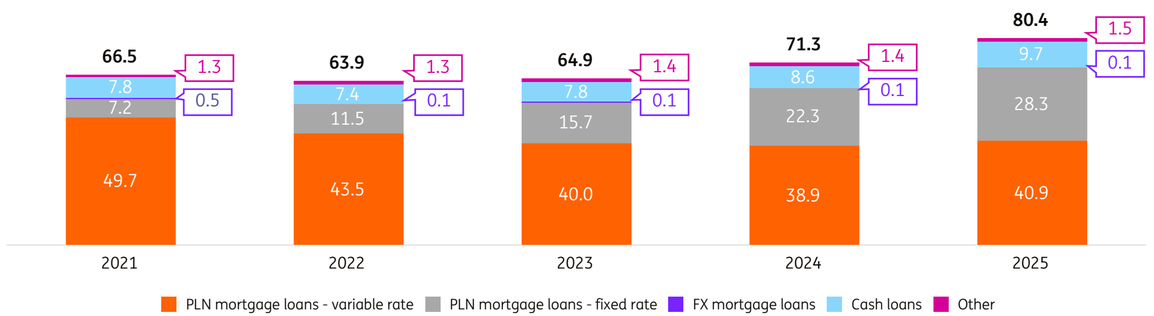


As at 2025 yearend, our market share in retail receivables was 10.6%, up 0.7 p.p. y/y. We also increased our market share in retail deposits from 10.1% in 2024 to 10.2% as at 2025 yearend, up 0.1 p.p. y/y.

Balance sheet and key indicators

(PLN billion)	2021	2022	2023	2024	2025	y/y (PLN billion)	y/y (%)
Total assets	92.0	93.0	104.1	113.0	126.9	+13.9	+12%
Receivables from clients (gross)	66.5	63.9	64.9	71.3	80.4	+9.2	+13%
Liabilities to clients	99.7	104.8	112.1	125.7	136.1	+10.4	+8%
Loans (gross) to deposits	67%	61%	58%	57%	59%		2.4 p.p.
Costs to income	47%	81%	44%	40%	41%		0.8 p.p.
Costs (including bank tax) to income	54%	91%	49%	46%	47%		0.8 p.p.
Cost of risk margin	0.22%	0.90%	0.17%	0.18%	0.22%		0.04 p.p.
Participation of Stage 3 and POCI	1.52%	1.45%	1.59%	1.34%	1.23%		-0.12 p.p.

Gross portfolio of receivables from clients of the retail segment by product (PLN billion)



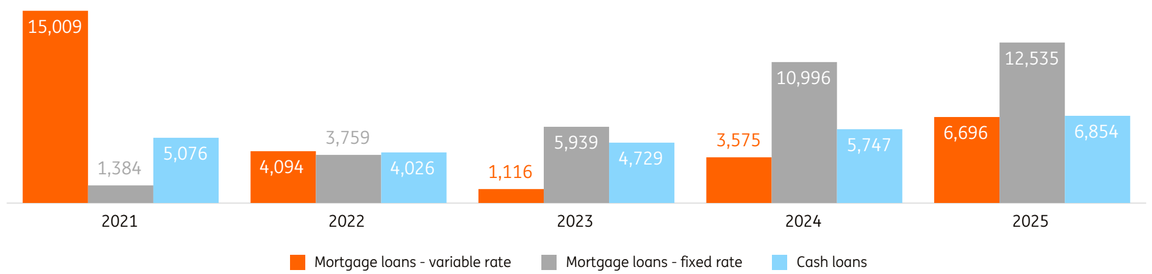
As at 2025 yearend, total gross receivables from retail clients increased by 13% y/y to PLN 80.4 billion. The highest growth was recorded in the PLN fixed-rate mortgage portfolio PLN +6.0 billion (+27% y/y). In contrast, the portfolio of PLN variable-rate mortgage loans increased by PLN 2.0 billion, (+5% y/y).

In mid-2024, the bank decided to suspend the sale of floating rate loans based on the WIRON 1M Compound Rate (which had been granted since the beginning of 2024 and had a volume of approximately PLN 3.2 billion as at 2025 yearend) and resumed offering such loans from the fourth quarter of 2024, but based on the 1M WIBOR rate.

The cash loan portfolio recorded an increase of PLN 1.1 billion, or 13% y/y, to PLN 9.7 billion.

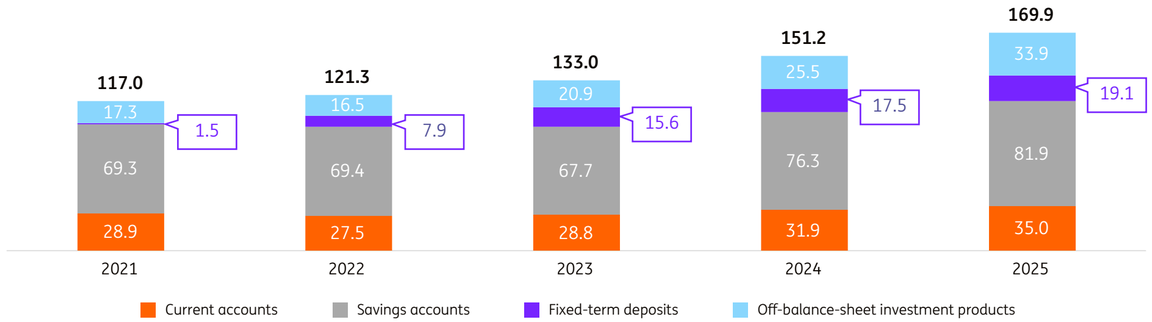
The mortgage portfolio for the energy-efficient home option amounted to PLN 5.0 billion as at 2025 yearend, an increase of 47% y/y (an energy-efficient home is a house or residential premise whose annual demand for non-renewable primary energy for heating, ventilation and hot water preparation does not exceed respectively: 62 kWh/m^2/year for a house or 76 kWh/m^2/year for a renovated house and 58 kWh/m^2/year for a residential premise in a multi-family building or 62 kWh/m^2/year for a residential premise in a single-family building).

Sales of retail loans (PLN million)



In 2025, we granted a total of PLN 19.2 billion in mortgage loans, 32% more than in the previous year. For several years, we have seen an increase in client interest in periodic fixed-rate mortgage loans – in total, we sold PLN 12.5 billion of them in 2025 (+14% y/y), and their share of the total mortgage sales structure was 65.2% (75.5% a year earlier). Sales of mortgage loans for an energy-efficient home in 2025 amounted to PLN 2,539.1 million (PLN 1,053.4 million a year earlier). In 2025, we granted PLN 6.9 billion in cash loans to natural persons, up 19% y/y. We sold 94% of these loans through the online channel (92% in 2024).

Portfolio of liabilities to clients in the segment by product (PLN billion)



The portfolio of on-balance sheet liabilities to retail clients increased by 8% y/y to PLN 136.1 billion:

- funds held in current accounts increased to PLN 35.0 billion (+10% y/y),
- savings accounts increased to PLN 81.9 billion (+7% y/y),
- funds held on time deposits increased to PLN 19.1 billion (+9% y/y).

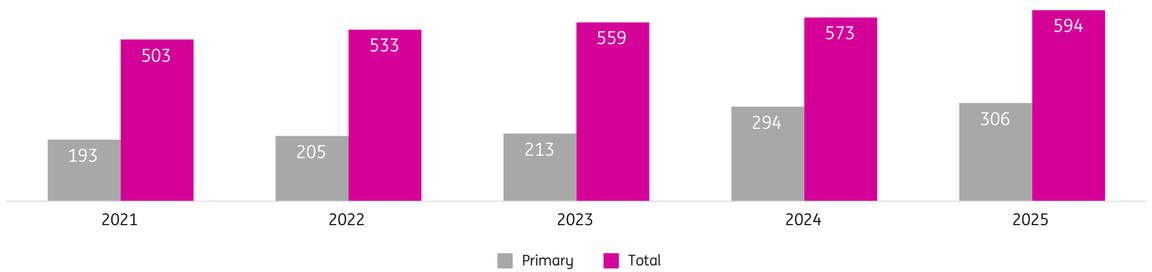
The structure of the retail segment's balance sheet liability portfolio remained similar to the previous year, with the share of current accounts at 26% (vs. 25% in 2024), savings accounts at 60% (vs. 61% in 2024) and time deposits at 14% (unchanged vs. 2024).

As part of our off-balance sheet products, we offer, inter alia, brokerage services and broker the sale of funds managed by TFIs. As at 2025 yearend, the assets accumulated in our clients' brokerage accounts amounted to PLN 9.3 billion (+19% y/y) and our clients' assets accumulated in TFIs amounted to PLN 24.5 billion (+39% y/y). Assets worth PLN 8.7 billion represented investments in funds complying with Articles 8 and 9 of the SFDR.

Corporate segment

Within the corporate segment, we serve companies, of whom we had 594.3 thousand as at 2025 yearend, of which 306.3 thousand were *primary* clients for whom we are the core bank.

Number of clients (thousands)



Commentary on segment performance

The gross result of the corporate segment was higher in 2025 by PLN 257 million (+9%) y/y. The improvement was mainly driven by:

- cost of risk lower by PLN 238 million (-26% y/y) and
- other income higher by PLN 220 million,

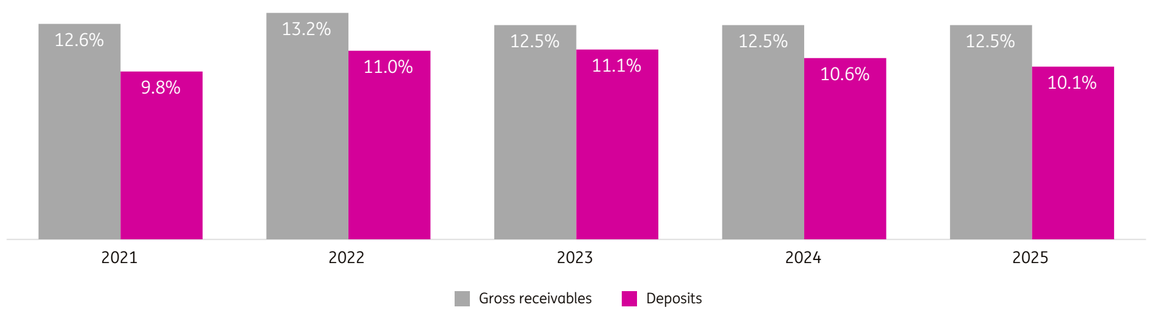
while operating expenses increased by +6% y/y.

Profit and loss account

(PLN million)	2021	2022	2023	2024	2025	y/y (PLN million)	y/y (%)
Net interest income	2,254	3,702	4,392	4,572	4,517	-55	-1%
Net fee and commission income	1,287	1,514	1,575	1,623	1,641	+18	+1%
Other income*	51	-75	243	150	370	+220	+147%
Income	3,592	5,141	6,210	6,345	6,528	+183	+3%
Operating expenses	-1,422	-1,548	-1,746	-1,980	-2,106	-126	+6%
Result before impairment for expected credit losses	2,170	3,593	4,464	4,365	4,422	+57	+1%
Risk cost**	-237	-443	-503	-915	-677	+238	-26%
Bank tax	-313	-400	-413	-437	-475	-38	+9%
Gross result	**1,620**	**2,750**	**3,548**	**3,013**	**3,270**	**+257**	**+9%**

**Including share in profit of associates.*

Market shares



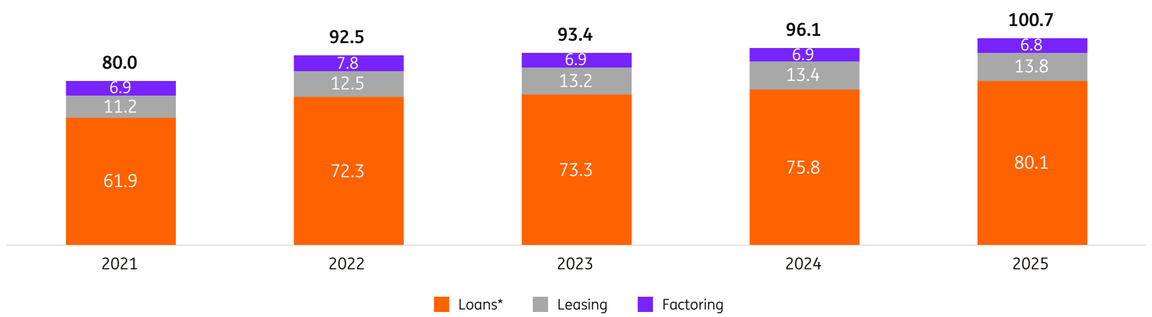
In 2025, we maintained our market share in corporate receivables at the 2024 level of 12.5%. In the corporate deposit market, we achieved a share of 10.1%, down 0.5 p.p. from 2024.

Balance sheet and key indicators

(PLN billion)	2021	2022	2023	2024	2025	y/y (PLN billion)	y/y (%)
Total assets	106.4	120.5	138.6	145.1	152.9	+7.8	+5%
Receivables from clients (gross)	80.0	92.5	93.4	96.1	100.7	+4.6	+5%
Liabilities to clients	69.1	84.7	90.1	92.5	97.3	+4.8	+5%
Loans (gross) to deposits	116%	109%	104%	104%	104%		-0.4 p.p.
Costs to income	40%	30%	28%	31%	32%		1.1 p.p.
Costs (including bank tax) to income	48%	38%	35%	38%	40%		1.4 p.p.
Cost of risk margin	0.32%	0.51%	0.53%	0.96%	0.69%		-0.3 p.p.
Participation of Stage 3 and POCI	3.50%	2.87%	3.43%	5.73%	5.79%		0.1 p.p.

*Including loans measured at fair value.

Gross receivables portfolio from corporate segment clients by product (PLN billion)

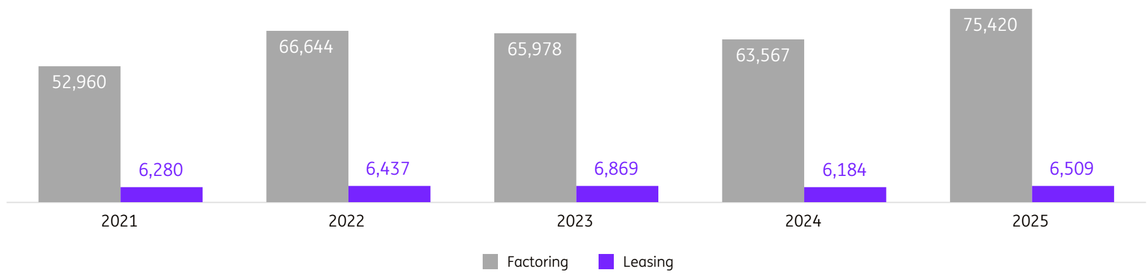


*Including loans measured at fair value.

As at 2025 yearend, total gross receivables (including loans at fair value) from corporate segment clients increased by 5% y/y to PLN 100.7 billion.

The loan portfolio increased by 5% y/y (by PLN 4.2 billion to PLN 80.1 billion). The leasing receivables portfolio increased by 3% y/y to PLN 13.8 billion (mainly due to the portfolio of large companies). In contrast, the value of the factoring portfolio was PLN 6.8 billion, unchanged from last year.

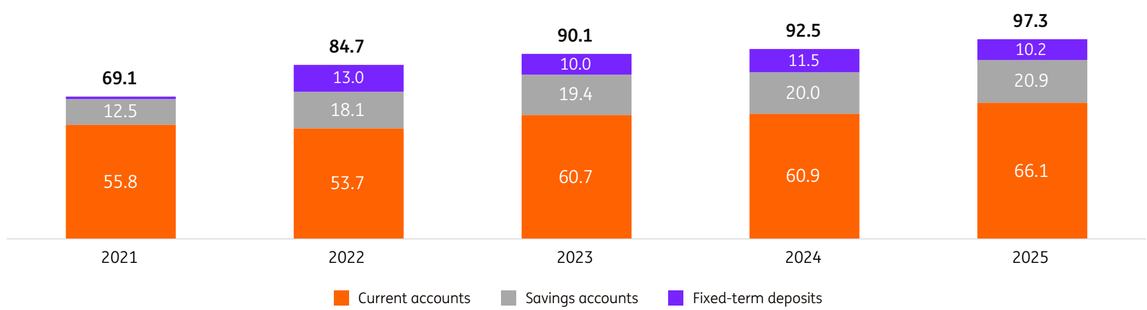
Turnover in factoring and leasing sales (PLN million)



Factoring turnover in 2025 was PLN 75.4 billion, 19% higher than in 2024. Turnover in 2025 allowed us to achieve 14.5% market share. In 2025, the number of our factoring clients will increase by 11.6% y/y to 9,700. In 2025, we purchased 4 million invoices – 1.4% less than the previous year.

Sales of leasing products amounted to PLN 6.5 billion in 2025, 5% higher than a year earlier. Our market share in sales of leasing products was 5.4% in 2025 (5.6% in 2024).
The number of leasing clients is 38,8 thousand (+3.9% y/y).

Portfolio of liabilities to clients in the segment by product (PLN billion)



The funds deposited by our corporate clients as at 2025 yearend amounted to PLN 97.3 billion and were by 5% higher than at the end of the previous year.

Current account balances continue to account for the most significant proportion of liabilities to this group of clients (68% compared to 66% a year earlier). Funds held in current accounts increased by 9% y/y to PLN 66.1 billion, with the strongest growth in current accounts of medium-sized and large companies (+5% y/y) and entrepreneurs (+15% y/y), and to a lesser extent current accounts of strategic clients (+8% y/y). Funds held in savings accounts increased by 5% y/y to PLN 20.9 billion, mainly due to an influx of funds held by entrepreneurs (+10% y/y). Term deposits fell by -11% y/y, mainly as a result of the decline in term deposits of medium-sized and large companies (-22% y/y).

Our market position

We are the third largest bank in Poland in terms of client deposits and receivables and the fourth based on asset size – on a consolidated basis at the end of Q4 2025. We were the fifth largest bank in terms of market capitalisation (PLN 44.4 billion) as at 2025 yearend, with our Price to Book Value (P/BV) ratio being the second highest in the sector at 2.1x.

Our competitive position

	2023		2024		2025	
Measure	Nominal	Position	Nominal	Position	Nominal	Position
Number of clients (million)	5.0	#4	5.1	#4	5.3	#4
Total assets (PLN billion)	245.4	#4	260.4	#4	282.0	#4
Client deposit portfolio (PLN billion)	202.2	#4	218.1	#4	233.4	#3
Gross receivables portfolio from clients (PLN billion)	156.5	#4	165.6	#4	180.3	#3
Commercial balance (PLN billion)	357.0	#4	385.7	#4	415.6	#3
Capitalization (PLN billion)	33.3	#4	31.4	#4	44.4	#5
P/BV ratio*	2.0x	#1	1.8x	#1	2.1x	#2

** The indicator is calculated based on the share price at the end of 2025.*

Awards and distinctions

Our daily efforts in offering attractive products and services to our clients, our attention to high quality service and transparent communication, our sustainability measures and practices, and our outstanding commercial and financial performance are recognised by the market. Below please find selected 2025 awards. Their full list is available here.

For overall performance

- ING was recognised in the Institution of the Year ranking.
- ING Bank Śląski has been awarded the Euromoney Awards for Excellence: Poland's Best Bank, Poland's Best Digital Bank, Poland's Best Bank for ESG.
- ING has once again been recognised in The Best Annual Report competition, organised by the Institute of Accounting and Taxation.
- ING Lease (Poland) received the Financial Order from the "Gazeta Finansowa" weekly for its contribution to the development of digitalisation in leasing on the Polish market.
- ING Lease (Poland) has once again won an award in the "Pearls of Polish Leasing" poll.
- Brunon Bartkiewicz was awarded the Copernicus Banking Prize.
- ING economists were awarded the title of "Best Macroeconomic Analyst 2024" according to the 17th edition of the competition for the best macroeconomic analyst, organised by the editors of "Parkiet" and "Rzeczpospolita".

For ESG activities and practices

- ING was awarded in the Equal Opportunities in Business Competition, organised by the UN Global Compact Network Poland.
- ING Bank Śląski, ING Hubs Poland and the ING for Children Foundation were among the employers most advanced in diversity and inclusion management in Poland. The list is based on the results of the Diversity IN Check survey.
- Five ING Bank Śląski practices featured in this year's Responsible Business Forum report. The results of the report were presented at the Responsible Business Forum's anniversary conference "Business Transformation – Scenarios for the Future", organised on the occasion of the organisation's 25th anniversary.
- ING Bank Śląski was awarded the Gold and Green ESG Leaf in the fourteenth edition of the list prepared by the editors of the Polityka weekly in cooperation with the consultancy EY Polska and the Responsible Business Forum.
- ING Bank Śląski has won the grand prize for the best report in the financial sector in the 2025 Sustainability Reports competition. In addition, in the "Internauts' Award" category, the ING for Children Foundation was the grand prize winner for its report "ING Volunteering our Strength".
- In 2025, ING Bank Śląski was awarded the title "Benefactor of the Year 2025", in the category "Good cooperation between business and NGOs". The chapter awarded the prize for cooperation with the Zwolnieni z Teorii Foundation.

For communication with clients, the market and employees

- ING has been awarded the Top Employer title for the 16th consecutive year.
- ING was awarded the title Ethical Company 2024.
- ING Bank Śląski has been awarded the title of Poland's Best Employers 2025.
- ING Bank Śląski was awarded the prestigious title of Solid Employer of the Year 2025 in the national category.

- ING was among the key players in the capital market.
- ING has been awarded the Grand Prix YouTube Works Awards 2024.
- ING was awarded the Gold Banker for best social media.
- ING Bank Śląski won as many as five awards and was ranked the second most creative brand in Poland in the KTR, the country's largest creativity competition.
- ING Bank Śląski received two Effie statuettes for its pensions campaign.
- ING was awarded at the IAB MIXX Awards 2025.
- ING and VISA received an award for the implementation of a customised carbon footprint calculator, in the "Green faces of technology" category.
- ING Bank Śląski has won three awards from the SME Banking Club for its products for companies in the CEE region:
  - for an investment loan for housing communities, as the best and unique for this client group;
  - for the fastest and smoothest remote onboarding for companies in the region and
  - distinction for working capital loan for sole proprietorships – for sales and after-sales processes for sole proprietorships.

  In addition, at the WOA.digital gala, ING Bank Śląski received the award for "Best Digital Factoring in Europe", thereby distinguishing the ING Financing of Invoices product.

Technological development

In 2025, we continued the technological transformation that had begun in previous years, while also organizing it and presenting it as part of the new, long-term strategy "ING. In the Beat of Life", announced in November 2025. The strategy sets the development horizon to 2035+, emphasising digitalisation, security and service availability, as well as scalable data and artificial intelligence platforms. This ensures that our technology initiatives remain consistent with business direction and client expectations.

2025 was a year of intensive work on modernising the bank's architecture, migrating to the public cloud and improving operational resilience in line with European regulations.

Our four technology pillars from 2025

Key systems – foundations for a modular and service-oriented architecture

We are continuing to rebuild key central systems and processes, gradually moving away from monolithic solutions to modular, service and API architectures. The aim is flexibility, shorter time-to-market for products and improvements and no impact of the introduction of changes on clients using 24/7 banking. These activities are part of our data-driven culture and prepare the organisation for the increasing use of AI algorithms and process automation.

Migration to the cloud – scalability, cost flexibility and availability

We moved more applications, solutions and data to the Google Cloud Platform (GCP) public cloud, expanding the catalogue of cloud services and their actual use in internal and client-facing processes. In 2025 we put together a dedicated Partner Interconnect to our data centres and exceeded the threshold of 44% for applications planned to be deployed and moved to the cloud (the previous year the result was 31%). The cloud has allowed us to dynamically adjust costs according to workload and business needs, while improving the availability parameters of critical services and reducing deployment times.

Modern data and AI platforms – greater adoption of AI/GenAI across the organisation

We have started to modernise our data platforms for real-time analytics and democratisation of access to information, which supports product personalisation and operational decisions.

In parallel, we have intensively developed competences and technologies related to artificial intelligence. We have implemented around 20 new AI solutions to support the bank's key processes and improve operational efficiency. Furthermore, we have started the first implementations of generative AI (GenAI), opening the door to innovative applications in the area of automation and client service. Gradually – while respecting the principles of protecting bank secrecy and processing data according to its classification – we are implementing artificial intelligence solutions to a limited extent to assist and improve the daily work of employees.

We have invested in cutting-edge technologies that create a solid foundation for the further development of AI in the organisation. At the end of the year, we upgraded the Virtual Assistant used in the bank's internal processes by replacing it with a platform that no longer understands not just keywords, but the whole point of the questions asked. In parallel, we are building an active AI Connect community – a space to share knowledge, inspiration and best practices that integrates employees around the topic of artificial intelligence. As part of the "I grow because I want to" initiative in September 2025, we organised four days of conferences fully dedicated to artificial intelligence. The event brought together internal and external experts, as well as practitioners and leaders, confirming the bank's commitment to building AI competence.

We have provided numerous training courses at both basic and advanced levels to enhance AI competencies across the organisation and prepare employees for the changes ahead.

Security and availability – operational resilience and service predictability

In 2025, we have strengthened the foundations of the digital working environment by implementing modern solutions to support collaboration, productivity and security. This enables teams to operate in a more integrated ecosystem, making it easier to share information, automate tasks and respond more quickly to client needs. These developments are part of our strategy to build scalable and secure technology platforms that support operational efficiency and the development of innovative services.

In 2025, we further strengthened Site Reliability Engineering (SRE) and monitoring automation to maintain high availability of key applications.

As part of our SRE activities, we have focused on improving the maturity of our processes and increasing the operational resilience of our systems. Key initiatives included:

- Standardising the measurement of service availability – we have implemented a uniform methodology for assessing the availability of key business processes, based on analysis of supporting IT applications and services, in line with regulatory requirements.
- Strengthening accountability management – we have expanded the remit of the central SRE team to look after the delivery of tasks relating to the core pillars of reliability (including DORA-related tasks).
- Competency development and reliability culture – we organised a series of training courses (including SRE Day) and workshops for technical teams, promoting best practice in monitoring, incident and problem management and system observability.
- Resilience and load testing – we have launched a project focused on verifying the performance and stability of systems under high load conditions, allowing us to better prepare for emergency scenarios.
- Integration with global standards – we have increased participation in international reliability initiatives by implementing solutions in line with industry best practice.

Thanks to these measures, we have maintained the availability of our key services at a level that allows clients to use our solutions uninterruptedly – for the Moje ING app it was 99.97% and for ING Business it was 100%. This has made it possible to meet client expectations while strengthening operational resilience and compliance with European regulations.

In terms of cyber security, we have improved and updated the reference architectures for identity and access management. Several years ago, we were the first in the market to offer clients the possibility of using the U2F key as an additional two-step verification system. In September 2025, we developed this service by allowing the first key to be self-activated in Moje ING and managing its functionality in the mobile app.

We support business objectives

In 2025, we saw a significant increase in the number of active users of the Moje ING app and an increase in transactional activity in remote channels. These trends confirm the need to further strengthen the stability, scalability and security of platforms. Our technology – stable, accessible, secure and scalable – actively supports the bank's business development and commercial goals.

Business-side initiatives and implementations that took place in 2025:

- We have improved the digital accessibility of our services – bringing key channels and processes into line with European accessibility standards, in line with the Web Content Accessibility Guidelines (WCAG). WCAG is an international set of guidelines developed by the World Wide Web Consortium that specifies how to design digital content in a way that is accessible to all users, including people with different types of disabilities. This ensures a consistent and inclusive experience in the use of our services.
- We have achieved another important milestone in the development of the new residential mortgage process, reinforcing the foundations for its further digitalisation, automation and simplification, and increasing client satisfaction due to faster and more efficient processing of loan applications.
- We have introduced a new payment interface – we have revamped the logic of the forms to make them more intuitive and clearer, which significantly improves the convenience of making transfers.
- We have implemented mObywatel as a new way of confirming identity – another step in the digitalisation of ING's banking services. Through integration with the government's mObywatel app, clients can securely manage their own banking access.
- We have introduced a new method of confirming identity – clients can authorise instructions in the mobile app by holding their payment card against an NFC-enabled phone, making the app activation process more convenient and secure.
- We have released a new version of BLIK recurring payments – clients can easily manage recurring payments on the mobile app, with a high level of security thanks to BLIK code authorisation.
- We have refreshed and optimised the account opening process for business clients – the new version of the onboarding application increases the level of automation and reduces handling time.
- We implemented a self-service communication portal – the solution supports the implementation of internal processes in the area of corporate banking, improving the convenience and transparency of service.
- We are systematically increasing the level of automation of key processes – introducing changes that increase the share of service in the straight-through processing(STP) model, which translates into faster service delivery and higher operational efficiency.

Our plans for 2026

As part of the implementation of ING's 2035+ strategy and the associated technology transformation, in terms of technology-related activities and IT infrastructure management, we are planning to:

- Launch technology transformation work covering key areas of operation, i.e. payments, core banking and pricing and billing solutions.
- Accelerate migration to the public cloud – we will deploy more cloud services and applications (both new solutions and those migrated from the local data centre) onto cloud environments.
- Continue the work of modernising the application towards modern technologies – we will implement measures that will ultimately reduce deployment times, increase flexibility and improve service quality, supporting the development of new functionalities in a more efficient manner.
- Develop analytics environments and modernising data platforms – we will begin work on creating a more integrated and scalable ecosystem of data and applied analytics tools, enabling more effective use of real-time data and more accurately supporting decision-making and the development of new services.
- Leverage advanced artificial intelligence technologies – we are planning activities that will increase the efficiency of internal and external client service, improve the development of new services and automate selected processes, ensuring a positive client experience and faster turnaround times.
- Implement modern working tools – we will provide employees with a modern working environment using cloud solutions and AI platforms, improving the ability of teams to collaborate.

Moje ING - individual clients and private banking clients

The Moje ING mobile app is the main channel for our clients to interact with the bank. It is already used by more than 3 million clients. In 2025, clients logged into Moje ING more than one billion times (90% on the mobile app) and made around 687 million transfers.

In 2025, we continued the consistent development of our Moje ING online and mobile banking, introducing a number of innovations that enhance the convenience, accessibility and security of banking services. We care about the performance and reliability of our systems. Moje ING's accessibility as at 2025 yearend was 99.97% (99.94% the year before).

Security and accessibility

New authorisation factors

NFC card in the application activation process – we have introduced a new strong authentication factor (SCA – Strong Customer Authentication) – the NFC-enabled bank card. The change aims to further reduce the risk of fraud and provides an alternative to the Voice Code Factor, which is sometimes problematic to listen to for people with hearing impairments. When authorising an instruction, the client applies the bank card to the NFC reader on the smartphone. Currently, the solution is used in the activation process of the Moje ING application. Interactive mobile authorisation – we have implemented a new method of confirming operations in Moje ING, increasing the level of security. In addition to entering the PIN in the app, the client is asked to provide additional information related to the instruction.

Enhancements to the "I Forgot My Password" Process

We have implemented a new version of the "I Forgot My Password" process in Moje ING, which enhances the convenience and security of logging in and recovering access. We have made improvements for the client and extended authentication methods to include mObywatel, enabling, among other things, a remote change of number for authentication.

New method to confirm mObywatel identity in mobile onboarding process

We have implemented a new method of confirming identity based on data provided from the mObywatel app. As an additional safety factor, we ask the client in the process to take a selfie. The solution responds to the needs of people who are increasingly using mObywatel to authenticate their identity in various life situations.

More accessible banking

As part of the implementation of our obligations under the EAA (European Accessibility Act) and PAD (Polish Accessibility Act) directives, in June 2025 we introduced in Moje ING and on the bank's website (www.ing.pl) numerous changes and improvements related to process accessibility. These measures ensure compliance with accessibility standards and improve the experience of all users, including those with special needs.

Convenience and usability

VISA Offers 2.0

ING was the first bank in Poland to make available a new version of its Visa Offers Programme for retail clients. The offers do not need to be activated beforehand – all you need to do is pay with a Visa card issued by ING, including using your phone or watch. Clients are reimbursed a portion of the amount spent for purchases from Programme partners. Each point has a value of PLN 1 and clients have the direct option to transfer the refund to their Visa card account. Together with Visa, we ensure that the offers are tailored to the best of our clients' needs.

Conscious financial management

We have introduced further innovations with a focus on conscious financial management. The Moje ING app not only provides tools to help control budgets, but also actively supports clients in building financial balance and healthy habits through communication tailored to the rhythm of their financial lives. From January, clients can add accounts and cards from Revolut to Moje ING, gaining a complete picture of their finances in one place. This solution provides transparency and real support for daily budget management.

Changes to the mortgage purchase process

As part of the mortgage purchase process at Moje ING, we implemented the insurance part of the insurance accompanying the mortgage loans. Clients applying for a mortgage as part of the Easy Hipo process were also provided with the functionality to sign the loan agreement and start the loan in the Moje ING app. This is a unique solution on the market.

Investment advisory service

In July 2025, we provided a unique feature in the market in Moje ING – click recommendation. It allows all investment fund orders resulting from an investment recommendation to be placed in the app with one click. An investment recommendation is issued to private banking clients with an advisory agreement. It is issued by the adviser after analysing the client's situation, risk profile, investment horizon, etc. The client decides for him/herself whether he/she will use the recommendation received.

Developments and improvements in the area of payments

New launch of transfers and Currency Exchange Service

In October 2025, we launched a new transfer and Currency Exchange Service in Moje ING, giving clients the following benefits:

- possibility to set up a default account for transfers in PLN and foreign currencies,
- a new transfers landing page with a context-sensitive menu and prompts for specific account types from which the client can perform a particular type of transaction, such as a currency transaction,
- information on lead times and costs – a visible deadline for the arrival of the transfer and its cost,
- full details before approving the transfer with the possibility of correction without leaving the process,
- the possibility to change the account without losing data, which increases the convenience of editing the transfer.

New features for payment cards

In 2025, one of our priorities was to provide individual clients with even more self-service products and to make processes for payment cards more consistent. This year we have carried out a number of improvements to Moje ING:

- We have simplified the ordering of a card in place of a blocked card, without the need to contact the bank by phone. The new card has exactly the same functionality as the blocked card.
- We have introduced a process that allows clients to self-verify suspicious transactions and decide whether to unblock or block the card. The client has the opportunity to review the list of transactions and decide whether to recognise all the transactions and unblock the card, or whether any of them raise concerns and block the card. This functionality increases security and speeds up the response to potential fraud attempts.
- We have made it possible for individual clients to order a new debit card themselves after a name change. During this order, you can additionally change the mailing address for sending the card.
- We enabled clients to view the full physical details of debit and prepaid cards (including card number and CVV2/CVC2 code). Until now, only digital card data could be checked in the app.

The process of migrating from a Visa card on your phone to Google Pay

We have made available in Moje ING the process of migrating Visa card payments on the phone to Google Pay for clients using Android devices. The process is designed to make the transition easier for clients. It is simple and intuitive, taking place in just two steps. As a first step, the client disables Visa payments on the phone in Moje ING (with no option to restart), then adds the card to Google Wallet. The migration supports the phase-out of Visa card payments on the phone in Moje ING planned for June 2026.

New release of BLIK Recurring Payments

We have provided clients with a new version of BLIK Recurring Payments, which allows them to easily and conveniently manage recurring payments in the app, such as for subscriptions or subscriptions. The service also provides security, as activation requires a BLIK code. Moje ING users can make:

- payments of a fixed amount and frequency – collected automatically,
- payments of variable amounts and frequency payments – collected automatically or upon confirmation (depending on the service provider).

Changes to the functionality of the Moje ING application

- On the homepage in Moje ING, we have introduced a number of changes to make it easier for clients to conveniently access information about their finances, including better visibility of the balance and details of the products they own, a context menu to set the visibility of amounts, accounts and funds. The changes also support accessibility compliance.
- We have completed the redesign of the "Offer" section in Moje ING, bringing it in line with WCAG requirements, the new illustrative style and usability principles. Changes include a menu redesign, expanded segmentation and the implementation of dedicated views for minor, mass, premium, private banking clients and companies.
- We have expanded the Parent Panel in the mobile app, allowing parents to update the details of children under 18, without contacting the helpline or visiting a branch. We have added the option to close banking for minors aged 6-13 and the ability to hide a child's accounts in the app, which increases financial security. We have also introduced a new tab with key information for parents of children aged 13-17.

- We have made available a Client Suggestion Form in the app – a dedicated space for client suggestions, comments and ideas on the development of Moje ING.
- We have made a number of changes to the Moje ING app to improve the experience for clients investing with ING. Among other things, we have changed the summary of fund information and the charts in the quotations so that the data is presented in a more convenient way for clients. We have also made changes to make it easier for clients to manage their investment portfolio.

Moje ING facilities for entrepreneurs

Facilities in the credit area

For clients with sole proprietorships, we have added a further two processes in Moje ING to handle loans held, secured by a guarantee from the Bank Gospodarstwa Krajowego (BGK). This allows the client to reduce the amount of the overdraft themselves and shorten the term of the loan if they have previously overpaid. Instructions are carried out online, fully automatically. As part of the new functionalities, we made the electronic application for the BGK guarantee available, making the process fully remote.

We have made a new loan and overdraft in the bank account application process available to a selected group of entrepreneurs on a pilot basis. As part of this process, the client is able to choose the offer that is convenient for them, receiving a calculation of the cost of the loan for each variant and product chosen. In addition, once the data has been entered, he receives an initial credit decision immediately on the application. The final credit decision is made after inspection of the client and the documents he or she has enclosed. The agreement is signed electronically and the release of funds is automatic.

Remote requesting of a common login

We have made available for sole proprietors with access to Moje ING a remote application process for a common login – a convenient solution whereby the client, using a single login, has access to both individual and company finances. Requesting a common login is fully remote and takes place in the Moje ING system by starting a conversation with a Virtual Assistant. As a result, the client does not need to visit a bank branch.

New look and feel of client products

- We have introduced a new look for the details of the company account (in PLN and currencies) and the savings account. In the new version of the savings account details, our clients will find all the information, products and services they need for their account in one place. With a view to even greater user convenience, we have added new navigation tabs: Details, Promotions (if the client participates), Extras, Q&A. We have also changed the presentation of the account and related products, which facilitates quick access to the most important information.
- For the prepaid card, we have changed the way the data is presented and added some facilities that will allow our clients to find the information they need more quickly. We present the card data in 3 sections:
  - Details – basic information, e.g. card type, number, activity status.
  - Limits – the amount of daily limits for transactions.
  - Questions and answers – quick access to the most frequently asked questions.

We have also changed the visualisation of the card – a graphic with information on the status and expiry date of the card has appeared in the interface. This way, clients know immediately whether the card is active and until when it is valid.

- On the small company loan screen, we have strengthened the communication about unfulfilled contractual terms and, in the case of contractual expiry, also about the unpaid commitment. We have also improved the functionality of purchasing insurance for a loan, which is now possible directly from the loan details screen.

ING Business

The online banking platform for corporate clients ING Business includes: a browser-based version, native smartphone apps and an H2H channel – ING WebService. We are successively working on further improvements and updates and making new solutions available to clients. ING Business availability was 100.00% as at 2025 yearend (99.89% a year earlier).

Changes to the mobile application

In 2025, we continued the intensive development of the ING Business mobile app, focusing on enhancing its functionality and user experience. As part of the ongoing work, we have provided a number of new capabilities, including:

- The Documents module, allowing documents to be viewed and signed directly on the mobile app, which has significantly speeded up approval processes.
- The Recipients module, including the addition and editing of saved beneficiaries of transfers, so far not available in the mobile app.
- BLIK phone transfer – we have added the ability to make transfers to a phone number linked to the BLIK system, which has increased the flexibility and speed of transactions. The maximum single transfer is PLN 1,000 and the daily limit for a single user is PLN 5,000.
- Currency transfer in the mobile app – for the first time, we have provided clients with the ability to create currency transfers on mobile devices, based on a new, convenient and intuitive format divided into steps. The implemented transfer is based on a step-by-step approach – the user fills in the data on 3 consecutive screens.

When filling in the form, the user focuses on less data which reduces the risk of mistakes. We are also significantly simplifying the authorisation of such a transfer – using a mobile app. The existing method of accepting a transfer using an SMS code remains as an alternative.

User rights

- Following the bank's strategy to digitise processes and support clients in self-service use of online banking, a new, simplified model for the self-service authorisation of ING Business system users has been created. The new approach to rights management allows the user to easily add or edit rights based on predefined roles, with the ability to assign signature schemes to applications and transfers. The new model has also been made fully available on the mobile app, where users have gained the ability to view and edit permissions.
- We were the first bank in the market to provide companies with a remote process for changing company representation. The process is available on the bank's website and allows the new management to declare the need to change the representation of the entity vis-à-vis the bank. The process includes the remote identification of the new representative and, if necessary, the conclusion of an annex to the agreement. This functionality significantly streamlines the switching process, eliminating the need for a visit to the branch.

Bank guarantees

In ING Business, we introduced a new bank guarantee issuance order, designed in line with current UX and UI standards. It is more readable, understandable and user-friendly. The above implementation is the first stage of changes to the guarantee issuing process. In the next few years, we plan to make available the possibility for the client to generate completed guarantee drafts directly on the new order and to automate the credit decision process for guarantees.

Rejected card transactions

Users of ING Business and the cardholder module can check the reason for the rejection of debit and prepaid card transactions. Simply go to the Card List and select Card Transaction History. In addition to completed transactions, the card transaction history also shows rejected transactions and the reason for their rejection. In the transaction details, clients will find a broader description of the rejected transaction, along with a hint of what to do next depending on the reason for the rejected transaction. Next year, we plan to make rejected transactions available in the transaction history for credit and charge cards.

Cash pool

ING Business users can independently manage daily limits for cash pool structures.

New functionalities for business clients in both systems – Moje ING and ING Business

New process for viewing card data

Responding to client expectations, we have introduced a new feature – the ability to view physical card data. On a single screen, we present the complete card data in an easy-to-read simplified form, including:

- Accessibility for the visually impaired – we provide easy access to the card number.
- Market changes – CVV number is gradually disappearing from physical cards.
- Convenience of online payments – clients are increasingly paying by phone and not carrying a physical card. The feature makes it easy to quickly copy card details, especially when the site does not support digital wallets or a BLIK code.

The process is available to the client in Card Details by selecting the option: Show data/Show card number and CVV code.

We have changed the process for adding cards to Apple Pay and Google Pay mobile wallets

To enhance security and convenience for our clients, we have changed the process of adding cards to mobile wallets and introduced an additional confirmation in the app, which eliminates the risk of unauthorised card additions. The new process ensures full protection of client funds and complies with the latest security standards.

Application enabling the activation of the Mass Payment Identification System (SIMP)

With this application, clients can remotely and automatically activate the Mass Payment Identification System (SIMP) service. Until now, this proposal was only available to housing associations.

We improve, develop and support

Retail segment

In 2025, the Retail Clients Division was split into the Private Clients Division and the Private Banking and Investments Division to support the implementation of the growth strategy in private banking. We have developed our offering for Private Banking clients by introducing new solutions, building a modern and convenient private banking experience.

New Konto z Lwem Private Banking account with a dedicated contactless Visa card

We have introduced a new account for the Private Banking segment – the Konto z Lwem Private Banking account – available both in Moje ING and in Meeting Places. Alongside it, we offered clients the prestigious Visa Contactless card, with the option to add it to Google Pay and Apple Pay wallets. It ensures that clients benefit from most

services at no extra charge. The card provides, among other things, no currency conversion fees and free withdrawals from ATMs worldwide, enhancing client convenience and mobility. Along with the account, clients invariably have access to their personal adviser and the Private Banking offer. The account is in line with the bank's strategy – building modern and convenient private banking.

Savings offer

In 2025, we continued to develop attractive savings solutions to support clients in building a financial future.

- As part of our cyclical "Start-up Bonus" offers, we encouraged people to start actively saving with ING. We implemented a Welcome Deposit offer for new Private Banking clients with a competitive interest rate, supported by a campaign on social media and industry portals.
- For clients already using our savings services, we have prepared a number of editions such as OKO Bonus [Bonus Open Savings Account], OKO Bonus MAX [Bonus MAX Open Savings Account] and OKO Bonus PvB [Bonus PvB Open Savings Account], dedicated to new funds. These offers provided competitive interest rates for those actively banking with ING and using the mobile app, further strengthening client relationships.
- With the long-term financial security of clients in mind, we promoted pension solutions. We introduced tools facilitating future planning, such as calculators for Individual Retirement Accounts (IKE) and Individual Retirement Security Accounts (IKZE), enabling clients to check potential savings and tax benefits resulting from contributions to these products. For entrepreneurs, we prepared a dedicated IKZE calculator and a new retirement offering tailored to the needs of self-employed individuals.

Investment offer

- In caring for the needs of our clients, we are constantly expanding our range of investment funds. Clients can take advantage of numerous solutions depending on their needs and risk profile. This year, we made available to clients new currency sub-funds (in EUR) from TFI Allianz Polska S.A. and TFI PZU S.A. as well as foreign funds from ING Solutions Investment Management.
- We are continually developing the range of investment strategies available to Private Banking clients. From December 2025, our clients gained access to ING ARIA foreign funds (9 strategies in EUR), managed by ING Solutions Investment Management.
- We have increased the list of available funds within the Deposit with Fund package and introduced the Deposit with Recommended Investment Portfolio to the bank's permanent offering.

Passive investment

Passive investment in the Exchange Traded Fund (ETF) market is increasingly popular among Polish investors. Low costs, easy portfolio diversification, lower risk compared to investing in single stocks are attracting a growing group of new investors. To support the growth of the ETF market, we have introduced a promotion for clients to reduce commission on orders. We have differentiated promotional commission rates so as to encourage investment especially from new and inactive investors. With this group of investors in mind, we have reduced the commission on buy orders to zero and diversified the commission rates on sell orders – lower for bond ETFs – to promote less risky and long-term investing.

Our promotion received a lot of interest from investors. In the ETF market, our client turnover increased by more than 90% y/y in 2025 and the number of clients holding ETFs in their accounts increased by more than 42% y/y in 2025.

Insurance offer

In cooperation with Nationale Nederlanden, we have prepared two new insurance products for our clients: Private Liability and Hospitalisation Insurance.

Carbon Footprint Calculator for individual clients

In September 2025, we made available a tool whereby each user can calculate their estimated individual carbon footprint. It also provides an opportunity to see how everyday choices can affect the environment and surroundings. It shows how the result obtained compares with others in our country. In addition, users can read individual tips on how to reduce their carbon footprint – in line with their values and lifestyle. The calculator is available at sladweglowy.ing.pl.

Building Energy Efficiency Calculator

In August 2025, we made available on our website a free tool to help homeowners plan renovations to improve their home's energy consumption – the Building Energy Efficiency Calculator. All you need to do is provide basic information about the building and the calculator will suggest investments that can increase energy efficiency, estimate potential bill savings, estimated investment costs and payback periods. The calculator gives you the opportunity to select the investments you want to make, plan them over time and check the available subsidies. The calculator can be used by everyone – you do not have to be a client of our bank.

Development of the Makler application

The Makler app has been adapted to meet the requirements of the WCAG standard (Content Accessibility Guidelines for People with Disabilities). As part of these activities, we redesigned the applications and client instructions and redesigned the application's key functionalities, including orders and quotations, in line with the best UX/CX (User Experience/Client Experience) standards. As a result, the Makler app has been adapted to WCAG requirements and our clients have gained a look and functionality even more tailored to their expectations. In addition, we have provided our clients with an Investor's Guide in the Makler app, which contains a wide range of knowledge on investing.

Development of Inga – ING Bank Śląski's voice bot

- We have adapted Inga to the new service model – splitting it into two helplines: Safety and Service.
- We taught voice bot 29 new information skills, including: information on promotions, bank register, inheritance matters, BLIK, card fees, sending PIT returns, insurance policy terms and conditions, activating phone payments, foreign currency account offers and where to find accessibility information.
- In terms of task skills, Inga is able to: block a card lost by our client (third-party application), cancel previously ordered cash and activate a card on the hotline, without the involvement of a specialist.
- We have implemented solutions to streamline client service and support the work of professionals to make them more efficient and comfortable.

Corporate segment

EU loans, technology loans and green loan

In 2025, we supported entrepreneurs applying for EU subsidies under successive competitions launched from aid programmes and signed a total of 96 agreements for an EU loan and we issued loan promises to finance projects with a total volume of over PLN 1.2 billion. We are also in a leading position in terms of environmental bonus promises awarded to clients by BGK. In 2025, we signed 95 green loan agreements for a total of approx. PLN 528 million. Under successive calls for proposals we have issued 119 promises and concluded conditional loan agreements for a total of approx. PLN 560 million. The green loan finances projects that aim to improve energy efficiency by upgrading a company's existing infrastructure. The support provided will thus facilitate the energy transformation of companies.

Sustainability-Linked Loan (SLL)

We have introduced financing for medium-sized and large companies – a loan linked to sustainable development goals (SLL). The product enables companies to implement ESG strategies by linking financing conditions to the achievement of measurable sustainability indicators. The benefits for clients are:

- support in achieving ESG goals and business transformation;
- the possibility of obtaining more favourable financing terms, subject to meeting agreed KPIs;
- strengthening the company's image as responsible and innovative.

Cooperation with BGK

In 2025, we continued our flagship De Minimis Guarantee programme, which was very popular with clients. Guarantee sales in 2025 exceeded PLN 6.2 billion (vs. PLN 6.2 billion in 2024) and thus, with total sales of these guarantees at a level of PLN 48 billion (from 2013 onwards) we are in 2nd place in the ranking of all banks having it in their offer. BGK's portfolio guarantees, which were implemented in 2024 into the bank's offering, were also very popular with clients in 2025:

- Biznesmax Plus Guarantee – an instrument to support the development of innovative companies and to increase the global innovation potential of the sector. In 2025, we have provided PLN 138 million of this guarantee, while since the beginning of the programme we have provided PLN 352 million, which represents 17% of the value of the entire BGK programme;
- Ekomax Guarantee – supporting energy efficiency improvements for companies and scaling up the energy transition. We have provided PLN 6 million of this guarantee in 2025, while we have provided PLN 12 million since the start of the programme, putting us at the forefront of guarantee sales;
- Investmax guarantee – the aim of this facility is to support micro-entrepreneurs and SMEs. The guarantee is an alternative for clients who have exhausted the de minimis aid limit. In 2025, we have provided PLN 234 million of this guarantee, while since the start of the programme we have provided PLN 270 million, representing 17% of the value of the entire BGK programme.

In 2025, we also started to cooperate with BGK in the area of our country's defence projects.

Trade finance

In 2025, we have been actively working on developing trade finance products. We issued 6,477 bank guarantees, 75% of which were e-guarantees. Similarly, in 2024 we issued 6,453 bank guarantees, 74% of which were e-guarantees.

This is a huge step towards reducing paper, speeding up processes, convenience and secure access to guarantees. In 2025, we opened 1,515 import letters of credit with a total volume of PLN 1,348 million. Similarly, in 2024, we issued 2,254 import letters of credit for a total of PLN 1,231 million.

Card facilities

- From 24 November 2025, we have implemented a revised application for the Mastercard Business prepaid card issued to sole traders in Moje ING. The revised process allows you to order the card on yourself and on another user in the company who uses Moje ING (e.g. a proxy in the company). The second major change is to allow clients to order a card without a physical form, the so-called "plastic-free card" (previously, the client could only order a plastic card).
- Card users in ING Business and on the mobile app can self-report planned trips abroad, reducing risk and providing greater convenience when using the card abroad. The banking system monitors foreign transactions and can block the card if it suspects an unauthorised operation. Application can be made easily – just go to the Card List and select Outbound trips. This eliminates the need to contact the bank by telephone.

- We have extended the multi-currency functionality on Mastercard Corporate Debit in PLN and Mastercard in EUR for ING Business users. Clients can pay conveniently abroad without additional currency conversions and commissions in as many as 17 currencies, including 10 newly added from 24 June 2025. To use the new currencies, the card must be linked to the selected currency account. Additional currency accounts can be opened in the ING Business mobile app. The cardholder can check in their app which accounts have been linked to their debit card.

Acquisition promotions for sole proprietors

We recognise that starting a business involves many challenges, especially in the first years. Therefore, ING makes it easy for people who decide to start their own business to get started and supports them with solutions that enable them to successfully grow without unnecessary start-up costs. To make our offer competitive, we support it with additional benefits for clients: PLN 3,600 for sole proprietorships for an easier first year!

From April to June, clients were able to receive PLN 300 per month for transfers to the Social Insurance Institution from their company account and for non-cash payments with their account card (10% of expenditure). These are paid out over 12 months, meaning that up to PLN 3,600 is waiting for the client throughout the promotion period. We continued this promotion in a modified form in the following months:

- Clients who sign up for the promotion between July and September are rewarded with PLN 150 per month. The annual bonus amounts to PLN 1,800.
- In the following months, we returned to the PLN 3,600 award, which additionally includes savings from the use of terminals, the iMoje gateway and a personal accountant.

Modern payment terminals

In 2025, we started implementing modern Android-based payment terminals. Based on client experience and UX best practices, we have developed a dedicated payment application that provides an intuitive user experience and new business opportunities. In November, the pilot was launched – the first devices went to new clients. PAX terminals combine advanced technology with simplicity of use.

eSignature

2025 was another year of significant growth in the development of remote leasing. In the Business Banking client area, we increased the percentage of contracts signed electronically by a further 15 percentage points to 77%, and agreements concluded through the Business Development Centre by 11 percentage points to 96%. Clients greatly appreciate the remote signing capabilities and high availability of qualified electronic signatures provided by ING Lease (Poland). The signing process is simple and quick – clients sign the contract in just a few minutes. In the next year, we will continue to develop the ability to sign leasing documents remotely, including enabling clients to sign in Moje ING and ING Business online banking.

Payment gateway imoje

The year 2025 was also a time of intensive development and implementation in the area of imoje payments.

- As part of the diversification of payment channels, we have added a new provider for the BLIK channel, which is Polski Standard Płatności.
- We have released functionality to enrich the offer with a new commission settlement mechanism, the so-called threshold rates. This allows us to set commission rates according to the merchant's turnover and automatically settle them.
- We have implemented the ability for the merchant to acknowledge receipt of a transaction initiated and paid for by the payer. Online shops in the travel, aviation or other service-related sectors use this mechanism for so-called overbooking, i.e. selling more seats than are actually available, in order to avoid additional costs related to commissions. The mechanism is dedicated to selected merchants. The functionality allows for a decision on the side of the online shop to collect a given transaction.
- As part of payment by card, we have made the new Click to Pay payment method available (in collaboration with Mastercard). It allows you to pay without having to enter sensitive card details. In the future, we plan to make it also available for cards issued by VISA.

Client experience

Client experience management

We base our decisions on a deep understanding of our clients' needs. We make sure that the solutions we implement respond to the real needs and expectations of our clients, designed in an appropriate way, based on the voice of the client, research and testing. Client focus is the cornerstone of what we do: we change, streamline and create solutions that make banking simple and unique. This is our responsibility and our competitive advantage.

We make sure that every product and service has a mapped client journey. We monitor the voice of the client and identify alerts (sudden increases in the number of votes in more specific categories) in real time, so we can respond dynamically. We reinforce employees' awareness and competence in the use of service design tools during, among other things, the annual CX Day.

Retail client

In 2025, we have structured the way our employees work on designing client solutions according to service design principles. We have strengthened the research stage with, among other things, quick access to a panel of employee tests and the development of tools for quick online surveys with clients. We pay even stronger attention to the prototyping stage of solution proposals, which are developed creatively but preceded by careful analysis and exploration. As a result, we design not "for" clients, but together with them, based on data, insights and a strategy

that strengthens the bank's position in the market. Each stage – from ideation to implementation – is a conscious step towards building experiences that set us apart from our competitors. Also this year's CX Day was focused on the agile use of service design elements in the design of solutions for the most strategic areas, as experienced by more than 30 interdisciplinary teams.

Business client

We invariably simplify processes and design solutions and products with the aim of providing the best possible experience for our business clients. We monitor satisfaction with our services through an extensive NPS survey programme. Thanks to the digitalisation of many processes, clients can complete most matters completely remotely. We design and use effective tools for personalised communication with clients, allowing us to develop remote sales.

- We take advantage of the opportunities created by millions of user visits to our systems. For people who want to start their own company and for budding entrepreneurs, we continue to develop the Firmove.pl (available in Polish). The website contains educational material (articles, videos, podcasts, e-books, infographics, checklists) and practical tools (calculators and document templates) to help users prepare for starting their own business. Since 2025, Firmove.pl has also made it possible to easily start a sole proprietorship in two ways — by using an intuitive registration application in the Central Register and Information on Economic Activity (CEIDG) or with the support of ING accountants. Registration assistance is provided free of charge and the service is open to anyone seeking expert support in the first phase of business development. As at 2025 yearend, the service had more than 2 million visits.
- We have implemented a new initiative, the Partner Programme, which responds to client needs in a personal and efficient way and supports the acquisition of companies. The programme focuses on two areas:
  - creating an affiliate network of micro-partners (ING Referral Programme), and
  - building relationships with large entities with a nationwide reach.

Several hundred partners have already joined the ING Referral Programme, mainly accounting firms and professional entities from other industries. The process of joining the programme is simple and fully online, and for every successful recommendation of ING products, our partners receive remuneration. Cooperation with large partners, on the other hand, is based on individual arrangements, based on product synergies and the creation of new offers that increase value for business clients. We plan to develop both areas further in 2026.

- We launched the "Recommend ING" promotion, which supported the acquisition of new clients through the recommendation of existing clients. Individual clients and companies were able to recommend the bank to friends. We awarded prizes for referrals: up to PLN 100 for a personal account and up to PLN 300 for a company account. During the promotion period (31.07-03.12.2025), 7% of new businesses opened an account with a referral code.
- We are constantly improving the process of opening the first account for companies. Our priority is to create a positive client experience during onboarding. The client can remotely apply for an account, make a remote identification (video verification) and sign the account agreement. The remote process is available not only to sole proprietorships, but also to partnerships and limited liability companies and housing associations. More than half of companies in 2025 have taken the opportunity to start a relationship with their bank online themselves.
- We have implemented a "Step 0" form that triggers whenever a potential client clicks on the Open Company Account button. This is the first stage of the process. Based on the Tax Identification Number (NIP) or Statistical Number (REGON), the system immediately identifies the company's legal form. This ensures that the client gets to the right account application and does not make mistakes. The process is fast and convenient. Prior to implementation, up to 11-15% of companies in the SME/MC area were starting the process on the wrong application. This prolonged service and created barriers. "Step 0" removes this problem. With "Step 0", as many as 60% of clients who have provided a Tax Identification Number (NIP) or Statistical Number (REGON), complete the account opening process. The form also collects data on traffic sources and allows the effectiveness of the campaign to be measured in real time. It also identifies clients who have aborted the process – we contact them through the Central Business Development Centre, which increases conversion and return on investment. The "Step 0" project is an important part of the bank's digital transformation. This resulted in a process that is based on a minimal set of data and is in line with our premise of designing an effortless experience for clients.
- We give you a range of options for contacting an adviser – from immediate help at a key moment, to scheduled meetings, to support as you complete your applications. This provides clients with flexibility, speed and professional support, resulting in a better experience and greater satisfaction with the bank.
  - From March 2025, we have increased the availability of advisers in remote channels. Clients can now make appointments online for all banking products – without visiting a branch. We have prepared simple appointment forms for companies (SME/MC, sole proprietorship) and communities. They are available in Moje ING, ING Business and on the bank's website. Video or audio meetings take place in LiveBank's secure environment, which allows for the presentation of an offer and the purchase of a product in real time. By December 2025, more than 18,000 online meetings had taken place. Clients have gained convenience and flexibility, and the number of visits to branches has decreased.
  - We have also introduced the Click2Call function, which allows clients to quickly connect with an adviser – without waiting for an appointment. We have added a simple form on the account pages for companies and sole proprietorships – the client clicks on it and is instantly connected to an adviser, so they can get support in seconds to choose an offer and open an account. The conversation takes place in a secure LiveBank environment (audio or video).
  - We added a chat function in the ING Business system, directly on product applications. This ensures that the client receives support exactly when he or she needs it – including when completing the application. One click is

all it takes to connect with an adviser. The adviser answers questions and guides you through the steps. The function is particularly helpful when opening an account for companies and onboarding new clients, where it is important to provide the client with a sense of security. This reduces application times, eliminates barriers and increases convenience. We plan to extend the chat to further applications to ensure a consistent experience.

- We have established partnerships with companies that specialise in creating and implementing decarbonisation strategies, improving the energy efficiency of the company and obtaining funding for investments. For more information, please visit: https://esg.ing.pl/esg-w-twojej-firmie/wsparcie-w-transformacji#partnerzy (available in Polish).
- Our factoring company, ING Commercial Finance, is actively supporting clients in building a safe and stable business by hosting webinars on countering commercial fraud. At the same time, we are holding a series of meetings on maintaining liquidity and effectively securing receivables. Through these initiatives, we provide practical knowledge and tools to help protect our clients' interests.
- At this year's CX Day in corporate banking, we focused on stimulating work in the service design stream. In this respect, 12 ideas were generated.
- How to stay one step ahead of fraudsters in the era of digital transformation? In the strategic client area, we met with experts, practitioners, and partners to discuss how to build digital security in a dynamically changing world. During the "Cybersecurity and Fraud Prevention in the Era of Digital Transformation" conference, we covered topics related to global fraud trends, fraudsters' mechanisms in Poland, online banking security, and the latest cybersecurity solutions and practices. We also shared an international perspective on combating cybercrime, because cybersecurity is not just about technology - it's also about collaboration, knowledge, and rapid response.

Net Promoter Score

The client is constantly at the centre of our strategy. We are constantly focused on improving our products and services in such a way that we not only keep up with the market, but above all anticipate our clients' expectations and deliver modern and interesting offers and great processes. A key tool that can measure this and show our bank against others is the Net Promoter Score (NPS). For us, this is more than just numbers, it is a barometer of loyalty and willingness to recommend our bank.

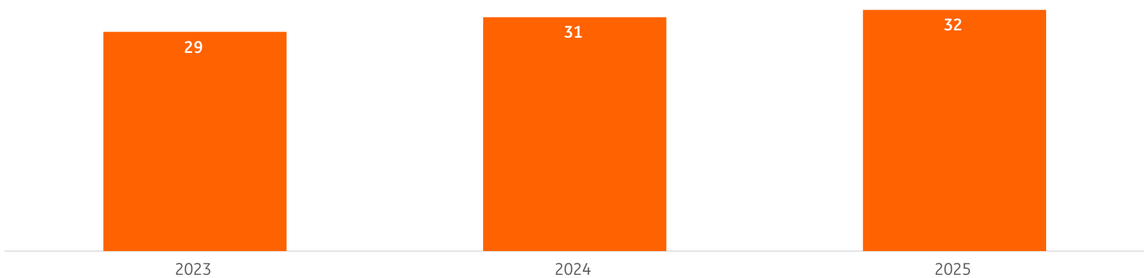
Thanks to a rigorous methodology and comparability (market benchmarks), we know exactly where we are in comparison to our competitors. Importantly, we do not stop at just a scoring scale, we analyse open statements and client comments from multiple sources, and access to alerts on changing rating trends across the bank's channels, products and services allows us to analyse the ever-present voice of the client and continuously monitor sentiment across a range of banking-related areas. We are able to do this systematically, with the help of technology, through a convenient app available to every employee.

We believe that the best solutions are born in the design process, where we juxtapose our ideas and visions with client evaluations and explore their reactions to the proposed solutions.

Retail segment

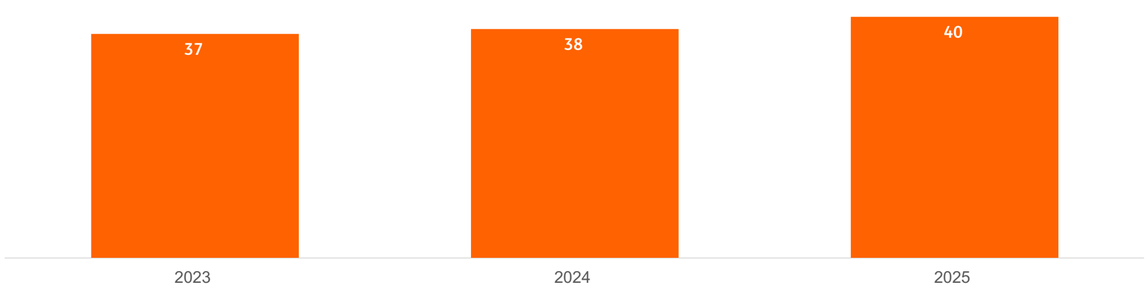
Our efforts are delivering results. In 2025, we retained our first position in the area of most recommended bank in Poland. The average NPS for retail clients increased by 1 percentage point from 2024 to 32 points.

Relational NPS score in the retail client area



Such a result guarantees the retention of the leader's position in the list, but also means a 16-point lead over the market average and a 10-point lead over the next bank.

Relational NPS score in the retail client area (main relationship)



The data comes from the independently syndicated NPS relational benchmark survey (Bermuda project), conducted by research agency Minds & Roses. The survey was conducted using the CATI method and covers a representative group of Polish bank clients aged 15 and over.

We are constantly developing our research by analysing more and more points of contact between clients and the bank. We are systematically increasing the number of surveys on key client journeys, and we are implementing more and more surveys in Moje ING so that clients can evaluate our processes right after the activity, on the spot. We study and analyse a number of key metrics from a client experience perspective, not just NPS, but CSAT, CES or FCR, and a number of key drivers in client pathway research.

Digital client experience remains a key area of our work. We are focusing on the development of the Moje ING system, while maintaining a high standard of service in stationary outlets. We prioritise digital interaction research in our development strategy, but nurturing direct contact with clients remains equally important.

We are also not forgetting the channels in which the client contacts the ING specialist. In 2025, we conducted Mystery Shopper surveys to verify the level of service standards in our meeting places and ING Express outlets. The results provided valuable information to support our efforts to further improve the quality of service in traditional channels. Thanks to the research, we also know client ratings on channels such as the helpline, chat or bot. There, we track not only client satisfaction and the level of business dealt with on first contact, but we also explore with in-depth research what is important to clients and how to fit in even better with their needs in a world where time is of the essence and banking should be effortless.

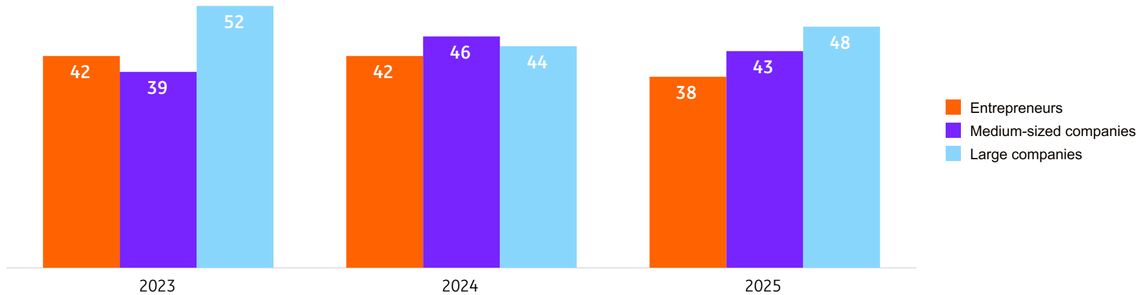
In independent quality rankings, we observe that our activities are highly rated by clients. Leading positions in market rankings reinforce our conviction that the chosen strategy for development and service quality is yielding tangible results.

Corporate segment

In 2025, we have maintained our leading position in the business client service quality rankings. The NPS scores achieved in all segments were significantly above market averages, confirming the high quality of client relationships and the effectiveness of the activities carried out.

- In the group of entrepreneurs, the NPS index was 38 points. The result achieved was 16 points higher than the market benchmark and determined the bank's first place in this segment.
- In the area of medium-sized companies, the NPS index was 43 points, 16 points higher than the average market value, which again puts ING at the top of the list.
- In the large corporate sector, the bank maintained its second place ranking with an NPS score of 48 (up by 4 points on 2024), which was 15 points above the market benchmark.

Relational NPS score in the area of entrepreneurs, medium-sized and large companies



The indicator values presented are based on the results of the NPS benchmark survey, carried out as part of an international research project commissioned by ING Group N.V. in the Business Banking markets. Measurements are mainly carried out using CATI, based on a consistent methodology that allows for comparability of results over time.

Client satisfaction and experience (CX) surveys are an important part of our growth strategy and client relationship management. In 2025, we sent more than half a million invitations to our clients – company representatives – to take part in the research, which allowed us to obtain a broad and representative analytical material. The material gathered is the basis for initiating and monitoring improvement measures in the product, process, and service areas.

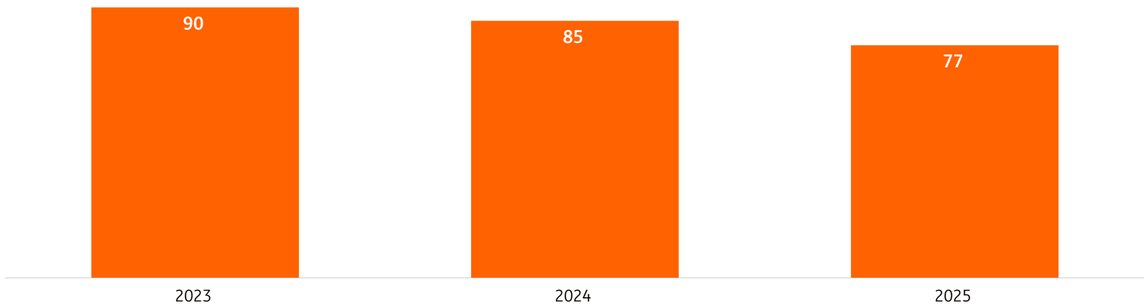
We focus not only on key processes but also on contact channels. In the past year, we have included new interaction channels and products in our research. Among other things, we carry out satisfaction surveys after video calls and chats with our consultants, which allows us to gather feedback in real time and better understand the needs of clients in real time.

In parallel, we are implementing initiatives to support the development of a client-oriented organisational culture (e.g. CX Day), which aim to raise awareness of the importance of the client experience and the responsibility of individual areas for shaping it.

Leading positions in the rankings confirm that clients appreciate the changes being made, which motivates us to further improve our processes, quality and service standards.

In the Wholesale Banking strategic client area, the relational NPS score was 77 points (down 8 points compared to 2024). The research in this area is also part of an international research project carried out by the ING Group N.V.

Relational NPS score in the area of strategic clients



Service in meeting places

Retail segment

In accordance with *the Bank Organisational Bylaw*, we serve individual clients at banking branches, which we divide into:

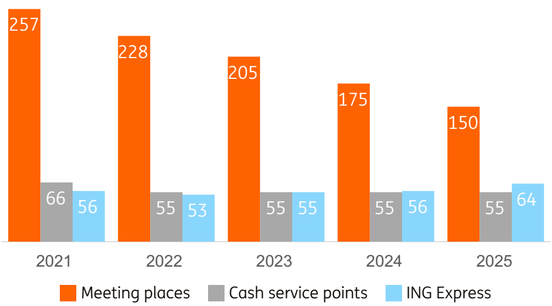
- meeting places: we will arrange a convenient day and time with the client to discuss their needs. Specialists will help you take care of your financial future, live better, as well as in everyday banking,
- private Banking meeting places – Private Banking clients will meet their adviser here,
- cash service points – here we take care of the comfort of withdrawing and depositing cash at the cash desk; a specialist will help to make the transaction smooth and safe,
- ING Express sales outlets – operate in shopping malls; our clients can open an account there along with access to online banking.

As at 2025 yearend we had:

- 150 meeting places (-25 y/y);
- 64 ING Express outlets (+8 y/y), located in major shopping centres across Poland. The ING Express network of points of sale is a response to the expectations of clients who are looking for a bank that is available anywhere at any time;
- 5 Private Banking centres and
- 55 cash service points dedicated to cash deposits and withdrawals at the counter (unchanged from 2024).

We are consistently in the process of modernising our bank outlets, which involves changing equipment and décor and introducing new functional solutions.

Number of our meeting places and cash service points



Geographical structure of venue locations as at 2025 yearend

We continue optimisation activities by relocating and consolidating outlets to the most attractive business locations in individual cities and regions.

Corporate segment

The bank serviced corporate clients in the segment of entrepreneurs and medium-sized and large companies through:

- 9 Business Development Centres,
- 29 Business Banking Centres,
- 14 Corporate Banking Centres.

Almost all of them operated in the same locations as the venues. Their number is unchanged from 2024.

Strategic clients were serviced by the Strategic Clients Department in Warsaw and a regional office in Katowice.

Automatic teller machines (ATMs), cash dispensers

In 2025, the ATM area will remain an essential part of the self-service infrastructure for our clients to access cash. The number of fee-free ATMs remained similar to the previous year. In total, at the end of the year, our clients had more than 5,200 commission-free ATMs at their disposal, including 92 withdrawing Euros.

The scope of the preferred ATM network has not changed in recent months. These are primarily devices:

- with the ING logo (850 pieces, all with deposit option),
- with the Planet Cash logo and Planet Cash in cooperation with other banks: BNP Paribas Bank Polska S.A., mBank S.A., Credit Agricole Bank Polska S.A., VeloBank S.A., Santander Bank Polska S.A. and selected Co-operative Banks (most of these also allow deposits).

Our work in the ATM area has mainly focused on adapting the machines to people with special needs. All ATMs with the ING logo are equipped with audio systems, a voice guide function that supports visually impaired people in completing transactions. We have supplemented this functionality with BLIK transactions and Euro withdrawals. All orange ATMs are also comprehensively labelled with stickers with messages in Braille. As far as possible, we have adapted the height of the ATMs to be operated by people who use a wheelchair. We have updated the ATM/deposit machine search engine with additional filters with individual facilities.

Our social involvement

We attach particular importance to activities in the area of financial education, which we have been targeting a wide range of audiences for many years. The implementation of these actions flows from the need to share the expertise we have as a financial institution. That is why, as part of their cooperation with partners in many projects, ING Bank Śląski Group employees participate as experts or mentors. In order to carry out social activities effectively, we establish partnerships with organisations with a broad, nationwide reach that declare high standards of action. Together with partners, we set targets and metrics to determine the effectiveness and social impact of the programme. This way, we know what social change we are achieving as a result of our joint activities.

ING Bank Śląski conducts social and charity activities in priority areas in line with its business strategy for sustainable development. We carry out activities both independently and in cooperation with community partners and with the support of two corporate foundations – the ING for Children Foundation and the ING Polish Art Foundation.

We attach great importance to the transparency of our activities. We work with organisations that declare their compliance with anti-corruption, ethical and environmental standards. We ensure due diligence in the process of establishing cooperation. Financial charitable donations are made on the basis of ING Bank Śląski S.A.'s Donations Policy in place at the bank, with the Donations Committee participating in the process each time. Sponsorship and partnership activities are also covered in our bank by the ING Bank Śląski Sponsorship Policy and the ING Bank Śląski Social Partnerships Policy, respectively. More information on this topic can be found here in the section Donations sponsorships and partnerships.

Actions for financial education, climate education, entrepreneurial development and sustainable development

- Children's programme "Economic Education at Your Fingertips"

As part of this initiative, ING Bank Śląski and the ING for Children Foundation have prepared a set of interesting and inspiring educational materials for primary school students. On programme website (available in Polish) you can find, among other things, content for Grades 1-3 developed by the ING for Children Foundation, as well as lesson plans for Grades 4-8, initiated and mainly developed by employees of the CFO Division of our bank and the Foundation. All materials were created with the support of external experts. The programme aims to develop children's financial and social skills through a holistic approach to economics. Topics include the history of money, earning, saving, sharing and developing future competences.

- Warsaw Banking Institute – Bakcyl, Security in Cyberspace (BwC) and #EduSmartGrowth

As part of the industry's financial education programme Bakcyl for primary and secondary school students, lessons on finance were taught by volunteer bank employees. There were two cyber security knowledge competitions for secondary school students and for students, as well as a grant competition as part of the #EduSmartGrowth programme – "The ECOnomy of Development: Young Leaders of Change!" on the theme of sustainability in secondary schools. The financial grants that the award-winning secondary schools received enabled them to implement their projects.

- ING Group N.V.'s global grant fund. – ING Community Investment Global Fund

The ING Group N.V.'s grant fund is dedicated to projects and programmes in individual countries for Community Investments – in the areas of financial health, supporting labour market resilient professional skills and supporting entrepreneurship. The projects, prepared by local NGOs in each country, are assessed by a grant fund jury made up of an international group of experts. Grants for projects are provided through ING Bank Śląski on the basis of the ING Bank Śląski's Donations Policy. In 2025, ING Bank Śląski provided the social partners with funds from the fund to implement 3 projects (Step forward / You A(nd)I – the Zwolnieni z Teorii Foundation and National Foundation for Environmental Protection). This was over PLN 1.3 million. With the support of the Zwolnieni z Teorii Foundation, a report was produced (https://krokdoprzodu.zwolnienizteorii.pl/, available in Polish) summarising the role of mentors in the Step Up programme, covering six years of the mentoring programme. As of 2019, more than 1,200 students have participated in the programme and have carried out nearly 300 community projects, supported by 294 mentors from ING Bank Śląski. The programme report points to the future and the role of education that inspires students to act independently and discover their own potential. The report shows that as many as 94% of participants in the mentoring pathway of the Step Up programme have gained self-confidence, more than 90% have developed competences useful in the labour market.

- The Zwolnieni z Teorii – Social Projects Competition In 2025

ING Bank Śląski continued, together with the ING for Children Foundation, to implement the ING Challenge – A Step Ahead, in partnership with the Zwolnieni z Teorii Foundation. Once again, as part of the largest Social Projects Olympiad in Poland, secondary school students organised their own social projects, responding to community, cultural, technological or environmental needs. In the implementation of the projects, youth teams benefited from the support of 80 expert mentors from the bank and foundations. A total of 556 participants completed our challenge. You can read more about this event here. The bank continued its involvement in the You A(nd)I programme, which aims to build awareness and knowledge about the use of AI tools. Selected participants in the Social Projects Olympiad, who implemented their ideas based on AI tools, took part in a webinar and classroom workshops led by AI experts from banks, among others.

- We Will Save the World – eco-programme for primary school pupils

"We Will Save the World" is an educational programme aimed at pupils at all levels of primary school, which combines the expansion of children and young people's environmental knowledge with the enhancement of digital competence. The We Save the World Programme is organised by the "ABCXXI – All of Poland Reads to Kids" Foundation, with the WWF Polska Foundation as the content partner. ING Bank Śląski is a Strategic Partner. The Ministry of Climate and Environment and the National Library have assumed Honorary Patronage of the Programme. More than 6,200 students and 250 educators from 101 institutions in 78 locations across the country were enrolled in the third edition of the programme, which ended in June 2025. For the first time, older students from agricultural schools also took part in this edition of the programme. The finale of the programme was for the students to carry out their own environmental projects for the benefit of the local community and to submit presentations of their implementation to the organiser for a competition. You can read more about the EIA Programme on the website: We Will Save the World – All of Poland Reads to Kids (available in Polish).

- Lesław Paga Foundation In 2025

ING Bank Śląski was a partner of a two-week development and education programme for talented students and graduates up to the age of 27, i.e. the 20th edition of the Capital Market Leaders Academy. The main focus of the Academy is to prepare programme participants for work in the financial sector, to impart specialist knowledge of the capital market, and to develop analytical, leadership and interpersonal skills. During the Summer School organised for programme participants, experts from ING conducted a workshop on the interconnectedness of banks and capital markets in an inflationary environment. During the workshop, programme participants were able to broaden their knowledge of the specifics of decision-making by banks and investors in an environment of elevated inflation, when classic investment patterns require particular flexibility. They also looked at how households' decisions on how to invest their savings depend on the balance of profit and risk, and analysed how banks compete with the capital market for individual clients' funds by offering deposits or investment products. How banks prepare offering strategies tailored to different client segments, taking care of funding and balance sheet liquidity was also a topic of discussion. You can read more about the Capital Market Leaders Academy programme here.

- Responsible Business Forum

ING Bank Śląski continued its partnership in the Responsible Business Forum as an institution that is committed to social responsibility and sustainability as well as diversity and inclusion initiatives as a signatory of the Diversity Charter. In the Responsible Business Forum's annual report "Responsible Business in Poland. Good practices" featured 5 good practices in the area of sustainable development from ING Bank Śląski. You can read about the highlighted practices here.

- United Nations Global Compact Network Poland (UNGC)

As a continuation of its cooperation with the UN Global Compact Network Poland (UNGC), ING Bank Śląski was a Climate Positive partner, which included initiatives related to energy transition, sustainable finance, biodiversity or greenwashing-free communication, among others. ING was also a partner in the Business & Human Rights programme, which initiated activities in the areas of human rights, gender equality, diversity management or business security. Representatives of ING Bank Śląski regularly and actively participated in the Steering Committee of this programme and spoke within the reports published by the UNGC. In 2023, ING Bank Śląski joined the UN Global Compact as a direct member at country level (ING Group N.V. is a long-standing member of the UN Global Compact at global level).

- Run Warsaw

We have been taking part in "Run Warsaw" event since 2013. The Orange Team is made up of employees and their accompanying persons and families. Every year we run and march for the ING for Children Foundation. In 2025, during the "Run Warsaw" and "I'm Marching and Cheering" events, the Orange Team numbered as many as 8,000 people, and ING employees ran and marched for a record amount for the foundation – PLN 170,000, which the foundation will donate to the organisation of the Orange Force programme in 2026. Read more about the Orange Power programme in the section about the ING Foundation for Children.

- ING Charity Sports Tournaments

In 2025, ING Bank Śląski adopted a consistent approach to sports tournaments organised as part of its well-being initiatives. All tournaments are for charity. On 28 June 2025, the ING Charity Football Tournament took place, with 20 ING teams taking part, around 200 players and footballers. Teams made up of bank employees and group companies from across the country competed. As well as promoting healthy lifestyles, the aim of the tournament was to support charities that provide sporting activities for people with disabilities. In 2025, support for activation activities for children and adults with disabilities (PLN 20,000 each) was received: Hope for the World Cup Foundation, the Amp Futbol Poland Association and the See No Obstacles Foundation. In addition, ING Bank Śląski organised charitable sports tournaments for its employees — a table tennis tournament, the proceeds of which

supported activities promoting the activation of people with disabilities through the Avalon Foundation, and a beach volleyball tournament, in which participants played in support of the Podaj Dalej Foundation named after P. Janaszek.

Donations and sponsorships and partnerships

In 2025, ING Bank Śląski made charitable donations of a financial and in-kind nature. Donations were made on the basis of *ING Bank Śląski's Donations Policy*. The policy sets out, inter alia, the areas of the bank's involvement in charitable activities. The bank has chosen the following areas for social investment:

- education and activities for children and young people, including leisure for children and young people, as well as support for social and subsistence needs,
- education, science, schooling and education – especially in the area of financial and climate education,
- health protection and prevention,
- actions to promote diversity, build openness and equal opportunities,
- environmental protection, combating climate change, and
- education and promotion of contemporary art by Polish artists,
- financial support in case of special events in which a worker or a member(s) of his or her family is affected.

In this policy, we also clarify which donations the bank does not make:

- for political purposes, for the benefit of political parties, election committees, for candidacy purposes, for election campaigns,
- those that may be considered as an attempt to influence decisions taken by persons exercising public functions,
- which have a business purpose and serve to establish or maintain a business relationship with a client or third party,
- that can be considered as trading in proceeds, in order to obtain preferential decisions for the bank,
- when there are circumstances indicating that the beneficiary has engaged in corruption, bribery or other unethical or illegal activities,
- if the donation could be judged as an attempt at corruption or bribery,
- natural persons, with the exception of donations as defined in *ING Bank Śląski's Donations Policy* (Article 2(2) and (3)),
- for organisations that discriminate against people on the basis of age, race, colour, religious belief, gender, disability, sexual orientation or country of origin,
- for organisations suspected of acting contrary to the bank's values in line with the ING Orange Code,
- for organisations that do not operate under the act of 24 April 2003 on the activity of public benefit institutions and voluntary work,
- for projects, programmes aimed at supporting religious worship, faith-based organisations,
- for student organisations if the purpose is to finance trips and/or student events,
- to cover the running costs of social organisations, e.g. office operation, service charges, salaries.

The Donations Policy sets out the roles of the Donations Committee, the Bank Management Board Bureau and the Management Board in the process, the due diligence requirements and the decision-making process. Each time a charitable donation is made, the Centre of Expertise – Compliance and the Donations Committee (made up of 5 representatives of the bank) are involved, as well as, depending on the amount, two members of the Bank Management Board or the bank management board. In 2025, ING Bank Śląski made charitable donations from its own funds totalling more than PLN 2,202 thousand.

In addition, the bank also made donations to the activities of two corporate foundations:

- for the ING for Children Foundation in the amount of PLN 3,565 thousand,
- for the ING Polish Art Foundation in the amount of PLN 2,030 thousand.

Objectives supported by the bank through donations, in selected areas of social investment in 2025, include:

- science, education, education and upbringing – particularly in the area of financial and climate education – the bank made donations totalling PLN 812.2 thousand,
- health care and prevention – the bank made donations totalling PLN 478 thousand,
- environmental protection, combating climate change – the bank made donations totalling PLN 739.6 thousand.

In total, ING Bank Śląski donated PLN 9,322.8 thousand to social and charitable activities (the amount of charitable donations and donations to 2 corporate foundations).

In 2025, the bank also made in-kind donations of end-of-life IT equipment (in good working order) and office furniture mostly to schools, kindergartens, care facilities and charities. The value of IT equipment donated to foundations, associations and care facilities amounted to PLN 269,400. Donations in kind were made on the basis of *the Procedure for the Resale / Donation / Deprocessing of Fixed Assets at ING Bank Śląski S.A.*

In 2025, ING Bank Śląski continued to implement its sponsorship strategy, focusing on key areas for client growth and the business environment:

- Support for the younger generations – activities aimed at developing financial resourcefulness and entrepreneurship, both in professional and personal life.
- ESG and sustainability – initiatives embedded in the bank's business strategy as one of its priorities. We see them as the foundation for building a sustainable competitive advantage – for the bank and its clients.
- Entrepreneurs and executives – we inspire leaders of medium-sized and large companies by promoting innovative approaches to doing business and supporting them to grow.

As part of our work with community organisations, we have been involved in projects on: financial education, climate action, entrepreneurial development and sustainable development. Partnerships also covered areas such as cyber security, future competences, diversity and equal opportunities. The collaboration was based on the exchange of expertise, experience and the joint design of solutions for internal and external stakeholders.

Activities were carried out in accordance with the principles set out in *the ING Bank Śląski S.A. Sponsorship Policy and the Policy for Entering into Partnership Agreements with Social Organisations*, ensuring transparency and efficiency of the processes.

In 2025, the bank has earmarked approximately PLN 15.1 million for sponsorships and partnerships, investing in initiatives that support social, economic and environmental development, in particular:

- PLN 3.5 million for activities aimed at entrepreneurs,
- PLN 9.3 million for measures targeting young people,
- PLN 2.3 million for ESG and sustainability-related activities.

Highlights of the bank's involvement in 2025

- European Economic Congress and EEC Trends

ING Bank Śląski has been supporting entrepreneurship for many years, engaging in key economic events such as the 17th edition of the European Economic Congress in Katowice and EEC Trends, a conference that is a programme prelude to the congress.

The EEC Trends conference took place on 03 February 2025 in Warsaw. It is a space for debate about key trends and developments, as well as the most important challenges of today's economy – from geopolitics, energy independence and digital sovereignty, to security, infrastructure and the labour market. There is also a focus on defence issues, including equipment purchases, modernisation and investment, which shape Europe's competitiveness and resilience in a changing world.

The 17th edition of the European Economic Congress took place on 23-25 April 2025 at the International Congress Centre in Katowice. The guiding principle directing the debates of this year's congress was "Together for a Safe Future". Discussions focused on building a strong and competitive European economy as a foundation for security. ING Bank Śląski experts, politicians, decision-makers as well as investors and representatives of major companies debated green energy and the economy, investment and development, and the functioning of the economy in the new realities. Digitalisation, new technologies and regulation were also an important context.

- European Financial Congress

In 2025 ING Bank Śląski was one of the sponsors of the European Financial Congress (EFC) in Sopot. It is one of the most important meetings of representatives of the financial sector, leading experts and business leaders, as well as academics. This year's edition focused on key geopolitical challenges, security and economic transformation. The European Financial Congress 2025 presented to what extent and how the financial sector can support:

- the competitiveness and development of the Polish and EU economies,
- transformation and security, in particular: defence, energy, digital and cyber,
- sector clients.

Over the course of three days, debates addressed key issues arising from the geopolitical situation and the growing uncertainty in global economic, trade and financial relations, but also the stability of the European and Polish financial systems. Discussions also focused on what Poland can contribute to international initiatives to increase Europe's competitiveness and security in a deglobalising environment. The tool for achieving competitiveness, increasing productivity, among other things, is technology. Their development and widespread adoption require financial sector support, as do energy, digital, cyber and defence security.

Representatives of the Management Board and experts from ING Bank Śląski took part in discussions during the Congress. The debates and discussions result in recommendations for systemic changes in economic policy for safe and sustainable development. The Congress culminated in a debate of the presidents of the largest Polish banks – a map of the challenges facing the banking sector. As is the case every year, recommendations for financial stability and economic development in Poland and the EU are also a tangible outcome of the Congress.

- Open Eyes Economy Summit

On 18-19 November 2025, the 10th edition of the Open Eyes Economy Summit Congress took place in Kraków, Poland. ING Bank Śląski, as a partner since the first edition of the Congress, supports this unique event that brings together business, science and culture, promoting the ideas of sustainable development and social responsibility. This year, the bank created a friendly conversation space where, over aromatic coffee, participants could exchange ideas and inspirations with representatives of ING, the ING for Children Foundation and the ING Polish Art Foundation.

- ING Silesia Beats

The brand's involvement in music events plays an important role in shaping its positive image among younger audiences as well as the wider community. ING Bank Śląski therefore decided to become the title sponsor of the ING Silesia Beats festival, which kicked off on 19-21 June in the Silesian Park in Chorzów and brought together more than 100 performers on nine stages and over 50,000 participants.

During the festival, the bank ensured strong exposure of the ING brand and its positive associations. There is a special offer for clients – a 20% discount on festival passes. At the festival itself, ING Bank Śląski provided participants with an extensive ING zone, including:

- Power Bank Zone – with a café, terrace and relaxation area.
- Entertainment zone – with creative graphic and light installations, mirrors and the use of AR technology.
- Chargers – allowing electronic devices to be charged.
- Kiosk – with activations and gadgets adapted to different weather conditions.

- Olsztyn Green Festival

The Olsztyn Green Festival (OGF) has played an important role in the cultural and social landscape of Olsztyn for ten years. Since 2014, the event has attracted lovers of music and ecology, creating a unique space to meet and celebrate together. The OGF is the only music festival in Poland that so clearly emphasises the importance of ecology and sustainability. ING Bank Śląski was present at the Olsztyn Green Festival for the second time. This year, the festival kicked off on 15-17 August at Lake Ukiel in Olsztyn. The bank has prepared a 10% discount for festival passes and two orange zones dedicated to festival-goers:

- A children's zone inspired by the educational game "ING City" in Roblox, and
- A relaxation zone where participants could relax, get attractive gadgets and recharge both their emotions and mobile devices.

- Smart Kids Planet

For the youngest, at the beginning of October ING Bank Śląski opened the Financial Mission Zone, in the newly opened Wise Fun Centre in Kraków. The centre is a modern space that introduces children to the world of finance and entrepreneurship through play. There are 3 challenges for children in the ING Zone:

- Cash machine-withdrawal machine – here they take on the role of a client and can also sort money in the vault learning teamwork and responsibility.
- The money management centre – here, at interactive stations, they can pay for purchases and exchange currency using coloured balls imitating different denominations, which teaches numeracy skills and introduces the basics of economics.
- Sending a transfer – here they can colour a "transfer print" and place it in a pneumatic tube that 'magically' transports it to the recipient. This experience teaches that today's finance is about speed, modern technology and security.

Children also have the opportunity to take part in workshops on internet safety, where they learn how to recognise safe website addresses or secure applications, and learn basic information about fake news and how to create secure passwords.

More than 20,000 people visited the Centre in its first month of operation.

- ING Strategic Sponsor of the film "Lalka"

ING Bank Śląski has become a Strategic Sponsor of the latest film adaptation of Bolesław Prus' novel "Lalka". Supporting Polish culture and art has been and continues to be an important part of our brand strategy.

Entrepreneurship, courage in action, faith in development – qualities that characterise the protagonist – are also valid in our times. As a bank, we support nearly 600,000 Polish companies on a daily basis. We were therefore delighted to be involved in sponsoring a film that evokes values close to every entrepreneur. Participation in this production also means supporting the education of young people by recalling and promoting the values of Polish literature. The film is scheduled for release in late 2026.

- Forbes Diamonds

In the first half of 2025, ING Bank Śląski continued its cooperation with Forbes Polska as a strategic partner of the Forbes Diamonds ranking – one of the most important lists presenting the most dynamically developing companies in Poland. The ranking included 8,812 entities with above-average growth dynamics, distinguished on the basis of a sound financial analysis and risk indicators performed by Dun&Bradstreet Poland. An integral part of the project was a series of 12 regional galas, fostering business contacts and the exchange of knowledge and experience between market leaders.

The project highlighted the bank's long-term commitment to supporting the development of Polish entrepreneurs, strengthening their potential and providing tools to facilitate their further growth.

Our corporate foundations

The ING for Children Foundation

The ING for Children Foundation its mission – We help children to be one step ahead. ING volunteering our strength! – implements in three areas: supporting development and education, nurturing health and equal opportunities.

Each of these includes a number of original programmes (e.g. Economic Education at Your Fingertips, ING's Orange Power, the Good Idea Fund or My Environment) as well as those carried out in cooperation with local and national organisations (e.g. the Zwolnieni z Teorii Competition or the ABC of Empathy). The Foundation continues to develop the ING Volunteer Programme, involving ING employees in various activities for children, young people and local communities. It helps socially and economically disadvantaged children and supports physical activity for children with disabilities.

In 2025, the Foundation's key activities are:

- The launch of the "Economic Education at Your Fingertips" programme for primary school children, about which we write more here (available in Polish). The Foundation has additionally developed two grant competitions – an internal one for ING volunteers (Good Idea – economic edition) and an external one for primary schools.
- Supporting 15 organisations and establishments in Poland with sports events for children with disabilities, as part of ING's Orange Power programme. We reached with the programme 1,700 children.
- Implementation of successive editions of the Good Idea Fund (66 projects) and My Environment (40 projects). A total of 1,026 ING volunteers were involved in both programmes.

Employee volunteering

ING Bank Śląski and other ING Bank Śląski Group companies provide all employees with the opportunity to use 8 hours per year for volunteering, in accordance with *the ING Bank Śląski Work Bylaw* and the work bylaws of the other Group companies. Every employee who takes advantage of this opportunity records their volunteering time in an internal system. Employees who volunteer for the ING for Children Foundation are covered by accident insurance.

Time spent on employee volunteering

	2021	2022	2023	2024	2025
Number of used hours	1,099	5,867	8,360	42,890	41,302

**In presenting the number of hours used for volunteering in 2024 and 2025, the ING for Children Foundation has changed the methodology for counting hours compared to previous years. In addition to the hours recorded by employees in the internal system, hours dedicated to volunteering activities carried out as part of the ING Volunteering programme after working hours and at weekends have been added. The involvement of ING employees in major sporting charity events for the ING for Children Foundation and its beneficiaries was also taken into account.*

For more information on the ING for Children Foundation's activities in 2025, see the report at: https://www.ingdzieciom.pl/co-robimy/dokumenty (available in Polish).

ING Polish Art Foundation

The ING Polish Art Foundation was established to support Polish male and female artists and to present the most current phenomena in art. The foundation is building a collection of contemporary art and carrying out a range of artistic and educational projects. In 2025, it implemented its projects in accordance with the action plan adopted and approved by the Management Board and the Foundation Council, including a jubilee exhibition to mark its 25th anniversary – "Image in Motion" at the Zachęta National Gallery of Art. The Foundation's 2025 activities were funded by ING Bank Śląski and ING Hubs Poland, in line with ING Group's global arts patronage programme, which plays an important role in creating the organisation's culture.

- Collection

The Foundation's collection consists of works created after 1990 by Polish living artists. The collection currently comprises more than 300 works – 96 paintings, 81 photographs, 42 works on paper, 53 objects (sculptures, ceramics, textiles, etc.), 15 videos and 17 installations. The collection includes works by 50 female and 78 male artists. The Foundation's collection remains one of the few consistently maintained corporate collections in Poland.

- Exhibitions, presentations and events

On the occasion of its 25th anniversary, the Foundation organised the exhibition Picture in Motion at the Zachęta National Gallery of Art in Warsaw, supervised by Audrius Pocius. The exhibition talks about collecting as a gesture to those who will come after us and seeks to answer the question: How is a legacy inherited?

As part of the Foundation's permanent activities, presentations and projects have been carried out in the Preview gallery, located in the bank's head office at 2 Puławska Street in Warsaw. In 2025, the gallery hosted 7 exhibitions, showcasing works from the Foundation's collection, as well as two special projects.

The Foundation presented a total of 16 films on the large-format Screen, available to all visitors to Union Square in Warsaw, in 2025. Invited to develop the film programme, curator Weronika Zalewska prepared four series (Wintering, Thaw, Reflections and Feedback), featuring films by emerging artists as well as works from the Zachęta collection. During the summer holidays, a selection of works by participants in the Artist-Professional programme could be seen on the Screen.

The Foundation also continued its public programme of events in the 1st Floor Gallery space. 2025 took place: 7 open tours of the collection and thematic meetings with artists, curators and journalists, as well as 8 meetings for organised groups, gathering a total of around 500 people.

As part of the provision and loan of works from the Foundation's collection, works have been exhibited at 11 exhibitions and events in Poland and abroad, including: Hidden meanings. The motif of interiors in Polish art from the 19th to the 21st century at the National Museum in Poznan; Gesture, Costume, Body at the Royal Castle in Warsaw or Half a Life at the Museum unter Tage in Bochum.

2025 is also the ninth edition of the Foundation Award during Warsaw Gallery Weekend (WGW). Through the Award, the Foundation supports Polish artists and galleries affiliated to the WGW. This year, the Foundation awarded two Grand Prizes and also a Special Prize.

- Artist – Professional

The Artist-Professional project, aimed at students and budding artists, was held for the ninth time in 2025. The aim of the project is to prepare for the moment of graduation and the professionalisation of artistic activity, to level the playing field and support in professional development. During the classes, you can learn about tools and practices helpful in functioning in the artist's profession. Lectures, workshops and portfolio consultations are given by curators, artists and activists, exhibition producers and art market specialists, among others. The 2025 edition includes 8 online lectures for 2,650 registered participants and 500 portfolio consultations led by 30 experts in the field, as well as a trip to the Summer School in Teremiski. All lectures were interpreted into Polish Sign Language (PJM). The recordings from this edition, as from previous editions, together with additional supplementary material, have been added to the Knowledge Base and are available to everyone on the Foundation's website (ingart.pl).

- Educational offer for bank employees

Traditionally, the Foundation started the year with a series of online meetings with ING employees. In the fifth edition of the "Lunch Course on Art", the starting point for each of the seven meetings were works that had recently been added to the Foundation's collection, presented in the context of interesting social phenomena or events in the lives of artists. On the occasion of the Foundation's anniversary exhibition at the Zachęta National Gallery of Art, an additional 6th edition of the course was held. At 5 meetings with Zachęta educators, staff were able to hear about the exhibition, the collection and the history of the gallery.

More than 10 guided tours of the Foundation's collection took place at Gallery 1 Floor for Polish and foreign bank employees and clients, as well as 2 meetings with the artist over coffee. As every year, there were also walks and visits to exhibitions as part of Warsaw Gallery Weekend. In addition, the Foundation communicated its activities to bank employees through a monthly newsletter.

The environment in which we operate

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The environment in which we operate is very complex. As a capital group, we interact with a wide range of stakeholders. It is therefore very important for us to manage these relationships. In this chapter you will find information on how we approach this, our presence in the capital market, what characterises the current economic situation, what our economists expect in this respect and what other trends have or may have an impact on our business.

Our presence on the capital market

Investor relations

ING Bank Śląski S.A. strives after the highest standards of capital market communications. We pay particular attention to reliable and transparent information and to equal treatment of all stakeholders as well as observe all the laws regarding disclosure duties of listed companies. We carry out these tasks on the basis of, among other things, the principles of corporate governance and the Information Policy (described in more detail in the section on Corporate Governance).

Important financial and business information in the form of financial reports, current reports, investor presentations and editable files with key bank data are presented to the broad capital market. Communication with investors, analysts and rating agencies (both credit and ESG ratings) is handled by a dedicated unit, the Investors Relations, ESG Reporting and Market Analysis Bureau.

Contact details:

Investors Relations, ESG Reporting and Market Research Bureau

e-mail: investor@ing.pl

In 2025, representatives of the Management Board and the Investors Relations, ESG Reporting and Market Analysis Bureau participated in individual and group meetings with investors and also attended key investor conferences.

As a rule, open meetings for investors, analysts and journalists are organised by the Investors Relations, ESG Reporting and Market Analysis Bureau once a quarter, at the quarterly report publication date. In 2025, we organised conferences in a hybrid mode, i.e. as meetings at the bank's premises, which we simultaneously broadcast over the Internet. Remote participants of the conference were still able to ask questions via the broadcast page or by contacting the Investors Relations, ESG Reporting and Market Analysis Bureau directly by email. Recordings of our conference broadcasts are available for viewing on the website in the Investor Relations tab.

We place great importance on the quality of our communication with stakeholders through our website. The website offers up-to-date information such as shares quotations on the WSE, company shareholding structure, General Meetings, dividend payout track or credit and ESG ratings. Current, interim and annual reports, results presentations, excel sheets with key financial and business information are also published on the website. The website has been designed in the RWD technology, so it is adjusted to mobile devices – tablets and smartphones.

Employees of the Investors Relations, ESG Reporting and Market Analysis Bureau also engage in educational activities. In 2025, they shared their knowledge and experience, inter alia, as speakers for internal training courses for bank employees and as conference panellists.

Our bank is among the companies subject to market observation and analysis. As at 2025 yearend, analysts representing 10 domestic and foreign financial institutions published reports and recommendations for the ING Bank Śląski's shares.

On the bank's Investor Relations website and on a separate Analyst and Market Consensus tab (located at this address), on a monthly basis, a summary of recommendations issued by analysts is updated together with the average target price and the market consensus based on the average of expectations.

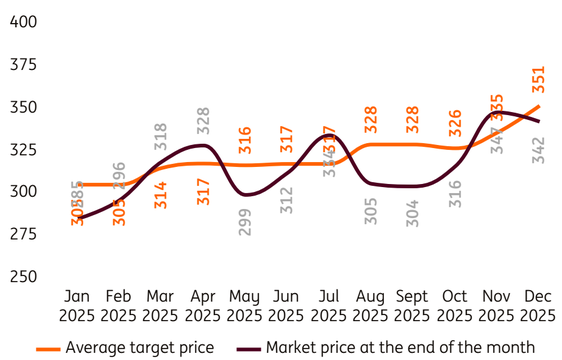
Recommendation structure for ING Bank Śląski shares as at 31 December 2025

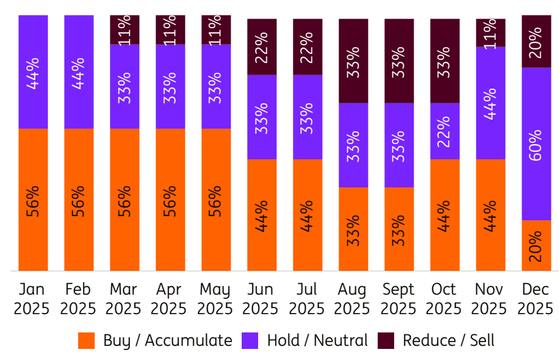
2x Buy / Accumulate | 6x Hold / Neutral | 2x Reduce/ Sell

Average target price for ING Bank Śląski S.A.'s shares as at 31 December 2025

PLN 350.94

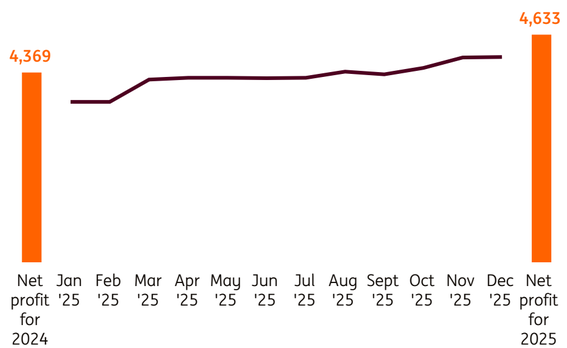
Structure of share recommendations and average target price over 2025



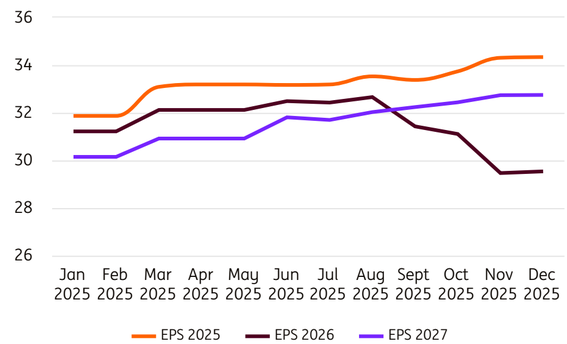


Analysts' expectations of the bank's 2025result changed gradually over the course of the year, and the average target price for ING Bank Śląski shares as at 2025 yearend was 15% higher than the corresponding price at the beginning of the year. The market price of the bank's shares has been on an upward trend throughout 2025 and at the end of the year it was only 3% below the average target price.

Analysts' expectations regarding the consolidated result of ING Bank Śląski in 2025 (PLN million)



Change in analysts' earnings per share (EPS) expectations for the 2025-2027 result (PLN per share)



The Investors Relations, ESG Reporting and Market Analysis Bureau also prepares a consensus of quarterly results based on the expectations of analysts covering our company. Looking ahead to the last four quarters (2025 results), the differences between the reported and expected results are shown in the table below. The highest divergence (relating to Q4 2025) was +13%, driven by higher-than-expected income and lower-than-expected risk and operating expenses.

Reported net profit versus quarterly market expectations (PLN million)

	1Q 2025	2Q 2025	3Q 2025	4Q 2025
Reported net result	1,014	1,135	1,112	1,372
Consensus of expectations*	1,013	1,087	1,079	1,211
Difference	**0%**	**+4%**	**+3%**	**+13%**

**Consensus and net profit for preliminary, unaudited data.*

Share price

In 2025, the price of ING Bank Śląski shares on the WSE fluctuated from PLN 238.5 to PLN 352.0. On 30 December 2025, our bank's share price was PLN 341.5 at the close of trading, 41.4% higher than on the last trading day of 2024. For comparison, the WIG-banks sector index grew by 55.3% at that time.

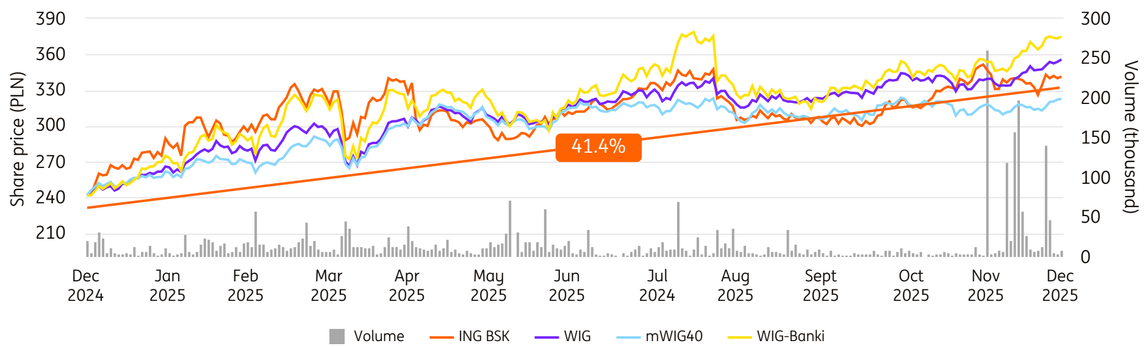
As at 2025 yearend, the market value of our bank was PLN 44.4 billion, while the book value of the bank's capital group was PLN 21.3 billion.

Our bank has been part of the WIG and mWIG40 indices since their inception.

Participation in the main stock indices of ING Bank Śląski SA (based on the last revision in a given year)

	2021	2022	2023	2024	2025
WIG	2.3694%	1.8698%	2.0650%	1.9371%	1.9145%
mWIG40	9.9999%	8.6946%	9.9950%	9.1380%	9.3738%

ING Bank Śląski S.A. share quotations in 2025 versus comparable selected WSE indexes



ING Bank Śląski S.A. shares data	2021	2022	2023	2024	2025
Share price as at the yearend (PLN)	267.0	164.8	256.0	241.5	341.5
Top share price (PLN)	282.0	287.0	275.5	357.5	352.0
Bottom share price (PLN)	167.2	130.0	151.6	223.5	238.5
Turnover weighted average spread (basis points)	43	50	41	39	38
Yearend capitalization (PLN billion)	34.7	21.4	33.3	31.4	44.4
Number of shares (thousands)	130,100	130,100	130,100	130,100	130,100
Total number of transactions	60,865	63,709	68,759	119,544	147,898
Number of block trades	2	1	-	18	9
Average number of transactions per session	242	254	275	480	594
Trading volume	2,404,219	2,203,660	2,840,678	3,354,489	3,940,550
Average trading volume per session	9,579	8,780	11,363	13,472	15,826
Market makers' share in turnover	8.78%	8.39%	9.23%	7.58%	9.06%
Dealers' share in turnover	2.50%	0.61%	0.99%	1.83%	1.10%
Earnings per share in PLN	17.7	13.2	34.1	33.6	35.6
Share book value (PLN)	104.0	71.8	128.6	132.0	164.3
Dividend per share* (PLN)	5.10	5.30	-	33.35	25.18
P/E ratio**	15.0	12.5	7.5	7.2	9.5
P/BV**	2.6	2.3	2.0	1.8	2.1

*Paid in the year; **index calculated based on the share price at the end of the year in question.*

Our Bank's shares are under the number ISIN PLBSK0000017. The ticker on the WSE market is "ING", and information about our bank on Bloomberg and Reuters is available under "ING PW" and "INGP.WA", respectively.

Our position in the ratings

Confirmation of our stable financial position and very good sustainability performance is provided by external credit and ESG ratings. Our bank cooperates with the following rating agencies:

- on credit ratings:
  - Fitch Ratings and
  - Moody's Investors Service,
- in terms of ESG ratings from Sustainable Fitch.

The history of the changes in credit ratings assigned by the two agencies can be found on our website.

Fitch Ratings Ltd.

Fitch Ratings agency (Fitch Ratings Ireland Limited with its registered office in Dublin) assigns a full rating under the agreement between our bank and the agency. As at the 2025 annual report's signing date, the ratings are as follows:

Fitch Ratings Ltd.	
Long-Term IDR	A+
Outlook for sustaining the rating	Negative
Short-Term IDR	F1+
Viability rating	bbb+
Shareholder Support Rating	a+
National Long-Term Rating	AAA (pol)
Outlook for sustaining the above rating	Stable
National Short-Term Rating	F1+ (pol)

In the press release published by Fitch on 10 September 2025, as part of the annual review, the agency maintained the ratings for ING Bank Śląski S.A. The outlook for the entity's long-term rating and the outlook for this rating on a national scale is Stable.

Moody's Investors Service Ltd.

Moody's Investors Service (Moody's Investors Service Cyprus Ltd.) assigns their rating to our bank on the basis of public information. As at the 2025 annual report's signing date, the ratings are as follows:

Moody's Investors Service Ltd.	
LT Rating	A2
ST Rating	P-1
Baseline Credit Assessment *(BCA)*	baa2
Adjusted BCA	baa1
Rating Outlook	Stable
Long-term/ short-term CR Assessment	A1 (cr) / P-1 (cr)
CR Rating	A1 / P-1

In the press releases published on 24 February 2026, the agency sustained the ratings assigned to the bank. In it, she stressed that the bank's rating reflects the bank's solid solvency profile and strong profitability, which ensure high levels of capital buffers and a stable funding profile.

Sustainable Fitch Ltd.

In 2022, our bank started working with Sustainable Fitch rating agency (Sustainable Fitch Limited, based in London).
In an announcement published by Sustainable Fitch Limited on 01 July 2025, as part of its annual review, the agency sustained the ESG rating for ING Bank Śląski at "2" on a five-point scale, with "1" being the best rating and "5" being the worst.
The agency indicated that the rating awarded reflects the implementation of the bank's sustainability strategy, including the continuation of its decarbonisation and transformation plan to 2050 and the reduction of greenhouse gas emissions from operations.

ING Bank Hipoteczny S.A. ratings

Moody's Investors Service Ltd.

Moody's Investors Service assesses the risk of both ING Bank Hipoteczny and mortgage bonds issued by the bank under an agreement between the bank and the agency. As at the date of signing of the 2025 Annual Report, ING Bank Hipoteczny had the following ratings assigned by the agency:

Moody's Investors Service Ltd.	
Rating of covered bonds	Aa1
LT Issuer Ratings	A3
ST Issuer Ratings	P-2
LT Counterparty Risk	A1
ST Counterparty Risk	P-1
Rating Outlook	Stable
Long-term/ short-term CR Assessment	A1 (cr) / P-1 (cr)

The agency emphasizes that the rating assigned to ING Bank Hipoteczny reflects:

- 100% ownership of ING Bank Śląski and its stable growth prospects,
- strategic alignment and operational integration within ING Bank Śląski Group structures,
- commitment from ING Bank Śląski to support ING Bank Hipoteczny's capital and liquidity position to meet regulatory requirements.

Involvement in industry initiatives and organisations

We are an active member of trade associations and organisations. Our activities require partnerships not only between companies in the same industry, but also cross-sector partnerships, with NGOs or universities. This allows us to share knowledge, indicate what is important to us, co-create standards and solutions, also to participate in many relevant projects.

Roundtables

In line with the cross-sector transformation plan, at ING we have adopted a dialogue-based approach assuming that partnering with clients is the key to a successful transformation towards sustainability. As a bank, we not only have a duty to finance, but also to actively support our clients in their decarbonisation journey. Our commitment means constantly sharing knowledge, jointly seeking the best solutions and creating strategies that benefit both our clients and society through sustainability efforts. Roundtables are the basis for such dialogue. A significant share of agricultural and transport companies is included in the cross-sector transformation plan initiative, so the 2025 roundtables were dedicated to the opportunities and challenges of transforming clients in the aforementioned sectors. In total, we organised nine industry roundtables with companies from the Business Banking division. The meetings were organised jointly with our content partners (available in Polish).

Membership of organisations and associations

Membership of organisations and associations	
ING Group N.V. at international level is a signatory to, among others:	• United Nations Global Compact (UNGC) • United Nations Guiding Principles on Business and Human Rights (UNGP) • UN Environment Programme Finance Initiative Principles for Responsible Banking (PRB) • United Nations-backed Principles for Responsible Investment (PRI)
ING Group N.V. is also owned by, among others:	• The Academy of Business in Society (ABIS) • Association for Financial Markets in Europe (AFME) • Climate Markets and Investment Association (CMIA) • Equator Principles Association (EP) • EUROSIF (VBDO) • International Integrated Reporting Council (IIRC) • United Nations Environment Programme Finance Initiative (UNEP FI) • United Nations-convened Net-Zero Banking Alliance • Information on ING Group partnerships is available at this link
Institutions with which we cooperate in Poland or are members include:	• Polish Bank Association • Polish Factors Association • Polish Leasing Association • Association of Stock Exchange Issuers • Polish Association of Capital Investors • UN Global Compact Network Poland (UNGC) • UNEP/GRID - Warsaw • Responsible Business Forum, • WWF Poland • The Visible Foundation • Business Accessibility Forum • Lesław A. Paga Foundation • Sustainable Investment Forum Poland (POLSIF)

Financial market and its regulations

We look at the data of the Polish banking sector, as well as our activities, by two segments:

Retail segment:	Corporate segment:
• individuals	• individual entrepreneurs • individual farmers • companies • non-commercial institutions operating on behalf of households • non-monetary financial institutions • local government institutions and Social Insurance Funds (FUS)

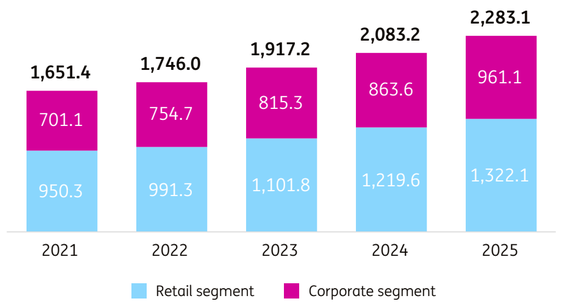
Banking sector

Liabilities

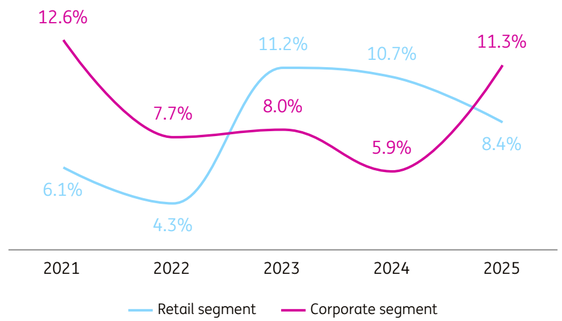
As of the end of December 2025, the basic cash categories were as follows:

- Total liabilities increased by 9.6% y/y to a total of PLN 2,283.1 billion (up by PLN 199.9 billion y/y) and were characterised by a higher growth rate on the deposits side of the corporate segment than on the retail segment.
- Liabilities to the retail segment reached PLN 1,322.1 billion, an increase of PLN 102.5 billion y/y (+8.4% y/y) compared to the end of December 2024.
- Liabilities to the corporate segment amounted to PLN 961.1 billion, i.e. they were 11.3% higher than as at the end of December 2024. The y/y increase in volume by PLN 97.4 billion was achieved primarily due to an increase in liabilities to corporates (by 14.4%, i.e. by PLN 75.5 billion to PLN 600.1 billion) and to local government institutions and the Social Security Fund (by 11.2%, i.e. by PLN 10.9 billion to PLN 108.1 billion).

Balance of liabilities* (PLN billion)



Growth rate of balance of liabilities*

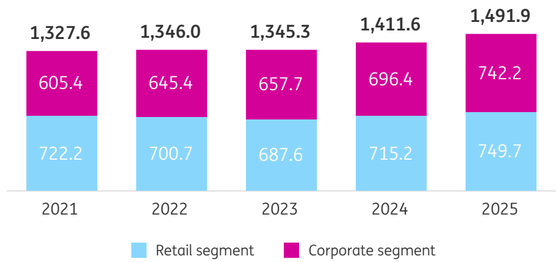


*Based on NBP data.

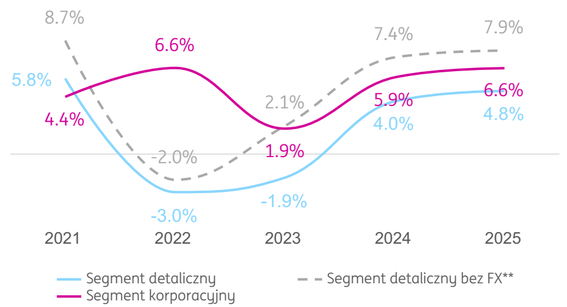
Receivables

- Total receivables at the end of December 2025 increased by 5.7% y/y to a total of PLN 1,491.9 billion (up by PLN 80.3 billion y/y) and were characterised by higher growth rates on the receivables side of the corporate segment than the retail segment.
- Receivables from the retail segment reached PLN 749.7 billion in December 2025 and were 4.8% higher than in the previous year. Volumes of residential loans, which form the main part of banks' credit exposure to the retail segment (their share of retail receivables was 68.4% in 2025, up from 69.3% in 2024), increased by 3.5% to PLN 513.0 billion. As at the end of December 2025, the portfolio of PLN-denominated housing loans amounted to PLN 472.6 billion and was up by PLN 34.8 billion y/y. Mortgage sales alone – based on NBP data – amounted to PLN 90.5 billion from January to December 2025 (+8% y/y). The portfolio of foreign-currency housing loans fell by PLN 17.7 billion y/y to PLN 40.4 billion due to the natural depreciation of the portfolio and the banks' provisioning for the legal risk of this portfolio and the implementation of client settlement programmes. Other retail loans, including consumer loans, were up by 7.9% (by PLN 17.3 billion in value terms) compared to the end of December 2024 and reached PLN 236.7 billion. Sales of other retail loans – based on NBP data – amounted to PLN 164.9 billion from January to December 2025, an increase of 25% y/y.
- Receivables from corporate clients increased by PLN 45.8 billion (+6.6% y/y) compared to December 2024 to PLN 742.2 billion. The main contributor to these increases is the corporate receivables portfolio, which recorded an increase of PLN 36.5 billion y/y (+9.0%), to PLN 442.9 billion. Demand for corporate loans remained on an upward trend y/y between January and December 2025. Sales of loans to non-financial companies – based on NBP data – amounted to PLN 212.7 billion in 2025, an increase of 6% y/y. On the other hand, receivables from individual entrepreneurs remained in a downward trend, with the balance decreasing by 4.5% y/y (PLN -2.2 billion) to PLN 47.1 billion.

Balance of receivables* (PLN billion)



Receivables dynamics*



*Based on NBP data; ** excluding FX mortgage loan portfolio.

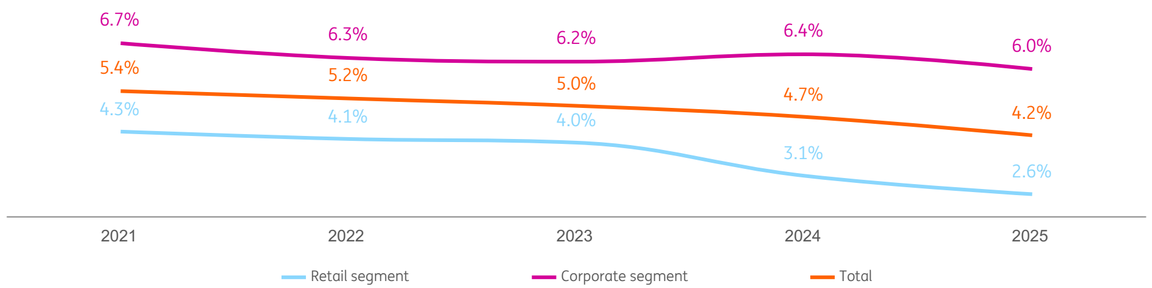
Asset quality

Regarding asset quality, as at 2025 yearend, the share of Stage 3 loans in total loans measured at amortised cost was 4.2% (compared to 4.7% in December 2024).

Asset quality in the retail segment was 2.6% as at 2025 yearend, an improvement of 0.5 p.p. as at 2024 yearend.

In the corporate segment, the share of Stage 3 loans and POCI exposures was 6.0% at the end of December 2025, 0.4 p.p. lower than at the end of 2024, mainly as a result of the higher quality of small and medium-sized companies, with a decrease in the quality of large companies.

Share of receivables in stage 3



Source: Estimate based on data from the PFSA.

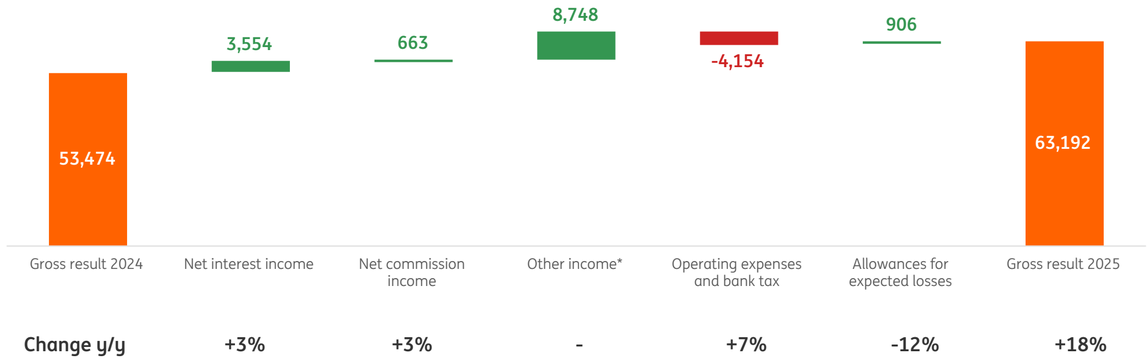
Financial results

The banking sector's pre-tax profit in 2025 amounted to PLN 63,192 million and increased by 18% y/y compared to 2024 mainly as a result of:

- other income of the banking sector higher by PLN 8,748 million y/y, partly due to lower y/y provisions made by banks for the legal risk of foreign currency mortgage loans,
- an increase in the banking sector's net interest income of PLN 3,554 million y/y, while the interest margin, based on average assets, declined by around 0.2 p.p. y/y to around 3.1% in 2025,
- lower cost of risk by PLN 906 million y/y, and
- an increase in net fee and commission income of PLN 663 million y/y.

In 2025, operating expenses were 7% higher than in the previous year, mainly in terms of salary costs (+8% y/y) and higher other operating expenses (including bank tax) by 8% y/y. Depreciation and amortisation costs increased by 3% y/y.

Factors affecting the gross result of the banking sector in 2025 (PLN million)



Change y/y	**+3%**	**+3%**	**-**	**+7%**	**-12%**	**+18%**

*Source: Estimates based on PFSA data; *including share in profits of associates.*

Capital market

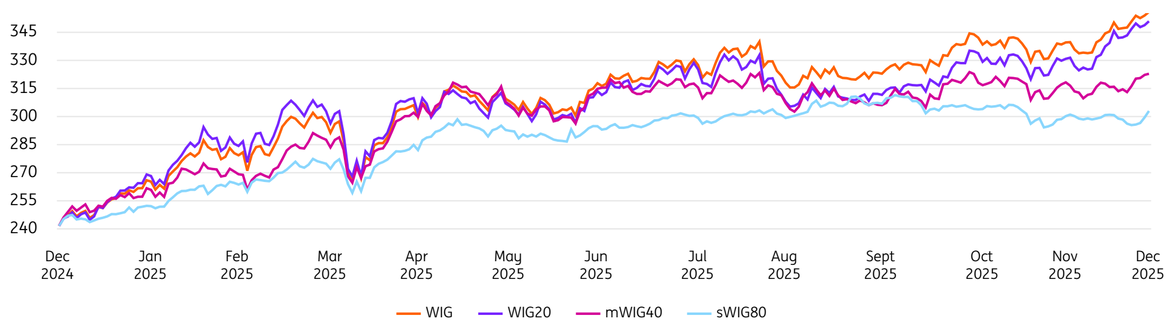
Warsaw Stock Exchange (WSE)

The main indices on the Warsaw Stock Exchange ended 2025 significantly higher than at the end of 2024. The broad market index, the WIG, has gained 47.3% compared to the end of 2024. The index grouping the largest-cap companies – the WIG20 – rose 45.3%, the mWIG40 in turn gained 33.6%, and the index of smaller companies – the sWIG80 – rose 25.4% in 2025 relative to the end of 2024.

At the end of December 2025, 399 companies were listed on the WSE Main Market, including 18 foreign companies. The capitalisation of domestic companies was PLN 1,122.9 billion which was by 53.4% higher versus the end of December 2024. The combined capitalisation of domestic and foreign companies amounted to PLN 2,435.7 billion, an increase of 63.3% y/y. In 2025, there were three IPOs (all previously listed on NewConnect), while 15 other companies were delisted.

2025 was characterised by an increase in turnover on the Main Market. The value of session trading in shares, rights to shares and pre-emptive rights increased by 41.9% y/y to PLN 470.3 billion. The value of total turnover (including block trades) increased by 42.7% to PLN 491.9 billion.

Major WSE indices in 2025 (as of 31 December 2024 = 100)



Source: Warsaw Stock Exchange (WSE).

Investment funds

As at the end of December 2025, the assets of investment funds (based on IZFiA data) amounted to PLN 434.8 billion, i.e. up by PLN 55.5 billion (+14.6%) compared to the end of December 2024. Each of the months from January to December 2025 was characterised by a positive balance of deposits and redemptions. Total net inflows in 2025 amounted to PLN 51.8 billion, 21.8% higher than in 2024. By far the most dynamic development was in the equity funds market, which grew by PLN 87.7 billion (+32.6% y/y) to PLN 356.3 billion throughout 2025. In 2025, debt funds accounted for 47.7% of the investment fund market (+7.0 p.p. y/y) – they strengthened their leadership position, increasing assets under management to PLN 207.5 billion (+53.1 billion, +34.4% y/y).

Source: Chamber of Fund and Asset Management Companies.

Open Pension Funds

In December 2025, the assets of open pension funds amounted to PLN 293.5 billion, i.e. up by PLN 80.5 billion (+37.8%) compared to the end of December 2024. As at the end of December 2025, 90.9% of these assets consisted of shares of domestic and foreign issuers (89.3% at the end of December 2024).

Source: The Polish Financial Supervision Authority.

Employee Capital Plans

Based on data from the Employee Capital Plans Register, these funds had accumulated PLN 45.1 billion in assets at the end of December 2025 in a total of 5.1 million Employee Capital Plans accounts (30.2 billion and 4.4 million respectively as at 2024 yearend). At the end of December 2025, 338,000 entities allow their employees to save for their retirement through Employee Capital Plans, and participation in the programme was 57.1% (65.6% in the private sector and 32.5% in the public sector).

Source: mojeppk.pl

Legal changes

For detailed information on the legal changes affecting the banking sector, please see the annex under Legal developments.

Business environment

2025

Gross Domestic Product

According to a preliminary estimate by the Central Statistical Office (CSO), the growth rate of the Gross Domestic Product (GDP) in 2025 accelerates to 3.6%, compared to an increase of 3.0% in 2024. The acceleration in household consumption growth (3.7%) was accompanied by a rebound in investment (4.2%), after a decline in 2024, a small positive contribution from inventory change (0.1 p.p.) and a negative contribution from net exports (-0.3 p.p.), with imports growing faster than exports. Domestic demand grew faster than foreign demand. A supporting factor for economic growth was private consumption, which accelerated despite a less dynamic increase in real disposable income than in 2024. However, it was still relatively high due to the rapid decline in inflation. In contrast, investment activity was characterised by elevated volatility. After an increase in the first quarter, the second quarter brought a decrease. The second half of the year was marked by a revival of investment. The low dynamics were characterised by the capital expenditure of large enterprises. In contrast, public investment, including in the procurement of weapons systems, was growing. The conjuncture in the main export markets remained weak, which translated into relatively low export dynamics, whose share of GDP declined for the third consecutive year. Growth in consumption and investment, meanwhile, fuelled an increase in imports. According to estimates by economists at ING Bank Śląski, GDP growth in the last quarter of 2025 was around 4.0% y/y. Household consumption increased by around 4.0% y/y and gross fixed capital formation increased by around 4.2% y/y (compared with 7.1% y/y a quarter earlier). GDP growth was dragged down by the change in inventories, with a slightly positive contribution from net exports. According to the bank's economists, 2026 should see consumption growth maintained at a rate of more than 3% and a revival of investment linked, among other things, to the implementation of projects financed by funds from the National Recovery Plan (NRP) and European funds under the 2021-2027 financial perspective.

Monetary easing in the wake of falling current inflation

At the beginning of 2025, inflation was still elevated and close to 5% y/y, but the following months saw a marked decline in consumer price growth. A marked reduction in inflation took place in April, when the pro-inflationary effect of reinstating VAT on food a year earlier expired. A further marked decline in the annual rate of price increases occurred in July, when inflation ceased to be conquered by the partial unfreezing of energy prices in mid-2024. In the second half of the year, services inflation and core inflation (headline index excluding food and energy prices) began to fall more markedly, as a result of weakening wage pressures and the gradual normalisation of wage growth. As at 2025 yearend, CPI consumer inflation fell to 2.4% y/y, i.e. below the National Bank of Poland's (NBP) target of 2.5% (with an acceptable band of accepted deviations of +/-1 p.p.). Falling inflation has prompted

the Monetary Policy Council (MPC) to cut interest rates. After cutting the cost of money by 50 bps in May, between July and December the MPC cut rates in increments of 25 bps at each decision-making meeting. At the same time, for most of the year the Council's communication focused on highlighting a number of upside risks to inflation and the need for a cautious approach in monetary policy. Restrictive rhetoric was, however, accompanied by a significant easing of monetary conditions. At its last meeting of 2025, in December, the MPC changed its stance and communicated that it was going into wait-and-see mode. The pause in interest rate cuts is intended to allow the Council to assess the macroeconomic effects of the monetary easing carried out earlier by lowering the central bank's reference rate by a total of 175 bps. In January 2026, interest rates remained unchanged (main rate still 4.0%). The Energy Regulatory Office's (URE) energy tariff update has resulted in electricity bills rising only marginally from the start of 2026, which was previously seen by the MPC as a leading risk to push up inflation. The beginning of 2026 should bring a further decline in inflation, making the pause in monetary easing likely to be short. Economists at ING Bank Śląski believe that a further 25 bps rate cut is in store. The MPC will decide in March, after reviewing the central bank's updated macroeconomic projection, which will reassure the Council that the decline in inflation is sustainable. By the end of 2026, the NBP's main rate may be reduced to 3.25%.

International economic environment

Donald Trump's second term as US president, which began in January 2025, has undermined the existing geopolitical order and weakened long-standing transatlantic ties. Far-reaching changes in trade policy led to extraordinary uncertainty in international trade in the first half of 2025, but there was some normalisation in the second half of the year, which should continue into 2026, albeit with significantly higher tariffs than at the start of Donald Trump's term. The new US administration has often adjusted tariffs, which in the case of China have been heavily shot through, and then sought to quickly bring about framework trade agreements, often coupled with a commitment to buy US products or make investments in the US. The average effective tariff rate on goods imported into the US rose from around 2.5% in early 2025 to almost 30% in April 2025, but fell to around 15% in the second half of last year. Already at the beginning of his time in office, Donald Trump introduced a broad agenda of change (taxes, migration, tariffs, slimming down the administration, linked to the introduction of the Department of Spending Efficiency DOGE). By demanding interest rate cuts, Donald Trump openly criticised the Federal Reserve's decisions and undermined the competence of Fed Chairman Jerome Powell, undermining confidence in the dollar and US assets. The new administration's support for the conventional energy sector has undermined investment in clean energy sources, but has reinforced the downward trend in energy market prices, particularly in the oil and natural gas markets. Internationally, the US president has been instrumental in extinguishing some of the world's armed conflicts, including in the Middle East, although the sustainability of these solutions may be questioned. From a European point of view, the key question was about the prospects of ending the Russian war in Ukraine. Donald Trump could not end it quickly, but he has led to a thaw in relations with Russia, reduced financial support for Ukraine and is prompting it to make territorial concessions to the aggressor. The year 2025 was marked by high volatility in the US GDP growth rate quarter after quarter, but a recession was avoided and economic growth reached around 2%, despite President Trump's chaotic policies in many areas (tariffs, restricting the supply of migrant workers, a record-long 43-day suspension of federal offices and agencies in the autumn of 2025). In 2026, we expect activity to normalise on the back of the receding negative impact of tariffs, an increase in spending by Americans (a wealth effect thanks to stock market records), or a race by technology companies to invest in artificial intelligence (AI). In addition, fiscal stimulus – tax cuts and a possible so-called 'tariff dividend' of around $300 billion before the mid-term elections to Congress at the end of the year – could work. In the wake of Donald Trump's economic decisions over the course of 2025, inflation expectations (for average annual CPI inflation in 2025) rose significantly above 3%, and heightened uncertainty kept the Fed from loosening monetary policy. The Fed chairman described the return to the monetary easing cycle in September 2025 and the next two reductions as managing risks to the Fed's dual mandate. The risks of a deteriorating labour market outweighed the inflation risks and, according to Powell, the official data overestimates monthly average employment growth by 60,000, meaning that the health of the labour market is actually worse than the official figures suggest. The expected weak labour market and disinflation will, in the opinion of ING Group economists, justify two further Fed rate cuts of 25 bps each in 2026. We expect a marked decline in inflation from 2.9% y/y in Q1 2026 to 2.3% y/y in Q4 2026 (average CPI inflation of 2.8% will be close to inflation in 2025). The European Union (EU) has in recent years been bearing the costs of over-dependence on the US in the area of security and the erosion of competitiveness through the relocation of industrial activity to China and other countries. However, the enforced change in both areas could be a lever for GDP growth in 2026 and beyond. Through the mobilisation of military and infrastructure spending in national budgets and through the SAFE(Security Action For Europe) loan programme, the EU will attempt to strengthen its productive capacity and confront China's export expansion. China continues to face weakness in domestic demand and is pursuing a plan for almost 5% growth based on a new wave of overseas expansion. We expect the euro area economy to maintain a decent growth rate in 2026. According to the bank's economists' forecasts, GDP growth will slow slightly to 1.2% in 2026 from the 1.4% estimated in 2025. The acceleration of economic growth in 2025 was made possible by the recovery in the southern European countries, but despite stagnation in Germany and with the downturn in France (after the 2024 Olympics). After a fairly recent episode of high inflation, with heightened uncertainty due to the war in Ukraine, and despite the ECB cutting interest rates by a total of 100 bps in 2025, consumers maintain an elevated propensity to save, although corporate investment has rebounded slightly after falling in 2024. The expected increase in public consumption and the slow recovery of private consumption will support prosperity in European services. Economic activity in industry remains subdued, but readings of business indicators from Germany began to improve towards the end of 2025. Despite the difficult external environment (war in Ukraine, trade war, competition from China), cyclical relief for European companies came from lower energy prices and lower ECB rates. In addition, there has been an acceleration in public investment, including armaments, and infrastructure, which is linked to the approaching deadline for the use of Reconstruction Fund funds. By December 2025, the European Commission had disbursed EUR 232 billion of a total EUR 358 billion NRP grant (65%) and EUR 146 billion of a total EUR 291 billion loans (50%) to EU countries. With decent growth and inflation close to the 2% target (no undershoot), ING Group economists expect ECB interest rates to remain unchanged in 2026, including the deposit rate at 2%, after four cuts of 25 bps in 2025. Risks to inflation and economic growth in the euro area in 2026 are generally balanced, which will support the stabilisation of

interest rates. In its latest projections (January 2026), the International Monetary Fund (IMF) predicts that, after 3.3% global economic growth in 2025, the same dynamics will continue in 2026. The IMF expects growth in the US to accelerate to 2.4% in 2026 from 2.1% in 2025 and growth in the euro area to slow slightly to 1.3% in 2026 from the 1.4% estimated for 2025. However, the German economy should accelerate very strongly and reach a 1.1% GDP growth rate in 2026 after stagnating at 0.2% in 2025. In terms of forecasts for 2026, market participants expect ECB rates to stabilise and the deposit rate to remain at 2%. In the case of the Fed, market participants are pricing in two interest rate cuts, but these expectations could be influenced by the appointment of a new "dovish" Fed chair, who will replace Jerome Powell in May 2026.

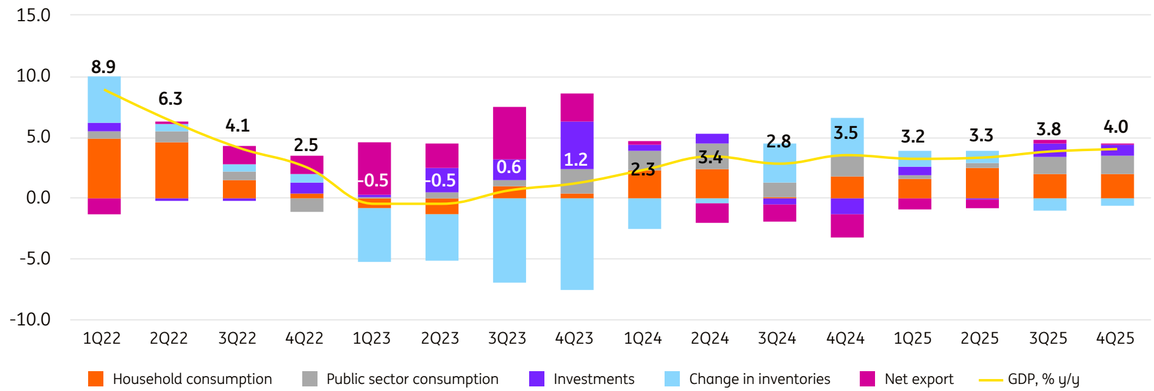
2026

The forecasts and expectations of economists at ING Bank Śląski presented below were made at the turn of 2025 and 2026.

Gross Domestic Product

ING Bank Śląski economists forecast GDP growth of 3.7% y/y in 2026, following 3.6% growth in 2025. Consumption growth should continue to exceed 3%, despite a further slowdown in real household disposable income. At the same time, the savings rate has increased between 2024 and 2025, and households have accumulated savings that can be used for consumption in subsequent periods (consumption smoothing). The second driver of growth will be investment, which should clearly accelerate due to the accumulation of inflows of funds from the European Union. Investment growth could exceed 8% in 2026. The government estimates that Poland will receive around PLN 120 billion in 2026 under the NRP, the implementation of which should be completed this year. Furthermore, according to those in power, Poland can additionally absorb around PLN 60 billion of structural funds under the 2021-2027 financial perspective. An additional source of funding for public defence spending will also be funds from the SAFE programme starting in 2026. Under it, Poland is applying for preferential loans of more than EUR 40 billion. Economic growth in 2026 will continue to be based mainly on domestic demand, with demand growth in the main export markets still slow.

Decomposition of GDP growth (%)



Source: CSO, projection by ING.

The economic growth outlook for 2026 is subject to heightened uncertainty due to the operation of factors that can both improve the state of the economy and worsen it. In particular, changes in forecasts may occur if geopolitical tensions further intensify or, conversely, de-escalate, including possible turmoil in Iran or the end of Russia's war with Ukraine. The European economy will also be challenged by growing US protectionism, as well as increasing competitive pressure from Chinese manufacturers and cheap goods from Asia.

Labour market

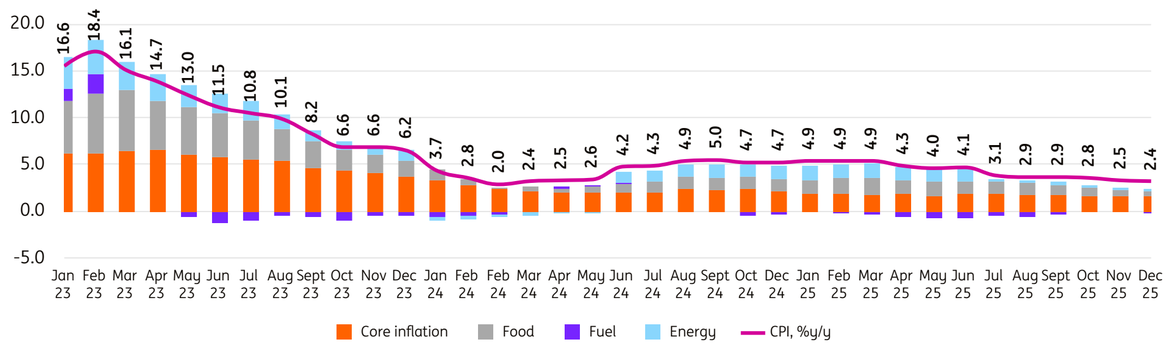
In 2025, a slight cooling of labour demand was observed, reflected in a slowdown in wage growth, a decline in employment and a lower number of job advertisements. According to CSO data, the growth rate of the average salary in the business sector for the whole of 2025 was 8.1%, clearly below the growth rate of 2024 (11.0%). In contrast, average employment in the corporate sector in December 2025 was 0.7% lower than a year ago. The decline in employment and the relaxation of regulations on the conditions for maintaining unemployment status led to an increase in the registered unemployment rate to 5.7% as at 2025 yearend from the 5.1% recorded at the end of 2024. The Labour Force Survey (BAEL) unemployment rate, on the other hand, remained close to historically low levels (3.1% in Q3 2025), due to limited labour supply in the context of a shrinking working-age population. The cumulative wage increases of recent years have brought the share of wage costs in value added to the highest levels in two decades. This is reflected in the reduced profitability of companies and the results of surveys among businesses indicating problems with high labour costs. ING Bank Śląski economists forecast a further decline in wage growth in 2026 to 5.5%. This scenario is supported by the modest increase in the minimum wage (by 3% in 2026) and the limited space in companies for further increases, as evidenced, among other things, by the falling percentage of companies planning to increase wages. With regard to employment, in an environment of increasing

economic activity and a declining number of economically active people (demographic changes), ING Bank Śląski economists forecast that the Labour Force Survey unemployment rate will remain stable at around 3% in 2026.

Inflation

ING Bank Śląski economists forecast an average annual price increase of 2.2% in 2026, up from 3.6% in 2025. For almost the whole year, consumer inflation should remain below the NBP's target (2.5%, +/-1 p.p.), and average annual growth in core inflation excluding food and energy prices should be close to the central bank's target, with services inflation falling. The decline in services and core inflation should be supported by a further deceleration in wage growth. Since January 2026, the minimum wage and public sector wages have increased by 3%. Increasing imports of cheap products from China are also having a disinflationary effect. The weakness of the US dollar and stable oil prices support low fuel prices, while favourable harvests and high grain stocks should help stabilise food prices. Decisions by the Energy Regulatory Office (URE) on electricity and gas tariffs will translate into low price increases for energy carriers.

Inflation (CPI) – decomposition (%)

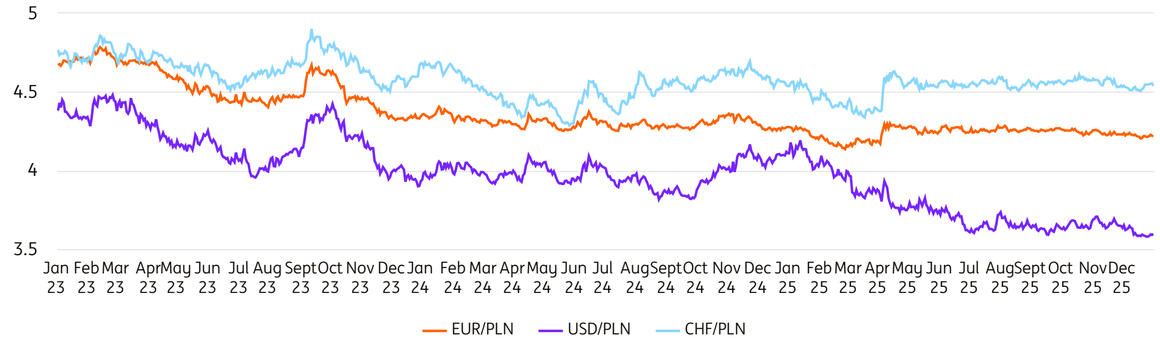


Source: CSO, projection by ING.

Impact of the situation in global financial markets on Poland's economy

In 2025, the EUR/PLN exchange rate was characterised by relative price stability. Despite a number of geopolitical developments – most notably the trade wars and their economic aftermath – the zloty remained little changed. The EUR/PLN exchange rate hovered around the 4.24 level for the vast majority of last year, fluctuating by +/-4 cents. The Polish currency remained resilient to global market events, but also to domestic factors, including NBP interest rate cuts, a deterioration in the country's fiscal outlook or a cut in Poland's credit rating outlook. The shield protecting the Polish currency from depreciation was the solid economic performance, which positively distinguished Poland from the CEE region for another year, as well as the large inflow of EU funds, including from the National Recovery Plan.

PLN exchange rates



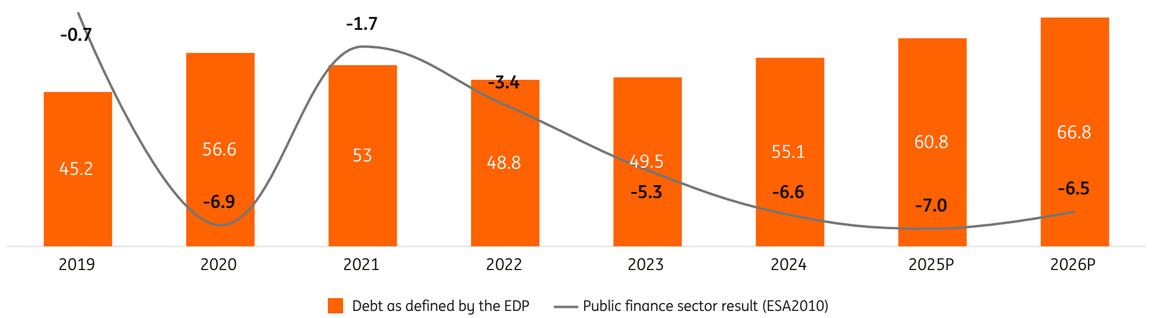
Source: NBP, ING forecast.

Public finances

As at 2023 yearend, the so-called general exit clause, which suspended the functioning of the European fiscal rules under the Stability and Growth Pact for the duration of the pandemic and its negative effects on public finances, expired. In 2023, the general government deficit stood at 5.1% of GDP, thus clearly exceeding the European limit of 3% of GDP, even after taking into account new defence investment spending, which is given a concession in the European Commission's process of assessing the fiscal situation in member states. By decision of 26 July 2024, the European Council triggered the excessive deficit procedure against Poland. In October 2024, the Polish government presented a medium-term budgetary and structural plan, which aims to limit the deficit below 3% of GDP in 2028. In January 2025, the European Council recommended that Poland eliminate its excessive deficit by 2028, committing the country to a specific growth path for net spending in subsequent years. The European authorities' recommendations on the expenditure path were updated during successive rounds of the process of coordinating the fiscal policies of the EU member states. According to ING economists' estimates, 2025 was another year with a very high deficit, probably close to 6%. The government is pursuing an ambitious programme to modernise the armed forces and increase spending on health care, while maintaining social benefits at a relatively high level. Despite the fears of some observers, an amendment to the Finance Act was avoided in 2025, mainly thanks to the better-than-expected situation of the Social Security Fund, whose contribution income was growing thanks to, among other things, an increasing number of insured foreigners amid continued wage growth. ING Bank Śląski economists expect fiscal policy to remain expansionary also in 2026, with the general government deficit still above 6% of GDP. The budget law for 2026 assumes a state budget deficit of PLN 272 billion and record high net (PLN 423 billion) and gross (PLN 690 billion) borrowing needs. Among the measures to reduce the scale of the fiscal imbalance, the government decided to increase the CIT rate for banks. In 2026, a rate of 30% will apply, instead of the current 19%. The state budget will gain approximately PLN 6.6 billion from this in 2026. At the same time, the

President vetoed bills introducing additional increases in excise duty rates on alcohol, an increase in the sugar tax, and a higher personal income tax on winnings. The total budget cost is a loss of income of around PLN 3.3 billion. A high deficit means a further build-up of public debt. ING Bank Śląski economists forecast that general government debt will rise to around 66-67% of GDP in 2026, up from around 60-61% of GDP estimated for 2025.

Public debt and budget deficit according to EU methodology (ESA2010; %)



Source: CSO, projection by ING.

Monetary policy

ING Bank Śląski economists expect that after a short period of interest rate stabilisation in early 2026, the Monetary Policy Council will return to cutting the cost of money. The case for monetary easing will be made for further improvement in the inflation outlook. Increases in regulated energy prices have proved negligible and the situation in the fuel and food markets continues to develop favourably. The growing share of low-cost imports from China is still an important disinflationary factor, and the expected continuation of the deceleration in wage growth should favour a further slowdown in services inflation and a consequent decline in core inflation. As at 2025 yearend, NBP interest rates were:

- deposit rate – 3.50%,
- reference rate – 4.00%,
- bill discount rate – 4.10%,
- bill re-discount rate – 4.05%,
- lombard rate – 4.50%.

According to forecasts by ING Bank Śląski economists, inflation dynamics will continue to decline in the coming months, and in the summer it is likely to reach this year's minimum, moving significantly away from the NBP's inflation target. As a result, the Monetary Policy Council will return to interest rate cuts, although uncertainty surrounds the scale of the cut in the cost of money in 2026.

Summary

According to economists at ING Bank Śląski, the external environment of the Polish economy in 2026 will be characterised by increased uncertainty due to geopolitical tensions concerning, among others, Greenland, Iran or Venezuela, and deteriorating transatlantic relations. A major political event in 2026 will be the midterm elections for the US Congress in November and the rise of the opposition to Donald Trump's policies.

From Poland's perspective, the key question is whether and under what conditions a ceasefire can be concluded in Ukraine, what the international security guarantees for the country can be and whether its territorial integrity will be preserved. In terms of economic trends, Poland can benefit from the expected cyclical recovery in the euro area and Germany. Stagnant in recent years, the economy of our largest trading partner should feel the effects of the fiscal stimulus package and higher spending on defence and infrastructure. A positive factor will be the stabilisation, or even decline, of global energy commodity and food prices, which will support keeping inflation under control and enable further NBP interest rate cuts this year.

According to ING Bank Śląski economists, economic growth will accelerate to 3.7% in 2026, with a more diversified growth structure. A drop in the savings rate will be needed to keep consumption growth above 3%, as the income rate slows from 5.3% to 2.0%. However, we expect support for consumption and investment based on EU subsidies. Their total increase (excluding loans) is 0.8 p.p. to 3.0% of GDP in 2026. We assume that around 0.5% of GDP from NRP grants will effectively support GDP in 2027 and there will be no deceleration effect on investment in 2027. Additionally, financing through low-cost loans from the NRP (EUR 29.4 billion compared to EUR 25.3 billion in grants) and from the new EU SAFE loan programme, which aims to increase defence spending, will commence. An important element that could favour private sector investment decisions would be a possible end to hostilities in Ukraine, which would reduce economic uncertainty in the region.

Forecasts by ING Bank Śląski economists	2023	2024	2025P	2026P	2027P
GDP growth (%)	0.2	3.0	3.6	3.7	3.2
General government sector debt according to EU methodology (% GDP)	49.5	55.1	60.8	66.8	70.8
Average annual inflation (CPI) (%)	11.4	3.6	3.6	2.2	2.2
Registered unemployment rate (%; CSO)	5.1	5.1	5.7	5.7	5.8
USD/PLN exchange rate (year-end)	3.94	4.10	3.60	3.46	3.48
EUR/PLN exchange rate (year-end)	4.35	4.27	4.23	4.22	4.25
WIBOR 3M (year-end)	5.9	5.8	4.0	3.3	3.3

Market trends

Market trends are factors influencing the future of the economy, society, the sector and our bank, inter alia, over a horizon of the next 2-3 years.

Poland is an economic miracle country and is still developing dynamically compared to European countries, but maintaining further convergence is not guaranteed (example of Spain or Hungary). In recent years, Poland's external environment has become more uncertain and challenging (Russian war in Ukraine, growing competition from China, low European competitiveness, giant US investments in AI), domestic structural weaknesses (deteriorating demographics, labour market shortages, fiscal imbalances) are increasingly becoming apparent. The external situation and security threats require massive public investment (defence, energy, infrastructure) and a rebuilding of private investment. Their stimulation will help to strengthen the growth potential of Polish companies under conditions of far-reaching demographic changes and increasing pressure of foreign competition, mainly from China.

Geopolitical tensions and security concerns in multiple dimensions

Recently, security issues have become a priority for public policies and company strategies. A risk for Europe is the attitude of the US during Donald Trump's second term. Internal and external security considerations have necessitated increased government defence spending, increased purchases of military equipment, greater cooperation within NATO and commitments to significantly increase defence spending. This commitment was formally adopted at EU level and led to the rapid implementation of the EU's EUR 150 billion SAFE loan programme. This programme will mainly finance the expansion of production capacity in the armaments industry in EU countries, including through cooperation between countries. Poland will be the largest beneficiary of this programme with a share of almost EUR 44 billion. Security in terms of energy, health or cyber security remains important. The latter is crucial in an era of proliferation of digital channels, including in the banking sector and the growing use of generative artificial intelligence (AI) in the economy.

According to the World Economic Forum 2026 report, geo-economic confrontation and armed conflict between states were cited as the biggest risks in the world today. Natural disaster risks, social polarisation, misinformation and misrepresentation and the economic downturn were cited next among business leaders.

Growing use of artificial intelligence, risk of disinformation

Artificial intelligence continues to develop rapidly in 2025 and technology companies, particularly in the US, have adopted huge investment programmes in this area. Although US companies dominate the technology race, China has also joined the race for AI, and attempts to develop AI solutions are also being made in many other countries. AI is raising expectations of increased productivity, although at the same time there are concerns about possible redundancies or polarised societies. These concerns are reflected in the aforementioned World Economic Forum report.

Deterioration of demographic trends worldwide and in Poland, generational changes in companies

Declining fertility rates and ageing populations affect many countries around the world, but for some, this is an abrupt change from historical trends. Poland's unfavourable demographics and skills shortages translate into high labour costs. Investments in AI, cloud, automation and robotics may be the answer to these trends, but for the time being they are implemented in Polish companies on a small scale. Despite domestic resources (IT specialists, participation in the development of OpenAI, Polish language model), the implementation of new technologies is still dominated by the model of low-cost services for global companies rather than the active development of domestic IT products. Several decades after the start of the Polish transformation, a new generation of workers is dealing the cards on the market, with a different work ethos and a greater emphasis on work-life balance. The generational change also applies to succession at the management level of Polish companies.

Increased external competitive pressure on Polish companies

Due to the significant increase in labour costs, the Polish economy has become less competitive against other emerging markets (Turkey, the Balkans, North Africa, Asia), although it remains attractive against Western Europe. Due to Donald Trump's tariff policy, competitive pressure from China and the search for new markets by Chinese companies has intensified. This pressure is reinforced by the over-regulation of the EU legal order, including competition rules, and the distortions caused by EU funding available mainly to small and medium-sized enterprises. Currently, companies invest little, have a limited focus on innovation and avoid external funding, financing investments mainly through equity and EU funds, followed by debt (loans and bonds), up to the issue of shares. This approach may limit demand for bank credit.

Technology that supports important change

The digitalisation of business is accelerating. Companies are increasingly using the potential of digitalisation to create new business models, improve efficiency or optimise resources. Regulatory changes, including in the ESG area, are accelerating technological innovation. An example is companies that need technological solutions, for

example to monitor supply chains. In banking, technology provides clients with the ability to use secure banking services on a large scale, anytime, anywhere. We are seeing the growing impact of technology on the experience of clients, employees or business partners. Of particular importance here is the automation of processes through the use of data analytics, machine learning, cloud solutions or artificial intelligence. Automated processes are efficient, consistent and more accurate. In doing so, they improve the quality of services and also free up staff time and potential for higher-value creative tasks.

Energy transformation of companies and households

Rising energy prices and environmental regulations are making energy efficiency improvements increasingly important for both households and businesses. The cost of investing in energy efficiency improvements is a considerable burden for both companies and households. It is therefore crucial to have access to various forms of support: grants, tax breaks or preferential loans. The role of the financial sector is and will continue to be important in this process. We can also see the increased involvement of financial institutions in building public and business knowledge and awareness of these issues.

Financial health

Banks are focused on supporting their clients' financial health by offering educational tools, spending analyses and personalised prompts to help build financial stability and resilience for the future. At the same time, the importance of retirement education is growing, as clients need clear, accessible information and support in making decisions about long-term saving and financial security planning.

According to our September 2025 study on the topic of saving for retirement, the number of people aged 25-34 who have started to save for retirement has almost doubled in three years, an increase that applies to all age groups. Already almost half of those surveyed (47%) said they were putting money aside for this purpose.

Our financial results

Consolidated results of the ING Bank Śląski Group 63

ING Bank Śląski standalone results 74

In this chapter, we present our financial results both on a consolidated and standalone basis. We identify the most important factors influencing the reported results. We believe that a transparent presentation of our financial results will help stakeholders in making future investment decisions.

Consolidated results of the ING Bank Śląski Group

Key effectiveness ratios

Key effectiveness ratios for the ING Bank Śląski S.A. Group in 2021-2025

	2021	2022	2023	2024	2025	Change 2025 to 2024
Cost share ratio* (C/I)	43.0%	47.2%	34.7%	35.1%	36.1%	+1.0 p.p.
Cost (with bank tax) share ratio** (C/I)	50.9%	55.5%	40.7%	41.7%	42.9%	+1.2 p.p.
Return on assets (ROA)	1.2%	0.8%	1.9%	1.7%	1.7%	-0.1 p.p.
Return on equity (ROE)	13.6%	17.4%	33.9%	26.7%	24.6%	-2.1 p.p.
Return on equity (ROE) - adjusted for MCFH	14.4%	10.2%	22.9%	20.4%	20.8%	+0.4 p.p.
Interest margin ratio (adjusted***)	2.6%	3.6%	3.6%	3.6%	3.3%	-0.3 p.p.
LTD ratio	85.9%	80.4%	76.3%	75.3%	76.6%	+1.3 p.p.
LCR****	164%	152%	216%	264%	251%	-13 p.p.
NSFR	158%	156%	171%	178%	161%	-17 p.p.
LR according to transitional definition	6.9%	7.0%	6.8%	6.6%	5.9%	-0.7 p.p.
MREL by TREA (separate)	17.1%	17.8%	26.3%	24.2%	25.2%	+1.0 p.p.
Total capital ratio	16.05%	16.22%	17.41%	15.67%	14.98%	-0.69 p.p.
Tier 1 capital ratio	14.41%	14.72%	16.02%	14.58%	14.18%	-0.40 p.p.

**Income including net profit of associates accounted for using the equity method; **costs including bank tax, and income including net profit of associates accounted for using the equity method; ***margin adjusted for the impact of credit holidays; ****in 2025, based on the analysis of the records of Q&A_2024_720, the Group introduced a change in the presentation of non-retail deposits in liquidity reporting, therefore the LCR indicator for 2024 changed compared to the one presented in the previous year.*

Key financial data

Brief information on the financial results of the ING Bank Śląski S.A. Group in 2021-2025

PLN million	2021	2022	2023	2024	2025	Change 2025 to 2024
Income*	6,897	7,722	10,678	11,279	11,854	+5%
Fixed	-2,965	-3,642	-3,700	-3,958	-4,284	+8%
Risk cost**	-372	-1,030	-614	-1,036	-842	-19%
Gross profit	3,015	2,403	5,720	5,545	5,927	+7%
Net profit***	2,308	1,714	4,441	4,369	4,633	+6%
Balance sheet total	201,654	217,266	245,361	260,359	282,025	+8%
Liabilities to clients	170,610	192,731	205,290	219,996	235,328	+7%
Loans and other receivables to clients, net****	146,614	155,030	156,560	165,658	180,316	+9%
Equity	13,531	9,343	16,736	17,170	21,342	+24%
Earnings per share (EPS) (PLN)	17.7	13.2	34.1	33.6	35.6	+6%
Dividend per share (PLN) for a given year	5.30	-	33.35	25.18	-	-

Including net profit of associates accounted for using the equity method; **including legal risk costs of foreign currency mortgage loans; ***allocated to equity holders of the parent company; ** including loans at fair value.*

For the purposes of converting the figures presented above into euros, the Bank uses the following rates:

- for items in the statement of financial position, the NBP exchange rate as at 31 December,
- for items in the profit and loss account – exchange rate calculated as an average of the National Bank of Poland rates prevailing on the last day of each month in the year.

EUR/PLN exchange rate

	2021	2022	2023	2024	2025
For the items set out in the statement of financial position	4.5994	4.6899	4.3480	4.2730	4.2267
For profit and loss account items	4.5775	4.6883	4.5284	4.3042	4.2372

Brief information on the financial results of the ING Bank Śląski S.A. Group in 2021-2025

EUR million	2021	2022	2023	2024	2025	Change 2025 to 2024
Income*	1,507	1,647	2,358	2,620	2,798	+7%
Fixed	-648	-777	-817	-920	-1,011	+10%
Risk cost**	-81	-220	-136	-241	-199	-17%
Gross profit	659	513	1,263	1,288	1,399	+9%
Net profit***	504	366	981	1,015	1,093	+8%
Balance sheet total	43,844	46,326	56,431	60,931	66,725	+10%
Liabilities to clients	37,094	41,095	47,215	51,485	55,677	+8%
Loans and other receivables to clients, net***	31,877	33,056	36,007	38,769	42,661	+10%
Equity****	2,942	1,992	3,849	4,018	5,049	+26%
Earnings per share (EPS) (EUR)	3.9	2.8	7.5	7.8	8.4	+8%
Dividend per share (EUR) for a given year	1.16	-	7.36	5.85	-	-

Including net profit of associates accounted for using the equity method; **including legal risk costs of foreign currency mortgage loans; ***allocated to equity holders of the parent company; ** including loans at fair value.*

Position of the Management Board on the feasibility of the previously published forecasts

The bank has not published its projected financial results for 2025.

Profit and loss account

Basic figures of the consolidated profit and loss account of the ING Bank Śląski S.A. Group for 2025 and changes compared to the previous year are presented in the table below.

Basic figures of the consolidated profit and loss account in analytical terms

PLN million	2021	2022	2023	2024	2025	Change 2025 to 2024	
						PLN million	%
Net interest income	4,970	5,614	8,171	8,725	8,871	146	+2%
Net commission income	1,845	2,095	2,164	2,294	2,359	65	+3%
Other income*	82	13	343	260	624	364	+140%
Total income	6,897	7,722	10,678	11,279	11,854	575	+5%
Operating expenses	-2,965	-3,642	-3,700	-3,958	-4,284	-326	+8%
Risk cost**	-372	-1,030	-614	-1,036	-842	194	-19%
Bank tax	-545	-647	-644	-740	-801	-61	+8%
Gross financial result	3,015	2,403	5,720	5,545	5,927	382	+7%
Income Taxes	-707	-689	-1,279	-1,176	-1,294	-118	+10%
Net financial result	**2,308**	**1,714**	**4,441**	**4,369**	**4,633**	**264**	**+6%**

**Including the share in net profit of associates accounted for using the equity method **including legal risk costs of foreign currency mortgage loans.*

Gross profit and net profit

In 2025, the bank's consolidated net profit reached PLN 4,633 million, up 6% y/y.

As since the beginning of 2018, the bank has applied, in its financial statements, the equity method to measure investments in its subsidiaries and associates, the bank's consolidated group net income is equal to the bank's standalone net income.

Gross profit and net profit of the ING Bank Śląski S.A. Group (PLN million)

The gross result was at PLN 5,927 million, an increase of 7% compared to 2024.

The biggest contributors to the PLN 382 million increase in gross profit for 2025 compared to 2024 were:

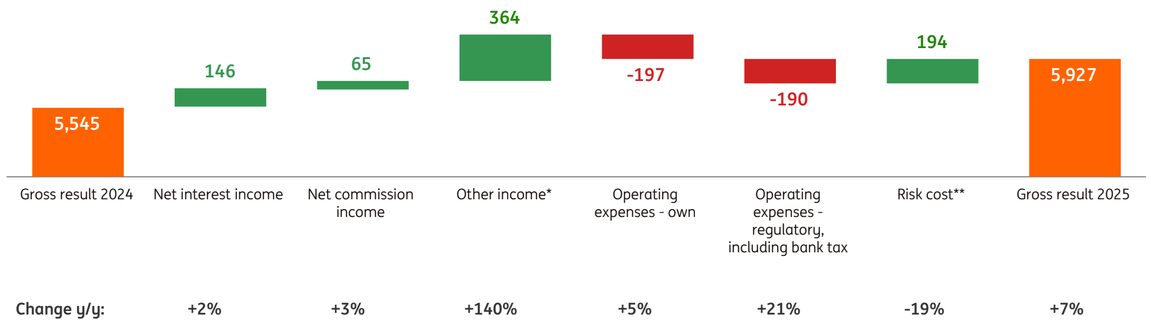
- higher by PLN 364 million (+140% y/y) other income (including the share of net profit of associates accounted for using the equity method), in particular the net income on financial instruments measured at fair value and the result from foreign exchange positions,
- lower by PLN 194 million (-19% y/y) costs of risk (combined with legal risk costs of foreign currency mortgage loans), due to their decrease in the corporate segment,
- higher net interest income by PLN 146 million (+2% y/y), and
- higher net fee and commission income by PLN 65 million (+3% y/y).

Gross profit for 2025 was negatively impacted by higher operating expenses, in particular:

- higher own operating expenses by PLN 197 million (+5% y/y), mainly due to higher staff costs (+5% y/y), IT costs (+17% y/y) and marketing costs (+16% y/y),
- higher regulatory costs including bank tax by PLN 190 million (+21% y/y), mainly as a result of a PLN 100 million charge on the BFG guarantee fund in 2025 (there was no such charge in 2024).

In 2025 the total income of the ING Bank Śląski Group attributable to the shareholders of the parent company (including, apart from net profit, also other income and cost items included in equity) amounted to PLN 7,448 million compared to PLN 4,765 million in 2024.

Change drivers for the gross result of the ING Bank Śląski Group in 2025 (PLN million)

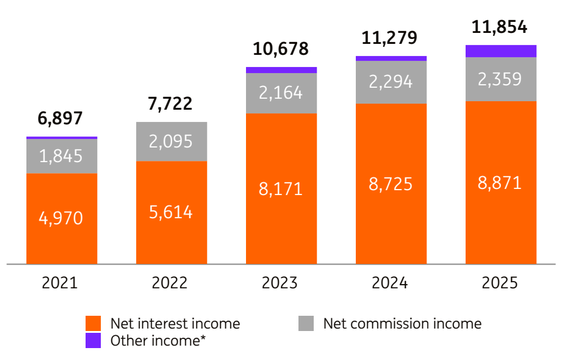


*Including the share in net profit of associates accounted for using the equity method; **including legal risk costs of foreign currency mortgage loans.

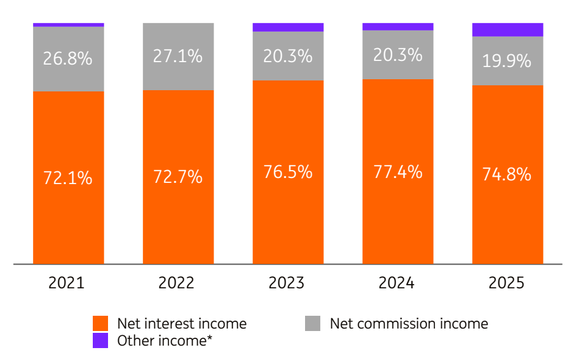
Income

In 2025 the total income of the ING Bank Śląski Group amounted to PLN 11,854 million. This means that the improvement compared to 2024 amounted to PLN 575 million (+5%) and was visible in all key items: other income, net interest income and net fee and commission income.

Income* by profit and loss account category (PLN million)



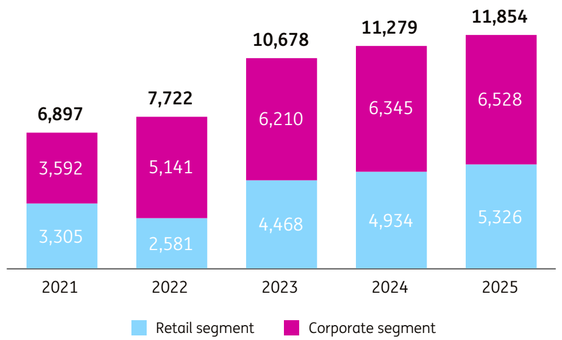
Income structure*



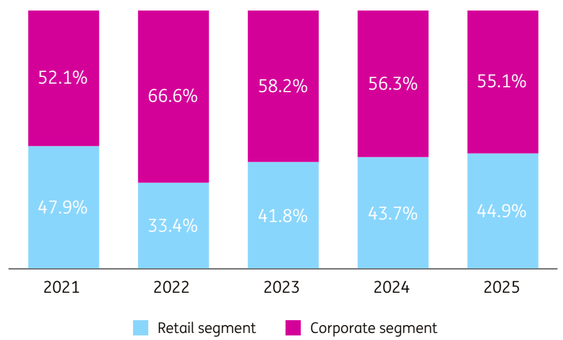
*Including the share in net profit of associates accounted for using the equity method.

In 2025, the retail segment was the main driver of revenue growth. Its revenue increased by PLN 392 million, or 8% y/y, to PLN 5,326 million (after adjusting 2024 interest income for the impact of mortgage loan moratoria of PLN 140 million, retail segment revenue growth in 2025 would be +5% y/y). Consequently its share in the structure was up by 1.2 p.p. to the level of 44.9%. Corporate segment revenue increased by PLN 183 million, or 3%, to PLN 6,528 million.

Income* by business segment (PLN million)



Revenue structure by business segment*

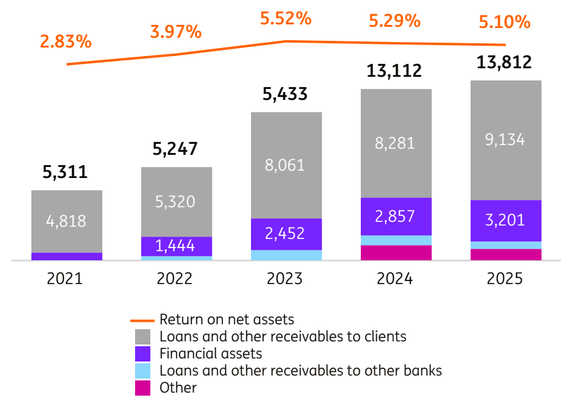


Net interest income

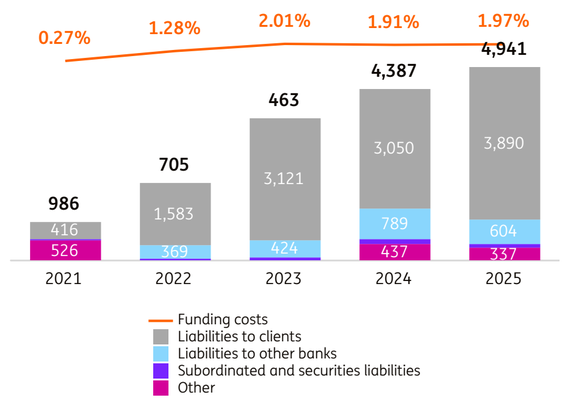
Net interest income in 2025 was influenced by an environment of falling interest rates on the one hand and rising client volumes on the other. In such an environment, interest income in 2025 increased by 5% compared to 2024 and interest expense by 13% y/y. Consequently, net interest income increased by 2% y/y, or PLN 145 million, to PLN 8,871 million. After adjusting the 2024 result for the effect of credit holidays (PLN +140 million), the 2025 interest result would be at a comparable level to that achieved in 2024.

The net interest margin was 3.27% in 2025, 25 bps below the 2024 result (3.52%). If the 2024 interest result were to be cleansed of the impact of credit moratoria, the 2025 interest margin would be 30 bps lower compared to 2024, as a result of both a lower return on assets and a higher cost of funding.

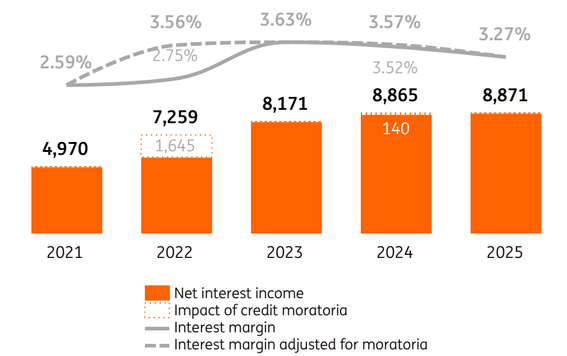
Interest income (PLN million)



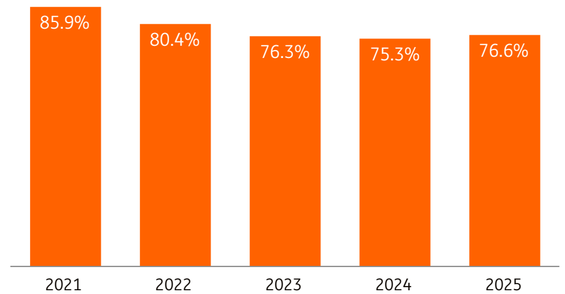
Interest expenses (PLN million)



Net interest income (PLN million) and interest margin



LTD ratio



Average basic interest rate* in 2025			
	Segment		Total
	Retail	Corporate	
Deposits			
PLN	2.14%	1.62%	1.94%
in foreign currencies	0.13%	0.24%	0.19%
Loans			
PLN	7.45%	6.96%	7.23%
in foreign currencies	1.28%	3.94%	3.89%
of which: retail mortgage loans			
PLN	7.02%		7.02%
in foreign currencies	1.28%		1.28%

Based on management data.

Average basic interest rate* in 2024			
	Segment		Total
	Retail	Corporate	
Deposits			
PLN	2.22%	1.89%	2.08%
in foreign currencies	0.15%	0.33%	0.25%
Loans			
PLN	7,55% (7,76%**)	7.55%	7,55% (8,01%**)
in foreign currencies	2.75%	5.27%	5.20%
of which: retail mortgage loans			
PLN	7,01% (7,25%**)	-%	7,01% (7,25%**)
in foreign currencies	2.75%	-%	2.75%

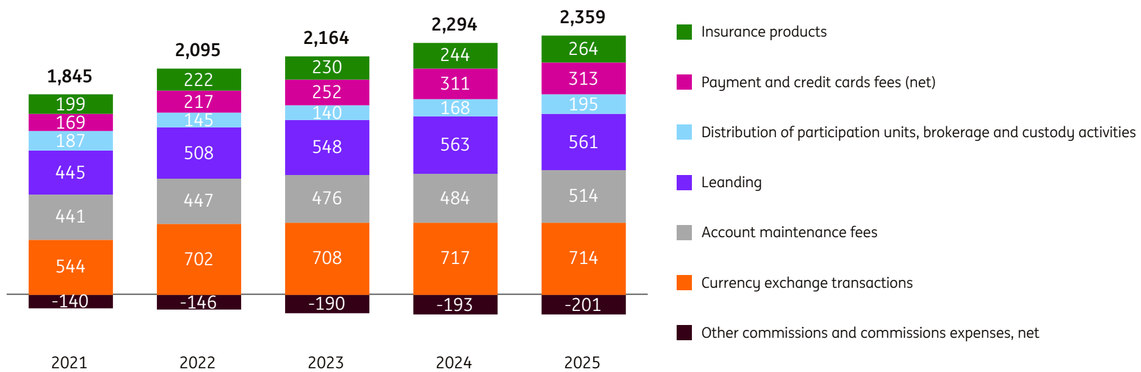
*Based on management data; **adjusted for the impact of credit moratoria.

Net fee and commission income

In 2025, the ING Bank Śląski Group's net fee and commission income increased by PLN 65 million (+3%) compared to 2024 to PLN 2,359 million. The most significant growth occurred in

- client account management – up by PLN 30 million (+6% y/y),
- unit distribution, brokerage and custody business – up by PLN 27 million (+16% y/y), reflecting positive trends in the investment fund market; TFI assets purchased by clients through us increased by 39% y/y to PLN 24.5 billion, and
- insurance products – up by PLN 20 million (+8% y/y), as a result of 32% higher mortgage sales.

Net fee and commission income (PLN million)



Other income

In 2025, other income of the Group (including the share in the net result of associates accounted for using the equity method) amounted to PLN 624 million and were higher by PLN 364 million compared to the previous year. The increase was mainly due to a higher result on financial instruments measured at fair value through profit or loss and the result from foreign exchange positions (PLN +323 million y/y).

Other income							
PLN million	2021	2022	2023	2024	2025	Change 2025 to 2024	
						PLN million	%
Net income on financial instruments measured at fair value through profit or loss and foreign exchange result	64	32	332	198	521	323	+163%
Result on sale of securities	41	2	1	-9	56	65	-%
Result on hedge accounting	-52	-39	-5	10	-15	-25	-%
Result on other basic activities	-	-7	-15	28	14	-14	-50%
Share in net profits of associates accounted for using the equity method	29	25	30	33	49	16	+47%
Total	**82**	**13**	**343**	**260**	**624**	**364**	**+140%**

Operating expenses including bank tax

In 2025, the ING Bank Śląski Group's operating expenses (including bank tax) increased by 8% y/y to PLN 5,085 million, of which own costs increased by 5% y/y to PLN 3,975 million, and regulatory costs – including BFG, PFSA and bank tax – increased by 21% y/y to PLN 1,110 million.

Regulatory costs (BFG and PFSA) accrued in 2025 were PLN 129 million higher y/y (+72%), in particular:

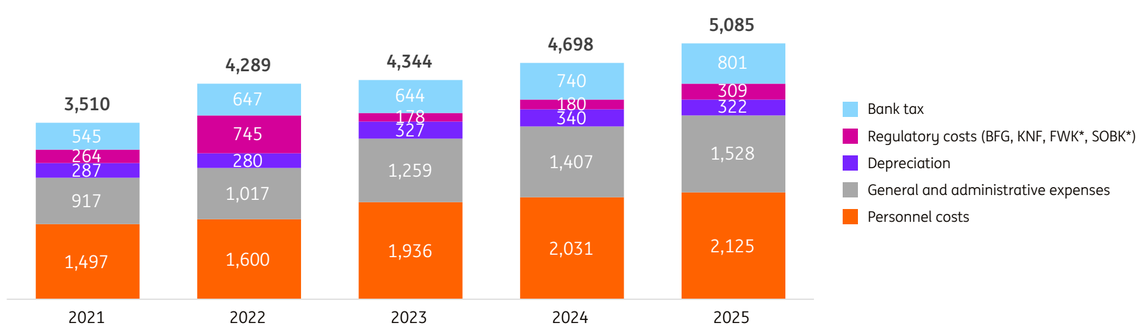
- the fee for the BFG restructuring fund was higher by PLN 23 million y/y,
- a fee for the BFG guarantee fund of PLN 100 million was charged in 2025 – there was no fee in 2024 – pursuant to Article 294(1) of the BFG Act, the Council of the Bank Guarantee Fund decided not to charge a contribution to the banks' guarantee fund in that year,
- the PFSA supervision costs increased to PLN 35 million against PLN 29 million the year before (+21% y/y).

In addition, the ING Bank Śląski Group paid a tax on certain financial institutions (so-called bank tax) of PLN 801 million in 2025 (+8% relative to 2024).

Staff costs increased by 5% y/y (PLN +94 million y/y), mainly as a result of salary increases.

General and administrative expenses increased by 9% y/y (PLN +121 million y/y), mainly as a result of increased IT costs (+17% y/y) and marketing and promotion costs (+16% y/y).

Operating expenses including bank tax (PLN million)

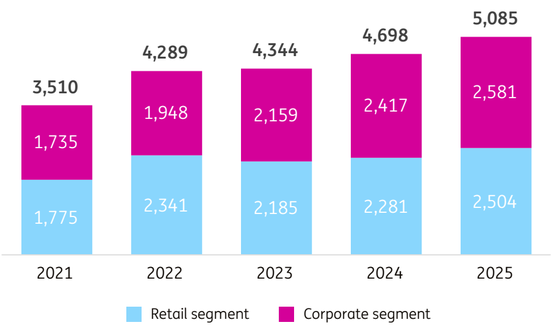


*Costs related to the Commercial Bank Protection Scheme (SOBK) and the Borrower Support Fund (BSCF) occurred in 2022, these costs did not occur in 2023-2025.

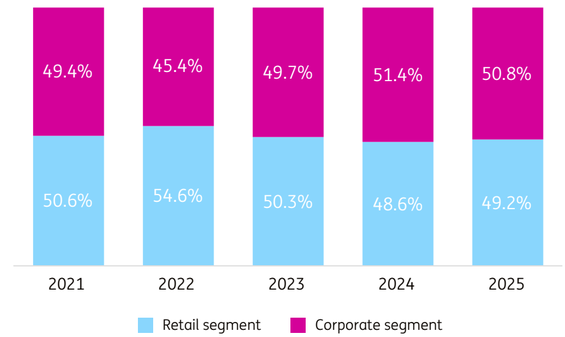
The headcount level in the ING Bank Śląski Group decreased y/y from 7,947 FTEs as at 2024 yearend to 7,646 FTEs as at 2025 yearend.

The operating expenses of the retail segment including the bank tax increased by PLN 223 million y/y (+10%) to PLN 2,504 million in 2025, while the corresponding costs of the corporate segment increased by PLN 164 million y/y (+7%) to PLN 2,581 million.

Operating expenses (including bank tax) by business segment (PLN million)

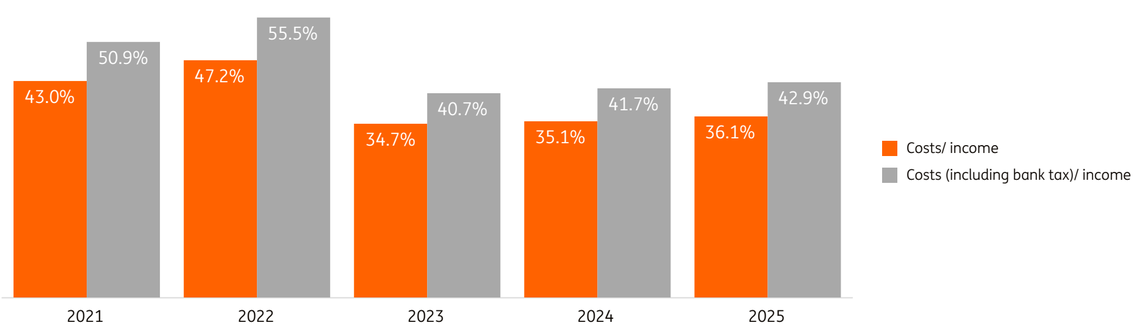


Structure of operating expenses (including bank tax) by business segment



Due to a slightly faster rate of growth in operating expenses than in revenue, the efficiency ratio – cost to revenue – increased by 1.0 p.p. in 2025 compared to the previous year. The ratio of costs including bank tax to income was 42.9% compared to 41.7% a year earlier (+1.2 p.p. y/y).

Cost/income ratio

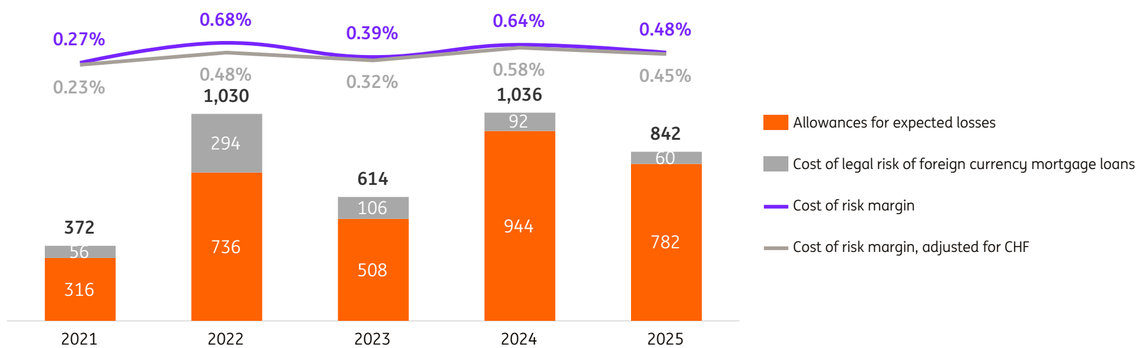


Allowances for expected credit losses including legal risk costs of foreign currency mortgage loans

In 2025, there was a decrease in the risk cost margin ratio (the ratio of the net expected loss allowance and provisions for legal risk of foreign currency mortgage loans to the gross loan portfolio) from 0.64% in 2024 to 0.48%. This was mainly due to the lower risk cost in the corporate segment.

The total risk cost (allowances for expected credit losses and legal risk costs of foreign currency mortgage loans) amounted to PLN 842 million in 2025, down -19% y/y.

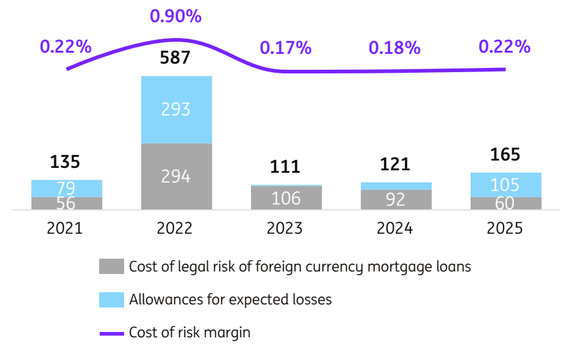
Consolidated allowances for expected credit losses including legal risk costs of foreign currency mortgage loans (PLN million)



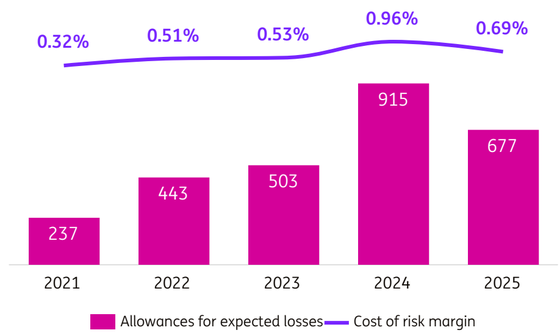
Allowances for expected credit losses in the corporate segment amounted to PLN 677 million against PLN 915 million in 2024 (-26% y/y). The decrease in allowances was due to the high base of reference – risks materialised for several corporate segment clients in 2024 as a result of the economic downturn.

The legal risk costs of foreign currency mortgage loans amounted to PLN 60 million in 2025 compared to PLN 92 million a year earlier. The coverage ratio of the active CHF mortgage portfolio by total provisions as at 2025 yearend was 142% (+11 p.p. y/y).

Allowances for expected credit losses in the retail segment, including legal risk costs of foreign currency mortgage loans (PLN million)



Allowances for expected credit losses in the corporate segment (PLN million)



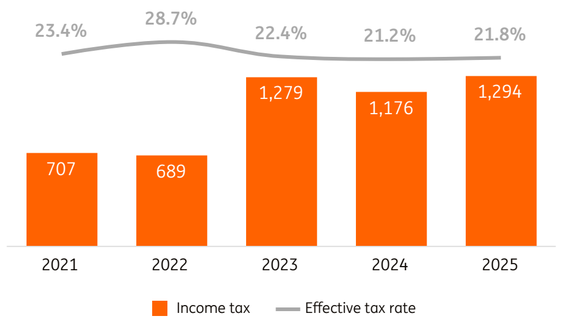
In 2025, changes in macroeconomic parameters in the provisioning calculation models increased the allowances for expected credit losses by PLN 22 million (more than 100% related to the corporate segment). In turn, in 2024, the cumulative impact of the change in macroeconomic parameters decreased the allowances for expected credit losses by PLN 82 million (74% of which related to the corporate segment).

In Q2 and Q4 2025, the bank sold corporate and retail receivables from Stage 3. The positive impact of these transactions on the allowances for expected credit losses amounted to PLN 64 million. The bank regularly sells Stage 3 receivables portfolios under its credit risk management policy. Similar transactions were also completed in 2024, with a total positive impact on the allowances for expected credit losses of PLN 80 million.

The quality of our loan portfolio is described in the section Bank and client security, under the heading Credit risk.

Income tax

Income tax (PLN million) and effective tax rate



In 2025, the ING Bank Śląski Group's income tax amounted to PLN 1,294 million, up 10% y/y, as a result of, inter alia, higher y/y gross result.

However, the reduction in income tax in 2025 was influenced by the revaluation of deferred tax assets and provisions using the new CIT tax rates.

The effective tax rate in 2025 was 21.8%, compared to 21.2% the year before.

Pursuant to Article 16(1)(71) of the CIT Act – the contribution to the banks' guarantee fund, as well as the contribution to the banks' forced restructuring fund, are not deductible costs. Bank tax is not a tax deductible cost either (pursuant to Article 16(1)(70) of the CIT Act).

Statement of financial position

In the following description of assets and liabilities, all reverse repo / repo transactions are included under "other assets / other liabilities".

Assets

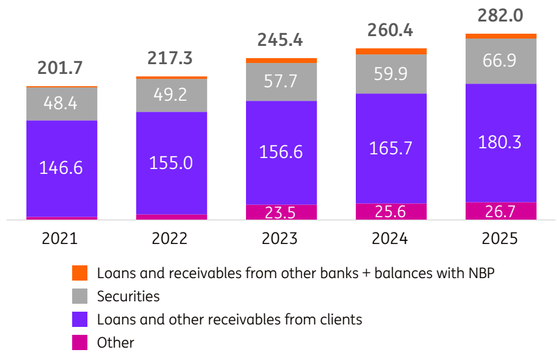
The ING Bank Śląski Group's total assets reached PLN 282.0 billion as at 2025 yearend (PLN 260.4 billion a year earlier). It implies they were up by 8% compared to the end of 2024.

The main driver of their growth was loans and other receivables from clients, which increased by PLN 14.7 billion to PLN 180.3 billion (+9% y/y). They remain the most important assets item (63.9% compared to 63.6% a year earlier).

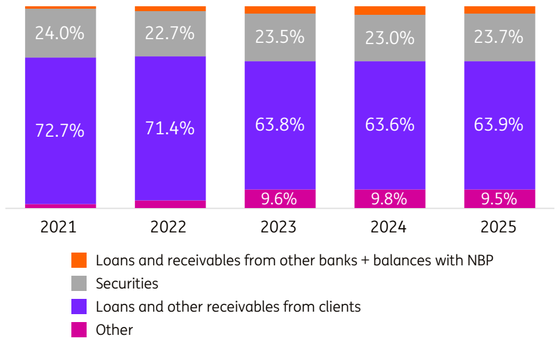
At the same time, securities increased by PLN 7.0 billion, +12% y/y, to PLN 66.9 billion, while loans and other receivables from other banks and funds in the NBP decreased by PLN -1.1 billion, -11% y/y, to PLN 8.2 billion in 2025 compared to the end of 2024.

In 2025, net loans in the retail segment increased by PLN 9.1 billion (+13% y/y), to PLN 79.5 billion, while in the corporate segment by PLN 4.4 billion (+5% y/y), to PLN 97.5 billion. Accordingly, the share of the retail segment in the net loans and other receivables portfolio increased from 42.5% in 2024 to 44.1% in 2025.

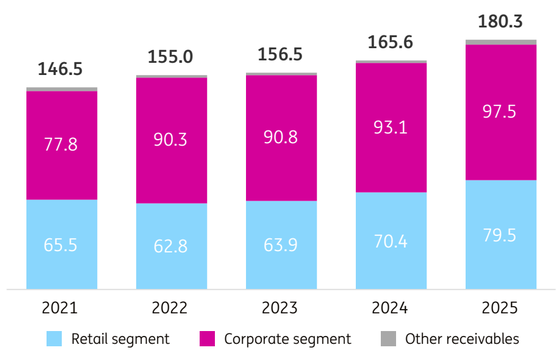
Structure of assets of the ING Bank Śląski Group (PLN billion)



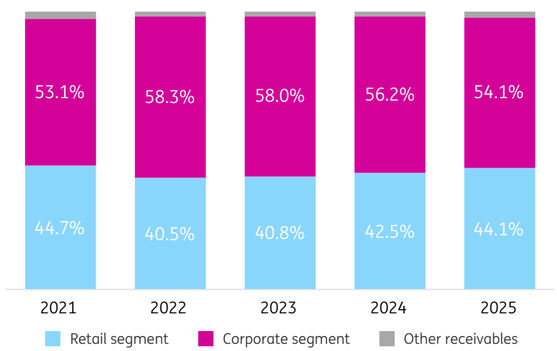
Structure of assets of the ING Bank Śląski Group



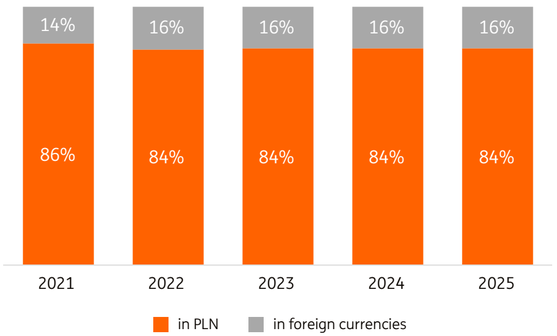
Net loans by segment (PLN billion)



Net loan structure



Currency structure of net client receivables portfolio



Within the structure of the net client receivables portfolio by currency, the share of exposures denominated in PLN amounted to 84% in 2025 and remained unchanged compared to 2024.

Net client receivables, both denominated in PLN and foreign currencies, increased by around 9% compared to 2024.

Net receivables portfolio from clients

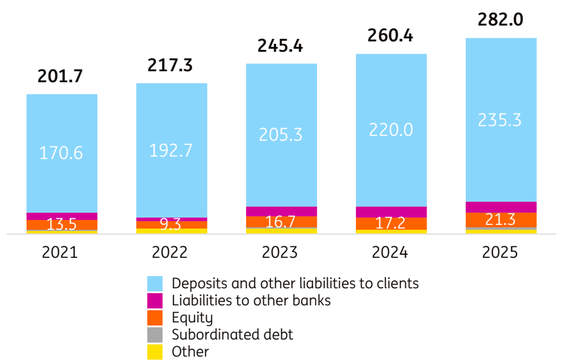
PLN billion	2021	2022	2023	2024	2025	Change 2025 to 2024	
						PLN billion	%
Total net receivables portfolio from clients							
Measured at amortised cost	146.5	155.0	156.5	165.6	180.3	14.7	+9%
Measured at fair value through profit or loss	0.08	0.06	0.04	0.02	0.01	-0.01	-67%
Total	**146.6**	**155.0**	**156.6**	**165.7**	**180.3**	**14.7**	**+9%**
Net receivables portfolio from clients measured at amortised cost							
Loan portfolio, of which:	**143.3**	**153.1**	**154.7**	**163.4**	**177.0**	**13.6**	**+8%**
households	75.4	72.7	72.8	77.3	86.6	9.3	+12%
business entities	64.9	77.3	78.8	83.4	86.5	3.1	+4%
central and local government institutional sector	2.9	3.1	3.2	2.8	3.9	1.1	+38%
Total, of which:	**143.3**	**153.1**	**154.7**	**163.4**	**177.0**	**13.6**	**+8%**
Corporate banking	**77.8**	**90.3**	**90.8**	**93.1**	**97.5**	**4.4**	**+5%**
overdrafts in current account	11.8	15.0	13.6	14.7	15.3	0.5	+4%
term loans and borrowings	44.7	51.5	53.2	53.9	57.4	3.5	+7%
lease receivables	11.1	12.4	13.1	13.3	13.7	0.3	+2%
factoring receivables	6.8	7.7	6.7	6.6	6.5	-0.1	-2%
debt securities (corporate and municipal)	3.3	3.8	4.2	4.6	4.7	0.1	+2%
Retail banking	**65.5**	**62.8**	**63.9**	**70.4**	**79.5**	**9.1**	**+13%**
mortgage loans and borrowings	57.2	54.9	55.5	61.1	69.1	8.0	+13%
overdrafts in current account	0.6	0.6	0.6	0.6	0.6	-	-1%
other loans and borrowings	7.7	7.3	7.8	8.6	9.8	1.2	+14%
Other receivables, of which:	**3.2**	**1.9**	**1.8**	**2.2**	**3.3**	**1.1**	**+51%**
opened call deposits	2.5	0.8	0.6	0.8	1.8	1.0	+136%
other receivables	0.7	1.1	1.2	1.4	1.5	0.1	+6%
Total	**146.5**	**155.0**	**156.5**	**165.6**	**180.3**	**14.7**	**+9%**

Equity and liabilities

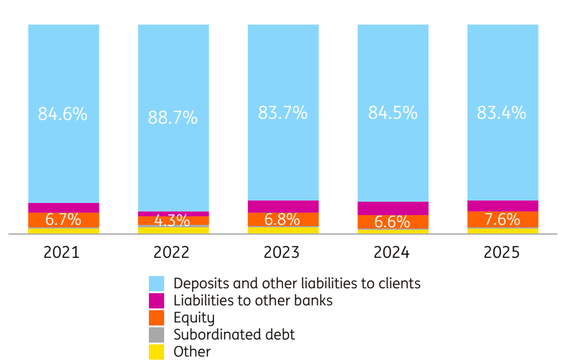
The dominant source of financing of the ING Bank Śląski Group's operations was clients' funds. As at 2025 yearend, deposits and other liabilities to clients amounted to PLN 235.3 billion (+15.3 billion, +7% y/y) and accounted for 83.4% of total liabilities. The value of equity increased by PLN 4.2 billion to PLN 21.3 billion as at 2025 yearend, driven by the net result generated during 2025 supported by the positive valuation of cash flow hedging

instruments (PLN +2.8 billion as at 2025 yearend compared to the end of 2024). This valuation forms part of accumulated other comprehensive income.

Equity and liabilities of the ING Bank Śląski Group (PLN billion)

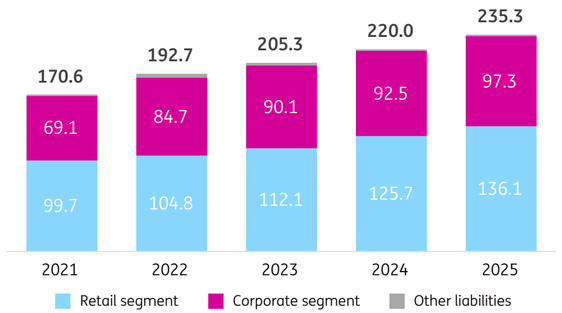


Structure of liabilities of the ING Bank Śląski Group

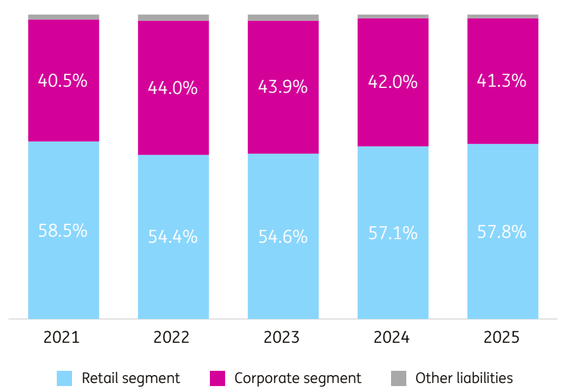


Deposits to retail segment clients increased by PLN 10.4 billion (+8% y/y), compared to an increase in the corporate segment of PLN 4.8 billion (+5% y/y). Thus, the retail segment's share of deposits and other liabilities increased from 57.1%% in 2024 to 57.8% in 2025.

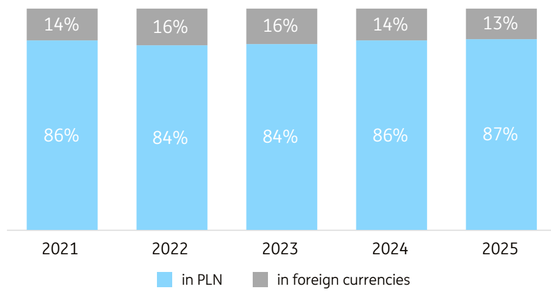
Deposits* by segment (PLN billion)



Structure of deposits*



*Deposits and other liabilities to clients.



Within the structure of the deposit portfolio (and other liabilities to clients), PLN-denominated client savings accounted for 87% of the deposit portfolio in 2025.

Deposits and other liabilities to clients denominated in PLN increased by around 8% y/y in 2024, while those denominated in foreign currencies remained virtually unchanged y/y.

Portfolio of liabilities to clients

PLN billion	2021	2022	2023	2024	2025	Change 2025 to 2024 PLN billion	%
Deposits, including:	**168.8**	**189.5**	**202.2**	**218.1**	**233.4**	**15.3**	**+7%**
households	113.9	118.5	125.6	139.7	151.0	11.3	+8%
business entities	51.5	64.3	73.0	73.1	76.9	3.8	+5%
central and local government institutional sector	3.5	6.7	3.6	5.3	5.5	0.2	+3%
Total, of which:	**168.8**	**189.5**	**202.2**	**218.1**	**233.4**	**15.3**	**+7%**
Corporate banking	**69.1**	**84.7**	**90.1**	**92.5**	**97.3**	**4.8**	**+5%**
current deposits	55.8	53.7	60.7	60.9	66.1	5.2	+9%
savings accounts	12.5	18.1	19.4	20.0	20.9	0.9	+5%
term deposits	0.8	13.0	10.0	11.5	10.2	-1.3	-11%
Retail banking	**99.7**	**104.8**	**112.1**	**125.7**	**136.1**	**10.4**	**+8%**
current deposits	28.9	27.5	28.8	31.9	35.0	3.1	+10%
savings accounts	69.3	69.4	67.7	76.3	81.9	5.6	+7%
term deposits	1.5	7.9	15.6	17.5	19.1	1.6	+9%
Other liabilities, including:	**1.8**	**3.2**	**3.1**	**1.8**	**2.0**	**0.1**	**+7%**
liabilities under monetary hedges	0.5	0.7	0.8	0.8	0.9	0.12	+16%
call deposits	-	-	-	-	0.04	0.04	+501%
other liabilities	1.3	2.4	2.2	1.1	1.1	-	-3%
Total	**170.6**	**192.7**	**205.3**	**220.0**	**235.4**	**15.4**	**+7%**

Off-balance sheet items

Off-balance items of the ING Bank Śląski Group					
PLN billion	2021	2022	2023	2024	2025
Contingent liabilities granted	48.7	48.2	53.2	55.4	63.0
unused credit lines	39.0	37.2	41.7	43.4	49.8
guarantees	6.2	7.5	8.1	8.0	9.3
credit card limits	1.5	1.5	1.7	1.9	2.1
undrawn overdrafts in current account	1.6	1.5	1.4	1.4	1.4
letters of credit	0.4	0.4	0.3	0.4	0.4
reverse repo	-	-	-	0.3	-
Contingent liabilities received	21.6	17.5	20.3	26.2	28.2
Off-balance sheet financial instruments	995.6	1,137.7	1,433.3	1,552.7	1,630.2
Total	**1,065.9**	**1,203.4**	**1,506.8**	**1,634.3**	**1,721.3**

Details of off-balance sheet items are presented in the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group for 2025.

ING Bank Śląski standalone results

Key performance ratios

Key effectiveness ratios for ING Bank Śląski S.A. in 2021-2025

	2021	2022	2023	2024	2025	Change 2025 to 2024
Cost share ratio* (C/I)	42.2%	46.6%	33.8%	34.3%	35.4%	+1.1 p.p.
Cost (with bank tax) share ratio** (C/I)	50.3%	55.3%	40.0%	41.0%	42.4%	+1.3 p.p.
Return on assets (ROA)	1.2%	0.8%	2.0%	1.8%	1.7%	-0.1 p.p.
Return on equity (ROE)	13.8%	17.8%	34.1%	26.9%	24.7%	-2.2 p.p.
LTD ratio	80.8%	75.8%	71.5%	70.7%	72.1%	+1.4 p.p.
LCR***	167%	156%	220%	267%	256%	-11 p.p.
NSFR	160%	158%	172%	178%	161%	-17 p.p.
LR according to transitional definition	7.4%	7.5%	7.2%	7.1%	6.3%	-0.7 p.p.
MREL by TREA	17.1%	17.8%	26.3%	24.2%	25.2%	+1.0 p.p.
Total capital ratio	17.09%	17.84%	18.74%	16.45%	16.35%	-0.10 p.p.
Tier 1 capital ratio	15.31%	16.18%	17.24%	15.31%	15.47%	+0.16 p.p.

**Income including net profit of associates accounted for using the equity method; **expenses including bank tax and income including net profit of associates accounted for using the equity method; ***in 2025, based on the analysis of the records of Q&A_2024_720, the Group introduced a change in the presentation of non-retail deposits in liquidity reporting, therefore the LCR indicator for 2024 changed compared to the one presented in the previous year.*

Key financial data

Brief information on the financial results of ING Bank Śląski S.A. in 2021-2025

PLN million	2021	2022	2023	2024	2025	Change 2025 to 2024
Income*	6,671	7,467	10,376	10,956	11,503	+5%
Fixed	-2,813	-3,480	-3,509	-3,755	-4,071	+8%
Risk cost**	-342	-966	-564	-971	-753	-22%
Gross profit	2,971	2,374	5,659	5,490	5,878	+7%
Net profit	2,308	1,714	4,441	4,369	4,633	+6%
Balance sheet total	195,905	211,159	239,600	254,941	275,684	+8%
Liabilities to clients	170,104	192,242	205,040	219,941	235,412	+7%
Loans and other receivables to clients, net***	137,419	145,788	146,702	155,477	169,632	+9%
Equity	13,216	9,266	16,619	17,107	21,288	+24%
Earnings per share (EPS) (PLN)	17.7	13.2	34.1	33.6	35.6	+6%
Dividend per share (PLN) for a given year	5.30	-	33.35	25.18	-	-

Including net profit of associates accounted for using the equity method; ** including legal risk costs of foreign currency mortgage loans; * including fair value loans.*

For the purposes of converting the figures presented above into EUR, we use the same exchange rates as those referred to in the section on our bank's consolidated results.

Brief information on the financial results of ING Bank Śląski S.A. in 2021-2025

EUR million	2021	2022	2023	2024	2025	Change 2025 to 2024
Income*	1,457	1,593	2,291	2,545	2,715	+7%
Fixed	-615	-742	-775	-872	-961	+10%
Risk cost**	-75	-206	-125	-226	-178	-21%
Gross profit	649	506	1,250	1,275	1,387	+9%
Net profit	504	366	981	1,015	1,093	+8%
Balance sheet total	42,594	45,024	55,106	59,663	65,224	+9%
Liabilities to clients	36,984	40,991	47,157	51,472	55,696	+8%
Loans and other receivables to clients, net***	29,878	31,086	33,740	36,386	40,133	+10%
Equity	2,873	1,976	3,822	4,004	5,037	+26%
Earnings per share (EPS) (EUR)	3.87	2.81	7.53	7.80	8.40	+8%
Dividend per share (EUR) for a given year	1.16	-	7.36	5.85	-	-

*Including net profit of associates accounted for using the equity method; **including legal risk costs of foreign currency mortgage loans; ***including fair value loans.

Profit and loss account

Basic figures of the profit and loss account of ING Bank Śląski for 2025 and changes compared to the previous year are presented in the table below.

Basic figures of the profit and loss account in analytical terms

PLN million	2021	2022	2023	2024	2025	Change 2025 to 2024	
						PLN million	%
Net interest income	4,673	5,330	7,762	8,338	8,464	126	+2%
Net commission income	1,779	2,019	2,079	2,208	2,272	64	+3%
Other income*	219	118	535	410	767	357	+87%
Total income	6,671	7,467	10,376	10,956	11,503	547	+5%
Operating expenses	-2,813	-3,480	-3,509	-3,755	-4,071	-316	+8%
Risk cost**	-342	-966	-564	-971	-753	218	-22%
Bank tax	-545	-647	-644	-740	-801	-62	+8%
Gross financial result	2,971	2,374	5,659	5,490	5,878	388	+7%
Income Taxes	-663	-660	-1,218	-1,121	-1,245	-125	+11%
Net financial result	**2,308**	**1,714**	**4,441**	**4,369**	**4,633**	**264**	**+6%**

*Including the share in net profit of associates accounted for using the equity method; **including legal risk costs of foreign currency mortgage loans.

Gross profit and net profit

In 2025, ING Bank Śląski S.A. generated a net profit of PLN 4,633 million. This means that the net result has increased by 6% compared to 2024.
The gross result was PLN 5,878 million and it was up by 7% compared to 2024. The change in gross profit for 2025 compared to 2024 was mostly influenced by:

- a PLN 357 million y/y (+87%) higher result on other income (including share of net profit of associates accounted for using the equity method), in particular the net income on financial instruments measured at fair value and the result from foreign exchange positions,
- an increase in net interest income of PLN 126 million y/y (+2%),
- an improvement in commission income by PLN 64 million y/y (+3%), and
- lower by PLN 218 million y/y (-22%) risk costs (including legal risk costs of foreign currency mortgage loans).

The gross result was negatively impacted by higher operating expenses including bank tax by PLN 378 million y/y (+8%).

In 2025, ING Bank Śląski's total income (which includes, in addition to net profit, other income and expense items included in equity) amounted to PLN 7,457 million, compared to PLN 4,819 million in 2024.

Net interest income

In 2025, net interest income of ING Bank Śląski was up by PLN 126 million compared to 2024 (+2% y/y) up to the level of PLN 8,464 million. After adjusting the 2024 result for the effect of credit holidays (+132 million), the 2025 interest result would be at a comparable level to that achieved in 2024. Positively, net interest income in 2025 was impacted by rising volumes, but negatively by an environment of falling market interest rates.

Net fee and commission income

In 2025, net fee and commission income of the bank was up by PLN 64 million (+3% y/y) compared to 2024 to the level of PLN 2,272 million. The most significant increase within commission income was in the categories:

- account management – up by PLN 30 million (+6% y/y),
- distribution of participation units – up by PLN 35 million (+37% y/y),
- offering of insurance products – up by PLN 17 million (+8% y/y).

Operating expenses including bank tax

In 2025, ING Bank Śląski's operating expenses (including bank tax) increased by 8% y/y to PLN 4,872 million. This increase in costs was mainly driven by:

- staff costs, which increased by PLN 91 million (+5% y/y),
- IT costs, which increased by PLN 77 million (+17% y/y),
- marketing and promotion costs, which increased by PLN 29 million (+16% y/y) and
- bank tax, which increased by PLN 61 million (+8% y/y) and other regulatory costs, including the costs of the BFG and the PFSA, which increased by PLN 128 million y/y.

The headcount level in ING Bank Śląski was 7,215 FTEs as at 2025 yearend, compared to 7,505 FTEs as at 2024 yearend (down by 289 FTEs).

Allowances for expected credit losses including legal risk costs of foreign currency mortgage loans

In 2025, the value of costs of risk (including legal risk costs of foreign currency mortgage loans) stood at PLN 753 million against PLN 971 million a year earlier (-22% y/y). The decrease in the risk cost has to do with the lower provisions made by the bank in the corporate segment.

Income tax

In 2025, ING Bank Śląski recorded income tax of PLN 1,245 million (+11% y/y). The effective tax rate in 2025 was 21.2%, compared to 20.4% the year before.

Pursuant to Article 16(1)(71) of the CIT Act – the contribution to the banks' guarantee fund, as well as the contribution to the banks' forced restructuring fund, are not deductible costs. Bank tax is not a tax deductible cost either (pursuant to Article 16(1)(70) of the CIT Act).

Statement of financial position

Assets

Total assets of ING Bank Śląski amounted to PLN 275.7 billion as at 2025 yearend. It implies they were up by 8% compared to the end of 2024. The main drivers of the increase were loans and other receivables to clients (up by PLN 14.2 billion, +9% y/y) and investment securities (up by PLN 6.5 billion, +11% y/y).

In terms of the net client receivables portfolio, growth was recorded by both the retail and corporate segments. The retail segment portfolio increased by PLN 7.6 billion (+13% y/y), making the segment's share of the total net receivables portfolio increase by 1.8 p.p. to 41.4%. The corporate segment portfolio increased by PLN 4.3 billion (+5% y/y) – the segment's share of the total portfolio as at 2025 yearend was 56.5% (-1.6 p.p. y/y).

ING Bank Śląski is also providing financing to its subsidiaries (corporate segment) for a total of PLN 15.1 billion as at 2025 yearend vs 15.3 billion as at 2024 yearend. All transactions shall take place on a basis which does not deviate from market conditions.

Portfolio of loans to subsidiaries of ING Bank Śląski S.A. – 2025

PLN million	ING Commercial Finance S.A.	ING Bank Hipoteczny S.A.	ING Lease (Polska) Sp. z o.o.*	Total
Breakdown by maturity				
Up to 1 year	3,352	317	3,384	7,053
Over 1 year	-	2,560	5,536	8,096
Total	**3,352**	**2,877**	**8,920**	**15,149**
Breakdown by currency				
PLN	2,260	2,877	7,823	12,960
EUR	1,040	-	1,097	2,137
Other	52	-	-	52
Total	**3,352**	**2,877**	**8,920**	**15,149**

**Including subsidiaries.*

Portfolio of loans to subsidiaries of ING Bank Śląski S.A. – 2024				
PLN million	ING Commercial Finance S.A.	ING Bank Hipoteczny S.A.	ING Lease (Polska) Sp. z o.o.*	Total
Breakdown by maturity				
Up to 1 year	3,281	-	243	3,524
Over 1 year	-	3,429	8,346	11,775
Total	**3,281**	**3,429**	**8,589**	**15,299**
Breakdown by currency				
PLN	2,239	3,429	7,723	13,391
EUR	988	-	865	1,853
Other	54	-	-	54
Total	**3,281**	**3,429**	**8,589**	**15,299**

**Including subsidiaries.*

At ING Lease (Poland), the sources of funding for long-term leasing contracts in EUR are loans received from ING Bank N.V. in Amsterdam and from ING Bank Śląski S.A. The loan agreement with ING Bank N.V. of 15 July 2021 introduced a total funding limit for the ING Lease (Poland) group of EUR 1,305 million and has not changed since 2021. In contrast, the loan agreement with ING Bank Śląski S.A. of 24 November 2016, together with subsequent annexes, introduced a sublimit for long-term financing of EUR 400 million in 2024, which remains at the same amount as at 2025 yearend.

As at 2025 yearend, the outstanding balance was EUR 1,113 million with ING Bank N.V. and EUR 258 million with ING Bank Śląski S.A. Disbursements are made in the form of loan tranches, which are drawn down in accordance with the needs arising from the leases and loans being drawn down. Repayment of the borrowed financing is carried out on time in accordance with the repayment schedules of the disbursed credit tranches.

Between 2024 and 2025, ING Bank Hipoteczny S.A., a subsidiary of the bank, did not issue any own bonds under the Bond Issue Programme (Bond Programme). Accordingly, at the end of 2024 and 2025, ING Bank Hipoteczny S.A. had neither issued nor unredeemed own bonds.

In 2025, ING Bank Hipoteczny S.A. issued Series 3 mortgage bonds with a nominal value of PLN 1 billion. As a result, as at 2025 yearend, liabilities under issued and outstanding mortgage bonds amounted to PLN 1,519 million (as at 2024 yearend: PLN 509 million).

On 9 December 2025, ING Bank Hipoteczny signed another annex with ING Bank Śląski to the Loan Agreement 3 of 14 December 2020. The amendment concerned the setting of the Availability Period to 14 December 2026. At the same time, on the same date, it terminated the Framework Agreement (Guarantee) dated 14 December 2020 with ING Bank Śląski.

Equity and liabilities

The dominant source of financing of ING Bank Śląski's operations was clients' funds. As at 2025 yearend liabilities to clients amounted to PLN 235.4 billion, or 85.4% of total liabilities.

Another significant source of financing was equity, which at the end of December 2025 amounted to PLN 21.3 billion and accounted for 7.7% of total liabilities.

In 2025, deposits and other liabilities to clients increased by PLN 15.5 billion y/y, or +7%, driven by both retail segment deposits (PLN +10.4 billion, +8% y/y) and corporate segment deposits (PLN +4.9 billion, +5% y/y).

Off-balance sheet items

Off-balance sheet items of ING Bank Śląski					
PLN billion	2021	2022	2023	2024	2025
Contingent liabilities granted	51.4	50.0	55.1	57.5	64.5
unused credit lines	41.5	39.0	43.6	45.5	51.4
guarantees	6.4	7.5	8.1	8.0	9.3
credit card limits	1.5	1.5	1.7	1.9	2.1
undrawn overdrafts in current account	1.6	1.5	1.4	1.4	1.4
letters of credit	0.4	0.4	0.3	0.4	0.4
reverse repo	-	-	-	0.3	-
Contingent liabilities received	19.6	17.3	19.5	25.1	27.3
Off-balance sheet financial instruments	995.6	1,137.7	1,433.3	1,552.7	1,630.2
Total	**1,066.5**	**1,205.0**	**1,507.9**	**1,635.3**	**1,722.0**

Details of off-balance sheet items were presented in the Annual Financial Statements of ING Bank Śląski S.A. for 2025.

ING Bank Śląski S.A. Management Board statement on the application of corporate governance principles

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In this chapter, we provide information and a corporate governance statement, including information about our shareholders, bank charter (the company's charter), general meeting, Supervisory Board and our Management Board.

ING Bank Śląski S.A. Management Board presents the Statement on the application of corporate governance principles in 2025, pursuant to Article 70.6.5) of the Regulation of the Minister of Finance of 29 March 2018 on current and periodic information published by issuers of securities and conditions for recognizing as equivalent information required by the law of a non-member state (Journal of Laws, item 57).

Principles and scope of application of corporate governance

Corporate governance determines how the bank's bodies operate and how its processes and systems function. The Bank Management Board accepted and the Supervisory Board approved: *Policy – Principles of Internal Governance at ING Bank Śląski S.A. and Policy – Principles of Internal Governance in the ING Bank Śląski S.A. Group.*

These documents describe the key principles for:

- the bank's management system, its organisational structure, internal and external relations, (including relations with shareholders and clients), their organisation,
- the functioning of internal supervision and key internal systems and functions, the rules of operation, powers, duties and responsibilities, and the interrelationship of the Supervisory Board, the Management Board and the bank's key functionaries; and
- the assessment of the bank's internal governance.

The principles indicated in the policies, which are followed by ING Bank Śląski S.A., are the implementation and realisation of the requirements resulting from, among others:

- the Banking Act of 29 August 1997 (Journal of Laws 2020, item 1896, as amended),
- the Act of 15 September 2000 Commercial Companies and Partnerships Code (Journal of Laws 2020, item 1526, as amended),
- Recommendation Z of the PFSA concerning the principles of internal governance in banks,
- Principles of Corporate Governance for Supervised Institutions of the PFSA,
- EBA's internal governance guidelines,
- Best Practice for GPW Listed Companies 2021.

ING Bank Śląski S.A. Management Board declares that the Bank complied in 2025 with the corporate governance principles set out in the "Best Practice for GPW Listed Companies 2021" and "Principles of Corporate Governance for Supervised Institutions".

The bank has not identified any breaches of the corporate governance principles adopted by the bank during the period covered by this report.

Internal governance in the bank is based on legal compliance, transparency and efficiency. The implementation of the stated objectives is achieved by implementing the principles described in the internal regulations indicated above and basing the internal governance model on a defined hierarchy. The bank, to the extent permitted by generally applicable law and guidelines of supervisory authorities, takes into account in its internal governance the considerations arising from its membership of ING Group N.V.

Our bank's internal governance consists of the following elements:

- bank management system,
- organisation of the bank,
- principles of operation, powers, duties and responsibilities and mutual relations of the Bank Supervisory Board, Management Board and persons holding key positions in the bank.

In order to ensure efficiency with regard to the elements comprising our bank's internal governance, the tasks, responsibilities and powers of the various bodies and organisational units (Management Board, Supervisory Board, General Meeting and other bodies/units) with regard to the implementation, operation, assessment and supervision of internal governance at the bank, together with the assignment of responsibility for these tasks.

In 2025, the Bank Management Board and Supervisory Board positively assessed the functioning and observance of internal governance in our bank in 2024.

Principles of corporate governance for supervised institutions

The bank applies *the Principles of Corporate Governance for Supervised Institutions* introduced by Resolution No. 218/2014 of the Polish Financial Supervision Authority of 22 July 2014 (Journal of Laws of the Polish Financial Supervision Authority, item 17) (hereinafter: "Principles of corporate governance"). The Principles of corporate governance were accepted in the scope set out in the Statement of the Bank Management Board of 30 December 2014, posted on the bank's website at this address.

In order to fulfil the commitment of the Bank Management Board made in the aforementioned Declaration, the Ordinary General Meeting of the Bank on 31 March 2015 adopted Resolutions 25 and 26, the contents of which are available at this address.

Since 2020, in connection with the conduct of the General Meeting with the possibility of electronic participation, the bank has used the principle resulting from Article 8.4 of the Principles of Corporate Governance. This means that ING Bank Śląski S.A. applies all *Principles of Corporate Governance for Supervised Institutions*.

Best Practice for GPW Listed Companies 2021

The set of corporate governance principles to which the bank was subject in 2024 is contained, inter alia, in the Best Practice for GPW Listed Companies 2021 introduced by a resolution of the Board of the Warsaw Stock Exchange S.A. of 29 March 2021. The text of this document, together with information on the application of the various principles, is available on the bank's website at this address.

Pursuant to a resolution of the Bank Management Board and a decision of the Supervisory Board, the Bank has adopted for application DPSN 2021 with the exclusion of principles 1.4.1, 1.4.2 and 2.9 as announced in our EIB report of 30 July 2021 (including the Attachment).

On 29 November 2021, the EGM made changes to the composition of the Bank Supervisory Board. Allowed the publication on 30 November 2021 of a further EBI report (with Attachment) reporting on the application of principle 2.9 ("The Chair of the supervisory board should not combine his or her function with the leadership of the audit committee acting within the board"). The EGM also passed a resolution regarding the application of the DPSN addressed to the General Meeting and shareholders.

The presentation in the Bank's 2021 Annual Report of the value of the equality ratio of the remuneration paid to its employees in accordance with Principle 1.4.2, allowed for the publication on 11 March 2022 of a further EIB report (with Attachment) reporting on the application of Principle 1.4.2.

On 6 March 2023, we published information on managing sustainability issues, including the competences and roles of the ESG Council and the ESG Risk Committee, on the ESG section of our bank's website. This allowed a further EIB report (with Attachment) to be published on the same day reporting on the application of Principle 1.4.1.

The bank currently applies all the principles set out in the Best Practice for GPW Listed Companies 2021.

Application of the Code of Best Practice for GPW Listed Companies 2021	
Chapter 1: Information policy and communication with investors	We maintain active communication with stakeholders through a transparent and fair information policy, and we analyse and meet investors' current expectations regarding access to information and communication channels. The principles of the information policy towards the capital market are available on the company's website at this address. It indicates that we respond to stakeholder questions as a general rule no later than 7 days. We provide comprehensive communication with investors through a dedicated website https://en.ing.pl/company-profile/investor-relations/ where legally required information, result presentations and recordings of selected major corporate events are regularly made available. We regularly hold quarterly results conferences. We publish annual reports in Polish and English. Our business strategy takes ESG issues into account, and details of long-term goals and their implementation are available at https://en.esg.ing.pl/. In the annual reports, we also present information on expenditure to support culture, sport, charitable institutions, etc.
Chapter 2 Management Board and Supervisory Board	The Management Board Bylaw and the Supervisory Board Bylaw are available at https://en.ing.pl/company-profile/legal-documents. Information on the current composition of the bodies is available at https://en.ing.pl/company-profile/authorities. Only persons with the appropriate competence, skills and experience are appointed to the Management Board and Supervisory Board. Our bank has a Diversity Policy for ING Bank Śląski S.A. Management Board and Supervisory Board Members. The policy assumes aiming at ensuring representation of both genders in the processes of selection and succession plans, keeping in mind the laws on fair treatment while establishing employment relationship.
Chapter 3 Internal systems and functions	We maintain effective systems of internal control, risk management, compliance and an internal audit function. The organisational units responsible for the various areas are organisationally separate and have legally compliant scopes of responsibility, and the persons in charge of these units report directly to the President of the Management Board or another Member of the Management Board. The remuneration of those responsible for risk management and compliance and the head of internal audit is based on the performance of the assigned tasks and not on the short-term performance of the company. The Supervisory Board oversees the functioning and effectiveness of our bank's internal systems and functions.

Chapter 4 General meeting and relations with shareholders	The general rules for the General Meeting are described in the General Meeting Bylaw, which is available at this address. The bylaw also addresses shareholder relations issues. The terms and conditions of participation in the General Meeting by means of electronic communication are set out in the Bylaw of Participation in the ING Bank Śląski S.A. General Meeting with the Use of Means of Electronic Communication adopted by the Supervisory Board and made available on the website at this address. In accordance with the Bank Charter, the Supervisory Board gives its opinion on draft resolutions submitted by the Management Board to the agenda of the General Meeting.
Chapter 5 Conflict of interest and related-party transactions	One of the elements of our bank's corporate governance is a conflict of interest management system established to identify, assess, manage and prevent actual and potential conflicts of interest that may arise between the bank and the private interests of employees, including the interests of the Bank Management and the Supervisory Board, the interests of the bank's clients, shareholders, material suppliers or business partners and between the bank's clients. The bank's internal regulations also set standards for the protection of protected and confidential information from misuse, the appropriate governance structure, the separation of physical, technical and/or functional barriers to the flow of information to control protected and confidential information.
Chapter 6 Remuneration	We have internal regulations in place to ensure that the remuneration of the Members of the Management and Supervisory Boards and key managers is sufficient to attract, retain and motivate people with the competencies necessary for the proper management and supervision of the company. The remuneration of the Supervisory Board Members does not depend on the number of meetings held or on the short-term performance of our bank.

Code of Banking Ethics

Notwithstanding the corporate governance principles, the bank applies *the Code of Banking Ethics* (available on the website of the Polish Bank Association) in the *Downloads section*.

Principles of professional ethics of the employees of ING Bank Śląski S.A.

In 2025, the bank had Bylaw – Principles of Professional Ethics for Employees of the ING Bank Śląski S.A. Group. Its purpose is to reduce the compliance risk by indicating to employees the principles, compliance with which is a prerequisite for ensuring the integrity of the bank's activities, including compliance with the law, regulatory requirements and ethical standards applicable in the financial services industry. The principles set out in the bylaw shall apply to the employee's all activities related to the performance of official duties. Some of the principles may also apply to the employee's private activity, if such private activity may negatively affect the bank's reputation or cause a conflict of interest . For more on the principles and values that guide us in building our corporate culture, see the Sustainability Statement here.

We address conflicts of interest

Our Group has a *Conflict of Interest Policy*, approved by the Management Board and Supervisory Board, which precisely defines the rules for dealing with situations of conflict of interest. Its purpose is to identify, assess, manage and mitigate actual and potential conflicts of interest, whether in the relationship between the bank and employees, clients, shareholders, suppliers or business partners.

The 2025 policy has been updated and synthesised to bring together and systematise all applicable legal requirements and internal standards. The document identifies and defines the risks associated with conflicts of interest and then translates them into specific organisational requirements and controls. In this way, the policy provides a consistent source of policies and procedures that support the effective management of conflict of interest risk in the bank.

The policy is applied together with complementary regulations, in particular the *Manual – Registers of Conflicts of Interest*, which provides for the registration of conflicts by: structural and incidental conflicts in order to manage their risks effectively. The registers define a catalogue of circumstances that may lead to a conflict of interest. Identified potential conflicts of interest, along with measures to mitigate their risk, are recorded and monitored.

The policy sets out the requirements for:

- the operation of the organisation and the methods used in the bank to manage conflicts of interest at the organisational level,
- personal interests of employees that may lead to a conflict of interest, such as between the interests of the bank, clients, or other stakeholders and the interests of employees, including the bank's management, are identified.

The controls in place at the bank include:

- the implementation of ethics and corporate culture training,
- the segregation of responsibilities in the bank's organisational structure and the relationship between the different levels of management, as well as the staff links between employees,
- the obligation to report on the undertaking of additional professional activities and personal interests that may lead to a conflict of interest. In addition, all employees are required to make annual declarations of personal interests,
- the regulation of private investments by employees with access to protected information,
- the process of determining remuneration in a way that ensures that the interests of clients are central and that quantitative elements are balanced by qualitative indicators when determining variable remuneration ratios.

We comply with the requirements under the Best Practice and the Corporate Governance Principles for managing conflicts of interest, among others:

- disclosure of policies for managing conflicts of interest on the bank's website,
- the implementation of standards of behaviour for members of the bank's bodies, including the obligation to refrain from engaging in professional activities that could lead to a conflict of interest and to report on the occurrence of conflicts of interest,
- the exclusion of body members from decision-making processes in conflict situations,
- examining potential conflicts of interest of members of the bank's bodies in the suitability assessment process,
- the obligation to assess related party transactions for conflicts of interest and to publish information about such conflicts on the bank's website.

Conflict of interest risks are assessed annually as part of the review of the bank's Conflict of Interest Registers. The results of this assessment are presented at the Non-Financial Risk Committee or, in the case of conflicts concerning members of the Bank Management and Supervisory Boards and persons reporting directly to the Bank Management Board, by each of these bodies respectively.

All employees are obliged to report irregularities related to corruption or conflicts of interest. Questionable behaviour should be challenged and (suspicious) improper payments or actions should be reported to management or through channels for anonymous reporting of violations of laws, internal regulations and ethical standards. More on the channels for reporting violations can be found here.

Information policy of ING Bank Śląski

The Bank, as an institution of public trust, conducts an information policy based on open and transparent communication towards shareholders, investors, the media and all interested parties. In implementing the information policy, the bank complies with the legal requirements relating to confidentiality and information security incumbent on the bank as a public company and supervised institution. In implementing the information policy, the Bank follows the corporate governance principles, in particular by providing shareholders, investors, media and all interested parties with proper access to the bank's information. The full content of the Information Policy is available on this page.

Shares and shareholders of ING Bank Śląski S.A.

Shares and share capital

In accordance with its Charter, the share capital of ING Bank Śląski S.A. is split into 130,100,000 shares with the nominal value of PLN 1 each share. All the shares issued by the Bank are ordinary bearer shares. No special control rights are attached to the bank shares. The Charter of ING Bank Śląski does not provide for any restrictions as to transfer of title to the shares issued by the bank, exercising voting rights and contains no provisions according to which equity rights related to securities are separate from holdings of securities.

Additionally, the Charter authorises the Management Board to increase the share capital but maximum PLN 26 million (or issues of maximum 26 million shares) by 26 April 2026 (authorised capital) and to waive pre-emption rights at share issues of the authorised capital. The decisions taken by the Management Board on the share issue price and waiver of pre-emption rights require approval by the Supervisory Board. The authorisation to issue the target capital will enable the Management Board to take, if necessary, quick actions aimed at the capital strengthening of the bank. A full justification in this regard was attached to the draft resolution of the General Meeting on this issue (p. 13 of this document).

Shareholding structure

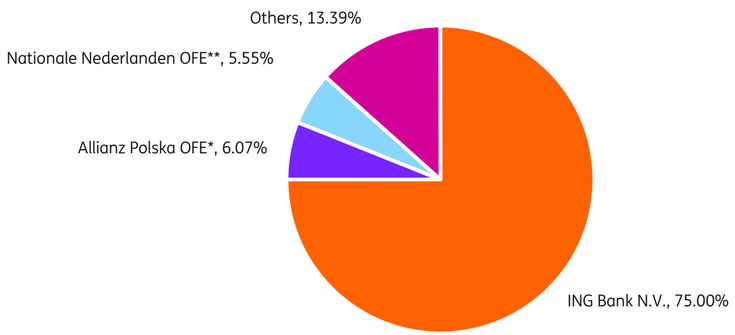
ING Bank Śląski S.A. is a subsidiary company of ING Bank N.V., which as at 31 December 2025, held a 75.00% shareholding in the share capital of ING Bank Śląski S.A. and 75.00% of the total number of votes at the General Meeting – the figures that have not changed since March 2005. The remaining shares of the Bank (25.00%) are in free float. They are held by institutions investors, especially Polish pension funds and national and foreign investment funds, and also individual investors.

The share of all OFEs in our bank's shareholding as at 2025 yearend was 21.16% compared to 21.38% as at 2024 yearend, of which:

- Allianz Polska OFE's share stood at 6.07%,
- Nationale Nederlanden OFE's share stood at 5.55%.

In 2025, the value of the share capital of ING Bank Śląski SA and the share of the main shareholder in the capital did not change.

Shareholder structure



*Based on semi-annually reported assets structure of Allianz Polska OFE as at 31 December 2025.
**Based on semi-annually reported assets structure of Nationale Nederlanden OFE as at 31 December 2025.

As at the publication hereof, ING Bank Śląski S.A. is not aware of any agreements that may in the future generate changes to the proportions of shareholdings by the existing shareholders. The Bank is also not aware of any shareholder other than those indicated below in the table exceeding the 5% shareholding threshold.

Shareholding structure

	Number of shares/Number of votes at GM		Share in the share capital and the total number of votes at the General Meeting	
Shareholder name	31 December 2024	31 December 2025	31 December 2024	31 December 2025
ING Bank N.V. (a subsidiary of ING Groep N.V.)	97,575,000	97,575,000	75.00%	75.00%
Allianz Polska OFE*	9,512,036	7,890,923	7.31%	6.07%
Nationale Nederlanden OFE**		7,217,029		5.55%
Others	23,012,964	17,417,048	17.69%	13.39%
Total	**130,100,000**	**130,100,000**	**100.00%**	**100.00%**

*Based on semi-annually reported assets structure of Allianz Polska OFE as at 31 December 2025.
**Based on semi-annually reported assets structure of Nationale Nederlanden OFE as at 31 December 2025.

Characteristics of the dominating shareholder

ING Bank N.V. belongs to the ING Group N.V. (ING Groep N.V.) - Europe's leading universal bank with a global reach, offering retail and corporate banking services to some 41 million clients in more than 100 countries. ING Group N.V. has more than 60,000 employees. ING Group N.V.'s products include savings accounts, payments, investments, loans and mortgage loans in the retail markets in which it operates. For the largest corporate clients (Wholesale Banking), ING Group N.V. provides specialised loans, tailored corporate financing, debt and equity-based solutions in securities markets, sustainable financing, payments and cash management, and trading and treasury services.

ING Group N.V. was established in 1991 as a result of a merger between the Dutch insurance company Nationale-Nederlanden and the national postal bank NMB Postbank. Over the years, ING Group N.V. has grown both organically and through mergers and acquisitions. After the global financial crisis of 2008-2009, the insurance business was sold and ING Group N.V. continued to operate as a European-focused retail bank and a global bank for the largest corporate clients (Wholesale Banking).

ING Groep NV is a public company listed on the stock exchange in Amsterdam (INGA NA, INGA.AS), Brussels and New York (ADR: ING US, ING.N). ING Groep N.V. has a diversified ownership structure. As at 2025 yearend, shareholders with a holding in excess of 3% (based on Dutch AFM filings) were BlackRock Inc. and Capital Research and Management Company. ING Group generated a net profit of EUR 6,327 million in 2025, compared to EUR 6,392 million in 2024. Total assets as at 2025 yearend amounted to EUR 1,054.4 billion. The ING Bank Śląski Group's assets accounted for around 6.3% of ING N.V Group's assets as at 2025 yearend, while our net profit accounted for around 17.3% of ING N.V Group's net profit.

More information on the majority shareholder can be found at https://ing.com/.

The Bank Charter and the principles for its amendment

The current Charter of ING Bank Śląski S.A. is available on the website at this address.

Principles for changing the Bank Charter

Amending the Bank Charter requires a resolution of the General Meeting and an entry in the register of entrepreneurs of the National Court Register. An amendment to the Bank Charter also requires the approval of the Polish Financial Supervision Authority.

Any change to the Charter relating to the bank's business shall not require the redemption of shares held by those shareholders who do not approve the change provided the resolution of the General Meeting on the change is approved by a majority of 2/3 votes in the attendance of persons representing minimum one half of share capital.

Changes made to the Charter in 2025

The changes to the Bank Charter registered in 2025 include:

- adjusting the object of the business to the current provisions of the Banking Act, in connection with the recommendations of the Polish Financial Supervision Authority,

- introducing the possibility for the bank to issue capital bonds,
- determining how to select an entity qualified to attest sustainability reporting in view of the change in legislation,
- deletion of the limitation on the maximum number of Management Board Members,
- deletion of the joint representation of a proxy with an attorney.

We informed you about the above mentioned amendments to the Bank Charter by current report No. 16/2025 of 9 May 2025 (link to the report and including the Attachment) and in current report no. 21/2025 of 11 August 2025 (link to the report together with including the Attachment 1 and including the Attachment 2).

General Meeting

Principles of convening and powers of the General Meeting

The General Meeting is convened by an announcement on the bank's website and in the manner specified for the provision of current information by public companies. The General Meeting works in compliance with the principles set out *in the Commercial Companies and Partnerships Code* and the Bank Charter as an Ordinary General Meeting or Extraordinary General Meeting.

General Meetings are convened on a date enabling the participation of all authorised and interested shareholders.

The competences of the General Meeting (apart from other matters stipulated in generally applicable provisions of law) include adopting resolutions, inter alia, in the following cases:

- considering and approving the annual financial statements as well as the Management Board Reports on the activities of the ING Bank Śląski S.A. Group, including the Corporate Governance and Sustainability Statements,
- accepting reports of the Supervisory Board and assessing the bank's remuneration policy,
- acknowledging the fulfilment of duties by Members of the Bank Management Board and Supervisory Board,
- distribution of profit and coverage of loss,
- payment of dividends, the determination of the dividend day and the dividend payment date,
- amendments to the Bank Charter,
- changes in the composition of the Supervisory Board,
- assessment of compliance by Members of the Supervisory Board with the requirements referred to in Article 22aa of the Polish Banking Law Act (suitability assessment),
- remuneration policy for Members of the Bank Management Board and Supervisory Board,
- increasing or decreasing the bank's share capital.

Shareholders' rights

Bank shareholders representing at least 1/20 of the share capital may:

- demand that an Extraordinary General Meeting be convened,
- demand that certain matters be placed on the agenda of the next General Meeting,
- submit, prior to the date of the General Meeting, draft resolutions on the items placed on the agenda.

Each shareholder may, during the General Meeting, submit draft resolutions regarding matters included in the agenda.

Operation of the General Meeting

In the case of convening an Extraordinary General Meeting, the Bank Management Board presents the justification for convening and putting certain matters in order or asks for such justification if the request comes from another authorised entity.

Draft resolutions are submitted to the General Meeting by the Bank Management Board after obtaining the opinion of the Supervisory Board.

Subject to the cases set out *in the Commercial Companies and Partnerships Code*, the General Meeting is valid regardless of the number of shares represented at it. Each share carries the right to one vote. Resolutions of the General Meeting are generally adopted by an absolute majority of votes, except for matters set out in the provisions of the Commercial Companies and Partnerships Code and the provisions of the Bank Charter. Apart from *the Commercial Companies and Partnerships Code*, the issues related to the convening and functioning of the General Meeting are specified in the Bank Charter, the General Meeting Bylaw and the announcement on convening the General Meeting.

General Meetings are held at the registered office of the Company in Katowice. The proceedings of the General Meeting are broadcast on the Internet. The Company may organise General Meetings in a manner enabling shareholders to participate by means of electronic communication, including, in particular, two-way communication in real time, enabling shareholders to express themselves during the General Meeting, as well as exercising voting rights in person or through a proxy. The interested representatives of the media may participate in the deliberations of the Meeting – as observers.

The principles of shareholders' participation in the General Meeting and the procedure to be followed during the General Meeting, as well as the method of communication between shareholders and the bank are set out in the General Meeting Bylaw. Only persons who are the bank's shareholders sixteen days before the date of the General Meeting (the date of registering participation in the General Meeting) are entitled to participate in the General

Meeting of the Bank. Shareholders may participate in the General Meeting and exercise their voting rights in person or through proxies.

A shareholder has the right to, among other things:

- voting, submitting motions and objections,
- proposing a candidate for the position of Chair of the General Meeting,
- submitting draft resolutions on matters placed on the agenda and submitting motions on a formal matter, in particular regarding the manner of deliberating and voting,
- proposing changes and supplements to draft resolutions included in the agenda of the General Meeting,
- proposing candidates for the Supervisory Board,
- dividends in the event of its adoption by the General Meeting (the list of authorised shareholders is determined on the dividend date set out in the resolution).

During the General Meeting, the Bank Management Board is obliged to provide the shareholder, at his or her request, with information about the company, if it is justified for the assessment of an issue on the agenda.

The Bank Management Board refuses to provide information if it could harm the company, a related entity or a subsidiary, in particular by disclosing technical, commercial or organisational secrets of the company. A Member of the Bank Management Board may also refuse to provide information if providing information could constitute the basis of his or her criminal, civil or administrative liability. The Bank Management Board may provide information in writing outside the general meeting if there are important reasons for it.

Shareholders also have the right to challenge resolutions of the General Meeting. This power may be exercised by a shareholder who:

- voted against the resolution and, after its adoption, demanded that the objection be recorded in the minutes,
- was unreasonably prevented from participating in the General Meeting,
- was not present at the General Meeting in the event of a defective convocation of the General Meeting or adoption of a resolution on a matter not included in the agenda.

The right to challenge resolutions of the General Meeting includes the possibility to:

- bringing an action to repeal a resolution in the event of a resolution contrary to the bank charter or morality and harming the company's interest or aimed at harming a shareholder,
- bringing an action for the declaration of invalidity of a resolution contrary to the Act.

The full text of *the General Meeting Bylaw* is available here.

The competences of the General Meeting are defined in particular by the provisions of the Commercial Companies and Partnerships Code, the Banking Law and the provisions of the Bank Charter.

Supervisory Board

Composition of the Supervisory Board

The Supervisory Board of ING Bank Śląski S.A. operates pursuant to the Banking Act, *the Commercial Companies and Partnerships Code*, *the Bank Charter and the Supervisory Board Bylaw*. The number of Members of the Supervisory Board is determined by the General Meeting and may not exceed 11 persons. Members of the Supervisory Board are appointed by the General Meeting for a joint term of office, which commences on the date of appointment and covers four consecutive full financial years.

The General Meeting determines the number of Members of the Supervisory Board for a given term of office. Members of the Supervisory Board may be dismissed at any time by a resolution of the General Meeting. The current term of office started on 11 April 2024 and expires on the date of the General Meeting approving the financial statements for 2028.

The Supervisory Board is composed of Independent Members, pursuant to the corporate governance principles adopted by the bank and legal requirements. Pursuant to the Bank Charter, at least two Members of the Supervisory Board should be free from any relations with the bank, its shareholders or employees, if such relations could significantly affect the member's ability to make impartial decisions (Independent Members). The minimum number of Independent Members of the Supervisory Board and the detailed criteria of independence result from the provisions of law and *the Best Practice for GPW Listed Companies* adopted by the bank and are specified in detail in *the Supervisory Board Bylaw*.

Changes to the composition of the Supervisory Board in 2025

In H1 2025, no changes to the Supervisory Board or Supervisory Board Committees composition were made. The composition of the Supervisory Board was kept unchanged and – in line with the bank's practice – on 29 April 2025, the Ordinary General Meeting adopted the suitability assessment (Ordinary General Meeting Resolution No. 29 on assessing satisfaction by the existing Members of the Supervisory Board of the requirements referred to in Article 22aa of the Banking Law Act (suitability assessment)). Individual and collective suitability assessment of the Supervisory Board Members was adopted by the General Meeting based on the Recommendation of the Remuneration and Nomination Committee passed on 27 March 2025.

On 27 June 2025, Mr Stephen Creese tendered his resignation from the capacity as the Supervisory Board Member, effective as of 31 August 2025. The reason for the resignation was his plans to leave ING Group. The resignation affected the composition of the Risk Committee.

On 24 September 2025, Ms Aneta Hryckiewicz-Gontarczyk tendered her resignation from the capacity as the Supervisory Board Member, effective as of 24 September 2025. The reason for resignation were personal reasons. The resignation affected the composition of the Remuneration and Nomination Committee and Risk Committee.

Following the resignations, the Supervisory Board changed the composition of the Remuneration and Nomination Committee and the Risk Committee on 25 September 2025. At the same time, the Supervisory Board resolved to commission an individual suitability assessment of Ms Monika Marcinkowska on account of holding the role of the Chair of the Remuneration and Nomination Committee and a collective suitability assessment of the Remuneration and Nomination Committee as well as an individual suitability assessment of Mr Michał Szczurek, new Risk Committee Member and a collective suitability assessment of the Risk Committee.

On 26 September 2025, the Remuneration and Nomination Committee decided to commission a study to analyse the timeliness of the suitability assessments of individual Supervisory Board Members, as well as an assessment of the collective suitability of the Supervisory Board. With the above in mind, on the basis of the Suitability Assessment Policy for Members of the Supervisory Board, Members of the Management Board and persons holding key positions in ING Bank Śląski S.A. ("Policy"), on 21 November 2025, the Remuneration and Nomination Committee, having reviewed the documentation of an additional individual suitability assessment conducted by an independent external entity, i.e. PwC Polska Kassel and Partners limited partnership ("PwC"), confirmed:

- the fulfilment of the suitability criteria applicable to the Chair of the Remuneration and Nomination Committee by Ms Monika Marcinkowska and satisfaction by the committee of the criteria applicable to the committee, including the criterion of independence of a sufficient number of members, including independence of the committee Chair;
- the fulfilment of the suitability criteria applicable to the Risk Committee Member by Mr Michał Szczurek and satisfaction by the Committee of the criteria applicable to the Committee, including the criterion of independence of a sufficient number of members, including independence of the Committee Chair,

recommending that the Supervisory Board adopt the above assessments. Following the receipt of positive recommendations from the Remuneration and Nomination Committee, the Supervisory Board accepted both assessments on 21 November 2025.

At the same time, upon reviewing the documents from the suitability assessment made by PwC, on account of the changes to on the Supervisory Board, on 21 November 2025 the Remuneration and Nomination Committee attested that each Member of the Supervisory Board has the knowledge, skills and experience required to hold the function of a Member of the ING Bank Śląski S.A. Supervisory Board, provides assurance of proper performance of duties relating to that function and fulfils other requirements as set out in Article 22aa of the Polish Banking Law Act, and thus meets the adequacy criteria set out in the said Policy. The Committee also attested that the individual competences of the individual Members of the Supervisory Board are complementary and allow for ensuring adequate level of collective performance of supervision duties in respect of all the business areas of the bank and the Supervisory Board as a whole holds the adequate knowledge, skills and experience enabling them to understand the actions of the bank, the main risks included.

There were no changes in the Audit Committee composition in 2025.

Proportion of women and men on the Supervisory Board as at 31 December 2025

43% / 57%

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Composition of the Supervisory Board as at 31 December 2025

	Function in the Supervisory Board	Audit Committee	Remuneration and Nomination Committee	Risk Committee
Ms Monika Marcinkowska	Chair, Independent Member	●	x	●
Ms Małgorzata Kołakowska	First Deputy Chair		●	●
Mr Michał Szczurek	Deputy Chair			●
Ms Dorota Dobija	Independent Member	●	●	x
Mr Arkadiusz Krasowski	Independent Member	x		●
Mr Hans De Munck	Member	●		
Mr Serge Offers	Member	●		

x Chair ● Member

Competency profiles of Supervisory Board Members

Supervisory Board Members have high qualifications. All Members have the relevant experience and knowledge that enable them to exercise oversight of the bank. Five out of the seven Supervisory Board Members are Polish citizens and native speakers of Polish. The other two Members are the citizens of Belgium and the Netherlands. Also, one of the Supervisory Board Members has dual citizenship: Polish and British.

Following the principle set out in the Best Practice for GPW Listed Companies concerning the application of a diversity policy, the bank has a diversity policy and ensures a 30% diversity and with regard to women and men in the Management Board and the Supervisory Board. The composition of the Supervisory Board is diverse and includes people from different backgrounds with a wide range of competencies, practical experience and knowledge, thus ensuring that the Supervisory Board is effectively supervised in all areas of the bank's activities and that the Supervisory Board is able to duly carry out the tasks and responsibilities assigned to it. For more

information on diversity among the Members of the Supervisory Board and the Management Board and the policies adopted in this regard, please click here. The qualifications of the Members of the Supervisory Board of ING Bank Śląski S.A. are presented on the website of the bank. Below are the biographies of the Supervisory Board Members indicating their individual competences.

Ms Monika Marcinkowska – Independent Member of the Supervisory Board
(Chair of the Supervisory Board, Chair of the Remuneration and Nomination Committee, Audit Committee Member, Risk Committee Member)

She received her master's degree from the University of Łódź, Faculty of Management and Marketing, specialty: Accounting. She got her PhD in economic science (management science) and habilitation degree in economic science. She has been Full Professor in economic science since 2014. She is a lecturer and researcher at the University of Lodz. During her professional career, she worked at PBG S.A., Pekao S.A., PKO BP S.A. and BRE Bank S.A., as well as held supervisory functions at Pocztylion-Arka PTE SA, DI Xelion sp. z o.o., and Polski GAZ TUW. She also was Member of the European Banking Authority's Banking Stakeholder Group, where from March 2020 to June 2024 she acted as coordinator of the Sustainable Finance Working Group, and in Belgian think-tank Bruegel. She joined the Supervisory Board of ING Bank Śląski S.A. in 2021.

Ms Małgorzata Kołakowska – First Deputy Chair of the Supervisory Board
(Remuneration and Nomination Committee Member, Risk Committee Member)

She graduated, with a master's degree in economics, from the Faculty of International Trade Economics and Organisation at the Main School of Planning and Statistics (at present Warsaw School of Economics). She completed the Advanced Management Program (AMP) at the Harvard Business School. She was the President of the ING Bank Śląski S.A. Management Board between 2010-2016, and then moved on to hold the function of the Global Head for Wholesale Banking at ING Bank NV Group in Amsterdam. Between 2018 and March 2025, she was the CEO of ING Bank N.V., London Branch (the United Kingdom, Middle East). Before joining ING, she was the Director at the European Bank of Reconstruction and Development (Poland and Baltic Countries) and Finance Director at McDonalds's Poland. At present, since August 2025, she has been the Non-Executive Director in ING Bank (Australia) Limited. She joined the Supervisory Board of ING Bank Śląski S.A. in 2016.

Mr Michał Szczurek – Deputy Chair of the Supervisory Board
(Risk Committee Member)

He graduated, with a master's degree in Economic Science, from a joint programme of Warsaw University and Columbia University. Also studied at the Faculty of Law and Administration, University of Warsaw and at the Department of Computer Sciences, Faculty of Electronics, University of Warsaw. He has been working at ING Group since the formative years of his career. He sat on the Management Boards of: Nationale-Nederlanden Polska PTE S.A. (later ING Nationale-Nederlanden Polska Powszechne Towarzystwo Emerytalne S.A.), ING Nationale-Nederlanden Life Insurance Company, ING Nationale-Nederlanden Polska S.A. and ING Bank Śląski S.A. (supervision of the retail banking area). He also held functions on the Management Board of TMB Bank in Thailand, ING Bank Romania and was the Head of Challengers & Growth Markets (C&G), in ING Asia. Between January 2023 and December 2025, he was the Country Manager for ING Bank Italia. He joined the Supervisory Board of ING Bank Śląski S.A. in 2018.

Ms Dorota Dobija – Independent Member of the Supervisory Board
(Chair of the Risk Committee, Remuneration and Nomination Committee Member, Audit Committee Member)

She received her master's degree in Cybernetics and Computer Science (specialty: Data Processing and Accounting) at Cracow University of Economics. She got her PhD in economic science (specialty: Accounting) at the same university and habilitation degree in economic science (management science) at Kozminski University. She has been Full Professor in economic science since 2015. She is a certified accountant, a lecturer and researcher. She gave lectures at the Cracow University of Economics, the University of Warsaw, amongst others, and Kozminski University where she has worked to this day. She has been sitting on the College of Fellows at the European Academy of Management since 2025. She was also a visiting professor at various universities around the world, including in the Netherlands, USA, Australia, Hongkong and the United Kingdom. She held supervisory functions in XIII National Investment Fund "Fortuna" and Pekao Investment Banking. She joined the Supervisory Board of ING Bank Śląski S.A. in 2021.

Mr Arkadiusz Krasowski – Independent Member of the Supervisory Board
(Chair of the Audit Committee, Risk Committee Member)

He graduated from the Warsaw School of Economics with a master's degree in Finance and Banking. He also completed the General Management Program at Harvard Business School. He is a Certified Information Systems Auditor (CISA) and he is certified in Risk and Information Systems Control (CRISC). A statutory auditor since 2003 and ACCA member since 2010. At present, he is in the process of the PhD dissertation preparation at the Nicolaus Copernicus University, Toruń. He started his professional career at Arthur Andersen Sp. z o.o. in 1998 and continued at Ernst & Young Audit Sp. z o.o., where in 2002-2008 he held managerial roles, and later in 2008-2022 Director and Partner, responsible also for Financial Markets Audit Division – Global Financial Services. Since 2020, he was Audit Committee Member at Harvard Club of Poland, and Audit Committee Chair since 2023. Since 2021 he has been Member of and since 2024 Deputy Chair of the Business Council, at the Nicolaus Copernicus University, Toruń, Faculty of Economic Sciences and Management. Since January 2025, he is Member of the Association of Independent Non-Executive Directors. He joined the Supervisory Board of ING Bank Śląski S.A. in 2024.

Mr Hans De Munck – Member of the Supervisory Board
(Audit Committee Member)

He graduated from the University of Chicago, Graduate School of Business, receiving his master's degree in Business Administration with high honours. He also completed the General Management Program at Vlerick Business School. He was a teaching and research assistant at the Faculty of Applied Economics, Catholic University of Leuven in

Belgium. He has worked at ING Group since the formative years of his career, where he has held managerial functions in the area of asset and liabilities management, market risk management, risk integration and analyses. He has been the Chief Financial Officer at ING Belgium since 2018. He joined the Supervisory Board of ING Bank Śląski S.A. in 2023.

Mr Serge Offers – Member of the Supervisory Board (Audit Committee Member)

He graduated from the University of Amsterdam with a master's degree in Accountancy and Control. He has been working at ING Group since the formative years of his career. He has held various managerial functions there, he was Head of Regulatory Reporting or Head of External Reporting for example. He was the Chief Financial Officer at ING Romania in 2018-2022. He was Head of Business Banking at ING Romania in 2022-2024. Additionally, in 2019-2024 he was Board Member on the Dutch and Romanian Chamber of Commerce and in 2020-2024 Board Member on the Romanian Chamber of Commerce responsible for the diversity area. Since October 2024, he has been Head of Business Banking at ING Germany. He joined the Supervisory Board of ING Bank Śląski S.A. in 2024.

Mr Stephen Creese (Member of the Supervisory Board until 31 August 2025)

He holds a BA in Economics and Economic History from the Faculty of Humanities at the University of Manchester. He also passed the exams and obtained the Certified Information Systems Security Professional (CISSP) certification in information security. From 1998 to 2021, he worked for Citigroup Inc., where he served as Audit Manager, Managing Director responsible for Risk and Control in Operations, Sales and Market Trading, and then Regional Director for Operational Risk – EMEA. Since June 2021, he has been with ING Group as Global Head of Non-Financial Risk. He was a member of the Supervisory Board of ING Bank Śląski S.A. from 2021 to 2025.

Ms Aneta Hryckiewicz-Gontarczyk (Member of the Supervisory Board until 24 September 2025)

She holds a Master's degree in Finance and Accounting and Financial Econometrics. She holds a PhD in Economics and a postdoctoral degree in finance. Since 2023, she has been a research fellow at Said Business School at the University of Oxford, UK. Since 2017, she has been a professor at the Leon Kozminski Academy in Warsaw. She has lectured at the School of Business and Economics, Maastricht University, the Netherlands, and the IESEG School of Management, Paris and Lille, France. She has also lectured at Goethe University in Frankfurt am Main and at Wharton Business School at the University of Pennsylvania, USA. From 2019 to 2023, she was a member of the Polish Academy of Sciences. She has lectured at the School of Business and Economics, Maastricht University, the Netherlands, and at IESEG School of Management, Paris and Lille, France. She has also lectured at Goethe University in Frankfurt am Main and at Wharton Business School at the University of Pennsylvania, USA. From 2019 to 2023, she was a member of the Polish Academy of Sciences. During her professional career, she held supervisory positions at PEKAO Investment Banking in Warsaw. She also held management positions at the Kozminski University, including Head of the Financial Systems Analysis Center and Head of the Economic Empirical Analysis Department since 2017, and Leader of the Big Data Science Program since 2018. Since 2019, she has served as Chair of the Economics and Finance Discipline and, since 2023, as Vice-Chair of the Finance Committee of the Kozminski University Development Foundation. Member of the Supervisory Board of ING Bank Śląski S.A. from 2024 to 2025.

Criterion of independence and possessed competences				
	Satisfies the criterion of independence as per the Act on Statutory Auditors, Auditing Firms and Public Oversight		Knowledge of and competency in accounting or financial statements auditing (including confirmation with the qualifications of the statutory auditor)	Has knowledge of and competency in the banking area
Ms Monika Marcinkowska	yes	yes	professor in economic science (university degree – specialisation: accounting)	yes
Ms Małgorzata Kołakowska	no	yes	competence acquired in the course of carrying out professional activities and exercising functions in the Bank's bodies	yes
Mr Michał Szczurek	no	yes	competence acquired in the course of carrying out professional activities and exercising functions in the Bank's bodies	yes
Ms Dorota Dobija	no	yes	certified accountant, Professor in economic science (university degree - specialisation: data processing and accounting)	yes
Mr Arkadiusz Krasowski	yes	yes	chartered accountant, member of ACCA CRISC certificate, CISA certificate	yes
Mr Hans De Munck	yes	yes	competence acquired in the course of carrying out professional activities and exercising functions in the Bank's bodies	yes
Mr Serge Offers	yes	yes	university degree - specialisation: accounting and controlling, competence acquired in the course of carrying out professional activities and exercising functions in the Bank's bodies	yes

Professional diversity of Supervisory Board Members	
Number of Supervisory Board Members from the financial and audit sector	Number of Supervisory Board Members from the higher education sector
5	2

Competences, rights and obligations of the Supervisory Board

The basic mission of the Supervisory Board is to perform the supervisory function – the Supervisory Board exercises permanent supervision over the bank's activities in all areas. The specific powers and duties of the Supervisory Board include evaluating the report on the bank's activities and the financial statements for the previous financial year, including the statements on the application of corporate governance and sustainability principles, the proposals of the Management Board concerning the distribution of profit or coverage of loss, and submitting an annual written report to the General Meeting on the results of this evaluation.

Apart from the aforementioned rights and obligations, the Supervisory Board adopts resolutions on matters set out in the Bank Charter. Resolutions of the Supervisory Board are passed by an absolute majority of votes, and in the event of a tie, the Chair of the Supervisory Board has the casting vote. Resolutions of the Supervisory Board may be adopted if the meeting is attended by more than half of the Members of the Supervisory Board, including its Chair or Deputy Chair, provided that all Members of the Supervisory Board have been invited. Meetings of the Supervisory Board are held at least 5 times a year. Resolutions of the Supervisory Board may – in the cases specified in the Bank Charter and on the principles set out in *the Supervisory Board Bylaw* – be adopted without holding a meeting, in writing or by means of remote communication.

Detailed principles of the Supervisory Board's operation are set out in the Bank Charter and the Supervisory Board Bylaw adopted by the Supervisory Board. In addition to the rights and obligations provided for in these regulations, the powers of the Supervisory Board include in particular:

- approval of the following adopted by the Bank Management Board: the ING Bank Śląski strategy and the annual financial plan,
- approving the overall level of risk acceptable to the Management Board, including operational and compliance risks,
- supervising the introduction and operation of an adequate and effective risk management system and internal control system at the bank,
- supervising the compliance of the bank's risk-taking regulations in line with the bank's strategy and financial plan,
- selection of an audit firm to audit and review the bank's financial statements and the consolidated financial statements of the bank's capital group, as well as the certification of the sustainability statement,
- adopting the Supervisory Board Bylaw and its committees,
- approving the strategies and procedures developed by the Management Board in the scope of the internal control system, risk management system, internal capital assessment process, capital management and capital planning,
- approving the policies and bylaws adopted by the Management Board, including: *Dividend Policy, Remuneration Policy, Management Board Bylaw, ING Bank Śląski S.A. Organisational Bylaw*,
- giving opinions on motions and matters subject to resolutions of the General Meeting, including draft resolutions of the General Meeting,
- presenting to the Ordinary General Meeting reports and assessments set out in the regulations, recommendations of the supervision authority and other regulations adopted by the bank, including the assessment of the bank's situation, including the assessment of internal control systems, risk management, compliance and the internal audit function,
- assessment of the functioning of the remuneration policy at the bank,
- assessment of the bank's application of the Principles of Corporate Governance for Supervised Institutions,
- appointment and dismissal of Members of the Management Board, as well as suspension of Members of the Management Board and delegating Members of the Supervisory Board to temporarily perform the duties of Members of the Management Board,
- applying to the Polish Financial Supervision Authority for consent to appoint the President of the Management Board and a Member of the Management Board overseeing the management of risks relevant to the bank's operations,
- concluding agreements with Members of the Bank Management Board regarding the performance of their functions and determining the remuneration resulting from these agreements (as part of the general principles adopted by the General Meeting),
- approving the policy of variable components of remuneration for persons holding managerial positions at the bank,
- expressing consent for Members of the Bank Management Board to act as management bodies of companies, societies, organisations and associations outside the bank's capital group,
- granting consent to grant loans, bank guarantees and sureties to Members of the Management Board and Supervisory Board and entities related to them by capital or organisation,

- expressing consent to activities that meet certain statutory criteria, including for the purchase and sale of fixed assets, establishment of a company, acquisition or purchase of shares and stocks, conclusion by the bank of significant transactions with a shareholder, including the consent or opinion on certain transactions with the bank's related entities,
- expressing consent to the appointment and dismissal of directors of the Internal Audit Department and the Centre of Expertise – Compliance and approval of their remuneration,
- considering the regular and exhaustive information received from the Management Board on all significant matters relating to the bank's operations, risks related to the business as well as the methods and effectiveness of risk management.

When exercising supervision over the bank's operations, the Supervisory Board has the right to control the full scope of the bank's operations, in particular:

- checking books, files and documentation,
- auditing the bank's assets and financial control,
- requesting the Bank Management Board to present all documents, materials and information regarding the requesting 's operations,
- request relevant reports and explanations from the bank employees,
- participating in the meetings of the Bank Management Board.

Attendance and topics of the Supervisory Board meetings in 2025

In 2025, Members of the Bank Supervisory Board devoted the necessary amount of time to perform their duties. Between 1 January and 31 December 2025, the Supervisory Board met nine times. The Supervisory Board also passed resolutions by way of circulation (12 cases). Meetings were held on site and in hybrid mode.

Dates of Supervisory Board meetings in 2025

20-21 February | 7 March | 29 April | 27 June | 25 Spetember | 26 Spetember | 17 November | 21 November | 12 December

Dates of meetings of the Supervisory Board by circulation in 2025

14 January | 30 January | 27 February | 18 March | 28 March | 9 April | 16 April | 23 May | 29 July | 1 October | 7 October | 14 October

In total, the Supervisory Board adopted 136 resolutions, including 16 passed by way of circulation. All the meetings were quorate and held in line with the procedures so that binding resolutions could be taken; the attendance rate during the meetings was high.

Attendance of the Supervisory Board Members in 2025 has been shown in the table below.

Attendance in 2025	Attendance at meetings / Number of meetings during the mandate
Monika Marcinkowska	21/21
Małgorzata Kołakowska	21/21
Michał Szczurek	21/21
Dorota Dobija	21/21
Arkadiusz Krasowski	21/21
Hans De Munck	18/21
Serge Offers	21/21
Stephen Creese (SB Member until 31 August 2025)	13/13
Aneta Hryckiewicz-Gontarczyk (SB Member until 24 September 2025)	13/13

During its meetings, the Supervisory Board considered matters resulting from legal regulations and supervisory recommendations, as well as matters related to the current operations of the bank. The Supervisory Board received from the Bank Management Board extensive information on the current economic and financial situation of the bank, its operation, action plans and any important events that may affect its operation.

In addition to regular meetings, the Members of the Supervisory Board stayed in regular and direct contact with the Bank Management Board and took an active part in all the material matters concerning the bank business.

The Chair of the Audit Committee of the previous and new terms of office held regular meetings with the Vice-President of the Management Board overseeing the CFO Division to discuss the bank's financial statements prior to their publication and meetings with the Director of the Internal Audit Department on the specifics of the internal audit function and the Centre of Expertise Lead III – Compliance on issues in the area of compliance risk management. The Chair of the Risk Committee held regular meetings with the managers of individual risk areas;

the former Chair and the present Chair of the Remuneration and Nomination Committee also held regular meetings with the management of the Centre of Expertise – HR.

In the course of the work carried out in Q1 2025, the Supervisory Board prepared and presented to the General Meeting: the required assessment of the bank's situation, including the assessment of internal control systems, risk management, compliance and internal audit functions, as well as a report on the activities of the Supervisory Board. Moreover, the Supervisory Board presented the General Meeting with an assessment of the manner in which the bank fulfils its disclosure obligations, which relate to the application of corporate governance principles, as well as an assessment of the rationality of the bank's sponsorship and charity policy. In 2025, the Supervisory Board considered and gave a favourable opinion on the draft resolutions presented to the General Meeting convened on 29 April 2025.

In the course of its work, the Supervisory Board discusses ESG topics (including ESG risks). The Supervisory Board approves the ESG strategy as part of the Bank's Business Strategy. ESG issues, including environmental, social and corporate governance factors, are addressed by the Supervisory Board as part of the Supervisory Board Sustainability Panel, which has been in place since the second half of 2024. The Supervisory Board examines the area of ESG and sustainability in detail, inter alia, when examining the bank's half-yearly and annual report.

ESG risks, including climate risk, also form part of the Risk Report, which is periodically presented to the Supervisory Board and the Risk Committee. In addition, the Supervisory Board periodically reviews reports on the bank employees' compliance with ethical principles, assesses the adequacy and effectiveness of the system for anonymous reporting of violations of the law, internal regulations and ethical standards. In addition, it analyses information on staff issues as part of the bank's regular OHI surveys.

In 2025, the Supervisory Board focused on the changes in the composition of the Management Board of ING Bank Śląski S.A. throughout the year. Due to the end of the term of office of the Management Board, and having regard to the resolution taken on 3 September 2024 on the appointment of Mr Michał Bolesławski to the position of the CEO of ING Bank Śląski S.A. as of the date of the General Meeting approving the 2024 financial statements and consent of the Polish Financial Supervision Authority Inspection received on 20 December 2024 to appointing Mr Michał Bolesławski to the position of the President of the Bank Management Board, based on the positive recommendations of the Committee for individual candidates for Bank Management Board Members, on 29 April 2025 the Supervisory Board appointed the Bank Management Board for the new term of office. The new term of office included: Mr Michał Bolesławski, President of the Management Board responsible for the CEO Division, Ms Joanna Erdman, Vice-President of the Management Board responsible for the CRO Division, Mr Marcin Giżycki, Vice-President of the Management Board responsible for the Retail Clients Division and Private Banking and Investment Division, Ms Bożena Graczyk, Vice-President of the Management Board responsible for the CFO Division, Mr Marcin Kościński, Vice-President of the Management Board responsible for the Business Clients Division, Mr Michał H. Mrożek, Vice-President of the Management Board responsible for the Wholesale Banking Division, Mr Maciej Ogórkiewicz, Vice-President of the Management Board responsible for the CIO Division and Ms Alicja Żyła, Vice-President of the Management Board responsible for the COO Division.

Ms Ewa Łuniewska was also appointed to the Management Board, taking up the position of Vice-President of the Management Board responsible for the Private Banking and Investments Division on 9 May 2025, i.e. from the date on which the amendment to Article 26.1 of the Bank Charter, covered by Resolution No. 28 of the Ordinary General Meeting of 29 April 2025, was entered into the Register of Entrepreneurs of the National Court Register.

Following resignation tendered by Ms Ewa Łuniewska on 12 December 2025 from capacity of Bank Management Board Member with effect from 31 December 2025, based on the opinion of the Bank CEO and on the Committee recommendation issued following the suitability assessment made, on 12 December 2025 the Supervisory Board appointed Mr Wojciech Sieńczyk to the position of Vice-President of the ING Bank Śląski S.A. Management Board in charge of the Private Banking Clients and Investment Division with effect from 1 January 2026.

Additionally, after the reporting date, following resignation tendered by Mr Michał H. Mrożek from capacity of Bank Management Board Member with effect from end of that day, on 8 January 2026, based on the opinion of the Bank CEO and on the Remuneration and Nomination Committee recommendation issued following the suitability assessment made, the Supervisory Board appointed Ms Agnieszka Wolska to the position of Vice-President of the ING Bank Śląski S.A. Management Board with effect from 1 April 2026. The same day, based on the opinion of the Bank CEO and on the Remuneration and Nomination Committee recommendation issued following the suitability assessment made, the Supervisory Board entrusted Mr Marcin Kościński with temporary supervision over the Wholesale Banking Division in the period from 9 January 2026 by the time the function has been assumed by the newly appointed Bank Management Board Member, i.e. to 31 March 2026.

Supervisory Board Members are continuously improving their competences. In 2025, Members of the Supervisory Board participated in internal training courses organised by the bank. Workshop sessions were held each quarter, in accordance with the training plan adopted by the Supervisory Board, with numerous Supervisory Board Members in attendance. Workshops addressed the management accounting and IT area topics amongst other things. As per the Guidelines on the management of environmental, social and governance (ESG) risks, the Supervisory Board Members also took part in the training session addressing material aspects of ESG and Sustainability (such as taxonomy, reporting, reputational risk).

In order to support Members of the Supervisory Board in their tasks, the Supervisory Board shall appoint Members of the Audit Committee, Remuneration and Nomination Committee and Risk Audit Committee from among its Members.

Remuneration and Nomination Committee

ESRS 2 GOV-3.29

The Remuneration and Nomination Committee supports the Supervisory Board in terms of monitoring and supervision over the bank's human resources and payroll area, and in particular, in the selection of Management Board Members, the diversity policy, suitability assessment of Management Board Members, succession plans, staff rotation processes, satisfaction surveys of the bank employees, and the remuneration and bonus policy, including the policy of components of variable remuneration.

The activities of the Remuneration and Nomination Committee are described in detail in *the ING Bank Śląski S.A. Supervisory Board Remuneration and Nomination Committee Bylaw* adopted by the Supervisory Board.

The Remuneration and Nomination Committee meets at least once a quarter.

The Remuneration and Nomination Committee consists of at least 3 Members of the Supervisory Board. Most of the Remuneration and Nomination Committee Members, including the Chair, should meet the criteria for Independent Members of the Supervisory Board. Currently, the Committee consists of three Members, including two Independent Members of the Supervisory Board.

H2 2025 saw the following changes to the composition of the Remuneration and Nomination Committee. On 24 September 2025, Ms Aneta Hryckiewicz-Gontarczyk tendered her resignation from the capacity as the Supervisory Board Member, effective as of 24 September 2025. Accordingly, the Supervisory Board changed the composition of the Remuneration and Nomination Committee at an additional meeting on 25 September 2025. Thus, as of 25 September 2025, the Remuneration and Nomination Committee worked in the following composition: Ms. Monika Marcinkowska, Chairwoman of the Committee and Ms. Dorota Dobija and Ms. Małgorzata Kołakowska, members of the Committee.

Ms Monika Marcinkowska and Ms Dorota Dobija are Independent Members of the Supervisory Board.

At the same time, the Supervisory Board decided to commission an individual assessment of the suitability of Ms Monika Marcinkowska to act as Chair of the Remuneration and Nomination Committee and a collective suitability assessment of the Remuneration and Nomination Committee. Next, on 21 November 2025 having reviewed the documents from the additional individual suitability assessment made by PwC, the Committee attested satisfaction of suitability criteria applicable to the Chair of the Supervisory Board Remuneration and Nomination Committee by Ms Monika Marcinkowska and satisfaction by the Committee of the criteria applicable to the Committee, including the criterion of independence of a sufficient number of members, including independence of the Committee Chair, and recommended that the Supervisory Board adopt the above assessments. Following the positive recommendations of the Committee, on 21 November 2025 the Supervisory Board adopted both assessments.

As at 2025 yearend, the Remuneration and Nomination Committee was composed as follows:

- Monika Marcinkowska – Chair (independent Member),
- Dorota Dobija – Member (independent Member),
- Małgorzata Kołakowska – Member.

Biographies of the Committee Members showing individual competences are presented here.

Competences, powers and tasks of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee's competences include, inter alia:

- selecting and assessing the suitability of Management Board Members, including analysing candidates for Management Board Members and presenting recommendations to the Supervisory Board in this regard and determining the scope of duties for a candidate to the Bank Management Board,
- presenting proposals regarding the content of agreements for the performance of the functions of a Management Board Member, taking into account the amount of remuneration, including variable remuneration,
- overseeing the policy regarding the selection and appointment of persons holding managerial positions at the bank,
- monitoring succession plans, employee turnover processes and the bank employee satisfaction survey,
- supervising the policy of the remuneration system in place at the bank, including monitoring of the remuneration and bonus policy, supervising the Variable Remuneration *Policy for the Identified Staff of ING Bank Śląski S.A.*,
- monitoring mechanisms to control the level of remuneration of the staff of the Internal Audit Department and the Centre of Expertise – Compliance and to protect the staff of these units from unjustified termination of employment,
- overseeing the remuneration package for those responsible for control functions reporting directly to the Management Board of ING Bank Śląski S.A.,
- submitting recommendations to the Supervisory Board regarding the approval of *the Policy for the Assessment of the Suitability of the Members of the Supervisory Board, Management Board and Key Function Holders at ING Bank Śląski S.A.* and changes to its content,
- determining the target value of the representation of the underrepresented gender in the Bank Management Board and Supervisory Board,
- developing a diversity policy in the composition of the Bank Management Board and Supervisory Board,
- periodic assessment of the structure, size, composition and effectiveness of the Management Board,
- periodic analysis of the knowledge, competences and experience of the Management Board as a whole and of individual Members of the Management Board,
- analysis of succession and employee development plans, in particular of managerial staff,

- monitoring the fluctuation process of the bank employees based on interim reports presented by the Management Board,
- monitoring the processes of testing the satisfaction of the bank employees, in particular with regard to methodology, research results and actions taken on their basis,
- developing proposals for the remuneration of Members of the Supervisory Board and presenting them to the Supervisory Board in order to submit a motion to the General Meeting,
- analysis of the remuneration and bonus policy, with particular emphasis on remuneration of senior management,
- presenting the Supervisory Board with recommendations on the results of the review carried out by the heads of units of the Internal Audit Department and the Centre of Expertise – Compliance in cooperation with HR regarding the level and structure of employment and remuneration,
- presenting the Supervisory Board with recommendations regarding information on the implementation of the remuneration policy in relation to the manager and employees of the Internal Audit Department, as well as the manager and employees of the Centre of Expertise – Compliance, taking into account possible changes and the remuneration budget.

Attendance and topics of the Remuneration and Nomination Committee meetings in 2025

Between 1 January to 31 December 2025, the Remuneration and Nomination Committee held nine meetings. The Remuneration and Nomination Committee also issued one opinion, one recommendation and two decisions by way of circulation. The meetings of the Remuneration and Nomination Committee were held at the following dates: 20 February, 7 March, 27 March, 29 April, 11 June, 26 September, 6 October, 21 November and 12 December, by way of circulation on 13 March, 27 June and 14 July.

The Committee issued 47 recommendations, 5 opinions, 12 decisions and 18 assessments (including 1 opinion, 1 recommendation and 2 decisions by way of circulation) in total.

All the meetings were quorate and held in line with the procedures so that binding recommendations could be issued; the attendance rate during the meetings was high. The attendance of Remuneration and Nomination Committee Members at the 2025 Committee meetings is given in the table below.

Attendance in 2025	Attendance at meetings / Number of meetings during the mandate
Monika Marcinkowska (Committee Chair)	12/12
Dorota Dobija (Committee Member)	12/12
Małgorzata Kołakowska (Committee Member)	12/12
Aneta Hryckiewicz-Gontarczyk (Committee Chair until 24 September 2025)	8/8
Michał Szczurek (Committee Member until 24 September 2025)	8/8

In 2025, the work of the Remuneration and Nomination Committee was primarily focused on the following areas:

- proactively overseeing the process of suitability assessment of Members of the Supervisory Board, the Management Board and persons performing key functions in the bank, including:
  - periodic annual suitability assessment of the Bank Supervisory Board and Management Board,
  - suitability assessment of candidates for Members of the Bank Management Board in conjunction with the new term of office,
  - suitability assessment of Supervisory Board Members in conjunction with assuming new functions on the Risk Committee and Remuneration and Nomination Committee,
  - collective suitability assessment of the Risk Committee, Remuneration and Nomination Committee and Supervisory Board as needed,
  - suitability assessment of Management Board Members due to entrusting them with a new role and Supervisory Board Members following a change in engagement,
- monitoring the adequacy and effectiveness of the bank's employment policy,
- succession review for the positions of the Management Board Members,
- monitoring the adequacy and effectiveness of the bank's remuneration policy,
- analysing information on pay policy/practice assumptions for 2025 and 2026,
- assessment of the level of achievement of goals for 2024 by Members of the Bank Management Board and setting bonus tasks for 2025,
- development and submission to the Supervisory Board of recommendations on the *Report regarding the implementation of the pay policy in relation to the internal audit employees and the Chief Audit Executive*,
- development and submission to the Supervisory Board of recommendations on the *Report regarding the implementation of the pay policy in relation to the employees and Lead II of the Centre of Expertise – Compliance*,

- analysing the proposals submitted by the Management Board for the remuneration packages of the bank's control functions,
- analysis of the results of the remuneration review based on the Hay Group report.

In 2025, the Remuneration and Nomination Committee focused on the appointment process for the Bank Management Board in particular.

In connection with the expiry of the term of office of the Management Board of the Bank, and having regard to the resolution adopted on 3 September 2024 on the appointment of Mr Michał Bolesławski as President of the Management Board of the Bank as from the date of the General Meeting of Shareholders approving the financial statements for 2024 and having regard to the receipt on 20 December 2024 of the consent of the Polish Financial Supervision Authority for the appointment of Mr Michał Bolesławski as President of the Management Board of the Bank, on 29 April 2025, having reviewed the documentation of the suitability assessment carried out for the President and candidates for Members of the Management Board of the Bank for a new term of office, i.e., Ms Joanna Erdman, Mr Marcin Giżycki, Ms Bożena Graczyk, Ms Ewa Łuniewska, Mr Marcin Kościński, Mr Michał H. Mrożek, Mr Maciej Ogórkiewicz and Ms Alicja Żyła by the independent entity PwC, the Remuneration and Nomination Committee confirmed the fulfilment of the suitability criteria applicable to the above functions, recommending that the Board adopt the above assessments by means of resolutions. The Committee has thus confirmed that all the above-mentioned candidates for the Management Board of the new term meet the suitability criteria.

Next, considering the changes to the Management Board composition in the course of the year and following resignation tendered by Ms Ewa Łuniewska from capacity of Bank Management Board Member with effect from 31 December 2025, having reviewed the documents from the suitability assessment conducted by Mr Wojciech Sieńczyka, for the candidate for Bank Management Board Member by a third party, PWC, on 12 December 2025, the Committee attested satisfaction of the suitability criteria applicable to the position of the Vice-President of the Management Board of ING Bank Śląski S.A in charge of the Private Banking Clients and Investment Division with effect from 1 January 2026 by the candidate for the Management Board Member and recommended that the Supervisory Board adopt the assessment of Mr Wojciech Sieńczyk in respect to the said position.

In addition, already after the reporting date, in connection with the resignation of Mr Michał H. Mrożek submitted on 8 January 2026 from the position of Member of the Bank Management Board, effective at the end of that date, the Committee on 8 January 2026, having reviewed the documentation of the suitability assessment conducted for Ms Agnieszka Wolska – candidate for Member of the Bank Management Board by the independent entity PwC, confirmed the fulfilment of the adequacy criteria applicable to the position of Vice-President of the Management Board of ING Bank Śląski S.A. responsible for the Wholesale Banking Division as of 1 April 2026 by the Management Board Member candidate and recommended that the Supervisory Board accept the assessment of Ms Agnieszka Wolska for this position.

Risk Committee

The Risk Committee supports the Supervisory Board in terms of monitoring and supervision over the risk management process, including the operational risk, the credit risk, and the market risk, and also the internal capital estimation process, capital management and planning and the model risk, and the capital adequacy area.

The activities of the Risk Committee are described in detail in t*he ING Bank Śląski S.A. Supervisory Board Risk Committee Bylaw adopted by the Supervisory Board*.

The Risk Committee at least once a quarter.

According to the Bylaw, the Risk Committee is composed of at least 3 Members of the Supervisory Board. Most Committee Members, including the Chair, should meet the criteria for Independent Members of the Board.

2025 saw the following changes on the Risk Committee:

On 27 June 2025, Mr Stephen Creese tendered his resignation from the capacity as the Supervisory Board Member, effective as of 31 August 2025. On 24 September 2025, Ms Aneta Hryckiewicz-Gontarczyk tendered her resignation from the capacity as the Supervisory Board Member, effective as of 24 September 2025. The resignations affected the composition of the Risk Committee. Accordingly, the Supervisory Board changed the composition of the Risk Committee at an additional meeting on 25 September 2025.

At the same time, the Supervisory Board resolved to commission an individual suitability assessment of Mr Michał Szczurek on account of holding the role of a new Risk Committee Member and a collective suitability assessment of the Risk Committee. Next, having reviewed the documents from the additional individual suitability assessment made by PwC, on 21 November 2025 the Remuneration and Nomination Committee attested satisfaction of suitability criteria applicable to the Risk Committee Member of the ING Bank Śląski S.A. Supervisory Board by Mr Michał Szczurek and satisfaction by the Committee of the criteria applicable to the Committee, including the criterion of independence of a sufficient number of members, including independence of the Committee Chair, and recommended that the Supervisory Board adopt the above assessments. Following the positive recommendations of the Committee, on 21 November 2025 the Supervisory Board adopted both assessments.

As at 2025 yearend, the Risk Committee was composed as follows:

- Dorota Dobija – Chair (independent Member),
- Małgorzata Kołakowska – Member,
- Arkadiusz Krasowski – Member (independent Member),
- Monika Marcinkowska – Member (independent Member),
- Michał Szczurek – Member.

Currently, the Risk Committee consists of 5 Members, including 3 Independent Members.

Biographies of the Committee Members showing individual competences are presented here.

Competences, powers and tasks of the Risk Committee

The competences of the Risk Committee include inter alia:

- determining the bank's current and future risk appetite,
- giving opinions on the risk management strategy in the bank's operations developed by the Bank Management Board and the information submitted by the Management Board regarding the implementation of this strategy,
- supporting the Supervisory Board in supervising the implementation of the risk management strategy in the bank's operations by senior management, estimating internal capital and reviewing strategies and procedures for estimating internal capital and maintaining internal capital on a permanent basis,
- verification whether the prices of liabilities and assets offered to clients fully reflect the bank's business model and its risk strategy,
- giving an opinion on the Supervisory Board's appointment of external experts,
- making recommendations to the Supervisory Board regarding changes in key risk positions,
- presenting the Supervisory Board with recommendations on granting a cash loan, bank guarantee, surety or other off-balance sheet obligations to Members of the Management Board, Supervisory Board and other persons indicated in Article 79-79c of the Banking Law, to the extent that the consent of the Board is required,
- analysis of information on the bank's remuneration policy/practice.

Attendance and topics of the Risk Committee meetings in 2025

Between 1 January and 31 December 2025, the Risk Committee met seven times. The Committee also issued recommendations and decisions by way of circulation (eight cases). The meetings of the Risk Committee were held at the following dates: 21 February, 6 March, 29 April, 7 May, 11 June, 25 September and 21 November, and by way of circulation on: 30 January, 9 April, 16 April, 23 May, 29 July, 1 October and 7 October. The Committee issued 36 recommendations in total (including 7 by way of circulation) and 3 decisions, including 2 by way of circulation.

All the meetings were quorate and held in line with the procedures so that binding recommendations could be issued; the attendance rate during the meetings was high.

Attendance of the Risk Committee Members in 2025 has been shown in the table below.

Attendance in 2025	Attendance at meetings / Number of meetings during the mandate)
Dorota Dobija (Committee Chair)	15/15
Małgorzata Kołakowska (Committee Member)	15/15
Arkadiusz Krasowski (Committee Member)	15/15
Monika Marcinkowska (Committee Member)	15/15
Michał Szczurek (Committee Member as of 26 September 2025)	3/3
Stephen Creese (Committee Member until 31 August 2025)	10/10
Aneta Hryckiewicz-Gontarczyk (Committee Member until 24 September 2025)	13/13

As part of the risk monitoring process at the bank, the risk report was a regular item on the Risk Committee agenda in 2025. The Report is structured into the reports from the credit risk, market risk, operational (non-financial) risk and model risk areas. Updates on CHF mortgage loans, and also various aspects of the ESG and climate risk were an essential element of the report discussed. In 2025, the work of the Committee was also focused, inter alia, in the following areas:

- monitoring the adequacy and efficiency of the risk management system at the bank,
- development and presentation of recommendations to the Supervisory Board in the field of documents relating to the risk management area, including *the Risk Management Strategy for 2025-2027*,
- development and presentation of recommendations to the Supervisory Board on key risk appetite limits for the retail and corporate credit risk areas and the Non-financial Risk Appetite Statement,
- development and submission to the Supervisory Board of recommendation regarding the types of agreements made by the bank that, in the Committee's view, should be classified as having a material impact on the financial- and legal standing of the bank,
- analysis of the *2024 ING Bank Śląski S.A. ICAAP Report*, and
- analysis of *the ING Bank Śląski S.A. ILAAP Review Report for 2024*,
- analysis of the pay policy/practice assumptions for 2025 and 2026.

To fulfil the requirement arising from *Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms amending Regulation (EU) No. 648/2012* as amended as well as from *Recommendation M* concerning operational risk management at banks and *Recommendation Z* concerning internal governance principles at banks, in 2025 the Risk Committee also focused on the process of development and quarterly disclosure by the bank of interim qualitative and quantitative

information on capital adequacy which is disclosed on a quarterly basis for the ING Bank Śląski S.A. Group. In 2025, the Risk Committee periodically issued decisions in this regard.

Audit Committee

The Audit Committee supports the Supervisory Board in monitoring and supervising the financial reporting process, internal and external audit and the management system at the bank and its subsidiaries, in particular the adequacy and effectiveness of the internal control system and the risk management system, relations between the bank and the entity performing the audit bank's financial statements.

The activities of the Audit Committee are described in detail in *the ING Bank Śląski S.A. Supervisory Board Audit Committee Bylaw adopted by the Supervisory Board*.

The Audit Committee at least once a quarter. While performing its tasks, the Audit Committee may use the assistance of experts.

Pursuant to the bylaw, the Audit Committee consists of at least 3 Members of the Supervisory Board. Most Members of the Audit Committee, including its Chair, should meet the criteria of independence, and at least one of the Independent Members in the Audit Committee should additionally have qualifications in the field of accounting or financial audit. Currently, the Audit Committee consists of three Independent Members of the Supervisory Board, which meets the requirements set out in the Act of 11 May 2017 on Statutory Auditors, Audit Firms and Public Supervision.

In 2025, the composition of the Audit Committee remained unchanged.

As at 2025 yearend, the composition of the Audit Committee was as follows:

- Arkadiusz Krasowski – Chair (independent member),
- Dorota Dobija – Member (independent member),
- Monika Marcinkowska – Member (independent member),
- Hans de Munck – Member,
- Serge Offers – Member.

As required under *the Statutory Auditors Act of 11 May 2017*, the majority of the Committee Members, the Committee Chair included, satisfy the independence criteria. Mr Arkadiusz Krasowski is a statutory auditor and ACCA Member. He also holds CRISC and CISA certificates. In addition, Ms Monika Marcinkowska and Ms Dorota Dobija have knowledge and experience in the field of accounting/auditing confirmed by the title of professor. The other Members of the Committee, i.e. Mr Hans De Munck and Mr Serge Offers, have competences acquired in the course of their professional activities. Mr Serge Offers also graduated from accountancy and control faculty.

Biographies of the Committee Members showing individual competences are presented here.

Competences, powers and tasks of the Audit Committee

The Audit Committee's remit includes:

- monitoring of the financial reporting process,
- monitoring the effectiveness of internal control systems, internal audit and risk management, including financial reporting,
- monitoring of financial audit activities, especially performance of an audit by an auditing firm taking into consideration conclusions and findings of the National Audit Oversight Committee resulting from controls conducted in an auditing firm,
- controlling and monitoring of the independence of a statutory auditor and an auditing firm, especially in the event whereby an auditing firm performs services other than audit.

The Audit Committee's tasks also include:

- supervising the bank's relations with related entities by monitoring the agreements concluded by the bank with these entities,
- performing other supervisory activities in the areas specified separately by the Supervisory Board or resulting from internal regulations approved by the Supervisory Board,
- assessment and presentation of recommendations in the field of dividend policy,
- development and presentation of recommendations to the Supervisory Board regarding the implementation of the policy of selecting an audit firm to conduct the audit and the policy of providing permitted non-audit services by the audit company conducting the audit, by entities related to this audit company and by a member of the audit company's network,
- defining and adopting the procedure for selecting an audit firm.

Attendance and topics of the Audit Committee meetings in 2025

Between 1 January and 31 December 2025, the Audit Committee held five meetings. The Committee also issued recommendations and decisions by way of circulation (four cases). The meetings were held at the following dates: 21 February, 6 March, 11 June, 25 September and 22 November, and by way of circulation on: 20 February, 12 June, 14 October and 17 November.

In line with the requirements of *the Good practices for public interest entities concerning the rules of establishment, composition and functioning of the Audit Committee* issued by the Polish Financial Supervision Authority Office

dated 24 December 2019 and the Audit Committee Bylaw, on 6 March 2025 the Audit Committee held separate closed meetings with the CFO and representatives of the internal and external audit.

The Audit Committee issued 26 recommendations for the Supervisory Board in total (including 3 by way of circulation) as well as 4 decisions (including 1 by way of circulation). All the meetings were quorate and held in line with the procedures so that binding recommendations could be issued; the attendance rate during the meetings was high.

The attendance of Audit Committee Members at Committee meetings in 2025 is given in the table below.

Attendance in 2025	Attendance at meetings / Number of meetings during the mandate
Arkadiusz Krasowski (Committee Chair)	9/9
Dorota Dobija (Committee Member)	9/9
Monika Marcinkowska (Committee Member)	9/9
Hans De Munck (Committee Member)	7/9
Serge Offers (Committee Member)	9/9

In 2025, the work of the Committee focused primarily on the following areas:

- monitoring of the adequacy and effectiveness of the internal control system and risk management system, including compliance risk,
- supervision of the bank's relationship with the entity auditing the financial statements of the bank, including consent to provision by that entity of the additional assurance service for the bank, and analysis of the work performed by the entity authorised to audit the financial statements and audit results as well as Bank Management Letter assumptions,
- assessment of the annual financial statements of ING Bank Śląski S.A. and the ING Bank Śląski S.A. Group, together with the sustainability statement and attestation of this reporting,
- running the process of selecting the auditing firm to audit the financial statements and provide attestation services of the Bank's sustainability statement for the period 2026-2027,
- analysis of the information and materials provided from time to time by the external auditor and presentations of the external auditor delivered for the Audit Committee Members directly at Committee meetings,
- regular analysis of periodical reports from the Chief Audit Executive on the status of the annual audit plan 2025 delivery and the status and changes in due dates of audit issue closure, and
- monitoring of compliance area works, AML area in particular.

Other areas of work for the Audit Committee in 2025 include:

- monitoring of the bank's relationship with related entities, including analysis of a periodic update on agreements with related entities,
- supervision of compliance area at the bank, including development and submission to the Supervisory Board of recommendations on amendments to *the Bylaw of the Centre of Expertise – Compliance and Policy on duties of the statutory bodies of ING Bank Śląski S.A. in the area of anti-money laundering and terrorist financing*,
- continuous analysis of periodic reports quarterly compliance risk report,
- analysis of a list of critical- and high-risk recommendations,
- analysis of information on financial and regulatory reporting and control environment for reporting.

In addition, in the course of its work in 2025, the Committee addressed the issues outlined in the Good Practices for Public Interest Entities Concerning the Rules of Establishment, Composition and Functioning of the Audit Committee published on 24 December 2019 by the Office of the Polish Financial Supervision Authority. With the records of the practices in mind, it took action on:

- monitoring of the financial reporting process,
- monitoring of effectiveness of internal control systems, internal audit as well as risk management,
- monitoring of financial revision,
- controlling and monitoring the independence of the statutory auditor and audit firm, in particular when services other than audit are provided to the public interest entity by the audit firm.

The Audit Committee – based on the information and documents provided by the Bank Management Board as well as analyses during the sessions – made assessment of risk of the processes and areas under monitoring. The Committee's assessment did not differ from the assessments made by the Board. The work carried out did not identify any areas for which the actions taken by the Management Board were inadequate to the bank's situation, market requirements or regulatory recommendations. The banking areas of particular focus of the Committee comprised: compliance, cooperation with the statutory auditor, anti-fraud, Know Your Customer, model risk, IT and outsourcing.

Internal Audit

The bank's risk management and internal control systems are organised on three independent levels (the so-called Three Lines of Defence Model), where the Internal Audit Department (hereinafter: Internal Audit) acts as a third line of defence. Internal Audit's primary responsibility is to independently and objectively assess the adequacy and effectiveness of the functioning of the internal control system, the risk management system, organisational governance and the systems and processes in place. This task is carried out through regular audits conducted at the bank, covering all significant areas of the bank's and its subsidiaries' activities. In addition, the internal audit function of ING Bank Śląski Group has been separated into ING Bank Hipoteczny S.A.

Internal Audit's tasks are carried out in accordance with the Audit Charter approved by the Bank Supervisory Board and with the provisions of the International Standards for the Professional Practice of Internal Auditing set out by the Institute of Internal Auditors (IIA), taking into account the requirements set out by the supervision authority (PFSA Office) in particular in Recommendation H. The last positive external verification of the Internal Audit's compliance with these provisions, carried out over a five-year cycle, took place in May 2021. In addition, the bank's internal auditors are required to comply with the principles set out in the Institute of Internal Auditors' Code of Ethics.

A key factor for the proper performance of audit tasks is to ensure the full independence of the bank's internal audit function. A number of organisational arrangements are used for this purpose, the most important of which are:

- proper positioning in the organisational structure – Internal Audit reports directly to the Bank's President of the Management Board and is supervised directly by the Audit Committee in terms of audit activities and methodology,
- the auditors' remuneration is not linked to the bank's financial performance,
- approving the appointment and removal of the Head of Internal Audit by the Bank Supervisory Board,
- monitoring potential conflicts of interest of auditors.

Internal Audit's independence is further strengthened by:

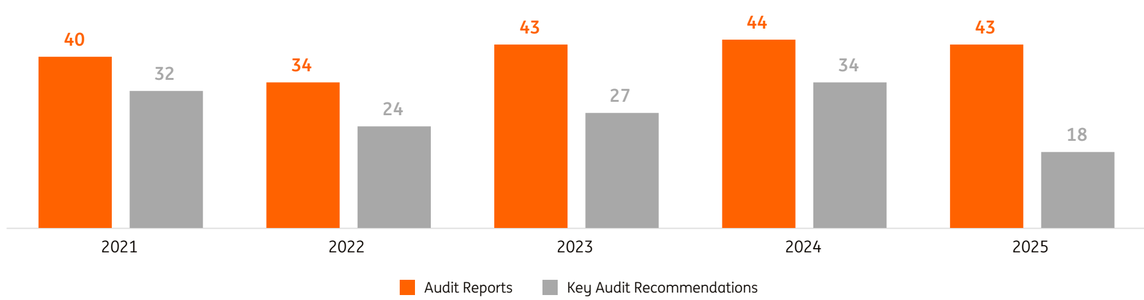
- direct contact between internal auditors and Members of the Management Board, Audit Committee, Supervisory Board and the bank's auditor,
- the participation of Internal Audit representatives in all meetings of the Bank Management Board, Audit Committee and Supervisory Board,
- non-involvement of internal auditors in the bank's operational activities.

Internal Audit auditors are required to perform their tasks with objectivity and due professional care. As at 2025 yearend, 73% of the bank's internal auditors held recognised industry certifications (e.g. CIA, CISA, ACCA). In addition, the bank supported them to further develop their professional skills. The average training hours completed per auditor in 2025 was 67.

In 2025, Internal Audit performed all planned audit tasks, issuing 43 reports and 18 key post-audit recommendations.

The audit plan was periodically reviewed and modified to cover areas currently relevant to the bank's strategy and to take into account the expectations of the supervision authority. In addition, eight audits assessed the maturity level of the organisation's risk culture in the audited area. Internal Audit monitored the status of the implementation of the post-audit recommendations and those from the regulators on an ongoing basis and gave an opinion on the correctness of their implementation. In 2025, the bank implemented the key audit recommendations substantially on time and there were no overdue items as at 31 December 2025. The results of the work and monitoring carried out by Internal Audit were periodically reported to the Management Board, the Audit Committee and the Bank Supervisory Board.

Audit plan 2021-2025



Risk control and management system in the process of preparing financial statements

The process of preparing financial statements is carried out within the CFO Division as one of the key elements of compliance with the standards. The basic elements enabling the implementation of the process are *the Accounting Policy* adopted by the Bank Management Board and the organisation of accounting in the bank, defining the main

principles of recording the bank's economic events. As a consequence of recording events, the bank's books are created, which are the basis for the preparation of financial statements.

The bank has identified the following risks in the process of preparing its financial statements:

- risk of erroneous input data,
- the risk of incorrect data presentation in financial statements,
- the risk of untimely reporting to external recipients,
- the risk of using erroneous estimates,
- the risk of lack of integration of IT systems and operational and reporting applications.

In order to mitigate this risk, the bank defined the structure of the process of preparing financial statements in two layers: application and content.

The application part of the process consists of the data flow from the bank's basic operating systems through a series of interfaces to the reporting database on which reporting applications are embedded. The application layer is controlled in accordance with the bank's IT Risk Policy at ING Bank Śląski S.A. Controls include user management, development environment management, integrity of data transfer systems, including the correct operation of interfaces in terms of completeness of data transfer from operating systems to the reporting environment.

The bank has a process description according to the principles adopted for the correct management of the financial statements process. The description includes the key elements occurring in the process and the identification of their performers. In addition, *the Manual Describing the Approach to Financial and Regulatory Reporting at ING Bank Śląski S.A.* identifies key control points. The key controls embedded in the process of preparing the bank's financial statements include the following:

- quality control of input data for the financial statements, supported by data control applications; a number of data validity rules, an error correction path and close monitoring of data quality levels are defined in the applications,
- assessing the impact of new and/or updated regulations on the reporting process,
- monitoring the timeliness of reports submitted,
- review and approval of manual postings/corrections, including supporting documentation,
- review and approval of the results of the reconciliation,
- control of data mapping from source systems to financial statements, which ensures correct data presentation,
- an analytical review based on the knowledge of specialists, the main goal of which is to confront the knowledge of business with financial data and to detect possible signals of incorrect data presentation, or incorrect input data,
- approval of reporting reports.

Key controls and the risks they cover are covered by the internal control system, the key control environment, which is subject to ongoing monitoring, including periodic risk appetite assessments and control effectiveness testing by dedicated monitoring units and internal audit. The bank's financial reporting process also complies with the SOx regulatory requirements required by ING Group N.V.

A description of the estimates adopted by the bank, in line with IAS/IFRS, is included in t*he Accounting Policy of ING Bank Śląski S.A.* In order to avoid the risk of erroneous estimates, the bank has adopted, inter alia, the following solutions:

- for the assessment of loan impairment – the bank has implemented specific models and applications as well as internal regulations for credit risk assessment,
- for the valuation of debt financial instruments quoted on active markets or for which the valuation is based on these quotations, the bank has implemented the required functionality of the core systems and, in addition, has introduced controls by the market risk management units,
- for the estimation of provisions for legal risk related to Swiss franc-indexed mortgage loans – the bank estimated their impact based on a scenario analysis differentiated by the probability of invalidation judgments and the bank's expected scale of settlements with clients,
- for the estimation the impact of a change in the interpretation of the provisions on commission reimbursements on consumer loans – assumptions were made regarding the expected outflows from complaints and prepayment profiles based on historical data,
- for the valuation of financial instruments not quoted in active markets – the bank implemented valuation models that were subject to prior validation before application,
- for the estimation of the provision for retirement and disability benefits – the bank commissioned an independent actuary to make the estimate,
- for the estimation of the provision for employee and managerial bonuses – the bank uses calculations in accordance with the bonus regulations adopted by the bank, using the forecast of the bank's results,
- for the valuation of its own real estate – the bank adopted as a rule obtaining a valuation from independent experts with a frequency of 3-5 years.

A detailed description of the accounting policies is included in the Annual Consolidated Financial Statements of ING Bank Śląski S.A. for 2025, under Accounting Policy and Additional Notes.

The bank's organisational structure put in place allows for a division of responsibilities between Front-office, Back-office, Risk and Finance. Additionally, the introduction of an appropriate internal control system enforces the implementation of control of transactions and financial data in back-office units and support units. This area is subject to an independent and objective assessment by the Internal Audit Department, both in terms of the adequacy of the internal control system, risk management and corporate governance. Read more about Internal Audit's role in control and risk management processes here.

Selection of the entity authorised to audit the financial statements and attest sustainability reporting

The selection of the audit firm for the audit of the separate and consolidated financial statements and the attestation of the Bank Group's sustainability statement for 2025 was made in accordance with the applicable regulations, including the regulations on the selection and procedure for the selection of the audit firm.

The Bank has a Policy of Selecting an Audit Firm to Audit Financial Statements, Assessing its Independence and Providing Other permitted Services at ING Bank Śląski S.A., which includes a policy for the selection of the audit firm for the audit of financial statements and for the attestation of sustainability reporting, and a policy for the provision to the bank – by the audit firm, an affiliate of the audit firm or a member of its network – of additional services that are not audit and attestation of sustainability reporting, including services conditionally exempted from the audit firm's prohibition.

The independent auditor for the audit of the financial statements is selected by the Bank Supervisory Board on the recommendation of the Audit Committee (more about the role of the Audit Committee can be found here). The selection is made taking into account the need to consolidate the financial statements and the related unified approach of ING Group N.V. regarding the rules for auditor changes. This approach meets the requirements of existing EU legislation.

Main assumptions of the developed *Policy of Selecting an Audit Firm to Audit Financial Statements, Assessing its Independence and Providing Other permitted Services at ING Bank Śląski S.A.*:

- the Audit Committee makes a decision regarding the approval of engaging an auditor (the audit firm conducting the audit and assurance of sustainability reporting, an entity related with this audit firm, or a member of the audit firm's network) to provide permitted services that are not audits or assurance services in the area of sustainability reporting,
- the provision of permitted services is possible only to the extent unrelated to the bank's tax policy, after the Audit Committee assesses the threats and safeguards to the independence of the statutory auditor and the audit firm,
- the verification and monitoring of the auditor's or audit firm's independence is carried out at each stage of the process of selecting an audit firm to carry out the audit and attestation of sustainability reporting.

When making the final selection, the Supervisory Board, and the Audit Committee at the stage of preparing recommendations, are guided by the following transparent and non-discriminatory selection criteria, which are used by the bank to evaluate offers submitted by audit firms:

- assessing the independence of the audit firm to carry out the audit and attestation of sustainability reporting already at the stage of the selection procedure,
- the ability to provide the full range of services specified by the bank (audit of individual accounts, audit of consolidated accounts, reviews, etc.),
- the firm's previous experience in auditing and attesting sustainability reporting of entities with a similar business profile to the bank,
- the firm's previous experience in auditing and attesting the sustainability reporting of public interest entities in the banking sector,
- professional qualifications, experience appropriate to the activities to be carried out within the framework of the study and attestation of sustainability reporting, and the number of people directly involved in providing the service,
- the proposed pricing terms by the audit firm to carry out the audit and attestation of sustainability reporting,
- a commitment to ensuring the quality of sustainability reporting research and attestation required by relevant professional standards.

On 9 December 2022, the Supervisory Board of the Bank selected Mazars Audyt Spółka z ograniczoną odpowiedzialnością, based in Warsaw (from 2024, Forvis Mazars), as the entity authorised to conduct the audit and review of the financial statements of ING Bank Śląski and the Bank's Group for the years 2023-2025. The selection was made on the basis of the recommendation of the Audit Committee, which was drawn up following a selection procedure organised by the bank that met the applicable criteria. The selection was made taking into account the two bids submitted and the Audit Committee's recommendation met the applicable conditions, with the proviso that, in view of the non-fulfilment of the condition regarding the need to obtain authorisation from the PFSA included in one of the bids, the recommendation identified one proposed audit firm.

On 6 December 2024, the Bank Supervisory Board also selected Forvis Mazars Audyt Sp. z o.o., with its registered office in Warsaw, as the entity authorised to carry out the attestation of the Bank Group's sustainability reporting for 2024. An analogous choice, regarding the attestation of sustainability reporting for 2025, was made by the Bank Supervisory Board on 21 November 2025.

The audit and review contract for 2023-2025, between the bank and Forvis Mazars, was signed on 22 June 2023. The 2025 study is the third year of collaboration with Forvis Mazars. On 3 March 2025, the bank concluded an annex to the indicated agreement, covering the attestation of the Bank Group's sustainability reporting for 2024. A further annex, concerning the attestation of reporting for 2025, was signed on 12 December 2025.

According to the statement provided, the audit firm Forvis Mazars Audyt spółka z ograniczoną odpowiedzialnością and the members of the audit and sustainability reporting attestation team fulfilled the conditions for the preparation of an impartial and independent audit report on the annual financial statements and sustainability reporting attestation report of the Bank Group in accordance with the applicable regulations, professional standards and professional ethics.

The bank complies with the applicable regulations regarding audit firm and key auditor rotation and mandatory grace periods. Under current law, the maximum uninterrupted period of employment with the same audit firm may not exceed 10 years. The maximum 10-year mandate given by the bank to the previous audit firm (KPMG Audyt spółka z ograniczoną odpowiedzialnością sp.k.) ended with the audit of the 2022 report. The auditor of the consolidated financial statements of the parent company ING Bank Śląski S.A. (ING Groep N.V.) for the period 2023-2025 was KPMG Accountants N.V. For the preparation of the consolidated financial statements of ING Groep N.V., KPMG Audyt spółka z ograniczoną odpowiedzialnością sp.k. provided (on behalf of ING Bank N.V.) review and audit services for ING Bank Śląski S.A.'s 2025 consolidation packages, thus ensuring a consistent approach in the audit implementation process at ING Groep N.V. level.

On 21 November 2025, the Bank Supervisory Board selected Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością spółka komandytowa, with its registered office in Warsaw, as the entity authorised to audit and review the financial statements of ING Bank Śląski and the Bank's Capital Group for the years 2026-2027,as well as to attest the sustainability reporting of the Bank's Capital Group for this period.

Non-audit services

In 2025, the audit firm auditing the bank's financial statements (Forvis Mazars Audyt Spółka z ograniczoną odpowiedzialnością) provided the following permitted non-audit services:

- review of the semi-annual financial statements of the bank and the ING Bank Śląski Group,
- attestation service – fulfilment of requirements for the storage of client assets,
- attestation service – compliance of the bank's annual capital adequacy information.

The provision of the aforementioned services was approved by the Audit Committee after assessing the threats and safeguards to the independence of the statutory auditor and the audit firm. In addition, Forvis Mazars Audyt Spółka z ograniczoną odpowiedzialnością conducted an attestation of ING Bank Śląski S.A.'s Group Sustainability Reporting for the period 2024-2025.

Auditor's remuneration

Remuneration of the entity authorised to carry out the statutory audit of the financial statements of the ING Bank Śląski S.A. Group entities and to carry out attestation of the sustainability reporting of the Bank's Group by bank and its subsidiaries

PLN thousand net	2023		2024		2025	
	Forvis Mazars	Another auditor	Forvis Mazars	Another auditor	Forvis Mazars	Another auditor
Audit of the annual financial statements	1,089	501	1,186	575	1,229	603
Review of the financial statements	345	40	456	-	464	-
Other attestation services, including the attestation of the sustainability reporting	137	-	346	-	353	-
Total	**1,571**	**541**	**1,988**	**575**	**2,046**	**603**

The remuneration does not include the supervision fee (as per the Act on Statutory Auditors, Audit Firms and Public Supervision).

Remuneration of the entity authorised to carry out the statutory audit of the financial statements of the ING Bank Śląski S.A. Group entities and to carry out attestation of the sustainability reporting of the Bank's Group by bank and its subsidiaries

PLN thousand net	2023		2024		2025	
	Bank	Companies	Bank	Companies	Bank	Companies
Audit of the annual financial statements	931	659	1,010	751	1,047	785
Review of the financial statements	345	40	385	71	398	66
Other attestation services, including the attestation of the sustainability reporting	137	-	346	-	353	-
Total	**1,413**	**699**	**1,741**	**822**	**1,798**	**851**

The remuneration does not include the supervision fee (as per the Act on Statutory Auditors, Audit Firms and Public Supervision).

Bank Management Board

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Composition of the Management Board

Pursuant to the Bank Charter, the Bank Management Board consists of at least three members, including the President and Vice-Presidents appointed by the Supervisory Board. The number of Members of the Management Board in a given term of office is determined by the Supervisory Board. Members of the Management Board are appointed for a joint term of office, which begins on the date of their appointment and covers four consecutive full financial years. The current term of office started on 29 April 2025 and expires on the date of the General Meeting approving the financial statements for 2029.

Appointment takes place after conducting the qualification procedure, the purpose of which is to check and evaluate the qualifications of the candidates. The suitability assessment process is carried out with the involvement of an external entity in order to increase the objectivity of the work related to the verification of documents and preliminary suitability assessment. As part of this procedure, the Supervisory Board, based on the recommendations of the Remuneration and Nomination Committee, assesses the individual suitability of candidates for functions in the Management Board (in particular, meeting the requirements of Article 22aa of the *Polish Banking Law Act*), as well as the collective suitability of the Management Board as a whole.

According to t*he Charter of ING Bank Śląski S.A.*, at least half of the Members of the Management Board should be Polish citizens. Two Members of the Management Board, including the President and the Vice-President of the Management Board, supervising the management of risks relevant to the bank's operations, are appointed with the approval of the Polish Financial Supervision Authority. Members of the Management Board may be dismissed by the Supervisory Board at any time. The Vice-President of the Management Board shall be dismissed after the Supervisory Board has consulted the President of the Management Board.

Composition of the Management Board in 2025

Due to the end of the term of the Bank Management Board, which began in 2020, the following changes to the composition of the Bank Management Board took place in 2025.

1. As of the date of the General Meeting approving the financial statements for 2024, i.e. 29 April 2025, the term of office of the Bank Management Board ended and thus Mr Bruno Bartkiewicz's mandate as President of the Bank Management Board expired.
2. The mandate of Mr Sławomir Soszyński, who resigned on 29 November 2024 to seek election to the Bank Management Board for the next term, also expired.
3. At the same time, on 29 April 2025, pursuant to a resolution of the Supervisory Board of 3 September 2024 and with the approval of the Polish Financial Supervision Authority of 20 December 2024, Mr Michał Bolesławski assumed the position of President of the Bank Management Board.
4. Also on 29 April 2025, the Supervisory Board, on the basis of a positive recommendation of the Remuneration and Nomination Committee, approved the individual and collective suitability assessment of the candidates for the Bank Management Board and thus appointed the following composition of the Bank Management Board for the new term: Ms Joanna Erdman – Vice-President of the Management Board of the Bank, Mr Marcin Giżycki – Vice-President of the Management Board of the Bank, Ms Bożena Graczyk – Vice-President of the Management Board of the Bank, Mr Marcin Kościński – Vice-President of the Management Board of the Bank, Mr Michał H. Mrożek – Vice-President of the Management Board of the Bank, Mr Maciej Ogórkiewicz – Vice-President of the Management Board of the Bank, Ms Alicja Żyła – Vice-President of the Management Board of the Bank.
5. In addition, the Supervisory Board resolved to appoint Ms Ewa Łuniewska to the Management Board of the Bank for a new term of office, effective from the date of entry in the Register of Entrepreneurs of the National Court Register of the amendment to Article 26 section 1 of the Charter of ING Bank Śląski Spółka Akcyjna (concerning the number of Members of the Management Board of the Bank), covered by Resolution No. 28 of the Ordinary General Meeting of 29 April 2025. It was agreed that Ms Ewa Łuniewska would serve as Vice-President of the Management Board until 31 December 2025.

Ms Joanna Erdman, Mr Marcin Giżycki, Ms Bożena Graczyk, Ms Ewa Łuniewska, Mr Michał H. Mrożek and Ms Alicja Żyła all served on the Board in the previous term.

The composition of the Bank Management Board and the distribution of the responsibilities of the Members of the Management Board from 29 April to 8 May 2025 were as follows:

- Mr Michał Bolesławski – President of the Bank Management Board supervising the CEO Division,
- Ms Joanna Erdman – Vice-President of the Bank Management Board supervising the CRO Division,
- Mr Marcin Giżycki – Vice-President of the Bank Management Board, supervising the Retail Clients Division, the Private Banking and Investment Clients Division, including the Brokerage Office, and supervising the subsidiary Nowe Usługi S.A.,
- Ms Bożena Graczyk – Vice-President of the Bank Management Board supervising the CFO Division and the subsidiary ING Bank Hipoteczny S.A.,
- Mr Marcin Kościński – Vice-President of the Bank Management Board overseeing the Business Clients Division and supervising the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
- Mr Michał H. Mrożek – Vice-President of the Bank Management Board, supervising the Wholesale Banking Division,
- Mr Maciej Ogórkiewicz – Vice-President of the Bank Management Board supervising the CIO Division,
- Ms Alicja Żyła – Vice-President of the Bank Management Board overseeing the COO Division and supervising the subsidiary SAIO S.A.

At the same time, in connection with the registration on 9 May 2025 in the National Court Register of the amendment to Article 26.1 of the Bank Charter regarding the number of Members of the Management Board in a nine-member composition, the function of Vice-President of the Management Board was assumed by Ms Ewa Łuniewska. The composition of the Bank Management Board and the allocation of responsibilities of the Members of the Management Board from 9 May to 31 December 2025 were as follows:

- Mr Michał Bolesławski – President of the Bank Management Board supervising the CEO Division,
- Ms Joanna Erdman – Vice-President of the Bank Management Board supervising the CRO Division,

- Mr Marcin Giżycki – Vice-President of the Bank Management Board, supervising the Retail Clients Division and supervising the subsidiary Nowe Usługi S.A.,
- Ms Bożena Graczyk – Vice-President of the Bank Management Board supervising the CFO Division and the subsidiary ING Bank Hipoteczny S.A.,
- Mr Marcin Kościński – Vice-President of the Bank Management Board overseeing the Business Clients Division and supervising the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
- Ms Ewa Łuniewska – Vice-President of the Bank Management Board supervising the Private Banking and Investment Clients Division, including the Brokerage Office,
- Mr Michał H. Mrożek – Vice-President of the Bank Management Board, supervising the Wholesale Banking Division,
- Mr Maciej Ogórkiewicz – Vice-President of the Bank Management Board supervising the CIO Division,
- Ms Alicja Żyła – Vice-President of the Bank Management Board overseeing the COO Division and supervising the subsidiary SAIO S.A.

On 12 December 2025, the Bank received the resignation of Ms Ewa Łuniewska from her position as a Member of the Bank Management Board, effective 31 December 2025. The resignation submitted was the result of the arrangements made between Ms Ewa Łuniewska and the Supervisory Board. Also on 12 December 2025, the Supervisory Board, on the basis of a positive recommendation from the Remuneration and Nomination Committee, appointed Mr Wojciech Sieńczyk as Vice-President of the Bank Management Board from 1 January 2026, overseeing the Private Banking and Investment Clients Division, including the Brokerage Office.

The composition of the Bank Management Board and responsibilities of Members of the Management Board as of 01 January 2026 were as follows:

- Mr Michał Bolesławski – President of the Bank Management Board supervising the CEO Division,
- Ms Joanna Erdman – Vice-President of the Bank Management Board supervising the CRO Division,
- Mr Marcin Giżycki – Vice-President of the Bank Management Board, supervising the Retail Clients Division and supervising the subsidiary Nowe Usługi S.A.,
- Ms Bożena Graczyk – Vice-President of the Bank Management Board supervising the CFO Division and the subsidiary ING Bank Hipoteczny S.A.,
- Mr Marcin Kościński – Vice-President of the Bank Management Board overseeing the Business Clients Division and supervising the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
- Mr Michał H. Mrożek – Vice-President of the Bank Management Board, supervising the Wholesale Banking Division,
- Mr Maciej Ogórkiewicz – Vice-President of the Bank Management Board supervising the CIO Division,
- Mr Wojciech Sieńczyk – Vice-President of the Bank Management Board, supervising the Private Banking and Investment Clients Division, including the Brokerage Office,
- Ms Alicja Żyła – Vice-President of the Bank Management Board overseeing the COO Division and supervising the subsidiary SAIO S.A.

In addition, on 8 January 2026, the Bank received the resignation of Mr Michael H. Mrożek as a Member of the Bank Management Board, effective at the end of that date. Also on 8 January 2026, the Supervisory Board, on the basis of a positive recommendation from the Remuneration and Nomination Committee, appointed Ms Agnieszka Wolska as Vice-President of the Bank Management Board from 1 April 2026, who will oversee the Wholesale Banking Division. Taking the above into account, the Supervisory Board, on the basis of a positive recommendation of the Remuneration and Nomination Committee, entrusted Mr Marcin Kościński with the temporary supervision of the Wholesale Banking Division for the period from 9 January 2026, i.e. until the newly appointed Member of the Management Board takes up his position from 1 April 2026.

Accordingly, the composition of the Bank Management Board and the division of responsibilities of the Members of the Management Board from 9 January to the date of signing of this report is as follows:

- Mr Michał Bolesławski – President of the Bank Management Board supervising the CEO Division,
- Ms Joanna Erdman – Vice-President of the Bank Management Board supervising the CRO Division,
- Mr Marcin Giżycki – Vice-President of the Bank Management Board, supervising the Retail Clients Division,
- Ms Bożena Graczyk – Vice-President of the Bank Management Board supervising the CFO Division and the subsidiary ING Bank Hipoteczny S.A.,
- Mr Marcin Kościński – supervising the Business Clients Division and the Wholesale Banking Division and supervising the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
- Mr Maciej Ogórkiewicz – Vice-President of the Bank Management Board supervising the CIO Division,
- Mr Wojciech Sieńczyk – Vice-President of the Bank Management Board supervising the Private Banking and Investment Clients Division, including the Brokerage Office and supervising the subsidiary Nowe Usługi S.A.,
- Ms Alicja Żyła – Vice-President of the Bank Management Board overseeing the COO Division and supervising the subsidiary SAIO S.A.

Based on the information available at the date of signing this report, from 1 April 2026, the composition of the Bank Management Board and the division of responsibilities of the Board Members will be as follows:

- Mr Michał Bolesławski – President of the Bank Management Board supervising the CEO Division,

- Ms Joanna Erdman – Vice-President of the Bank Management Board supervising the CRO Division,
- Mr Marcin Giżycki – Vice-President of the Bank Management Board, supervising the Retail Clients Division,
- Ms Bożena Graczyk – Vice-President of the Bank Management Board supervising the CFO Division and the subsidiary ING Bank Hipoteczny S.A.,
- Mr Marcin Kościński – supervising the Business Clients Division and supervising the following subsidiaries: ING Usługi dla Biznesu S.A. and ING Investment Holding (Polska) S.A.,
- Mr Maciej Ogórkiewicz – Vice-President of the Bank Management Board supervising the CIO Division,
- Mr Wojciech Sieńczyk – Vice-President of the Bank Management Board supervising the Private Banking and Investment Clients Division, including the Brokerage Office and supervising the subsidiary Nowe Usługi S.A.,
- Ms Agnieszka Wolska – Vice-President of the Bank Management Board supervising the Wholesale Banking Division,
- Ms Alicja Żyła – Vice-President of the Bank Management Board overseeing the COO Division and supervising the subsidiary SAIO S.A.

Michał Bolesławski

President of the Management Board Supervises the CEO Division

Mr Michał Bolesławski meets all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of President of the Management Board at ING Bank Śląski S.A. since 2025.

From April 2023 to January 2026, he was a Member of the Management Board (Non-executive Director) at ING Belgium.
From 2021 to 2025, he held positions at ING Bank N.V in: Global Head of Business Banking (**January 2023 – April 2025**), Head of Business Banking Netherlands (January 2021 – July 2023) and Head of Business Banking Market Leaders (**January 2021 – January 2023**).
From January 2012 to February 2021, he was Chair of the Supervisory Board of ING Commercial Finance Polska S.A., ING Lease (Polska) Sp. z o.o. and ING Usługi dla Biznesu S.A. **From December 2018 to February 2021**, he was Chair of the Supervisory Board at ING Investment Holding (Poland) S.A. In addition, he held other supervisory positions at Nowe Usługi S.A. and ING Bank Hipoteczny S.A.
He has been with the ING Group since 2000. In **January 2006**, he took on the role of Bank Director in charge of the Corporate Banking Division and held this position **until July 2008**. **From September 2004 to December 2005**, he held the following positions: acting. Director (**September – December 2004**) and then Director (January – December 2005) in the Corporate Sales Network. **From April 2003 to August 2004**, he was Deputy Director of the Corporate Client Services Department. Prior to that, he held the position of Business Manager **from October 2001 to March 2003**.
From September 2000 to August 2001, he was Project Officer at ING Group and **from September to October 2001** he was Project Manager at ING Barings.
From May to August 2000, he was an Analyst at the General Inspectorate of Banking Supervision.
Since February 2021, he has been a Member of the Board of the ING Polish Art Foundation, where he previously (**October 2018 – February 2021**) held the position of Chair.
Graduate of Harvard Business School, PLD 25 and the Warsaw School of Economics. He also studied at Harvard University and Kennedy School of Government and ESADE (Escuela Superior de Adminis y Direccion de Empresas).

Joanna Erdman

Vice-President of the Management Board Supervises the CRO Division

Ms Joanna Erdman meets all the requirements set out in the provisions of Article 22aa of the Act of August 29, 1997 – the Polish Banking Law Act.

She assumed the position of Vice-President of the Management Board at ING Bank Śląski S.A. in April 2013. Since 24 May 2021, she has held the position of Vice-President of the Bank Management Board responsible for overseeing material risk management.

Since June 2020, she has been a Member of the Supervisory Board of the following subsidiaries: ING Commercial Finance Polska S.A., ING Lease (Polska) Sp. z o.o. and in Nowe Usługi S.A., where she was previously Chair of the Supervisory Board.
In December 2018, she became Deputy Chair of the Supervisory Board of ING Investment Holding (Poland) S.A. and continues in this role (she was a Member of the Supervisory Board from June to September 2023). **Since March 2018**, she has been a Member of the Supervisory Board of ING Bank Hipoteczny S.A.
She has been with the ING Group since 1996. In **2010-2013** she served as the Director of the Bank, overseeing the Strategic Clients Division. **In 2007**, she took up the position of the Director of the Strategic Clients Department in the Strategic Clients Division, which she held **until 2010**. In **2001-2007**, she was the Director of the Strategic Client Centre in the Corporate Banking Division at ING Bank Śląski S.A. **From 1996 to 2001**, she worked in the corporate division of the ING Bank N.V. branch, and before that in the Marketing Department of Bank Pekao S.A. **from 1995 to 1996**.
From **June 2020 to September 2021**, she was a Member of the Supervisory Board of Biuro Informacji Kredytowej S.A., after which she became Deputy Chair and later Chair of the Supervisory Board. **Since September 2025**, she has again served as Deputy Chair of the Supervisory Board of Biuro Informacji Kredytowej S.A.
From June 2020 to April 2021, she was a Board Member of the Responsible Business Forum. For 5 years – **from June 2016 to April 2021** she worked at the ING for Children Foundation. First as a Member of the Foundation Board and then as Chair of the Foundation Board (**June 2019 – April 2021**).
She is a graduate of the Warsaw School of Economics and London Business School. She has participated in development programmes in the areas of risk management and ESG/Sustainability: Advanced Risk Management Programme at Wharton University, University of Cambridge Sustainable Finance and Global Association of Risk Professionals (GARP) – Sustainability and Climate Risk.

Marcin Giżycki

Vice-President of the Management Board
Supervises the Retail Clients Division

Mr Marcin Giżycki meets all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. since August 2016 (he also supervised the Private Banking and Investment Clients Division from 1 April 2025 to 8 May 2025).

Since December 2018, he has been a Member of the Supervisory Board at ING Investment Holding (Poland) S.A. He was a Member of the Supervisory Board at ING Bank Hipoteczny S.A. **from March to April 2018** and subsequently became Deputy Chair of the Supervisory Board and continues to hold this position. **Since August 2015**, he has held supervisory positions at New Services S.A. – first as a Member of the Supervisory Board and currently as Chair of the Supervisory Board. **In 2015**, he became a Member of the Management Board of ING Securities S.A. and later President of the Management Board **(August 2015 – May 2016**). **In 2006**, he took on the role of Bank Director responsible for part of the Retail Banking Division at ING Bank Śląski S.A. and held this position for 10 years, while **in 2016** he held the position of Bank Director of the Brokerage Division. **Between 1996 and 2006**, he held various positions in sales and retail network management at ING Bank Śląski S.A.
In addition, **from May 2017 to June 2020**, he held supervisory positions at Biuro Informacji Kredytowej S.A. as Deputy Chair of the Supervisory Board, Chair of the Supervisory Board and Member of the Board).
He has been a Board Member at the ING for Children Foundation since May 2021. He has been a Member of the Supervisory Board of Polski Standard Płatności S.A. **since April 2025**.
Graduate of the Graduate School of Business at Stanford University, the University of Economics in Katowice and the Poznan School of Banking.

Bożena Graczyk

Vice-President of the Management Board
Supervises the CFO Division

Ms Bożena Graczyk meets all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. since July 2017.

She has been Chair of the Supervisory Board of ING Bank Hipoteczny S.A. **since June 2021**, having previously served as a Member of the Supervisory Board.
She is also a Member of the Supervisory Board of subsidiaries: ING Commercial Finance Polska S.A., ING Lease (Polska) Sp. z o.o., ING Investment Holding (Polska) S.A., ING Usługi dla Biznesu S.A. and SAIO S.A.
From 1994 to 2017, she was with KPMG, where she became Partner in the audit and advisory area for the financial services sector **in 2001**. She has held the positions of Director of the Accounting Advisory Services Team and Director of the Financial Risk Management Team. **From 1996 to 1997**, she worked at KPMG Spain, where she was involved in the audit of the financial statements of financial institutions.
Additionally, she has been a member of the Presidium of the Diversity and Inclusion Committee of the Polish Bank Association **since February 2023**.
She is a graduate of the University of Lodz. She completed the Stanford Executive Program at the Stanford Graduate School of Business, the Executive MBA in International Business jointly delivered by the University of Bristol and École Nationale des Ponts et Chaussées, and the Advanced Management Program at the IESE Business School at the University of Navarra. She also participated in the Tempus programme at the University of Limburg in the Netherlands.
She is qualified as a chartered accountant.

Marcin Kościński

Vice-President of the Management Board Supervises the Business Clients Division

Mr Marcin Kościński meets all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. since April 2025.

He is Chair of the Supervisory Board of subsidiaries: ING Commercial Finance Polska S.A., ING Investment Holding (Polska) S.A., ING Lease (Polska) Sp. z o.o., ING Usługi dla Biznesu S.A., and Member of the Supervisory Board of SAIO S.A.
Between 2016 and 2025, he also held other supervisory roles in companies: ING Investment Holding (Polska) S.A., ING Lease (Polska) Sp. z o.o. and ING Usługi dla Biznesu S.A.
From January 2016 to April 2025, he was Bank Director – Corporate Sales Network. **Between January 2004 and July 2013**, he successively held the following positions: Senior Corporate Client Advisor, Branch Director Corporate Affairs, Regional Director Corporate Affairs. Prior to that – **from May 2002 to June 2003**, he worked in positions: Client Advisor – Assistant, Client Advisor for Corporate Services and Client Advisor for Small Business Services at the Corporate Banking Centre in Poznań.
In August 2013, he took on the role of CEO at ING Lease (Polska) Sp. z o.o., with which he was involved until December 2015.
From 2003 to 2004, he was associated with Fortis Bank Polska S.A. as a CB (Corporate Banking) Client Advisor.
Since October 2025, he has been a Member of the Board of the Polish Bank Association for Micro, Small and Medium-Sized Companies in Warsaw.
Graduate of the Academy of Economics (now: University of Economics) in Poznań, where he also obtained his PhD in economic sciences **in 2006**. He has completed specialist training: INSEAD Business School (**2022**), The London School of Economics, Executive Education in Digital Marketing Strategy **(2025**).

Ewa Łuniewska

Vice-President of the Management Board Supervised the Private Banking and Investment Clients Division until 31 December 2025

Ms Ewa Łuniewska met all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. from January 2021 to 31 December 2025 (supervised the Business Clients Division until 29 April 2025; from 9 May 2025 supervised the Private Banking and Investment Clients Division).
She was Chair of the Supervisory Boards of the following subsidiaries **until June 2025**: ING Lease (Polska) Sp. z o.o., ING Commercial Finance Polska S.A. and ING Investment Holding (Polska) S.A., and **until May 2025** – Chair of the Supervisory Board of ING Usługi dla Biznesu S.A.
Between 2012 and 2025, she also held other supervisory roles in companies: ING Lease (Polska) Sp. z o.o., ING Commercial Finance Polska S.A., ING Usługi dla Biznesu S.A., ING Investment Holding (Polska) S.A., Nowe Usługi S.A., SAIO S.A.
From the beginning of 2016 until the end of 2020, she held the position of President of the Management Board of ING Lease (Polska) Sp. z o.o. and **until November 2018** the position of Member of the Management Board of ING Investment Holding (Polska) S.A.
In 2006, she was appointed Bank Director in the Corporate Sales Network Division of ING Bank Śląski S.A., where she worked **until 2015**. Prior to that, she was Head of Strategic Clients in the Strategic Clients Division **from 2001 to 2005**. For two years (**2000-2001**) she was with ING Bank N.V. where, as Managing Director she supervised the Corporate Banking Department, the Treasury Management Department, the Structured Finance Department and was a member of the Executive Committee.
From April 1997 to 1999 she was Deputy Director and then Director of the Capital Markets and Structured Finance Department at ING Bank N.V. She started her career **in 1991** in the Corporate Banking Department of ING Bank N.V.
In 2020, she held the position of Chair of the Executive Committee of the Polish Leasing Association. **Since 2016**, she has been involved in the ING Polish Art Foundation, where she first served as a member of the Foundation's Council and has been Chair of the Foundation's Council **since 2021**.
From January to October 2025, she was a Member of the Council of the Polish Bank Association for Micro, Small and Medium-Sized Companies in Warsaw and sat in the Presidium of this Council.
Since January 2025, she has been a Member of the Board of the Netherlands Polish Chamber of Commerce in Warsaw**.**
Graduate of the Warsaw School of Economics.

Michał H. Mrożek

Vice-President of the Management Board Supervised the Wholesale Banking Division

Mr Michał H. Mrożek met all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. from July 2020 to 8 January 2026.

From July 2025 to January 2026, he held the position of Acting Head of Wholesale Banking Central & Eastern European (CEE) Network at ING Bank N.V.
From October 2022 to January 2026, he was a Member of the Supervisory Board of the subsidiary SAIO S.A.
From April 2019 to June 2020, he held the position of General Manager and Head of Wholesale Banking at HSBC France HBFR, Poland Branch. He was President of HSBC Bank Polska S.A. **from 2015 to 2019** and was Managing Director of Citibank N.A. **from 2011 to 2014**. Previously, **between 1998 and 2011**, he was with Citibank Handlowy – first as Deputy Head of Corporate Banking, then as Director of Strategic Planning and Corporate Development, and **between 2004 and 2011** he was Deputy President of the Management Board. **Between 1995 and 1998**, he was Head of Corporate Banking Department at Bank Handlowy in Warsaw.
From 1991 to 1995 he was with Price Waterhouse (International Privatization Group), Washington, D.C., first as Manager and then as Department Head. He started his professional career at a branch of Bank Austria in New York.
In addition, he served as Vice-President at the Employers' Association of Banks and Financial Institutions LEWIATAN **from 2019 to 2021**. **From 2018 to 2019**, he was Chair of the Council of the Polish Bank Association. **Since 2013**, he has been a member of the New York Council of the Kosciuszko Foundation and the Council of the Jan Karski Educational Foundation.
Graduate of Georgetown University School of Foreign Service in Washington, DC.
In 2013, awarded by the Minister of Foreign Affairs with the Badge of Honor "Bene Merito" for his contribution to promoting and strengthening the role of Poland in the international arena. **In 2011** awarded the Bronze Cross of Merit by the President of the Republic of Poland for his contribution to the development of the Polish banking market.

Maciej Ogórkiewicz

Vice-President of the Management Board Supervises the CIO Division

Mr Maciej Ogórkiewicz meets all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. since April 2025.

From September 2024 to April 2025, he held the following roles at ING Hubs Poland: Global IT Security Cluster Leader (CISO Hub Lead) and Member of the Management Team of ING Hubs Poland.
He was responsible for ING Group's defence against cyber attacks **between October 2022 and April 2025** as: Global Head of Security Assessment Services, Global Head of Attack Surface Management and then as Global Head of Security Detection and Response at ING Bank N.V.
From July 2017 to September 2022, he was Director of the IT Security Department and served as Chief Information Security Officer (CISO) at ING Bank Śląski S.A. Additionally, he held the position of CISO for the Business Line – Retail Banking at ING Bank N.V. **from February 2019 to February 2020**.
In the period **from June 2010 to June 2017**, he held the following positions in ING SERVICES POLSKA sp. z o.o.: IT security expert, Manager of the IT Risk Management department, Deputy Director of the Security Services Department.
From August 2003 to May 2010, he was associated with Solidex S.A., where he was Vice-President of the Management Board and, before that, Member of the Management Board and Director of the Implementation and Service Department, and held various specialist positions (Consulting Engineer, Cisco Authorised Instructor (CCSI), Security Network Administrator, Manager of the Systems and Infrastructure Maintenance Team, Deputy Director of Technical Affairs, Strategic Project Advisor SOLIDny EXpert).
From March 2002 to August 2003, he worked for the company "MEDIASYSTEMS" s.c. - First as an IT Security Specialist and then as IT Team Manager and Computer Network Administrator.
Since April 2025, he has been a member of the Presidium of the Electronic Banking Council of the Polish Bank Association.
Graduate of the Silesian University of Technology in Gliwice.
He completed specialised training **between 2006 and 2023**: ISC2 – Certified Information Systems Security Professional (**2006**), ISACA – Certified Information Security Manager (**2007**), ISACA – Certified Information Systems Auditor (**2008**), ISACA – Certified in Risk and Information Systems Control (**2011**) and Cisco Certified Internetwork Expert – Security (**2008**) and Google Cloud Certified Professional Cloud Security Engineer (**2023**).

Alicja Żyła

Vice-President of the Management Board
Supervises the COO Division

Ms Alicja Żyła meets all the requirements set out in the provisions of Article 22aa of the Polish Banking Law Act of 29 August 1997.

In the position of Vice-President of the Management Board of ING Bank Śląski S.A. since September 2021.

She has also been Chair of the Supervisory Board of the subsidiary SAIO S.A. **since October 2022**.
From 2018 to 2021, she was associated with ING Lease (Poland) Sp. z o.o., first as Vice-President of the Management Board and then as President of the Management Board. Previously, she headed the Operations Division at ING Bank Śląski S.A**. from 2008 to 2018**. She has worked at the bank **since 1996**, starting in the HR department. For the following years, she was associated with the Retail Banking Division, where, inter alia, she was Director of the Product Development Department **from 2006**.
She has also held numerous supervisory positions: she was a Member of the Supervisory Board of the National Clearing House S.A. (**2009-2020**) and NN Investment Partners TFI S.A. (**2019-2021**). **In 2021**, she sat on the Board of the ING Polish Art Foundation and served as Deputy Chair of the Executive Committee at the Polish Leasing Association.
In 2025, she became Chair of the Board of the ING for Children Foundation, having previously served in various membership roles.
She is a graduate of the University of Economics in Katowice and a participant in the ING International Management Development Programme at Tilburg University.

Sławomir Soszyński

Vice-President of the Management Board
Supervised the CIO Division

Mr Sławomir Soszyński met all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of Vice-President of the Management Board at ING Bank Śląski S.A. from October 2019 to 29 April 2025.

From 2017 to 2019, he was a Board Member overseeing the J.P. Global Corporate Centre. Morgan Poland Services Spółka z o.o. in Warsaw. Previously, he had been associated with J.P. since 2015. Morgan in London as Executive Director of Architecture for the Corporate Technology and Technology Infrastructure Sector.
From 2014 to 2015, he served as Global Head of Technology at OSTC Group in Poland.
Previously, he spent **10 years** with Citibank in Poland, London, New York and Singapore. During this time, he was responsible for IT security, technology in the Global Audit Division and then retail banking technology and IT architecture in EMEA as CTO.
From April 2023 to April 2025, he was Deputy Chair of the Presidium of the Electronic Banking Council of the Polish Bank Association, where he had previously served as a Member **since February 2020**.
Graduate of Nicolaus Copernicus University. He completed the MBA programme at Kozminski University.

Brunon Bartkiewicz

President of the Management Board
Supervised the CEO Division

Mr Brunon Bartkiewicz met all the requirements set out in the provisions of Article 22aa of the Act of 29 August 1997 – the Polish Banking Law Act.

In the position of President of the Management Board at ING Bank Śląski S.A. from 2016 to 29 April 2025 (previously in 1995-2000 and 2004-2009).

From June 2021 Supervisory Board Member of ING Bank Hipoteczny S.A. He also held this position during the period **March – April 2018**. Previously (**April 2018 – June 2021**) Chair of the Supervisory Board of this company. Chief Innovation Officer at ING Bank N.V. **from 2014 to 2016**. **From 2012 to 2014** Managing Director of the International Retail Banking Division at ING Bank N.V., where he oversaw ING's activities in France, Italy, Poland, Spain, Romania and Turkey.
He held supervisory positions at Bank Śląski S.A. **from 2000 to 2001** and ING Bank Śląski S.A. **from 2010 to 2016** – first **from April 2010 to May 2011** as a Member of the Supervisory Board and then **from May 2011 to March 2016** as Deputy Chair of the Supervisory Board. **From 2010 to 2012** he was associated with ING Direct N.V. as General Manager.
From October 2010 to March 2012 Member of the Management Board ING Bank (Australia) Ltd. He also served as a Member of the Management Board at ING Oyak Bank A.S. **from 2008 to 2009** (now ING Bank A.S.). For 5 years (**2004-2009**), Supervisory Board Member of ING Towarzystwo Ubezpieczeń na Życie. **In 2004** he became President of the Management Board of ING Bank Śląski S.A. and held this position until the **end of 2009**. **In 2000**, he took on the role of Chief Executive Officer and Member of the Management Board at ING Direct N.V. for a further four years. **From 2002 to 2003** Member of the Board of ING Direct (UK) N.V.
In addition, **from 2000 to 2004** he was: Member of the Management Board of ING Bank Canada, ING Direct Canada, Member of the Supervisory Board of ING DiBa AG and at ING Bank (Australia) Ltd. he was Chair of the Management Board.
From 1991 to 2009, he was associated with Bank Śląski S.A., first as a Bank Director, then as a Member of the Management Board and First Vice-President and President of the Management Board. He previously worked at Penetrator S.A. (**1990-1991**), Digital Laboratories International S.A. (**1986-1990**) and at the Central School of Planning and Statistics (now the Warsaw School of Economics), Department of International Finance (**1986-1989**).

Between 1991 and 2009, he held supervisory positions in the following entities: Dom Maklerski Banku Śląskiego S.A. in Katowice – Supervisory Board Member, Nationale Nederlanden Polska – Supervisory Board Member, CERA – Supervisory Board Member, ING BSK Asset Management – Supervisory Board Member, ING Securities S.A. – Chair of the Supervisory Board and Supervisory Board Member, as well as functions as Member of the Management Board at ING Direct – Italian Branch (**from 2001 to 2014**) and ING Direct – French Branch (**from 2001 to 2013**).
In addition, he served on the Supervisory Board of Polski Standard Płatności S.A. **from June 2024 to April 2025** – initially as Chair of the Supervisory Board (**June 2024 – December 2024)** and currently as Supervisory Board Member. **Since April 2021**, he has been a member of the Programme Board of the Business Women Leaders Foundation.
For many years, he was involved in the activities of the Polish Bank Association, where he was, inter alia, a Member of the Management Board (**2005-2010**), Chair of the Union Council (**June 2020 – April 2021**), Member of the Presidium of the Union Council (**April 2021 – November 2022**) and then a Member of the Union Council (**from November 2022 to April 2025**). For two years (**2019-2020**) he was a Member of the University Council of the Cracow University of Economics.
From June 2022 to May 2024, he was also a Member of the Supervisory Board of Interhyp AG (Munich, Germany). He has been a Member of the University Council of the Warsaw School of Economics **since December 2024**.
Graduate of the Central School of Planning and Statistics (now the Warsaw School of Economics) in Warsaw. He has participated in management and banking training courses including CEDEP – Insead France and the Executive Program at the Graduate School of Business at Stanford University.

Competencies of the Management Board

The Management Board shall manage and represent the bank. All the matters not otherwise reserved by law or the Bank Charter to the competence of the other bank's management bodies shall be within the scope of the Management Board's responsibilities. The Management Board operates collectively, subject to the matters which, pursuant to the provisions of the bank's internal regulations, were entrusted to individual Members of the Management Board. As a rule, the bank has two-person representation – in the following configurations:

- two Members of the Bank Management Board,
- one Member of the Bank Management Board with a proxy,
- two proxies.

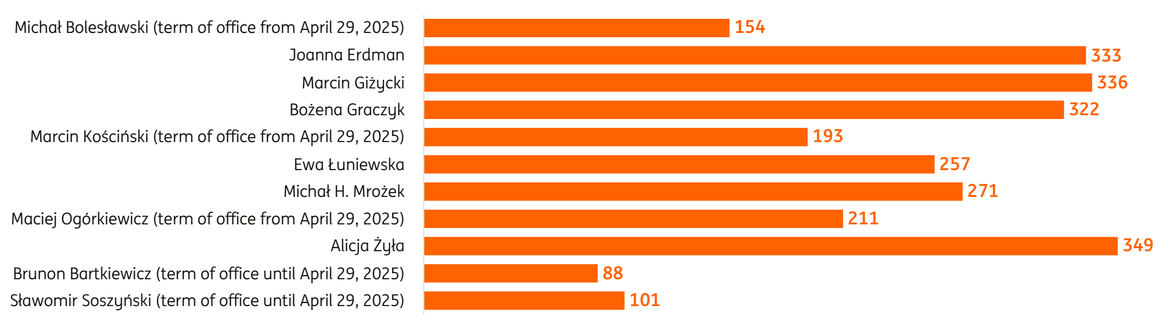
Proxies acting independently or jointly with the persons indicated above or with another representative may be appointed to perform specific activities or perform certain types of activities.

The Bank Management Board formulates a strategy for the Bank's operations, which requires the approval of the Supervisory Board.

The Management Board shall adopt resolutions if more than half of its members are present at the meeting and all Management Board Members have been invited. Resolutions of the Management Board shall be adopted by an absolute majority of votes. In the event of equal votes, the President of the Management Board shall have a casting vote.

In 2025, 71 meetings of the Bank Management Board were held. A total of 353 resolutions were adopted unanimously.

Number of resolutions in which individual Members of the Bank Management Board participated



Members of the Bank Management Board supervise individual divisions and organisational units, in accordance with the division of powers established by the Management Board and approved by the Supervisory Board, being responsible for the implementation of their mission and basic tasks. The organisation of work of the Management Board, matters requiring resolutions of the Management Board and its mode of functioning are set forth in the Management Board Bylaw resolved by the Management Board and approved by the Supervisory Board.

In addition to the matters listed in the Bank Charter or the ING Bank Śląski S.A. Organisational Bylaw, the following matters in particular (subject to the competence of the Supervisory Board) require resolutions of the Management Board:

- all matters which, in accordance with generally applicable laws and the provisions of the Bank Charter, require decisions of other statutory bodies of the bank,
- defining the bank's policies, including in particular the credit policy, risk management policy and remuneration policy,
- determining the rules for raising funds from other financial institutions and the rules for their use, and to determine the rules for depositing its own funds with other banks,
- defining the principles for determining the interest rate on products offered by the bank, including, in particular, the interest rate on loans and advances, funds on term accounts and payable on demand, and penalty interest,
- considering applications for recognition of extraordinary losses and the creation of provisions in excess of the amounts determined by the Bank Management Board separately,
- adopting investment plans and determining the principles of investment implementation,
- decisions on matters related to the purchase, encumbrance, sale and lease of real estate and other property rights, to the extent exceeding the amounts separately determined by the Management Board,
- decisions on the purchase and sale by the bank shares or stocks of other legal persons with a value exceeding the amounts separately determined by the Management Board,
- establishing principles for granting and revoking powers of attorney to perform specific activities or activities of a specific type,
- matters beyond the scope of day-to-day management, including in particular matters falling outside the competences of individual Members of the Management Board and committees appointed by the Management Board,
- other matters where the decisions have been reserved for the competence of the Management Board in separate regulations adopted by the Management Board and other matters brought by the President of the Management Board or another Member of the Management Board,

- matters where legal or other regulations require an opinion by the Management Board.

In cases other than those mentioned above, the following rules shall apply:

- decisions in matters where no collective action is required by the Management Board and that have been delegated to the competencies of individual Members of the Management Board, are to be made in the form of decisions of such Member of the Management Board; however, the Management Board by way of a resolution may identify matters that require a decision of minimum two Members of the Management Board,
- decisions in matters that have been delegated by the Management Board to the competencies of the competent committee established by the Management Board, are made in the form of resolutions of such committee,
- decisions in matters not reserved for the competences of the Management Board, a Member of the Management Board or the appropriate committee shall be made in the form of decisions managing the organisational unit at the appropriate level, within the scope of the competences entrusted to him/her.

The competences of individual Members of the Management Board are set out in the organisational bylaw and the regulations concerning the functioning of their areas introduced by the Management Board.

Additionally, the Management Board to authorised to increase the share capital but maximum PLN 26 million (or issues of maximum 26 million shares) by 26 April 2026 (authorised capital) and to waive pre-emption rights at share issues of the authorised capital. The decisions taken by the Management Board on the share issue price and waiver of pre-emption rights require approval by the Supervisory Board.

As at 31 December 2025, the Bank had the following standing committees, which are appointed by the Bank Management Board, approving their composition, tasks and bylaw:

- Assets and Liabilities Committee (ALCO),
- Credit Policy Committee,
- Credit Committee of ING Bank Śląski S.A.,
- Restructuring Credit Committee,
- Retail Product Committee,
- Corporate Products and Financial Markets Committee,
- Model Validation Policy at ING Bank Śląski S.A.,
- Committee for the parameterisation of financial instruments measured at fair value,
- Market Data and Valuation Models Committee,
- Client Protection and Product Approval Committee,
- Committee Evaluation Team (SOX),
- Donations Committee,
- Operational Risk in a Trading Environment (ORIATE) Committee,
- IT Architecture Committee,
- Retail Price Committee,
- Reference Rates Committee,
- Client Risk Management Committee (CIRC) at ING Bank Śląski S.A.,
- Know Your Customer Committee (KYC) at ING Bank Śląski S.A.,
- IT Risk and Security Committee in ING Bank Śląski S.A,
- Pricing Committee for Business Clients,
- ESG Council Committee,
- ESG Risk Committee,
- Model and AI Risk Management Committee at ING Bank Śląski S.A.,
- Sustainable Finance Committee of the Wholesale Banking Division,
- Issuance Committee of the Wholesale Banking Division at ING Bank Śląski S.A.,
- Sustainable Finance Committee of the Business Clients Division.

Remuneration of the Management Board and the Supervisory Board members

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Since 2020, the bank has been operating a resolution adopted by the Ordinary General Meeting of ING Bank Śląski S.A. Remuneration Policy for Supervisory Board and Management Board Members of ING Bank Śląski S.A.

The policy has been prepared in line with the requirements arising from EU regulations and national legislation including:

- *Polish Banking Law Act,*

- *Principles of Corporate Governance for Supervised Institutions,*
- *The Act on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies.*

The policy sets out the principles for the remuneration of members of our bank's management bodies. The latest amendments to the policy were adopted by Resolution of the Ordinary General Meeting of ING Bank Śląski S.A. No. 30 of 29 April 2025. The changes made related to the remuneration structure of the Supervisory Board Members for their functions on the Supervisory Board and its Committees. The amendment is intended to ensure a market level of remuneration for Board Members and to be consistent with the Good Practice for Audit Committees 2021, according to which the remuneration of the audit committee Chair should not differ from that received by the Chair of the Supervisory Board.

As at 2025 yearend, none of the Members of the Supervisory Board held shares in ING Bank Śląski or in the bank's related entities.
In the case of the Members of the Bank Management Board, the non-deferred treasury shares for 2024 totalling 9,066 shares and the deferred treasury shares for previous years totalling 3,241 shares were granted under the Incentive Scheme based on this financial instrument. These shares were transferred to the individual brokerage accounts of the Management Board Members.

Number of shares granted to Members of the Bank Management Board

First name and surname	Number of shares
Brunon Bartkiewicz	2,762
Joanna Erdman	1,443
Ewa Łuniewska	1,272
Marcin Giżycki	1,569
Bożena Graczyk	1,565
Sławomir Soszyński	1,223
Michał Mrożek	1,272
Alicja Żyła	1,201
Total	**12,307**

Remuneration of Supervisory Board members

Each Supervisory Board Member serves by virtue of appointment by resolution of the General Meeting. The Members of the Supervisory Board are appointed for a joint term of office which commences on the date of appointment and covers four consecutive full financial years. Members of the Supervisory Board shall hold office until the date of the General Meeting approving the financial statements for their last full financial year in office.

In determining the level of remuneration of the Supervisory Board Members and allowances for additional functions on the Board, market medians for these positions in the banking sector are taken into account, taking into account the scale of the bank's activities and its financial position. Supervisory Board Members' remuneration is analysed annually based on Sedlak & Sedlak's independent remuneration report, which presents financial data from the banking sector on remuneration levels and fringe benefits.

In accordance with the regulations, Members of the Supervisory Board who perform other functions at ING Bank N.V. at the same time perform their tasks on the Supervisory Board free of charge. Members of the Supervisory Board waive their right to remuneration by submitting a declaration to that effect in writing.

No variable remuneration is granted to Members of the Supervisory Board. The fixed remuneration of the Members of the Supervisory Board consists of:

- basic remuneration,
- a monthly fixed allowance for the performance by the Supervisory Board Members of any additional function on the Supervisory Board or its committees, set as a percentage of the basic remuneration in the amount of:
  - for the Chair of the Supervisory Board – 100%,
  - for the Deputy Chair of the Supervisory Board and the members acting as Chair: Risk Committee, Remuneration and Nomination Committee – 30%,
  - for the member acting as Chair of the Audit Committee – 75%,
  - for members not acting as Chairs of Supervisory Board Committees – 15%.

Below are the values of the remuneration due and paid by the bank to the Members of the Supervisory Board in 2025.

Benefits payable to Members of the Supervisory Board of ING Bank Śląski for 2025 (in PLN thousand)

First name and surname	Period from – to	Remuneration	Rewarding	Other benefits	Total
Monika Marcinkowska	01.01.2025 - 31.12.2025	488	0	0	488
Dorota Dobija	01.01.2025 - 31.12.2025	315	0	0	315
Aneta Hryckiewicz-Gontarczyk	01.01.2025 - 24.09.2025	209	0	0	209
Arkadiusz Krasowski	01.01.2025 - 31.12.2025	346	0	0	346
Małgorzata Kołakowska	01.01.2025 - 31.12.2025	238	0	0	238
Michał Szczurek	01.01.2025 - 31.12.2025	0	0	0	0
Stephen Creese	01.01.2025 - 31.08.2025	0	0	0	0
Hans De Munck	01.01.2025 - 31.12.2025	0	0	0	0
Serge Offers	01.01.2025 - 31.12.2025	0	0	0	0
Total		**1,597**	**0**	**0**	**1,597**

Benefits paid to Members of the Supervisory Board of ING Bank Śląski for 2025 (in PLN thousand)

First name and surname	Period from – to	Remuneration	Rewarding	Other benefits	Total
Monika Marcinkowska	01.01.2025 - 31.12.2025	495	0	0	495
Dorota Dobija	01.01.2025 - 31.12.2025	320	0	0	320
Aneta Hryckiewicz-Gontarczyk	01.01.2025 - 24.09.2025	214	0	0	214
Arkadiusz Krasowski	01.01.2025 - 31.12.2025	352	0	0	352
Małgorzata Kołakowska	01.01.2025 - 31.12.2025	238	0	0	238
Michał Szczurek	01.01.2025 - 31.12.2025	0	0	0	0
Stephen Creese	01.01.2025 - 31.08.2025	0	0	0	0
Hans De Munck	01.01.2025 - 31.12.2025	0	0	0	0
Serge Offers	01.01.2025 - 31.12.2025	0	0	0	0
Total		**1,619**	**0**	**0**	**1,619**

**The remuneration includes the return of contributions to the Social Insurance Institution due to exceeding the annual basis of contributions for retirement and disability pension insurance in keeping with a decision by the Social Insurance Institution.*

The monthly fixed remuneration for individual Supervisory Board Members is no more than 10 times the average basic salary received by an employee at ING Bank Śląski.

The principles of the Management Board Members remuneration

Internal regulations governing remuneration

The remuneration of a Member of the Bank Management Board is determined in accordance with *the Executive Remuneration Bylaw for Members of the Management Board of ING Bank Śląski S.A.* adopted by the Bank Supervisory Board. The latest amendments to the bylaw were made by Resolution of the Supervisory Board No. 126/XX/2025 of 21 November 2025.

The bylaw is a clarification of the rules resulting from the Remuneration Policy for Supervisory Board and Management Board Members of ING Bank Śląski S.A. and at the same time constitute the implementation of *the Variable Remuneration Policy of Identified Staff of ING Bank Śląski S.A.*

Agreements with Members of the Management Board

The Members of the Management Board are employed on the basis of employment contracts for a joint term of office, which commences on the date of appointment of the body and covers four consecutive full financial years, including the term of office until the date of the General Meeting approving the financial statements for the last full financial year of the members' term of office.

The agreements set out the terms and conditions of employment and the full remuneration package of the Management Board Member. In this respect, the agreements comply with applicable laws and internal regulations.

In addition, the Members of the Management Board have entered into non-competition agreements with the bank upon termination of their employment, which formulate the principles applicable to a Member of the Management Board and the benefits to which they are entitled upon termination.

Management Board Member remuneration package

In accordance with the regulations indicated above, the emoluments of a Management Board Member consist of:

- fixed remuneration comprising basic salary and fringe benefits, and
- variable remuneration, i.e. annual bonus.

The remuneration package for the Members of the Management Board is reviewed annually by the Remuneration and Nomination Committee of the Supervisory Board. In determining the terms and conditions of remuneration for Members of the Management Board, the Supervisory Board takes into account a market comparison, including the median values of comparable positions in comparable organisations. Market data sourced from:

- payroll reports, including Korn Ferry, Sedlak & Sedlak,
- stock exchange reports of banks listed on the Warsaw Stock Exchange (internal bank benchmarking).

Comparative market data sourced from independent salary reports includes data for the banking sector covering base salary, variable salary, termination benefits and other benefits. These figures provide a benchmark for the remuneration policy for the Members of the Management Board.

As part of the review of the remuneration package, the Remuneration and Nomination Committee of the Supervisory Board:

- analyses salary data from the market,
- recommends the level of fixed remuneration and the proportion of the annual bonus to the basic salary.

Fixed remuneration

The base salary is set in relation to the market salary level, according to the grade according to Korn Ferry's job evaluation methodology. When determining the basic salary of a Management Board Member, the following in particular shall be taken into account: the function performed, the scope of responsibility, qualifications and professional experience.

The Bank provides the following fringe benefits to Members of the Management Board:

- Life and accident insurance with a guaranteed insured sum in the amount of gross annual basic salary, another type of protection and investment insurance or an investment fund, with the same premium,

- payments towards an investment fund in the amount of 15% of the monthly basic salary of a Management Board Member,
- medical care (Gold Package). The Management Board Member has the right to extend the medical care to which he/she is entitled with the Gold Partner or Family package. The surcharge for the selected package shall be covered from the Management Board Member's own funds in an amount equal to 35% of the total price of the respective Package. The remaining amount representing 65% of the price of the package in question is covered by the bank.

A separate part of the benefits included in the fixed remuneration are benefits related to the termination of the employment contract, i.e.: severance pay and punitive damages. The employment contracts provide for a severance payment of six times the average monthly basic salary of the last six months of service preceding the termination of employment. Severance pay is not payable if a Member of the Management Board is dismissed for cause:

- an employment relationship be terminated under Article 52 of the *Labour Code*,
- termination of employment on the resignation of a Member of the Management Board, when the termination of the relationship occurs on the initiative of a Member of the Management Board who terminates his or her employment contract in order to take up employment with another entity or to pursue his or her own business,
- the suspension of a Member of the Management Board or the suspension of the entire Management Board by the Polish Financial Supervision Authority under the provisions of the Banking Law.

Severance pay is also not paid in situations where a Member of the Management Board continues to be employed by ING Group N.V. after termination of the contract with the bank.

In addition, the Members of the Management Board have entered into non-compete agreements with the bank setting out the rights and obligations of the parties to the agreement with regard to competitive activities during and after the termination of the employment relationship. Under the terms of the contract, for a period of 12 months from the date of termination of employment, the Management Board Member is entitled to payment of punitive damages equal to 12 months of the gross base salary received by the Management Board Member in the last year of the contract. The amount of punitive damages is reduced in the event of:

- dismissal of a Member of the Management Board for reasons justifying termination of the employment relationship without notice (Article 52 of the Labour Code) or due to suspension of a Member of the Management Board or the entire Management Board of the Bank by the Polish Financial Supervision Authority under the provisions of the Polish Banking Law Act – up to 25% of the 12-month gross basic salary received in the last year of the contract;
- termination of the employment relationship due to the resignation of a Member of the Management Board on his/her own initiative who terminates his/her employment contract in order to take up employment in another entity or to pursue his/her own business – up to 50% of the 12-month gross basic salary received in the last year of the contract. The Supervisory Board may authorise the Chair to increase the punitive compensation above this level.

The Members of the Management Board do not receive remuneration or rewards for their functions in the authorities of subsidiaries and associates of the ING Bank Śląski Group.

Furthermore, the Supervisory Board may decide on granting other benefits, e.g. covering private school tuition for children, rent and fittings of an apartment or a house or payment of a rent allowance, covering membership fees in clubs and associations in Poland and abroad, provided this is justified by interest of the bank.

Variable remuneration

A Member of the Management Board may receive a bonus of up to 100% of the annual base salary for the performance of bonus tasks set by the Supervisory Board. The objectives set by the Board support the creation of long-term value for the bank and include attention to the bank's cost of risk, cost of capital and liquidity risk. The objectives include both non-financial and financial elements.

- Targets of a financial nature include selected ratios set according to financial or management accounting standards taking into account the cost of risk, cost of capital and liquidity risk (including long-term). The target levels of the financial criteria are consistent with the Strategy and Financial Plan of ING Bank Śląski S.A. adopted by the Supervisory Board for the respective assessment period. As a rule, tasks of a financial nature cannot be linked to the results obtained in the areas controlled by the Management Board Member concerned.
- Non-financial targets account for at least 50% of all targets, excluding the Management Board Member responsible for control functions. As a rule of thumb, the objectives of the Management Board Member in charge of control functions only include non-financial tasks.

The weights for financial and non-financial purposes are determined annually by the Supervisory Board.

A right to an annual bonus depends on the attainment by the bank in a financial year representing an assessment period of at least 80% of a gross profit forecast in a plan for the given year. Should such profit not be achieved, a Management Board Member shall not have the right to an annual bonus and a base value thereof shall not be computed. In compliance with the Capital Management Policy at ING Bank Śląski S.A., ING Bank Śląski tests capital to ensure that a total bonus pool for all the employees does not limit the bank's ability to maintain an adequate capital base. In case of such limitation, a decision may be taken not to activate the bonus pool.

The final decision on the amount of the annual bonus for individual Management Board Members is made by the Supervisory Board based on the recommendation of the Remuneration and Nomination Committee of the

Supervisory Board. As a rule, 40% of the bonus is deferred and 60% of the bonus is deferred if the amount set out in the bylaw is exceeded. The deferral period is five years from the determination of the variable remuneration by the Supervisory Board. The award of deferred variable remuneration is made annually over a period of five years, in five equal parts, unless there are grounds for reduction or non-payment. For the President of the Management Board, the deferral period is six years and the deferred variable remuneration is divided into six equal parts.

Non-deferred and deferred variable remuneration is divided into two parts:

- at least 50% in financial instruments – as of 1 July 2022, the treasury share (previously a phantom share) became the primary instrument;
- the remainder in cash to the Management Board Member's bank account designated for the purpose of remuneration payment, no later than within seven working days after the General Meeting of ING Bank Śląski approves the Bank's annual financial statements.

Share-based incentive scheme

The bank's share-based incentive scheme was adopted by resolution of the Bank's Ordinary General Meeting No. 29 of 7 April 2022 in the bank and in the bank's group companies subject to mandatory consolidation, excluding ING Bank Hipoteczny S.A.

Under the programme, treasury shares are awarded free of charge as a component of variable remuneration to Identified Staff within the meaning of the Regulation of the Minister of Finance, Funds and Regional Policy of 8 June 2021 on the risk management system and internal control system and remuneration policy in banks (Journal of Laws 2021, item 1045).

The operation of the programme is conditional on a sufficient number of treasury shares being raised from the market. Pursuant to the programme, the Bank's Ordinary General Meeting authorised the Bank Management Board to purchase the Bank's own shares on the terms and conditions described below:

- own shares will be fully paid up,
- own shares will only be acquired for the purpose of implementing the programme,
- the maximum number of own shares acquired will not exceed 800,000 (in words: eight hundred thousand) shares, representing 0.6% of the bank's share capital and representing 0.6% of the total number of votes in the bank, and in no case will the total nominal value of the own shares acquired, taking into account own shares previously acquired by the bank and its subsidiaries which have not been sold or cancelled, exceed 0.6% of the bank's share capital,
- the total amount that may be allocated for the acquisition of own shares, including the costs of their acquisition, shall not exceed PLN 200 million (in words: two hundred million) and shall in no case exceed the amount of the reserve capital created for this purpose,
- treasury shares will be acquired through an investment firm selected for this purpose,
- the unit purchase price per own share will be no less than PLN 50 (in words: fifty) and no more than PLN 500 (in words: five hundred), with the price per own share determined taking into account Article 5 of the MAR Regulation and the Technical Standards.

In the event that, for any reason, the repurchase of shares from the market is in fact impracticable or not possible without undue difficulty or within the assumed timetable, for the purpose of further fulfilment of the bank's obligations under the programme, the Bank Management Board, with the consent of the Supervisory Board, may decide to replace the bank's own shares with another financial instrument whose value depends on the value of the bank's shares or to fulfil the bank's obligations under the programme in another manner that achieves its objectives.

Phantom share rights granted prior to the start date of the new scheme will be exercised under the existing principles. In particular, the deferred portions of the remuneration granted in phantom shares will not be convertible into treasury shares.

As a result of the transactions, the bank acquired a total of 136,749 treasury shares for a total of PLN 38 million.

	Tranche 1	Tranche 2	Tranche 3	Tranche 4	Tranche 5	Tranche 6
Total number of shares bought back	24,931	22,800	16,292	25,000	22,726	25,000
Timeframe for purchase	12.05.2023-03.07.2023	05.12.2023-29.12.2023	13.03.2024-05.04.2024	04.12.2024-31.12.2024	19.03.2025-07.04.2025	04.12.2025-31.12.2025
Total value of shares bought back (PLN)	4,201,796.0	6,110,408.0	5,190,328.5	6,271,279.0	7,437,381.0	8,534,080.0
Share of shares bought back in share capital	0.01916%	0.01752%	0.01252%	0.01922%	0.01747%	0.01922%

Own shares (deferred for previous years and non-deferred) were transferred to the individual brokerage accounts of the Members of the Management Board and Identified Staff in number:

Bank Management Board	Identified Staff
9 066 non-deferred shares 3 241 deferred shares	29 720 non-deferred shares 5 699 deferred shares

No bonus shall be due should an employment contract be terminated under Article 52 of the Labour Code. The Supervisory Board may also decide to reduce the annual bonus or not to pay it out in a given bonus award period based on the verification of assessment of the execution of the bonus tasks, taking the ex post risk into account.

Linking remuneration to sustainability matters

ESRS 2 GOV-3.29, ESRS E1 GOV-3.13

The criteria for awarding variable remuneration are in line with our bank's long-term business strategy, values and risk appetite, promote and support the process of effective risk management, and support the long-term interests of the bank and its clients. As of 2020, the provisions of the ING Bank Śląski S.A. Group Remuneration Policy are in force, which refer to the linking of remuneration principles at all levels with sustainability objectives. The remuneration policy is consistent with the bank's strategy for the period, which is reflected in the objectives set for the Management Board and employees for the year and directly translates into the level of variable remuneration. In 2025, the objectives set for Management Board Members were ESG-related and included, inter alia, the tasks of:

- CO_2 emission reductions,
- increasing the proportion of women in senior management positions,
- production of high-quality mortgages,
- development of new products in the area of sustainable finance (EUR million),
- increasing the level of mobilisation of sustainable volumes,
- improving the control environment, providing for a shift from limited assurance standards to reasonable assurance standards (CSRD),
- implementing the objectives of the ESG Data Model project in accordance with the objectives, scope and timeline defined and approved by the 2025 Project Steering Committee,
- designing and implementing initiatives to develop and retain Talent,
- implementing initiatives focused on vitality, taking responsibility, competence development, personnel management,
- implementation of ESG risk management solutions – compliance with ESG/climate risk regulations, with particular focus on EBA/ECB requirements,
- development of ESG risk assessment methodology standards to assess financial risks in line with CSRD requirements.

Quantitative and qualitative criteria for awarding the variable remuneration components to members of the Bank's Management Board

Goals' dimensions and weight		Goals' categories	Example indicators
Job (60%)	**Financial** (max 50%)	Total bank financials	Assessment of the bank's profitability, capital efficiency, and the level and control of operating costs
		Performance of the area under management	
	Non-financial (set within areas in line with ING's strategy in a given year)	Customers	Growth of the active customer base, maintaining high customer satisfaction, and developing and strengthening remote service channels
		Strategy	Digitization and modernization / technological transformation and development, increasing process automation, development of alternative customer contact channels, and strengthening the private banking and investment fund strategy
		ESG*	Development of a pro-environmental and sustainability-focused product offering, actions aimed at achieving emission neutrality, building a robust ESG reporting and risk-management system, strengthening gender balance among leaders, and ensuring a high level of organizational health
		Risk	Maintaining financial and non-financial risk – including KYC processes – within the established risk appetite, and ensuring full regulatory compliance
Orange Behaviours (40%)		Individual goals, related to the way in which tasks are performed	Objectives that relate to the principles of the Orange Code, which defines the identity of ING Bank Śląski and defines what bank employees can expect from each other, Orange Behaviours targets can develop soft skills or behaviours that build effectiveness in one's role

**The ESG category accounts for between 3% and 24% of the weighting of the criteria used to award variable remuneration components to the members of the Bank's Management Board.*

Remuneration of Management Board Members

Remuneration due and paid in 2025

Below are the values of the remuneration due and paid by the Bank to Members of the Bank Management Board in 2025.

Benefits payable to Members of the Management Board of ING Bank Śląski for 2025 (in PLN thousand)

First name and surname	Period from – to	Remuneration	Rewarding*	Other benefits**	Total
Brunon Bartkiewicz	01.01.2025 - 29.04.2025	1,005	—	253	1,259
Michał Bolesławski	29.04.2025 - 31.12.2025	1,789	—	321	2,110
Joanna Erdman	01.01.2025 - 31.12.2025	1,669	—	319	1,988
Ewa Łuniewska	01.01.2025 - 29.04.2025 10.05.2025 - 31.12.2025	1,467	—	304	1,770
Marcin Giżycki	01.01.2025 - 31.12.2025	1,705	—	326	2,031
Bożena Graczyk	01.01.2025 - 31.12.2025	1,696	—	316	2,011
Sławomir Soszyński	01.01.2025 - 29.04.2025	894	—	1,826	2,720
Michał Mrożek	01.01.2025 - 31.12.2025	1,591	—	291	1,883
Alicja Żyła	01.01.2025 - 31.12.2025	1,528	—	283	1,812
Marcin Kościński	29.04.2025 - 31.12.2025	890	—	150	1,040
Maciej Ogórkiewicz	29.04.2025 - 31.12.2025	810	—	177	986
Total		**15,045**	**0**	**4,565**	**19,610**

**The benefits for 2025 for the Members of the Management Board of ING Bank Śląski S.A. under the Variable Compensation Scheme have not yet been awarded. In keeping with the bank's remuneration system, the Bank Management Board Members may be entitled to a 2025 bonus to be paid out in 2026-2033. Accordingly, a provision has been made for the payment of the 2025 bonus for the Members of the Management Board, which amounted to PLN 14,780, 823 thousand as at 2025 yearend. The final decision on the amount of this bonus will be made by the Bank Supervisory Board; **insurance, contributions to the investment fund, medical care and other benefits granted by the Bank Supervisory Board.*

Benefits paid to Members of the Management Board of ING Bank Śląski for 2025 (in PLN thousand)

First name and surname	Period from – to	Remuneration	Rewarding*	Other benefits**	Total
Brunon Bartkiewicz	01.01.2025 - 28.04.2025	1,005	1,734	253	2,993
Michał Bolesławski	29.04.2025 - 31.12.2025	1,789	273	321	2,384
Joanna Erdman	01.01.2025 - 31.12.2025	1,669	784	319	2,772
Ewa Łuniewska	01.01.2025 - 29.04.2025 10.05.2025 - 31.12.2025	1,467	453	304	2,223
Marcin Giżycki	01.01.2025 - 31.12.2025	1,705	851	326	2,882
Bożena Graczyk	01.01.2025 - 31.12.2025	1,696	847	316	2,858
Sławomir Soszyński	01.01.2025 - 29.04.2025	894	591	1,826	3,311
Michał Mrożek	01.01.2025 - 31.12.2025	1,591	546	291	2,428
Alicja Żyła	01.01.2025 - 31.12.2025	1,528	385	283	2,197
Marcin Kościński	29.04.2025 - 31.12.2025	890	—	150	1,040
Maciej Ogórkiewicz	29.04.2025 - 31.12.2025	810	—	177	986
Total		**15,045**	**6,464**	**4,565**	**26,074**

Bonus resulting from the Variable Compensation Plan: for 2024 non-deferred cash, for 2023 1st tranche deferred cash, for 2022 2nd tranche deferred cash, for 2021 3rd tranche deferred cash, for 2020 3rd tranche deferred cash, for 2019 4th tranche deferred cash and for 2018 5th tranche deferred cash; Phantom Shares resulting from the Variable Compensation Plan: for 2022 1st tranche deferred, for 2021 2nd tranche deferred, for 2020 2nd tranche deferred, for 2019 3rd tranche deferred, for 2018 4th tranche deferred and for 2017 5th tranche deferred;insurance, investment fund contributions, medical care and other benefits granted by the Bank Supervisory Board.*

Equal pay

We pay very close attention to equal pay in our bank. In addition to the area of equal pay between men and women, an important element is not to allow a disparity between the remuneration of the Members of the Management Board and the average remuneration of our employees. Therefore, this area is governed by two policies: *the ING Bank Śląski S.A. Supervisory Board and Management Board Members Remuneration Policy* and *the ING Bank Śląski Group Remuneration Policy*.

According to the provisions of the regulations cited above, the average gross annual total remuneration of the Members of the Management Board does not exceed 40 times the average gross total remuneration of the other employees in an annual period.

Diversity policy for supervisory and management bodies

ESRS 2 GOV-1.21

ING Bank Śląski applies the principle of diversity in the selection, qualification assessment and succession of supervisory and management bodies. The bank's Diversity Policy for ING Bank Śląski S.A. Management Board and Supervisory Board Members (approved by Resolution of the Ordinary General Meeting of ING Bank Śląski S.A. No. 34 of 7 April 2022) formulates principles to ensure that the members of these bodies are characterised by a broad range of competencies, high professional qualifications, adequate professional experience, skills and good repute. At the same time the policy assumes aiming at ensuring representation of both genders in the processes of selection and succession plans, keeping in mind the laws on fair treatment while establishing employment relationship.

In making its decision when appointing members to the management bodies, the bank takes into account that more diverse management bodies foster constructive dissent and discussion based on different points of view.

The principles set out in the policy aim to:

- reach a broad spectrum of competence when appointing Supervisory Board and Management Board Members so as to have diverse points of view and experience and to facilitate independent opinions and reasonable decisions to be issued by a given body;
- ensure the high quality of tasks performed by management bodies by way of selecting competent individuals to the Supervisory Board and Management Board, primarily applying objective business-related criteria and taking into account benefits stemming from diversity.

As regards business-related criteria, the diversity strategy ensures selection of persons with diverse knowledge, skills and experience, suitable for positions held by them and duties entrusted to them, who complement each other at the level of the Management Board and Supervisory Board. The criteria are verified in the suitability assessment process described in the Policy of Appointing and Recalling Members of the Supervisory Board of ING Bank Śląski S.A. Moreover, apart from knowledge, competences and professional experience, the diversity policy covers gender- and age-related differences and applies them to arrive at the best outcome.

The Remuneration and Nomination Committee of the Supervisory Board of ING Bank Śląski defines the target value of the representation of the underrepresented gender in the Bank Management Board and Supervisory Board and adopts a plan aimed at achieving the target value. The target value is determined according to the term of office of the Supervisory Board and the Management Board of the Bank, i.e. once every four consecutive full financial years counted from the beginning of the term of office of a given body.

Information on diversity in the Management Board and Supervisory Board

	Management Board	Supervisory Board
Gender		
women	4	3
men	5	4
Age		
41-50 years	2	2
51-60 years	7	5
61-70 years	-	-
Citizenship		
Polish	7	5
other	-	2
Seniority		
to 5 years	4	5
6-10 years	4	2
>10 years	1	-

Professional experience of the Members of the Management Board and Supervisory Board			
First name and surname	Position	Work experience	Education
Professional experience of Management Board Members:			
Michał Bolesławski	President of the Bank Management Board	banking, finance	finance and banking
Joanna Erdman	Vice-President of the Bank Management Board	banking, finance	finance and economics
Marcin Giżycki	Vice-President of the Bank Management Board	banking, finance	banking and finance
Bożena Graczyk	Vice-President of the Bank Management Board	banking, finance	finance and economics
Ewa Łuniewska	Vice-President of the Bank Management Board	banking, finance	finance and economics
Michał Mrożek	Vice-President of the Bank Management Board	banking, finance	finance and economics
Maciej Ogórkiewicz	Vice-President of the Bank Management Board	IT security	IT
Alicja Żyła	Vice-President of the Bank Management Board	banking, finance	finance and economics
Professional experience of Supervisory Board Members:			
Monika Marcinkowska	Chair of the Supervisory Board (Independent Member)	banking, finance	economics, management
Małgorzata Kołakowska	First Deputy Chair of the Supervisory Board	banking, finance	economics
Michał Szczurek	Deputy Chair of the Supervisory Board	banking, finance	economics, law, IT
Dorota Dobija	Independent SB Member	banking, finance	economics, IT
Arkadiusz Krasowski	Independent SB Member	banking, finance	economics
Hans De Munck	Member of the Supervisory Board	banking	economics
Serge Offers	Member of the Supervisory Board	economics, accounting, controlling	economics

Since the implementation of the Policy in 2019, the target for under-represented gender has been set at 30% women and 70% men. The means to achieve the target value is to verify and update the database of successors. The target is reviewed annually on the basis of reports prepared by HR units and presented to the Remuneration and Nomination Committee of the Supervisory Board of ING Bank Śląski S.A. If the target value is not achieved, the bank will document the reasons, the measures to be taken and the timing of such measures to ensure that the target value is achieved.

As at 2025 yearend, the Management Board consisted of 4 women (44% of the number of Management Board Members), and the Supervisory Board comprised 3 women (43% of the number of Supervisory Board Members). On the Supervisory Board, 29% (2 people) have a nationality other than Polish.

Other information

Tax Policy

ING Group N.V. has an ING Global Tax Policy that applies to the entire ING Groep. It aims to ensure that, with regard to tax matters, all ING N.V. Group employees act in accordance with the tax laws contained in local legislation, the ING Values and the ING Tax Principles.

ING Bank Śląski has a Tax Policy, that governs the principles we follow with regard to tax matters. In line with this policy, we comply with the principles described in *the ING Global Tax Policy* and *the Orange Code*.

As a result of the cyclical regulatory review in 2025, we revised the Tax Policy, which included introducing and defining the obligations that bank employees and ING entities are required to comply with, as well as supplementing the document with a description of tax risks and audit objectives.

In order to mitigate potential tax risks, we implement lower-level documents, i.e. tax procedures and instructions, inter alia:

- *ING Bank Śląski S.A. Corporate Income Tax Settlement Manual,*
- *Procedure on how to document and determine tax liability and deferred tax at ING Bank Śląski S.A.,*
- *Manual on Tax Documentation for Transactions with Related Entities and Those Established in Countries with Harmful Tax Competition,*
- *Manual on Flat-rate Income Taxes on Certain Income (revenue) Earned by Individuals and Non-resident Legal Entities, Together with Operating Procedures,*
- *Manual on the Preparation by the Bank of information on Income from Other Sources and Information on Certain Income from Monetary Capital,*
- *ING Bank Śląski S.A. Value Added Tax Settlement Manual,*
- *Manual and Procedure for Accounting for the Tax on Certain Financial Institutions (bank tax),*
- *Procedure for dealing with non-compliance with the obligation to provide information on tax schemes, etc.,*

- *Manual on the Definition of Activities to be Performed by Individual Units at ING Bank Śląski S.A. When Obtaining and Submitting Information on US Reported Accounts*,
- *CRS Reporting Manual (Common Reporting Standard)*,
- *Manual and Procedure for the Settlement of Excise Duty at ING Bank Śląski S.A.*

We apply the arm's length principle in our transactions with related entities. We strive to comply with national and international laws and regulations, taking into account both the letter and spirit of the law, as well as standards such as the OECD (Organisation for Economic Co-operation and Development) Guidelines.

We take a transparent approach to tax issues. Our disclosures are made in accordance with the relevant national legislation, as well as applicable requirements and reporting standards, such as IFRS.

The tax area is run by the Centre of Expertise TAX. The mission of this team, following the adopted Policy, is:

- providing high-quality tax support to the bank's business units and management,
- handling of the bank's tax settlements in accordance with applicable laws and regulations,
- ensuring, in cooperation with other units of the CFO Division, that the bank's tax position is correctly reflected in our financial statements.

The main tasks of the Centre of Expertise TAX include:

- rendering opinion, developing and implementing solutions relating to the bank's taxes,
- keeping tax reporting and tax settlements in compliance with applicable laws and the bank's internal needs,
- rendering opinions concerning bylaws, manuals and procedures, external legal acts, draft agreements and other internal documents of the bank with respect to tax effects,
- informing of significant amendments to tax legislation,
- developing and updates or principles and procedures relating to tax liabilities under CIT, VAT, banking tax, flat/withholding tax, excise tax, customs duties, civil law tax.

Summary information on the bank's implemented tax strategy for periods when this was required by law is available on this page.

Management Board statement on agreements concluded

The Bank Management Board declares that as at 31 December 2025 ING Bank Śląski S.A. did not hold:

- material loan agreements, sureties and guarantees not related to operating activities,
- material underwriting agreements,
- significant guarantee agreements granted to subsidiaries,
- liabilities to the central bank,
- material agreements with the central bank or supervision authorities,
- agreements referred to in Article 141t (1) of the Polish Banking Law Act.

Detailed information on transactions with related entities was presented in the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group for 2025 and in the 2025 Financial Statements of ING Bank Śląski S.A.

Indication of proceedings pending before a court, a body competent for arbitration proceedings or a public administration body

Detailed information regarding initiated administrative and court proceedings is provided in the Consolidated Annual Financial Report of the ING Bank Śląski S.A. Group for 2025 and in the Financial Report of ING Bank Śląski S.A. for 2025.

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Over the last few years, the organic growth of the ING Bank Śląski S.A. Group has been carried out with high, better-than-market-quality assets. The speed and consistency of credit decisions can be a competitive advantage. This is due to the entire organisation as well as the experience and motivation of our employees. Due to the increasing use of modern technology, the area of IT security and our clients' data is becoming more and more important.

Risk and capital management system

Risk management system

Our management system allows us to manage risks according to the size and profile of the risks we incur. We continuously identify, measure or assess, monitor and control risks, including mitigation and reporting with an assessment of the effectiveness of the actions taken.

A risk management system is a set of principles, mechanisms, methodologies, models and tools (including, but not limited to, policies and procedures) embedded in risk processes. It covers all areas of our bank's operations as well as the operations of the entire corporate group, including cooperation with outsourcers, clients, and partners.

We hedge or mitigate risks by putting in place appropriate controls, a system of limits and an adequate level of provisions (allowances), as well as capital and liquidity buffers.

Our risk management system ensures that we:

- maintain a safe level of solvency, liquidity, and non-financial risks (including operational risk, compliance risk, and model risk), as well as an appropriate level of reserves,
- support the effective achievement of business objectives,
- ensure compliance with legal regulations and supervisory requirements.

As part of the risk management system:

- we measure or assess risks at a set frequency that is appropriate to the scale and complexity of our bank's and group's activities,
- we use risk measurement or assessment methods that take into account the bank's current and planned activities and authorisation criteria,
- we use formalised:
  - principles for determining the amount of risk taken and risk management principles,
  - procedures to identify, measure or estimate and monitor risks, also taking into account expected future risk levels,
  - limits to mitigate risks and rules in case limits are exceeded, including ways and means to eliminate future overruns,
- we use an established management reporting system to monitor the level of risk,
- we have an organisational structure in place that is adjusted to the size and profile of the risk that the bank incurs,
- we have a qualified risk management unit and provide training for first and second line of defence employees,
- we have a well-defined process for assessing and measuring credit risk, independent of the lending function,
- we have a documented range of reviews for the estimation of expected credit losses including the models used to estimate impairment allowances under IFRS 9 (impairment models) and the timing of these, with at least an annual frequency.

Organisational structure of risk management

The CRO Division (which is headed by the Vice-President of the Management Board responsible for risk, Chief Risk Officer) includes:

- Risk Integration area, which reports to the Bank Director. It includes:
  - Risk Model Department,
  - ESG Risk Management Department,
  - Risk Integration Department,
  - Risk Change and Data Tribe,
  - Strategy and Transformation Team;
- organisational units related to credit risk, which report directly to the Vice-President of the Management Board responsible for risk. It includes:
  - Department of Wholesale Banking Credit Risk,
  - Regional Credit Risk Department,
  - Consumer Credit Risk Department,
  - Business Credit Risk Department;
- other separate organisational units are:
  - Credit Restructuring Department,

- Model Risk Management Department,
- Operational Risk Management Department,
- Market Risk Management Department and
- Credit Risk Inspection Department.

Each area controls and supervises the bank's business and risk management processes assigned to them.

Three lines of defence model

The risk management system is outlined in the policy – *General Principles of Risk Management at ING Bank Śląski S.A.* Our risk management structure is based on a model of three lines of defence. It provides us with a solid foundation for risk management by defining and implementing three layers, with separate enforcement and oversight responsibilities.

First line of defence is responsible for developing, implementing and executing mitigating controls and monitoring their effectiveness. Its responsibilities include:

- analysis,
- control and
- managing risks in the processes, including for outsourced activities.

The management of the business units and support functions has primary responsibility for assessing, controlling and mitigating all risks affecting their operations, and for the completeness and accuracy of financial and risk reports relating to their areas of responsibility.

The second line of defence is responsible for formulating and translating risk appetite into methodologies and policies. Moreover, it objectively verifies and challenges risk management and control processes implemented by the first line of defence. It also coordinates the reporting of risks and controls by the first line of defence. Its main task is:

- support,
- instructing,
- providing opinions,
- counselling,
- questioning and
- overseeing the first line of risk management.

The third line of defence is the Internal Audit Department, which provides the Management Board, Supervisory Board and Audit Committee with independent assurance on the quality and effectiveness of the internal control system, risk management, corporate governance and the implemented systems and processes.

Diagram of the three lines of defence model

Internal control system

The internal control system is described in the policy – *Internal Control System at ING Bank Śląski S.A.* It is one of the elements of bank management and its foundations, principles and objectives derive from the Banking Act, the Regulation of the Minister of Finance, Funds and Regional Policy on the risk management system and the internal control system and remuneration policy in banks and Recommendation H, concerning the internal control system in banks issued by the Polish Financial Supervision Authority.

The purpose of the internal control system is to ensure:

- The efficiency and effectiveness of the bank's operations,
- The reliability of financial reporting,
- Compliance with the bank's risk management principles,
- Compliance of the bank's operations with laws, internal regulations and market standards.

The internal control system consists of:

- Control function – this is the element of the internal control system that consists of all controls in the processes operating in the bank, independent monitoring of their compliance and reporting within the control function.

Includes positions, groups of people or organisational units responsible for carrying out the tasks assigned to this function.

- Centre of Expertise – Compliance – acting as a compliance function to identify, assess, control, monitor and report on risks of non-compliance of the bank's activities with laws, internal regulations and market standards.
- Internal Audit Department – which is an independent unit tasked with examining and assessing, in an independent and objective manner, the adequacy and effectiveness of the risk management system and the internal control system within the first and second lines of defence.

Principles of risk management

We manage credit, market, liquidity, funding, and non-financial (operational and compliance) risks according to the principles established by:

- Polish legal standards,
- regulations of the Polish Financial Supervision Authority and other authorised bodies, as well as
- in accordance with the standards set by ING Group N.V. to an extent that does not lead to a breach of the aforementioned regulations and best practice documents.

Irrespective of the need to ensure regulatory and legal compliance (compliance), we treat the management of credit, market, liquidity and funding and operational risks as a fundamental and integral part of the overall management of the ING Bank Śląski Group.

The document *General Principles for the Management and Mitigation of Credit, Market and Operational Risk at ING Bank Śląski* is approved by the Bank Supervisory Board, based on the recommendations of the Risk Committee. The policy is approved by the Bank Management Board.

Detailed information on the principles of lending activities, credit risk management, risk management system is presented in the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group for 2025.

Risk appetite

The risk appetite determines the maximum amount of risk we are prepared to accept, thereby supporting the stability of the organisation and its further development. As part of our risk and capital management, we set risk appetite limits (known as RAS – Risk Appetite Statements), allowing us to meet regulatory levels, even in a stressful situation, and strategic capital targets, allowing us to implement our business strategy.

Capital adequacy objectives

As part of our capital strategic goals, we maintain management buffers that enable the implementation of our strategy in unexpected regulatory and business changes. The minimum level of capital adequacy results from the obligation to maintain minimum levels of capital ratios under the following external regulations:

- Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 (4.5% for CET1, 6% for T1 and 8% for TCR),
- Act of 5 August 2015 on macroprudential supervision of the financial system and crisis management in the financial system sanctioning additional capital buffers, including:
  - hedging buffer, which in 2025 (as in 2024) was 2.5%,
  - another systemically important institution buffer of 1.0% imposed by a decision of the PFSA, received on 11 December 2024,
  - the countercyclical buffer applied to exposures on which such a buffer has been imposed by the 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 (at the end of December 2025, the countercyclical buffer was effectively 1.001% (solo: 1.002%), compared to 0.009% (solo: 0.009%) as at the end of December 2024).
- Regulation of the Minister of Development and Finance of 18 March 2020 repealing the Regulation on the systemic risk buffer.

As part of the risk appetite setting (RAS) in the area of capital adequacy, we also set capital limits for individual risks.

Own funds and capital requirement

Minimum capital requirements

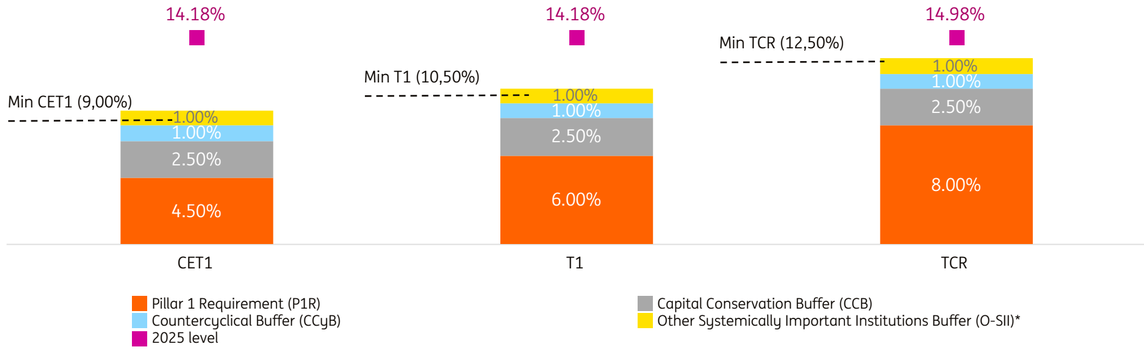
On 11 December 2024, we received a letter from the Polish Financial Supervision Authority (as reported in the current report) regarding a change in the level of the buffer of another systemically important institution, the adequate amount of which, based on the principles adopted by the PFSA, was set at an equivalent of 1.0% of the Total Risk Exposure Amount (TREA). Since that date, the buffer of another institution of systemic importance to us has not changed.

On 19 December 2024, we received a letter from the PFSA (as reported in the current report) regarding the non-designation of a recommendation for us to mitigate the risks inherent in our business by maintaining own funds to cover an additional capital charge (P2G) to absorb potential losses arising from stress events. The PFSA's decision was upheld in 2025.

As a consequence, at the end of 2025, the minimum capital requirements for the ING Bank Śląski Group are:

- the Common Equity Tier 1 (CET1) requirement is 9.00%, of which:
  - 4.50% Pillar 1 Requirement (P1R),
  - 0.00% Pillar 2 Requirement (P2R),
  - 2.50% Capital Conservation Buffer (CCB),
  - 1.00% Countercyclical Buffer (CCyB),
  - 1.00% Other systemically important institution (O-SII) buffer,
  - 0.00% Pillar 2 Guidance (P2G) recommendation.
- The Tier 1 (T1) requirement is 10.50%, of which:
  - 9.00% CET1 requirement,
  - 1.50% Pillar 1 requirement for Additional Tier 1 (AT1) instruments.
- The Total Capital Ratio (TCR) requirement is 12.50%, of which:
  - 10.50% T1 requirement,
  - 2.00% Pillar 1 requirement for Tier 2 (T2) capital.

Structure of minimum capital requirements for the ING Bank Śląski Group as at 31 December 2025:



Own funds

Our own funds on a consolidated basis consist of:

- common Equity Tier 1 capital, which amounted to PLN 18,167 million as at 2025 yearend (PLN 18,237 million as at 2024 yearend),
- Tier 2 capital, which amounted to PLN 1,032 million as at 2025 yearend (PLN 1,364 million as at 2024 yearend).

At 31 December 2025, as at 31 December 2024, no Additional Tier 1 (AT1) capital is identified in the Group.

Capital requirement

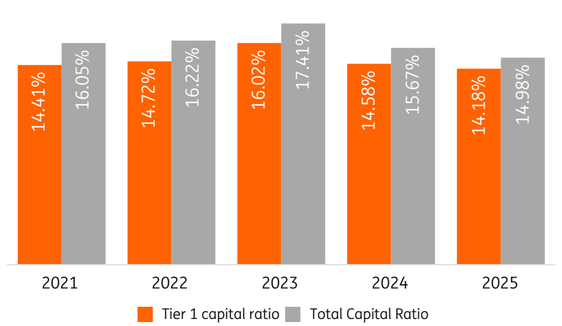
For reporting purposes in 2025 and 2024, we used the internal ratings approach and the standardised approach to calculate the capital requirement for credit risk. We are approved by the Polish Financial Supervision Authority and the National Bank of the Netherlands to use the Advanced Internal Ratings Based Approach (AIRB) for exposure classes: companies and credit institutions for our bank and ING Lease (Polska) sp. z o.o. From the beginning of 2025, following the implementation of the CRR3 Regulation, some credit exposures were included in the basic internal ratings-based approach (F-IRB). In the area of operational risk, we use the business indicator method. In the area of market risk, we use the basic method and the updated average return period method (depending on the type of risk). We determine capital requirements relating to concentration risk, settlement risk and adjustment risk or credit valuation (CVA). In all cases, the requirements are set in accordance with the CRR Regulation.

Our total capital requirement as at 2025 yearend was PLN 10,251 million, up by PLN 242 million on the previous year. Within its structure, it was dominated by the credit risk requirement. As at 2025 yearend, it represented 87% (as at 2024 yearend it was 84%).

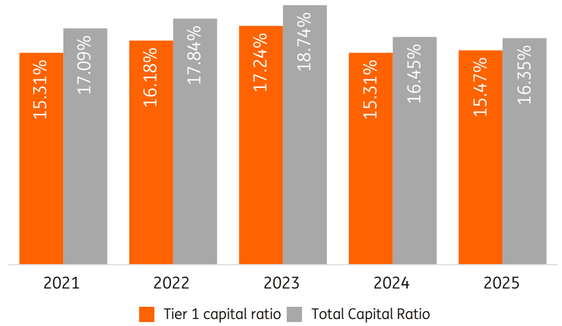
Capital adequacy

As at 2025 yearend, the value of our Total Capital Ratio on a consolidated basis was 14.98% compared to 15.67% as at 2024 yearend, and the value of our consolidated Tier 1 ratio was 14.18% compared to 14.58% as at 2024 yearend.

Capital ratios for the ING Bank Śląski S.A. Group



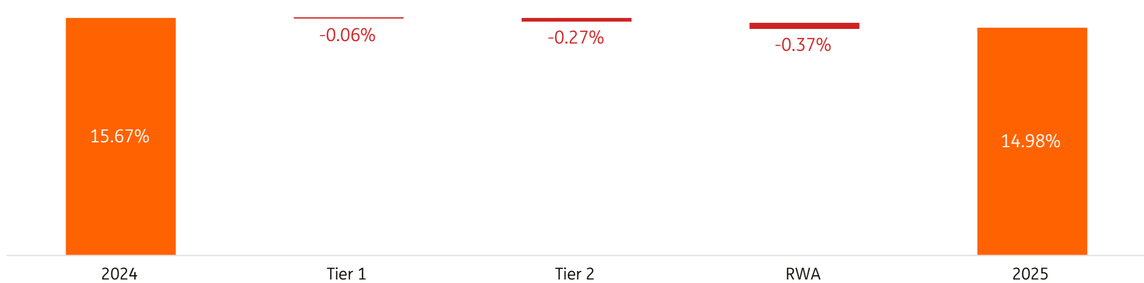
Capital ratios for ING Bank Śląski S.A.



The main drivers of the change in the Total Capital Ratio are:

- as part of common equity Tier 1 capital:
  - increase in coverage shortfall due to unserved exposures – decrease in Total Capital Ratio by 0.05 p.p.,
  - increase in the shortfall of credit risk adjustments against expected losses according to the IRB approach – decrease in the Total Capital Ratio by 0.03 p.p.,
  - change in the valuation of equity investments included in unrealised gains and losses on the portfolio measured at fair value through other comprehensive income – an increase of 0.03 p.p. in the Total Capital Ratio,
- as part of Tier 2 capital:
  - increase in the amount of subordinated loans not included in own funds as a result of entering the last 5 years to maturity – decrease in the Total Capital Ratio by 0.25 p.p.,
- as part of the capital requirement:
  - reduction in risk-weighted assets due to implementation of CRR3 – increase in Total Capital Ratio of 1.81 p.p.,
  - increase in risk-weighted assets due to changes in on-balance sheet and off-balance sheet credit exposures – 1.40 p.p. decrease in Total Capital Ratio,
  - increase in risk-weighted assets due to the inclusion of a management buffer for CRR3 uncertainties – decrease in the Total Capital Ratio by 0.50 p.p.,
  - increase in risk-weighted assets due to model changes and risk migration – decrease in Total Capital Ratio by 0.23 p.p.

Structure of the annual change in the Total Capital Ratio (consolidated approach)



The surplus of the Total Capital Ratio over the regulatory requirement decreased from 4.16% at the end of 2024 to 2.48% at the end of 2025, and the surplus of the Tier 1 ratio decreased from 5.07% at the end of 2024 to 3.68% at the end of 2025.

Dividend policy

The most important assumptions of our dividend policy are as follows:

- stable realisation of dividend payments in a foreseeable perspective in the amount of up to 75% of our bank's annual net profit in compliance with the prudent management principle and all regulatory requirements we are obliged to comply with, and taking into account the adopted *Best Practice for GPW Listed Companies*,
- a proposal to pay dividends in excess of the ratio indicated above is possible if justified by the bank's financial situation and provided that all other requirements of the law and the dividend policy are met,
- the possibility of making dividend payments from excess capital above minimum capital adequacy ratios and above the minimum levels of capital ratios set by the Polish Financial Supervision Authority for dividend payment purposes.

When deciding on the proposed amount of dividend payment, the Bank Management Board takes into account the supervisory requirements communicated within the framework of the official communication of the PFSA concerning the dividend policy of banks, as well as the following considerations:

- the current economic and financial condition of the bank and the capital group, including limitations when financial losses are generated or in case of low profitability (low return on assets / equity),
- the assumptions of the management and risk management strategy of the bank and the bank's group,
- restrictions resulting from Article 56 of the Act on Macro-prudential Supervision over the Financial System and Crisis Management in the Financial System of 5 August 2015,
- the need to reduce current period profits or unapproved annual profits included in own funds by foreseeable dividends, in accordance with Article 26 of EU Regulation No. 575/2013,
- macroeconomic environment.

PFSA's guidelines with respect to dividend for 2025

On 17 December 2025, the Polish Financial Supervisory Authority published its position on dividend policy in 2026. Up to 50% of the profit for 2025 can only be distributed by banks that meet the following criteria:

- do not implement a recovery programme,
- are positively evaluated as part of the Supervisory Revision and Evaluation Process (final SREP score not worse than 2.5),
- have a leverage ratio (LR) of more than 5%,
- have a Common Equity Tier 1 (CET1) capital ratio of not less than the required minimum: 4.5% + 56.25% * P2R requirement + combined buffer requirement (taking into account the announced countercyclical buffer target of 2%) + P2G [2],
- have a Tier 1 (T1) capital ratio of not less than the required minimum: 6% + 75% * P2R requirement + combined buffer requirement + P2G[2],
- have a Total Capital Ratio (TCR) of not less than the required minimum: 8% + P2R requirement + combined buffer requirement + P2G[2].

An amount of up to 75% of the 2025 profit can only be paid out by banks that meet the criteria for a 50% payout and also whose portfolio of receivables from the non-financial sector has good credit quality (share of NPLs, including debt instruments, of no more than 5%).

We should meet the criteria set out above on both a standalone and consolidated level, as at 2025 yearend and at the time of the resolution regarding the potential payment of dividends from 2025 profits.

The maximum dividend payable is capped at 75%, in line with the expectation of ensuring the stability of the Polish financial sector by adjusting the capital base of supervised entities to the level of their risk and protecting the recipients of financial services of these entities.

In addition, for banks that are characterised by an excessively high sensitivity of interest income or economic value of capital to interest rate changes, the dividend rate should be further reduced by 25 bps. The sensitivity of net interest income is understood to be higher than the regulatory limits for SOT NII > -5% and SOT EVE > -15%, both on an individual and consolidated level.

Dividends paid

On the basis of the PFSA's position on the banks' dividend policy for 2025, on 29 April 2025 the Bank's Ordinary General Meeting passed a resolution on the payment of dividends from the 2024 profit. Based on this resolution, on 12 May 2025 the bank paid a total dividend of PLN 3,276 million, i.e. a gross dividend of PLN 25.18 per share.

The history of dividends paid in the last five years is shown in the table below. The full story is available on our website.

Brief history of dividend payments for a given year, payable in the following year by ING Bank Śląski S.A.

	2020	2021	2022	2023*	2024
Dividend amount in a given year (PLN million)	664	690	-	4,339	3,276
Dividend amount per share (PLN)	5.10	5.30	-	33.35	25.18
Dividend payment rate (to consolidated profit)	49.6%	29.9%	-	97.7%	75.0%
Dividend payment rate (to the share price on the dividend rights acquisition day)	2.0%	2.3%	-	11.0%	8.5%

**Including: PLN 3,331 million from the Bank's 2023 profit, representing 75% of ING Bank Śląski S.A.'s standalone and consolidated profit for 2023, and PLN 1,008 million from the dividend reserve. The amount of PLN 1,008 million consists of: PLN 494 million in profit for 2019 and PLN 514 million in profit for 2022.*

Declared dividends

The Bank Management Board is recommending to the General Meeting a dividend of PLN 3,475 million from the profit for 2025, which represents 75% of the consolidated profit of the ING Bank Śląski Group and 75% of the standalone profit of ING Bank Śląski. The proposed dividend per share is PLN 26.71 gross. The proposed dividend date is 22 April 2026, and the proposed dividend payment date is 27 April 2026. The amount of the proposed dividend takes into account both the current financial situation of the group and the bank and its development plans.

[2] Pillar 2 Guidance or Additional Capital Recommendation – measures a bank's vulnerability to an adverse macroeconomic scenario using the results of supervisory stress tests. Sensitivity defined as: the relative change in CET1 calculated between the lowest level of CET1 in the scenario horizon and CET1 at the start of the test, including supervisory adjustments. The amount of the recommendation takes into account the compensation of the safety buffer.

Recovery plan and enforced restructuring

On 26 November 2025, we received as the ING Bank Śląski Group a positive decision from the PFSA of 21 November 2025 on the approval of the updated *Recovery Plan* document. *The Recovery Plan* complies with the provisions of Polish law transposing the requirements of the BRR Directive, namely:

- the Bank Guarantee Fund Act of 10 June 2016 (as amended) and
- the implementing provisions of that Act.

In parallel with the work on the *Recovery Plan*, we are implementing further solutions to improve the feasibility of an effective restructuring. Work is underway to prepare data and information for this year's resolution planning process at local level (to the Bank Guarantee Fund) and at group level (to *the Single Resolution Board*) in the form of:

- the first iteration of *the Multi-Year Testing Program* for the feasibility of an effective forced restructuring (EBA/GL/2023/05),
- self-assessment of the degree of implementation of the EBA Guidelines for improving the ability to restructure effectively (EBA/GL/2022/01),
- reporting for the purpose of drawing up and implementing resolution plans ("Z" template reporting) according to the new standards, i.e. EBA/ITS/2025/04,
- BGF's annual survey,
- Operational continuity in resolution (OCIR),
- CFT (Critical Functions Template) group reporting,
- FMIR (Financial market infrastructure report) group reporting,
- updates to *the Redemption or Conversion Manual*.

The Bank Guarantee Fund (BGF) – as part of the tasks described in the Act – is obliged to participate in the forced restructuring colleges established by the competent forced restructuring authorities for groups that include a domestic entity or a significant branch operating on the territory of the Republic of Poland.

In carrying out these tasks, the BGF participates in the Single Resolution Board (SBR), which was set up by the Single Resolution Board (SRB) of the ING Group N.V., consisting of the parent company ING Groep N.V. and subsidiaries, including ING Bank Śląski S.A. The BGF, in a letter of 05 June 2025, reported that, in cooperation with the SRB, acting within the framework of the college, they had agreed and adopted, in the form of a joint decision, a Minimum Requirement for Own Funds and Eligible Liabilities, MREL, on a consolidated basis for ING Group N.V. and for subsidiaries, including ING Bank Śląski, at the standalone level (internal MREL). The joint decision indicates that the group compulsory restructuring plan provides for a compulsory restructuring strategy involving a single point of contact in the event of the commencement of a compulsory restructuring (Single Point of Entry, SPE). The preferred compulsory restructuring tool for ING Group N.V. is the bail-in instrument.

The MREL requirement set by the BGF, in consultation with the SRB, for us is 16.25% of the Total Risk Exposure Amount (TREA) Total Risk Exposure Amount (TREA) – excluding the combined buffer requirement of 4.50% at the end of 2025, and the 5.91% Total Exposure Measure (TEM), at a standalone level. As at 2025 yearend, the MREL TREA rate was 25.22% and the MREL TEM rate was 10.32%. The entire MREL requirement should be met in the form of own funds and liabilities that meet the criteria set out in Article 98 of the BGF Act, which transposes Article 45f(2) of the BRR Directive. The part of MREL corresponding to the recapitalisation amount should be met in the form of the following instruments: additional Tier 1 (AT1), Tier 2 (T2) capital instruments and other subordinated eligible liabilities acquired directly or indirectly by the parent company. As at 2025 yearend, we meet the BGF's expectation.

The MREL requirement – according to the current BGF methodology for subsidiaries in cross-border group structures for which SPE strategies have been defined – for risk exposures can be estimated based on the formula:

$$(CRR_{TCR} + BFX) + [1 - (CRR_{TCR} + BFX)] * (CRR_{TCR} + BFX) + MCC$$

- CRR_{TCR} – the minimum required by CRR with respect to the Total Capital Ratio,
- BFX – Pillar 2, i.e. add-on for foreign currency mortgage exposure,
- MCC – market credibility buffer (the nominal difference between the MREL requirement on a consolidated basis for the bank and the MREL requirement on a stand-alone basis, expressed as a percentage of the risk exposure on a stand-alone basis).

The MREL requirement, in relation to a measure of total exposure, can be estimated based on the formula:

$$(CRR_{LR}) + [1 - CRR_{LR}] * CRR_{LR}$$

- CRR_{LR} – the minimum leverage ratio required by the CRR.

Common Equity Tier 1 (CET1) instruments held by an entity for the purposes of the combined buffer requirement cannot be counted towards the MREL requirement expressed as a percentage of total risk exposure.

The restructuring strategy and the MREL requirement may be subject to change, in particular in connection with work within the supervisory colleges.

As at 2025 yearend, the value of non-preferred senior loans from ING Bank N.V. amounted to EUR 2,110 million. This value consists of:

- a loan of EUR 260 million (which we announced in the in our current report of 22 December 2022) concluded for a period of 6 years (with the bank having the right to repay it early after 5 years),

- a loan of EUR 1.5 billion (which we announced in the in our current report of 21 December 2023) concluded for a period of 4 years (with the bank having the right of early repayment after 3 years), and
- a loan of EUR 350 million (which we announced in the in our current report of 9 October 2024) concluded for a period of 4 years (with the bank having the right to repay it early after 3 years).

The loans are part of the implementation of the SPE strategy for ING Group N.V.

Development of our competences

As part of the promotion of a risk culture, we improve the skills of our employees by organising internal or participating in external training courses on topics such as:

- principles and methods of risk management,
- knowledge of credit principles,
- knowledge of risk models and interpretation of their results,
- knowledge of systems and risk reporting,
- ESG and sustainability,
- liquidity and funding,
- market risk,
- general banking issues organised by ING Group N.V. and other units of the bank.

Credit Risk

Introduction

The overarching documents governing credit risk management are: *The General Principles of Risk Management at ING Bank Śląski S.A.* and *the Credit Risk Management Policy at ING Bank Śląski*.

Credit risk is understood as:

- the risk of the ING Bank Śląski Group incurring a financial loss as a result of a debtor failing to meet its loan obligations to the Group in full and on time,
- the risk of reduced economic value of credit exposures or groups of credit exposures as a result of impaired ability of debtors to service their debt at the agreed time.

The policy of the ING Bank Śląski Group on the risk of the credit exposure portfolio takes into account the fact that activities generating credit risk may also be associated with other risks, including but not limited to:

- liquidity,
- market risk,
- operational risk,
- legal risk,
- reputational risk,
- ESG risks,
- concentration.

These risks can reinforce each other. The Group optimises and mitigates losses relating to risk exposure by:

- setting internal limits,
- appropriate design of credit products,
- applying collateral,
- application of functional control,
- effective monitoring, restructuring and collection,
- monitoring of changes to the clients' credit worthiness and reliability,
- regular monitoring and validation of models used to identify and measure credit risk,
- performing analyses of trends and the values of key risk indicators,

Our primary objective in the credit risk management process is to support the effective achievement of business objectives through proactive risk management and organic growth activities, while:

- maintaining a safe level of capital and liquidity ratio standards and an adequate level of reserves,
- ensuring compliance with the law and supervisory requirements,

We manage credit risk in an integrated manner based on:

- strategic planning,
- a consistent system of limits, policies and procedures, and
- tools for risk management, including those to identify, measure and control risk.

This integrated system consists of all the processes carried out in connection with lending activity. The specific objectives of credit risk management are:

- supporting business initiatives,
- maintaining credit losses at the target level,
- ongoing verification, review of adequacy and development of the applied procedures, models and other elements of the risk management system,
- adapting operations to changing external conditions.

Risk management strategy and risk appetite parameters

Credit risk management is treated as a fundamental and integral part of overall management. The core elements of risk management include determination and monitoring of strategy implementation and RAS parameters.

Credit risk management strategy

The credit risk management strategy supports implementation of business objectives while maintaining our bank's safe level of solvency and liquidity and an adequate level of provisions. We determine the strategy in order to ensure an optimum development of the loan portfolio while maintaining an adequate quality and profitability of credit operations and capital allocation. The primary goal of defining the credit risk management strategy is to optimise the risk/return on equity ratio, while considering information on the current and prospective macroeconomic environment, the bank's portfolio and the level of execution of the RAS limits.

In the credit risk management strategy, we provide for a "lookout to the future", including the need to remain competitive, attractive and to develop the bank's offer.

Determining the bank-wide risk appetite (RAS)

RAS is a bank-wide risk appetite, defined by setting acceptable values for key metrics. The bank-wide risk appetite is supported and hedged by setting more detailed strategic, internal limits and other risk measures.

Types of RAS limits for credit risk:

- sales and portfolio size limits,
- portfolio quality limits/risk parameter values,
- monitoring and recovery efficiency limits,
- sectoral limits,
- concentration limits, including limits for the portfolio of mortgage-backed credit exposures, resulting from the requirements of Recommendation S,
- RAS qualitative and quantitative parameters for ESG risk.

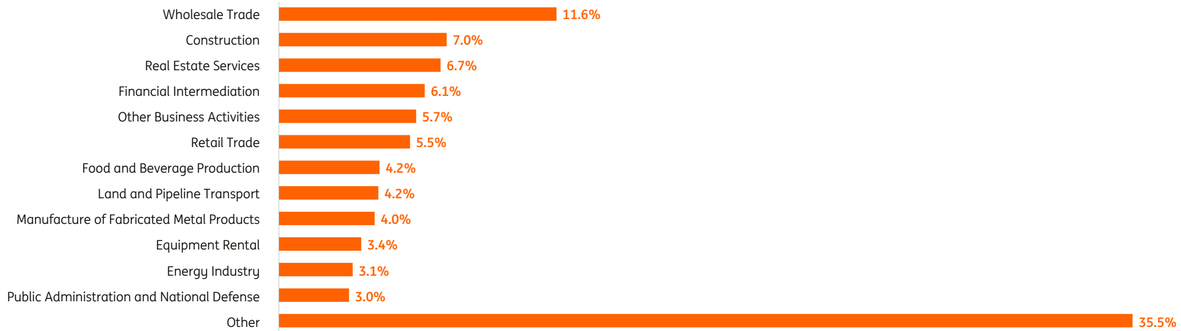
In addition to RAS limits, we set credit risk limits for individual areas, business lines and products, as well as transaction limits that are accepted by the relevant credit decision-maker. In addition, we set internal concentration limits for:

- industries,
- forms of collateral accepted,
- regions,
- mortgage-backed credit exposures.

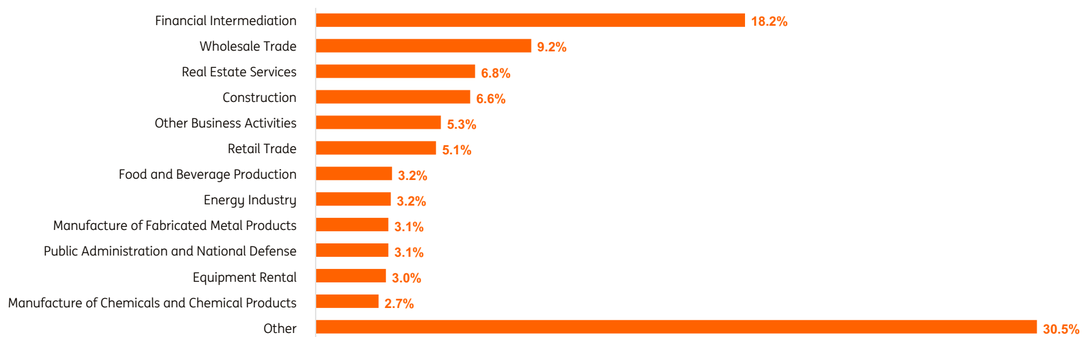
The ongoing execution of RAS limits is monitored and reported during the year on a monthly basis.

Structure of non-bank corporate client portfolio – total on-balance sheet and off-balance sheet exposure

ING Bank Śląski Group



ING Bank Śląski



Credit risk management process

Credit risk management is a continuous process which includes all actions of the bank related to its credit business. All units and persons that perform tasks in the credit process closely cooperate in order to:

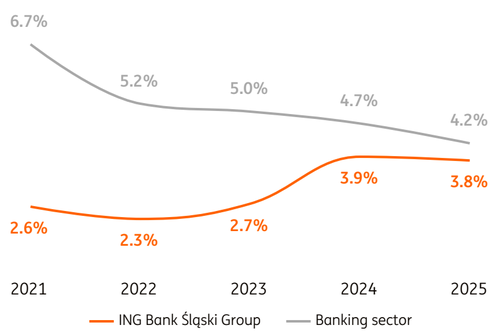
- improve the effectiveness of risk management, and
- maintain risk at a level consistent with the strategy, the approved bank-wide risk appetite (RAS) and the bank's financial plans.

We implement the credit risk management process through three organisationally and functionally independent lines of defence. The bank applies organisational arrangements that take into account the separation of the banking product sales function from the risk management function at all levels of the organisational structure, including the Bank Management Board. The separation of the monitoring functions and risk control of credit exposures (including concentration risk) from the sales functions of banking products and the risk underwriting functions is maintained below the level of the Bank Management Board; for retail credit exposures – also at the level of the Management Board.

In case of simplified, automatic credit process paths, the separation of the sales functions of banking products from the risk underwriting functions of credit exposures relies on the independence of the development and validation process of tools supporting the process of risk underwriting from the sales and operational functions. Competences with respect to credit decisions relating to individual credit transactions are separated from decision authority on the development of credit policies and credit risk management principles.

Quality of the loan portfolio

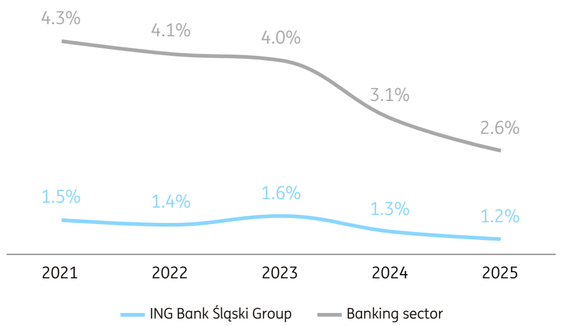
Share of Stage 3 and POCI loans for the ING Bank Śląski Group



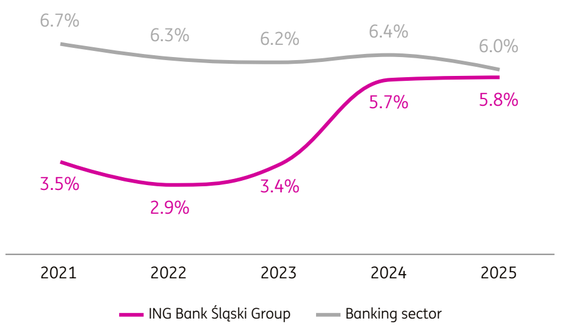
The share of Stage 3 and POCI loans in our bank's group fell from 3.9%% as at 2024 yearend to 3.8% as at 2025 yearend, while compared to the share for the banking sector (4.2% as at 2025 yearend) it was 0.4 p.p. lower. The group's Stage 3 and POCI loans stood at PLN 6,821 million compared to PLN 6,462 million as at 2024 yearend (up by +6% y/y), mainly driven by growth in the corporate segment's non-performing loan portfolio.

As at 2025 yearend, the share of loans in Stage 3 and POCI loans in the retail segment in the ING Bank Śląski Group amounted to 1.2% compared to 2.6% for the sector. The corresponding ratios for the corporate segment were 5.8% for the ING Bank Śląski Group and 6.0% for the sector, respectively.

Share of Stage 3 and POCI loans in the retail portfolio



Share of Stage 3 and POCI loans in the corporate portfolio



In 2025, the quality of our loan portfolio, apart from the increase in business volumes and prudent lending policy, was also affected by the sale of receivables classified as Stage 3 loans. As a result of these transactions, gross loans decreased by PLN 457 million in the corporate segment and by PLN 1,256 million in the retail segment.

Quality of the portfolio of loans to clients* of the ING Bank Śląski Group

PLN billion	2021	2022	2023	2024	2025	Change 2025 to 2024 PLN billion	Change 2025 to 2024 %
Total exposure	146.4	156.4	158.3	167.4	181.2	+13.8	+8%
Stage 1 and 2	142.6	152.8	154.0	160.9	174.3	+13.4	+8%
Stage 3 and POCI	3.8	3.6	4.2	6.5	6.8	+0.4	+6%
Impairment allowance	3.1	3.3	3.5	4.0	4.2	+0.2	+5%
Allowance for stages 1 and 2	0.6	1.2	0.9	0.8	0.8	0.0	-1%
Allowance for stage 3 and POCI	2.5	2.1	2.6	3.1	3.4	+0.2	+7%
Portfolio share in stage 3 and POCI	2.6%	2.3%	2.7%	3.9%	3.8%		-0.1 p.p.
Portfolio coverage ratio in stage 3 and	65.2%	58.6%	61.0%	48.7%	49.2%		+0.4 p.p.
Exposure - corporate banking	79.9	92.5	93.4	96.1	100.7	+4.6	+5%
Stage 1 and 2	77.1	89.8	90.2	90.6	94.9	+4.3	+5%
Stage 3 and POCI	2.8	2.7	3.2	5.5	5.8	+0.3	+6%
Impairment allowance	2.2	2.2	2.5	3.1	3.3	+0.2	+6%
Allowance for stages 1 and 2	0.4	0.7	0.6	0.5	0.5	0.0	-1%
Allowance for stage 3 and POCI	1.8	1.5	1.9	2.5	2.7	+0.2	+8%
Portfolio share in stage 3 and POCI	3.5%	2.9%	3.4%	5.7%	5.8%		+0.1 p.p.
Portfolio coverage ratio in stage 3 and POCI	63.4%	56.7%	60.1%	46.2%	46.9%		+0.7 p.p.
Exposure - Retail Banking	66.5	63.9	64.9	71.3	80.4	+9.2	+13%
Stage 1 and 2	65.5	63.0	63.9	70.3	79.4	+9.1	+13%
Stage 3 and POCI	1.0	0.9	1.0	1.0	1.0	0.0	+3%
Impairment allowance	1.0	1.1	1.0	0.9	0.9	0.0	+1%
Allowance for stages 1 and 2	0.2	0.5	0.3	0.3	0.3	0.0	-1%
Allowance for stage 3 and POCI	0.7	0.6	0.7	0.6	0.6	0.0	+2%
Portfolio share in stage 3 and POCI	1.5%	1.4%	1.6%	1.3%	1.2%		-0.1 p.p.
Portfolio coverage ratio in stage 3 and POCI	70.1%	64.1%	63.7%	62.9%	62.2%		-0.7 p.p.

**Excluding other receivables.*

Quality of loans portfolio to clients* of ING Bank Śląski

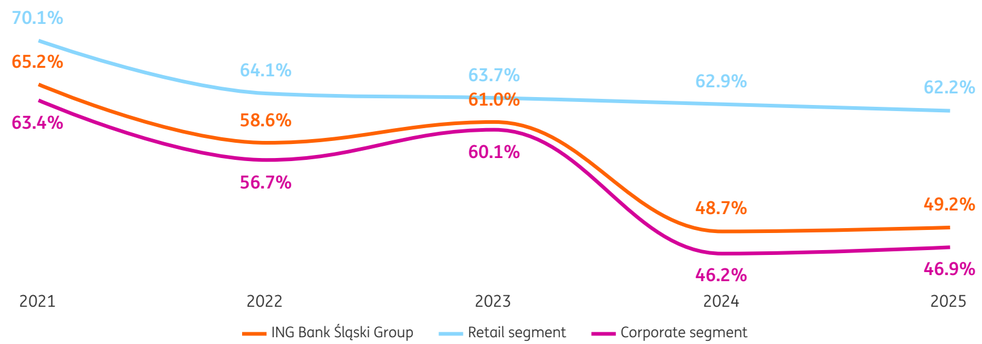
PLN billion	2021	2022	2023	2024	2025	Change 2025 to 2024	
						PLN billion	%
Total exposure	126.8	138.6	141.7	150.5	162.6	+12.1	+8%
Stage 1 and 2	123.5	135.6	138.1	144.9	156.7	+11.8	+8%
Stage 3 and POCI	3.2	3.0	3.6	5.6	5.9	+0.3	+5%
Impairment allowance	2.9	3.0	3.2	3.7	3.8	+0.2	+5%
Allowance for stages 1 and 2	0.6	1.1	0.9	0.8	0.7	0.0	-1%
Allowance for stage 3 and POCI	2.3	1.9	2.4	2.9	3.1	+0.2	+6%
Portfolio share in stage 3 and POCI	2.6%	2.2%	2.5%	3.7%	3.6%		-0.1 p.p.
Portfolio coverage ratio in stage 3 and	69.6%	63.0%	65.0%	52.0%	52.7%		+0.6 p.p.
Exposure - corporate banking	74.7	86.0	87.1	90.1	94.6	+4.5	+5%
Stage 1 and 2	72.5	83.9	84.5	85.4	89.6	+4.2	+5%
Stage 3 and POCI	2.3	2.1	2.6	4.7	4.9	+0.2	+5%
Impairment allowance	1.9	1.9	2.3	2.8	3.0	+0.2	+6%
Allowance for stages 1 and 2	0.4	0.6	0.6	0.5	0.5	0.0	-1%
Allowance for stage 3 and POCI	1.6	1.3	1.7	2.3	2.5	+0.2	+7%
Portfolio share in stage 3 and POCI	3.0%	2.5%	3.0%	5.2%	5.2%		0.0 p.p.
Portfolio coverage ratio in stage 3 and POCI	68.9%	62.1%	64.9%	49.6%	50.6%		+1.0 p.p.
Exposure - Retail Banking	52.1	52.6	54.6	60.4	68.0	+7.6	+13%
Stage 1 and 2	51.1	51.7	53.6	59.5	67.1	+7.6	+13%
Stage 3 and POCI	1.0	0.9	1.0	0.9	1.0	0.0	+3%
Impairment allowance	0.9	1.0	1.0	0.9	0.9	0.0	+1%
Allowance for stages 1 and 2	0.2	0.5	0.3	0.3	0.3	0.0	-
Allowance for stage 3 and POCI	0.7	0.6	0.6	0.6	0.6	0.0	+2%
Portfolio share in stage 3 and POCI	1.9%	1.7%	1.8%	1.5%	1.4%		-0.1 p.p.
Portfolio coverage ratio in stage 3 and POCI	71.2%	65.3%	65.3%	64.4%	63.3%		-1.0 p.p.

Excluding other receivables.

Coverage of stage 3 portfolio with allowances

At the end of December 2025, the ING Bank Śląski Group had provisions for its Stage 3 and POCI loan portfolio of PLN 3,353 million compared with PLN 3,148 million as at 2024 yearend (up by +7% y/y). The portfolio allowance rate in Stage 3 and POCI was 49.2%, compared to 48.7% last year. The increase in the ING Bank Śląski Group's coverage ratio was due to higher portfolio coverage in the corporate segment.

Impairment/Stage 3 and POCI portfolio coverage ratio



Risk cost

In 2025, there was a y/y decrease in the risk cost margin ratio (the ratio of the allowance for expected net loan losses and provisions for legal risk of foreign currency mortgage loans to the gross loan portfolio). More information on the cost of risk can be found in the chapter Our financial results.

Types of applied credit risk collaterals

In order to secure the risks associated with our lending activities, we accept legal personal and material collateral in various forms, such as:

- bank guarantee,
- surety under civil law,
- blank promissory note,
- surety on a bill of exchange,
- the transfer of claims,
- mortgages,

- registered pledge,
- transfer of ownership for collateral,
- cash deposit,
- blocking of funds in a bank account.

As at 2025 yearend, the value of Basel2 collaterals on the accounts or assets of the borrowers amounted to PLN 247.3 million (of which 59.4% were mortgages) for the ING Bank Śląski S.A. Group and PLN 173.9 billion (of which 78.4% are mortgages) for ING Bank Śląski S.A.

Market risk

Introduction

The main objectives of market risk management at ING Bank Śląski S.A. are:

- to ensure awareness and understanding of our bank's exposure to market risk,
- to ensure that the bank's exposure to market risk is appropriately managed,
- to ensure (where applicable) that the exposure is within accepted limits.

We define market risk as the potential loss we may incur due to:

- adverse movements in market prices (such as yield curves, exchange rates, capital market prices),
- market parameters (market price volatility),
- the correlation between individual price movements and
- client behaviour (e.g. early repayment of loans).

Policy of market risk management

The Market Risk Management Department has normative documents that describe its scope, principles and responsibilities. To optimise the market risk management process, we created *the Market Risk Management Policy at ING Bank Śląski S.A.* In it, we describe the bank's approach to market risk management, including defining the principles, methodology for managing and measuring market risk at the bank, as well as the general principles for managing the process at the bank and its subsidiaries.

Another document is the policy describing our approach to the process of defining risk appetite in the area of market and liquidity risk (*Policy for Determining and Monitoring Risk Appetite in the Area of Market and Liquidity Risk*). It is also approved by the Bank Management Board.

The bank's market risk management process includes:

- identification,
- measurement,
- monitoring and
- risk reporting.

The Market Risk Management Department provides the managers of the Financial Markets Area in the Wholesale Banking Division, the Centre of Expertise Treasury, selected members of the Management Board and the ALCO Committee with regular risk reports.

Additionally, the ALCO, the Bank Management Board and Supervisory Board are provided with periodic reports with the major measures of market risk. The acceptance of individual market risk limits is carried out at the level of the ALCO Committee, the Bank Management Board or the Supervisory Board, according to the division of responsibility in determining the levels of limits defined in t*he Policy for Setting and Monitoring Risk Appetite in the Area of Market and Liquidity Risk*.

Employees of the Market Risk Management Department are qualified specialists and the independence of the department is assured by its separation from the risk generating units.

Our bank's market risk management also includes the Product Control function ("Product Control"), which ensures the correctness of the pricing of Financial Markets products in the Wholesale Banking Division and the Centre of Expertise Treasury by monitoring the correctness of the pricing models and controlling the quality of the market data used for valuation and calculation of the financial result.

Decisions related to valuation process issues such as:

- sources of market data used for valuation,
- calculation of adjustments for market valuation models(bid-offer spread and BVA),

were made by the Market Data and Valuation Models Committee until September 2025. Decisions related to valuation model issues from September 2025 onwards are taken by the Models and AI Risk Management Committee.

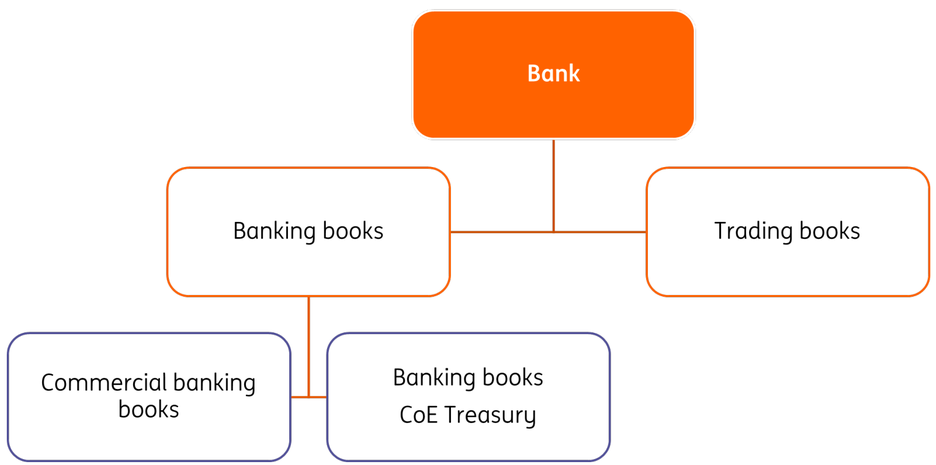
The market risk profile and the way these risks are managed did not change significantly during the reported period.

Book structure and risk measurement methods

At the bank, we maintain an intention-based book structure, which translates into many processes, including market risk management. The book structure reflects the types of market risk that are anticipated and accepted in the bank's areas and of the fact that market risk should be internally transferred/mitigated. The books are grouped according to the intention to maintain a position on:

- "trading" (positions taken in order to generate benefits in a short period of time due to market price fluctuations), and
- "banking" (all other positions).

General structure of the banking books



Banking books are divided into commercial banking books and Centre of Expertise Treasury banking books. The commercial banking books include books of the retail and corporate divisions containing deposits and commercial loans. The risks relating to those positions are transferred to:

- Centre of Expertise Treasury's banking books (to manage the banking book's interest rate risk, basis risk and liquidity risk as a whole), and
- the trading books of the Financial Markets Area in the Wholesale Banking Business Line (for foreign exchange risk) through internal transactions.

The process ensures that the banking commercial books do not retain any material economic market risk. Maintaining open positions in the Centre of Expertise Treasury's banking books is permitted within accepted market risk limits.

For more on risk measurement methods, please refer to the 2025 Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group.

Measurement of interest rate risk in the banking book

In measuring the interest rate risk of the banking book, the bank uses the measures required by the European Banking Supervision regulations (EBA/GL/2022/14).

For more on the measurement of interest rate risk in the banking book, please refer to the 2025 Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group.

Measurement of market risk in the trading book

The VaR measured by the bank is compliant with the best market practices. In calculating VaR, the bank uses the following assumptions:

- one-day holding period, 99% confidence level,
- 260-day follow-up period.

For more on the measurement of market risk in the trading book, please refer to the 2025 Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group.

Sensitivity to the interest rate risk in regulatory measures

The sensitivity to interest rate risk for the following measures is presented below:

- Standard Oultlier Test for Economic Value of Equity is a measurement of the sensitivity of the economic value of an interest rate position to sudden changes in interest rates.
- Standard Outlier Test for Net Interest Income is a measurement of the sensitivity of interest performance to sudden changes in interest rates over a time horizon of 1 year.

The following measures relate to the relevant currencies, i.e. the PLN and the EUR. The parameters for the parallel scenarios are 250 bps. (PLN) and 200 bps. (EUR). For the non-parallel scenarios, changes are assumed (for PLN and EUR respectively):

- for short-term rates – by 350 bps and 250 bps,
- for long-term rates – by 150 bps and 100 bps.

The assumptions for the recognition of individual items, the size and shape of the shock scenarios and how the results are aggregated are set out in *European Commission Regulation (EU) 2024/856*. The observed changes in measurements are mainly due to two factors:

- changes (growth) in product volumes and
- changes to the model parameters used for non-maturity product portfolios.

Shock scenarios used for supervisory purposes*

As of the end of the year; changes in million PLN	2025	2024	2025	2024
	changes in the carrying amount of the revalued capital		changes in net interest income	
Parallel increase in shock / rates	-541	48	298	379
Parallel decrease in shock / rates	52	59	-325	-557
Fall in short-term rates and increase in long-term rates (steepener)	670	347	-	-
Increase in short-term rates and decrease in long-term rates (flattener)	-1,326	-515	-	-
Increases in short-term rates	-1,339	-453	-	-
Fall in short-term rates	785	374	-	-

**Positive results in a given scenario are scaled by a factor of 0.5 in accordance with the EBA guidelines in the IRRBB area.*

Shock scenarios used for supervisory purposes*

As of the end of the year; changes in Tier 1 capital	2025	2024	2025	2024
	changes in the carrying amount of revalued capital in relation to Tier 1 capital		changes in net interest income relative to Tier 1 capital	
Parallel increase in shock / rates	-2.98%	0.28%	1.64%	2.25%
Parallel decrease in shock / rates	0.29%	0.35%	-1.79%	-3.31%
Fall in short-term rates and increase in long-term rates (steepener)	3.69%	2.06%	-	-
Increase in short-term rates and decrease in long-term rates (flattener)	-7.30%	-3.06%	-	-
Increases in short-term rates	-7.38%	-2.69%	-	-
Fall in short-term rates	4.32%	2.22%	-	-

**Positive results in a given scenario are scaled by a factor of 0.5 in accordance with the EBA guidelines in the IRRBB area.*

Sensitivity of own funds to changes in interest rates arising from debt instruments measured at fair value through other comprehensive income in the Centre of Expertise Treasury portfolio

	approximate change in the regulatory capital base for curve movement			
	-2%	-1%	+1%	+2%
2025	47	23	-23	-47
2024	67	34	-34	-67

For other information on the interest rate sensitivity of the bank's result and capital, please refer to the 2025 Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group and the 2025 Annual Financial Statements of ING Bank Śląski S.A.

Liquidity and funding risk

Introduction

The process of stable liquidity and funding risk management is considered to be one of the most important processes in our bank.

Liquidity and funding risk – the risk of the lack of ability to perform financial liabilities under on- and off-balance sheet items at reasonable prices. We maintain liquidity so that 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.

Types of liquidity risk

We divide liquidity risk into two groups:

- liquidity risk resulting from external factors, and
- risk of internal factors relating to the specific bank.

Our aim is to take a conservative approach to liquidity risk management that will enable us to safely withstand events specific not only to our bank but to the banking sector as a whole.

In terms of time horizon, we divide liquidity risk into:

- operational – focused on the day-to-day funding of the bank's positions and the management of intraday liquidity,
- strategic – focused on ensuring that the bank's structural liquidity positions are at an acceptable level.

Considering the tenor and clients' behaviour (the two aspects affecting the bank's liquidity), we identify three types of liquidity and funding risk:

- structural,
- related to client behaviour,
- related to stress conditions.

Management process

In order to optimise the liquidity and funding risk management process, we have developed *the Liquidity and Funding Risk Management Policy at ING Bank Śląski S.A.* which sets forth the principles ensuring adequate funding sources and mitigation of risks and costs related to funding. The Policy describes a general approach to the liquidity and funding risk management process in the bank. The main objective of this process is to maintain an adequate level of liquidity to ensure the safe and stable operation of the bank under normal market conditions and during a crisis. This policy is complemented by *the Contingency Funding Plan Manual at ING Bank Śląski S.A.*, which sets out the organisation and actions to address liquidity shortfalls under stress conditions.

The Policy was developed on the basis of the market management strategy in business, approved by the Supervisory Board (including the liquidity and funding risk management strategy). In particular, it reflects the risk appetite set out in the strategy and approved by the Supervisory Board.

The acceptable level of liquidity and funding risk is defined through a multi-element system, which is in line with the approach described in the Policy for Setting and Monitoring Risk Appetite in the Area of Market and Liquidity Risk.

Our limit system is based on 3 levels of acceptance:

- limits setting the risk appetite accepted by the Supervisory Board,
- strategic limits that allow for the implementation of the accepted risk strategy within the risk appetite accepted by the Bank Management Board, and
- internal limits at the discretion of the ALCO Committee.

In addition, we are preparing an ILAAP process report. We present here, in a comprehensive and consistent manner, key indicators and figures on the bank's liquidity risk profile. There we take into account the strategy, the financing plan and the bank's risk tolerance. The results of the report are accepted by the Management Board, which informs the Supervisory Board of the results of the evaluation.

The general approach to liquidity and funding risk management is composed of five recurring activities:

1. Risk identification

We perform risk identification on an annual basis or ad-hoc by organising risk identification workshops.

2. Risk assessment

We assess each identified risk to determine the significance of such risks for the bank. We also carry out risk identification in the implementation of new products. We assess the valuation of risks and their materiality based on the probability with which these risks occur and the magnitude of the financial impact should they materialise.

3. Risk control

We control risks through actions that reduce the likelihood of their occurrence or actions that reduce the impact should they materialise. Definition of acceptable risk levels is an element of risk control.

4. Risk monitoring

An important element of risk management is to continually check that the implemented risk controls are being executed. Regular inspection should evidence that risk control actions are effective.

5. Risk reporting

Adequate reporting is a major element of the liquidity and funding risk management process which provides the managers with information required for risk management. Being able to show shareholders and partners that we are controlling risk efficiently helps to gain their trust and is one of the most important elements in banking.

In-depth analysis of long-term liquidity

In line with the requirements of Recommendation S, we are preparing an in-depth analysis of long-term liquidity, with a particular focus on mortgage loans. The liquidity analysis above shows the level of risk involved in financing long-term mortgage loans. Based on the analysis carried out, it was concluded that the processes currently in place for the supervision of long-term liquidity are sound. It was therefore recommended that the existing measures be maintained.

Liquidity management in relation to currencies

We have an active liquidity management policy in relation to major currencies. For those currencies, liquidity risk measurement and limitation is made per currency and the management of operational liquidity is performed separately for each currency and it is incorporated in the risk transfer system.

Intraday liquidity management

Intraday liquidity is actively managed by the Centre of Expertise Treasury. In this process, the short-term (overnight and intraday) liquidity position and risk is of paramount importance, with the aim of meeting payment and settlement obligations in a timely manner under regular business conditions and in emergency / stressful situations.

Transfer and pricing of liquidity risk

The bank operates a risk transfer system under which market risks, including liquidity risk, are transferred to the Centre of Expertise Treasury. Applying adequate tools, it manages the risks in a centralised manner within the limit system applied by the bank.

Framework risk management principles

The framework liquidity and funding risk management principles contain all material methods with respect to intraday, shorty-term, medium-term and long-term liquidity and funding risk management. These consist of the following key elements:

- limit system and liquidity risk measurement,
- monitoring of funding sources and concentration risk,
- management of liquidity reserves,
- intra-day liquidity management,
- management of collateral items,
- stress tests and contingency plans.

For more on the liquidity and funding risk management framework, please refer to the 2025 Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group.

Non-financial risk

Non-financial risk include operational and compliance risk management functions and is based on a common framework that sets out clear principles and standards for identifying, assessing, monitoring, mitigating and reporting risks.

We manage non-financial risks in compliance with the Strategy and Risk Appetite Statement for Non-financial Risks approved by the Bank Management Board that set forth risk limits and tolerance. Compliance with the stated risk appetite is monitored using the periodic non-financial risk report. In addition, the Bank has a Non-Financial Risk Committee established by the Bank Management Board, which oversees the management of non-financial risks (identification, measurement, mitigation and monitoring of risks) and ensures that appropriate measures are taken to mitigate non-financial risks. In addition, the Supervisory Board, with the support of the Risk Committee, also oversees the management of operational risks and evaluates the effectiveness of operational risk management activities at least once a year.

The non-financial risk management framework in place allows us to proactively identify the main risks and gaps and the associated risks that may cause undesirable events. These are supported by processes such as risk and control self-assessment, monitoring of key risk indicators or testing of key controls. The results of analyses of internal and external events keep improving the adequacy and effectiveness of the internal control system functioning in the bank.

Around 1,400 reported incidents were analysed in 2025. The most important of these, resulting in the greatest risk impact, concerned compliance and external fraud risks.

In addition, the guidelines for the principles of immediate reporting of material non-financial risk events to the Management Board, the Supervisory Board and ING Group N.V. have been clarified in 2025.

We believe that an effective control environment is essential to building and maintaining a sustainable business, and retains and enhances the confidence of clients, employees and shareholders.

Operational risk

Introduction

We define operational risk as the possibility of direct or indirect loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk also includes legal risk and model risk, which are described in the following subsections.

Operational risk management is an integral part of the ING Bank Śląski Group management process. The operational risk management process and business processes show interdependence, which means that information obtained within the operational risk management process is included while taking decision on business, and the operational risk management process incorporates business decisions.

Operational risk management objectives

We define operational risk management objectives, which are part of the overall risk management strategy, based on:

- regulatory requirements,
- recommendations of the Management Board and Supervisory Board,
- ING Group N.V.'s plans and good practices,
- the need to implement mitigating measures identified during assessments and external and internal audits,
- improvement plans in the area of risk management.

Additionally, the Management Board – in agreement with the Supervisory Board – in its risk appetite statement defined the maximum acceptable loss limits, capital limits and risk scope that it is willing to accept in the pursuance of the planned business objectives – subject to full compliance with the law and regulations. The level of limit utilisation is monitored and reported periodically to the Management Board, the Non-Financial Risk Committee, the Risk Committee and the Supervisory Board.

The main objective in operational risk management continues to be to continuously improve the safety of the bank and its clients and to improve the efficiency of the risk function. These measures focus on comprehensively strengthening non-financial risk management by optimising structures, processes and also increasing automation and integration of the tools used.

In addition to implementing core processes in the area of operational risk, in 2025 we focused our actions on:

- optimising the operational risk management structure and the rules of the Non-financial Risk Committee,
- developing a single control framework for subsidiaries,
- starting work on the integration of local and group tools in the area of non-financial risks,
- transferring selected activities to the first line of defence (recording and monitoring recommendations and deviations),
- implementation of a new approach to the control function matrix (automation),
- optimisation of data metrics and the risk monitoring and reporting process, as well as a list of relevant processes,
- clarifying the definition of events at the interface between operational and credit risk,
- updates to regulations and methodologies, including those relating to DORA, AI Act, CRR 3, ESG, third-party and intra-group governance rules, and policies and standards for IT risk (including digital resilience), business continuity and security of people and assets,
- increasing the granularity of risk appetite limits by creating additional KRIs,
- raising the risk culture among employees through training and webinars, with a particular focus on proactive identification of risks in the first line of defence.

Operational risk management policies

According to operational risk management, we have a coherent and continuously updated set of internal normative documents. The principles and guidelines outlined in the regulations are designed to limit the consequences and probability of financial and reputational losses.

The operational risk management system is based on:

- legal standards,
- requirements of the regulator,
- *Operational Risk Management Policy* and detailed rules, manuals and procedures relating to the various sub-processes of operational risk management.

Operational risk management process

The Bank has a permanent Non-Financial Risk Committee, whose main task is to oversee the management of non-financial risks. In mid-2025, we increased the frequency of the Committee's work from quarterly to monthly.

We have effective and consistent processes for identifying and controlling non-financial risks across all of the bank's products, actions, processes and systems.

The operational risk management system applies to all spheres of the bank and the bank's group activities, cooperation with clients, suppliers and partners, which has been developed in accordance with the principle of proportionality, i.e. taking into account the nature, scale and complexity of the activities, as well as the materiality of the processes and the bank's operational risk profile. It represents a consistent, ongoing practice that includes the following elements:

- risk identification and assessment, including, inter alia, risk assessments, internal and external event analysis or scenario analyses and stress tests,
- risk mitigation and monitoring of mitigating actions,
- conducting controls,
- monitoring and quality assurance.

Key activities in 2025

IT and business continuity risks were the main areas to be analysed in 2025, mainly in the context of geopolitical risks in Poland affecting the level of cyber and operational threats, as well as in the context of internal strategic initiatives undertaken by us. Within IT risk, we focused on identity and access management actions, mitigating IT system vulnerabilities and IT change management.

As a result of the multidirectional analyses and actions undertaken, the risk is at an acceptable level. In 2025, as in previous years, there were no breaches of the key limits arising from the non-financial risk appetite statement. The main actions of the Operational Risk Unit under the second line of defence, supporting the first line of defence, for the period 2024-2025 are as follows:

Operational risk data by topic	Operational risk data for 2024	Operational risk data for 2025
Legislative changes - opinion/analysis	around 1,200 initiatives	around 1.3 thousand initiatives
Product development - opinion/analysis, including product review	400 initiatives, including around 60 reviews	around 400 initiatives, including around 60 reviews
Number of registered recommendations	around 800 registered recommendations, including no overdue recommendations with high priority at the end of each quarter	around 1,000 registered recommendations, including no overdue recommendations with high priority at the end of each quarter
Closing recommendations - opinion/analysis	around 300 recommendations	around 500 recommendations
Conducted workshops to assess risks in processes	around 160 scores	around 180 scores
Risk project support	around 30 projects	around 40 projects
Risk assessments – IT area	around 360 assessments	around 230 assessments
Monitoring of KRIs	around 220 indicators	around 200 indicators
Number of internal events/incidents	around 1,400 events	around 1,400 events

Model risk

We manage model risk in accordance with *the Model Risk Management Policy at ING Bank Śląski*. This policy defines the key model risk management responsibilities that must be followed for each type of model. These responsibilities are defined in relation to the general principles of model risk management, as well as in relation to the different stages of the model life cycle.

The Model Risk Management Department provides a model register (iModel application), which is a repository of information on the models operating in the bank's group and which is updated by participants in the model risk management process, including model owners, validators and modellers. The model register contains, inter alia, information on the materiality of the models, the results of the monitoring of their effectiveness and the results of the validation of the models (model outcomes with validation findings).

We regularly evaluate the risks of the individual models and, if required, allocate capital charges to the models, in accordance with the principles adopted in the internal regulations.

The quality of the performance of the models is subject to verification as part of the monitoring of model effectiveness and model validation. Model validation is performed in compliance with *the Model Validation Policy at ING Bank Śląski* and validation manuals.

Management reporting to the Models and AI Risk Management Committee, the Bank's Management Board and the Supervisory Board on the status of model management and validation activities includes, inter alia, an assessment of the aggregate level of model risk in the context of the accepted tolerance level for this risk and the status of the validation plan.

The bank has a Models and AI Risk Management Committee to oversee all areas of model risk, including controlling the level of model risk and overseeing the risk of models and GenAI (Generative AI) solutions.

As at 2025 yearend, we used 180 models in the bank (as at 2024 yearend, 176 models). In 2025, more than 140 validations and validation assessments of local and group models have been approved, 44 of which are pre-validations. In addition, regulations for model risk management have been updated, e.g. *the Model Lifecycle Standard, the Model Identification Standard, the Model Categorisation and Classification Standard,* as well as *the Model Validation Policy*.

Legal risk

Legal risk is the risk associated with:

- inability (or perceived inability) to comply with relevant laws, regulations and standards,
- contractual obligations which have been breached or which cannot be enforced as intended, or have been enforced in an unforeseen or undesirable manner, and
- liability (in tort) to third parties in connection with an act or omission for which we are responsible,

leading to a potential breach of the bank's integrity, leading to damage to our reputation, legal or supervisory sanctions and financial loss.

The sources of legal risk are:

- changes in the legal environment affecting how we operate and do business,
- differences in interpretation of the law and inconsistent case law,
- shaping and enforcing contractual relationships with our clients and clients and our interaction with third parties.

In order to mitigate legal risks, we take the following measures, among others:

- we actively monitor changes in the legal and supervisory environment and draw up Legal Information to ensure that internal regulations comply with common law,

- we agree positions (interpretations of laws) with market regulators and state authorities on legal issues of importance to us,
- we provide an internal opinion on our legal documentation and on the contracts we enter into with clients/ contractors,
- we provide legal advice on an ongoing basis to individuals who have a need,
- we manage legal claims and lawsuits, including initiating/coordinating appropriate legal action,
- in the non-financial risk management application “Risk Navigator”, we have a “legal claims” module for managing claims,
- we undertake training for management and employees on legal and supervisory issues.

Compliance risk

Introduction

Our compliance mission is to build an organisational culture based on knowledge of and compliance with laws, internal regulations, market standards and ING Values and Behaviours, as defined in the Orange Code.

Compliance risk management process

We understand compliance risk as the risk of the consequences of non-compliance in processes with laws, internal regulations and market standards operating in the bank.

The Bank Supervisory Board oversees compliance risk management and the Bank Management Board is responsible for effective compliance risk management, including:

- the implementation of organisational arrangements, regulations and procedures that enable compliance risk to be managed effectively, and
- ensuring that the resources and means required to perform the tasks are adequate.

The Centre of Expertise – Compliance is an organisationally separate, independent unit that is responsible for the organisation and operation of the compliance risk management process. The aim of the Centre of Expertise – Compliance is to shape solutions for identifying, assessing, controlling and monitoring the risk of non-compliance of the bank’s activities with the law, internal regulations and market standards, and to provide reports in this respect. Compliance actions aim at the active participation of our employees in compliance risk management by shaping a risk culture based on knowledge of and compliance with laws, internal regulations, market standards.

Centre of Expertise – Compliance flexibly adapts organisationally to the changing external environment. The changes are necessary to further increase the effectiveness of compliance risk management and to effectively mitigate these risks. With this in mind, the Centre of Expertise – Compliance unit:

- developed the required procedures and methodologies on the basis of which it carried out independent inspections, training programs, issued recommendations and recommendations in banking processes, including in the process of providing opinions on product and legislative changes and marketing materials,
- strengthened the competences of subordinate employees,
- implemented an automation plan in the area of compliance risk,
- continued to cooperate with regulators in monitoring the implementation of the audit recommendations received.

Key initiatives in 2025

In 2025, we continued our work to improve our compliance risk management system, including but not limited to the following:

- optimising and improving the monitoring of transactions in the AML/CFT area,
- the development and implementation of a new KYC Profiling engine for AML/CFT client profiling,
- coordinating the work of aligning the bank’s operations with the new AML regulatory package,
- the implementation of a process for the quarterly residual valuation of risks in the area of non-compliance RAC (Risk Assessment for Compliance),
- the implementation of solutions to optimise the work of the compliance monitoring area in cooperation with the Group in the NEXT project,
- the introduction of a new MCO PAD tool for handling private transactions of bank employees allowing for more effective oversight of market abuse risks and conflicts of interest,
- the implementation of regulations complementing the area of client-oriented policies,
- supporting the implementation of regulatory solutions related to participation in the Reference Index Fixing and WIBOR reform,
- introducing a methodology and carry out a materiality assessment of climate and environmental risks for compliance risk,
- support in streamlining banking processes, taking into account the protection of clients’ personal data.

During the year, we regularly reviewed and updated our internal compliance procedures and regulations.

Tackling financial crime

The ING Bank Śląski S.A. Group, which is part of the globally operating the ING Group, conducts its business in an honest, prudent and responsible manner, with the aim of ensuring compliance with applicable laws and regulations, including financial crime prevention.

As a financial institution, a bank is at risk of its activities being used for money laundering (including predicate offences, e.g. corruption, tax evasion, fraud), terrorist financing and sanctioned activities (including transactions for or on behalf of sanctioned natural persons, entities or countries). We have referred to these risks collectively as Financial Economic Crime (FEC) risks.

The fight against financial crime can only be effective if banks, public authorities, the judiciary, and market participants – at national and international levels – join forces and share information. Therefore, we are taking a number of measures to strengthen processes related to financial crime prevention.

FEC policies and key requirements

We have implemented a number of solutions to mitigate FEC risks by applying the principles set out in *ING Bank Śląski S.A.'s Anti-Money Laundering and Countering the Financing of Terrorism (AML/CTF) Policy* and related documentation (collectively the FEC Policy). They indicate the requirements to best protect the bank, its clients and the public from FEC risks. Sources of these requirements include:

- *Act on Counteracting Money Laundering and Financing of Terrorism*;
- *Act on special Solutions to Prevent Support for Aggression against Ukraine and to Protect National Security*;
- applicable European Union legislation on anti-money laundering and countering the financing of terrorism;
- the agreement between the Government of the Republic of Poland and the Government of the United States of America on Improving Fulfilment of International Tax Obligations and Implementation of FATCA Legislation and the accompanying Final Arrangements, as well as the Act on Implementation of the Agreement;
- the Act on exchange of tax information with other countries (CRS);
- specific reporting requirements for Mandatory Disclosure Rules tax schemes (MDR) and the tax integrity of Client Tax Integrity clients (CTI);
- the bank's institutional risk assessment, taking into account the National Risk Assessment;
- guidance from the Financial Action Task Force (FATF);
- Wolfsberg Group standards;
- other relevant sources, such as industry and market standards.

Our principles

In the process of getting to know clients and business partners, we are guided by the following principles:

- we comply with legislation, guidelines and industry standards;
- we do not participate in, enable or engage in actions prohibited by law or FEC Policy;
- we do not advise clients on legislation, especially on how to circumvent it;
- we only accept and maintain client and business partner relationships after conducting Client Due Diligence (CDD) and Third Party Due Diligence (TPDD), respectively, if the outcome of the investigation is positive and the relationship is consistent with ING's risk appetite;
- we are transparent with our clients regarding information and reporting requirements;
- we invest in expertise and the right tools to ensure high data quality and compliance with FEC Policy requirements;
- we document the effective implementation of KYC requirements.

We implement these principles through, among others:

- applying client and third-party due diligence measures;
- monitoring transactions to detect suspicious activity and reporting suspicious activity to the competent authorities;
- screening and inspections for compliance with UN, US, EU, Polish and Dutch sanctions programmes;
- training and other awareness-raising actions for employees;
- fulfilment of reporting obligations.

Responding to challenges

In response to current challenges, we support initiatives to jointly combat the commission of financial crimes, including engaging in industry projects that aim to systemically strengthen and improve AML/CFT processes.

We also undertake a number of activities that build awareness among our clients about the importance and relevance of KYC activities, including:

- on the website, we provide information on the KYC process for retail and corporate clients;
- we send communications to clients reminding them to update and confirm their data;

- in the Business Banking and Wholesale Banking divisions, we use a sanctions questionnaire, thereby raising client awareness of sanctions risks;
- we focus on the highest possible quality of client experience in the AML/CFT area (e.g. we are successively implementing the provisions of the European Accessibility Directive).

In addition, if financial security measures are not possible as a result of transaction analysis or due to documentation deficiencies, we terminate client relationships.

ESG risk

In this section, we describe our approach to ESG risk management, including, inter alia, channels for transferring to traditional risk categories, actions taken to mitigate ESG risks, addressing ESG risks within the organisational structure/processes/internal documentation, the tolerance framework towards these risks, reporting and the approach to ESG data.

You can also find information about ESG risks in the section that constitutes our Sustainability Statement (here), where we focus on the process of identifying and managing so-called material risks.

Channels through which ESG factors are transmitted to core risk categories and the actions taken.

According to the *ECB Guide on climate-related and environmental risks – supervisory expectations relating to risk management and disclosure* of November 2020, we have identified ESG risks as a set of factors that potentially amplify the likelihood and severity of traditional risk categories, such as:

- credit risk (including concentration risk),
- market risk,
- liquidity and funding risk,
- operational risk,
- compliance risk,
- business risk,
- reputational risk.

ESG risk management is therefore about integrating mechanisms for its identification, measurement, assessment, mitigation, monitoring, reporting into the standard processes of managing the previously mentioned risk categories.

Below we identify those ESG risks that we believe will have the greatest impact on our business. We present them in order of most material expected impact. We have grouped them according to traditional risk categories, starting with the impact within credit risk. We have set out in more detail the ESG risks and the transmission channels to the traditional risk categories in the internal document *List of ESG Impacts, Risks, and Opportunities*.

a) **ESG risks in credit risk:**

as part of **transition risk**, we identify the risk of deterioration in the quality of receivables from companies in carbon-intensive industries due to a decline in their revenues / increase in costs / increase in debt due to:

- regulations unfavourable to them,
- the need for significant investment in green solutions/products/processes,
- loss of competitiveness as a result of support (at macro level) for alternative low-carbon technologies,
- changing audience preferences,
- increase in legal costs,
- increased reporting costs,
- write-offs of assets related to technology/products that have gone out of use.

What actions we have taken:

- We have continuously adhered to our commitment to divest from financing of activities related to the mining of thermal coal, its trade or the generation of electricity/heat from it.
- We have identified the sectors most exposed to transition risks (based on an internal methodology for sectoral assessment of climate and environmental risks) and:
  - in manual processes, we require each credit decision package to refer to this risk and indicate its mitigants, including for Wholesale Banking and Business Banking clients with weaker financial standing we require information on emission intensity and transition plans,
  - in semi-automatic and automatic processes, transition risk is one of the factors influencing the overall assessment of the sector and thus affects the credit limits offered.
- We take this risk into account in the rating process through the possibility of appealing a corporate client rating.
- We periodically estimate emissions from the loan portfolio.

- We conducted internal climate stress tests to assess the impact of climate change risks across all time horizons based on NGFS scenarios. The analysis carried out (stress test) illustrates the level of risk costs under different scenarios over three time horizons – short (1 year), medium (3 years) and long (10 years).
- We have built, validated and monitored a scoring model for transition risk in the Business Banking client division. The results from the sector-level model were used to carry out an analysis of the materiality of transition risk in this client segment. We are working on the model being used in the credit process to assess the transition risk of a particular client. We expect the model to identify as accurately as possible those clients who are particularly at transition risk, enabling an appropriate gradation of risk.
- We have implemented a process for capturing and collecting ESG data from large corporate clients in line with the EBA Guidelines on ESG Risk Management.
- For the client portfolio of the Wholesale Banking division and the Business Banking division, we take into account transition risk within the sectoral RAS limits (risk appetite parameter). We apply a proportional reduction in the credit risk limit, the amount of which depends on the ratings given to individual sectors as part of the transition risk materiality assessment.
- For the Wholesale Banking and Business Banking reserve models, we have assumed an adjustment for this risk, which is not included in the models, until the models have been updated with a parameter for climate transition risk.

as part of the **transition risk**, we also identify:

- the risk of a decline in the value of real estate accepted as collateral with low energy efficiency,
- the risk of deterioration in the quality of receivables from mortgage loans granted to individual clients using a real estate with low energy efficiency,
- the risk of deterioration in the quality of receivables from loans financing commercial real estate with low energy efficiency.

What actions we have taken:

- We include transition risk in the value of real estate collateral in the portfolio of retail mortgage exposures and in the vast majority of the portfolio of corporate exposures of clients of the Business Banking division.
- We periodically review the portfolio of retail mortgage loans for the energy efficiency of the real estate accepted as collateral and monitor the proportion of real estate with a high transition risk.
- In the retail mortgage segment, we periodically set a maximum share of new financing earmarked for the lowest performing real estate (RAS – risk appetite parameters for new sales).
- On a cyclical basis, we estimate emissions from the retail mortgage portfolio and the commercial real estate loan portfolio.
- We are reducing issuance in the area of retail mortgage loans and commercial real estate financing loans (details can be found here).
- We collect information on the energy efficiency of the collateral real estate (for existing and new loans).
- We use an algorithm to estimate energy efficiency for residential real estate for which an energy performance certificate is missing. In addition, we have introduced an algorithm for estimating energy efficiency for commercial real estate lacking an energy performance certificate in 2025.
- In the retail banking segment, we promote products designed to finance energy-efficient real estate and to finance energy efficiency improvements in real estate.
- In relation to clients of the Wholesale Banking division and the Business Banking division, we apply financing criteria for income-generating properties, according to which we do not finance real estate with low energy efficiency.

as part of **physical climate** risk, we identify the risk of a decline in the value of real estate taken on as collateral that are exposed to acute or chronic physical hazards:

What actions we have taken:

- We include the risk of river flooding in the value of real estate collateral in the portfolio of retail mortgage exposures and in the vast majority of the portfolio of corporate exposures in the Business Banking clients segment.
- Flood insurance is mandatory in the retail mortgage exposure portfolio, regardless of the location of the real estate.
- In the Business Banking division's portfolio of corporate client exposures, if a risk of river flooding is identified for a real estate, then it is mandatory to obtain flood insurance or, if no such insurance can be obtained, a derogation credit decision is mandatory.
- We have established and monitor levels of key risk indicators (KRIs) for physical risk for mortgage loans granted in the Retail Banking segment and for loans secured by real estate in the Business Banking division. The KRI makes it possible to establish a quantitative appetite for physical risk, which translates into a better understanding, monitoring and control of physical risk in the above segments.
- We carry out an estimation of physical risk in the banking book in accordance with *Commission Implementing Regulation (EU) 2022/2453* of 30 November 2022 laying down implementing technical standards on disclosure of information on environmental, social and governance risks (Template 5).

- We are developing our tools for accurately assessing physical risk with new data sources and working on the precision of the results obtained. In our physical risk assessment model, we have taken into account flood data from the Polish State Water Management. In our reporting and portfolio analyses performed on an address basis, we assess physical risk with accuracy to the building number.

as part of **physical climate** risk, we identify the risk of deterioration in the quality of receivables from companies due to a decline in their revenues / increase in costs / increase in debt due to their operations in a location exposed to acute or chronic physical hazards:

What actions we have taken:

- In the individual credit process of a Business Banking division client, in the manual path, we examine the level of river flood risk in relation to the real estate in which the client operates. Where we identify a risk, we require confirmation of a flood insurance policy or the identification of significant mitigants (neutralising factors) as part of the credit decision.
- In the individual credit process of a client of the Wholesale Banking division, the exposure to physical risk, we assess in a sectoral approach, while additionally examining the physical risk at a specific address in a known use of proceeds financing situation.
- We carry out an estimation of physical risk in the banking book in accordance with *Commission Implementing Regulation (EU) 2022/2453* of 30 November 2022 laying down implementing technical standards on disclosure of information on environmental, social and governance risks (Template 5).
- We are developing our approach to assessing the share of exposures that are sensitive to sudden or prolonged physical risks in the exposure to undertakings and we monitor this share on a cyclical basis.

as part of **environmental risk and social risk**, we identify the risk of deterioration in the quality of receivables from companies due to a decline in their revenues / increase in costs / increase in debt due to their activities having an adverse impact on the environment or an adverse impact on employees / communities:

What actions we have taken:

- The bank's largest clients are subject to constant monitoring of the so-called "adverse press".
- In manual credit processes, we require each credit decision package to address this risk and identify its mitigants.
- In accordance with our *ESG Manual*, we exclude from financing or impose restrictions on financing environmentally or socially harmful activities (including a move away from financing activities related to the mining of, trading in or generation of electricity/heat from thermal coal, or, inter alia, a move away from financing companies whose activities are materially related to the cultivation, processing, production and sale of tobacco products and e-cigarettes).

b) ESG risk in compliance risk:

as part of **compliance risk**, we identify the risk of the consequences of non-compliance in the processes with laws, internal regulations and market standards operating in the bank:

What actions we have taken:

- The organisational structure of our bank ensures proper oversight of ESG risks.
- The bank has an *ESG Risk Management Policy* and an *ESG Manual* in place.
- The ESG Data Model project ensures, inter alia, regulatory compliance of the bank's ESG reporting.
- As part of *Client Centricity Policy*, factors such as greenwashing, physical risk and transition risk have been included in the Client Unfairness risk.
- We are monitoring the implementation of our publicly made declarations, including the move away from financing activities related to the mining of thermal coal, its trade or the generation of electricity/heat from it, or those substantially involving the production, cultivation, processing and sale of tobacco.
- We have introduced an *ESG (sustainability) product and transaction qualification manual.*
- We consider clients' ESG needs and preferences in our product approval processes. We review environmental, social and corporate governance communications for greenwashing.
- We implement greenwashing mitigation measures based on *the Greenwashing Risk Management Manual*.
- We have implemented *the ING Bank Śląski S.A. Product and Service Accessibility Manual.* The document sets out the requirements a bank must meet to ensure that products and services for retail clients are accessible to all, including clients with special needs.
- We have developed Client Centricity Guidelines for physical risk and transition risk in mortgage products. The document sets out the framework, context and practical guidance for applying an adequate level of client protection to the physical and transition risks associated with mortgage products offered to retail clients. All documents are complementary to *the Client Centricity Policy*.
- Thanks to employee awareness activities, including numerous training courses, and the mandatory greenwashing assessment in all new and modified products, the risk is reduced.
- We continue to implement initiatives in the area of compliance, integrating ESG aspects into compliance management processes. These measures reinforce regulatory consistency and ensure that the bank's activities are aligned with applicable legal requirements and the regulator's expectations.

c) ESG risk in liquidity risk:

as part of **transition risk and physical climate risk**, we identify the risk of disruption to the bank's liquidity as a result of increased deposit outflows from the bank or increased credit needs of clients due to the need to cover additional expenses resulting from the materialisation of transition risk or physical risk:

What actions we have taken:

- We periodically analyse client deposits with high climate risk. The results of the analysis do not make it clear that client volumes with high climate risk represent a homogeneous volume of deposits that can be treated separately due to the expected costs of climate risk. The issue of high climate risk client deposit outflows was included as an additional stress parameter in the liquidity stress tests, in the Climate Liquidity Stress Test, as well as when assessing the materiality of climate and environmental risks within the liquidity risk framework.
- As a result of the 2025 stress tests, an additional systemic scenario with an ESG risk factor (climate factor) showed that the bank has sufficient highly liquid and tradable assets to survive the stress test for the systemic scenario without the need for additional stress management actions.
- We conducted a Long-Term Climate Liquidity Stress Test with a horizon to 2050 to assess the impact of climate risk on liquidity risk. The results of the Climate Liquidity Stress Test showed that there was no material impact of climate risk on liquidity risk. In addition, an adverse financial impact has been estimated, resulting from additional stress factors, which puts a strain on the bank's liquidity, but to a limited extent (it does not represent a threat to the bank's liquidity, an internal limit overrun or the need for mitigating measures). The Climate Stress Liquidity Test will be conducted periodically.
- We have also carried out an analysis of how client balances of the retail banking segment will change in the affected areas in autumn 2024. The results of the analysis carried out at different points in time since the floods indicated that there have been no significant changes in the account balances of clients in the flood-affected areas.
- Based on the above analyses, we carried out an assessment of the materiality of climate and environmental risks within liquidity risk. We assessed the impact of climate and environmental risks on liquidity risk to be negligible. A materiality assessment is carried out at least once a year, in accordance with regulatory requirements.

d) ESG risk in market risk:

we carried out an assessment of the materiality of climate and environmental risks within the market risk framework. We assessed the impact of climate and environmental risks on the trading book exposures to be negligible.

e) ESG risk in ither areas:

we also manage other ESG risks, without describing them in detail, among others:

- due to the estimated low impact of these risks (e.g. operational risk of disruption to business continuity and security of people and resources due to physical climate risks),
- due to the historically firmly established and effective system for managing these risks (e.g. social risks arising from poor human resources practices, social and environmental risks associated with working with suppliers).

Oversight of ESG risk management

We expect the impact of ESG risks to become increasingly strong and therefore our organisational structure addresses these concerns well. It ensures that ESG risks are effectively supervised and that the implementation of ESG risk management mechanisms is carried out correctly and in a timely manner.

The organisational structure of risk management, including the role of the Supervisory Board, the Bank Management Board and the Division supervised by the CRO (Chief Risk Officer), is set out in *the Policy – General Principles of Risk Management at ING Bank Śląski S.A.* The Supervisory Board monitors and oversees the risk management process, including credit, market, liquidity and funding and operational risks. It is supported in this task by the Risk Committee, which includes a minimum of three members of the Supervisory Board. More information on the organisational structure in the context of the ESG area can be found here.

At the beginning of 2025, the Supervisory Board approved the Risk Management Strategy, in which among the key objectives for 2025-2027 is the continuation of efforts to increasingly identify, measure and assess ESG risks, as well as efforts to ensure that ING Bank Śląski's policies, procedures and processes are in line with requirements under external regulations.

The Bank Management Board is involved in monitoring and overseeing the risk management process, including credit, market, liquidity and funding and operational risks. The Bank Management Board approves the Bank's business strategy and risk management strategy which include ESG risk strategies as elements. The approved strategy responds to an assessment of the expected impact of ESG risks in the short, medium and long term. In addition, the Bank Management Board set up a standing ESG Risk Committee, tasked with creating the structure, policies, methods and tools for ESG risk management, and appointed the members of the Committee.

The Management Board has designated the CRO as the Management Board Member responsible for carrying out key tasks in the implementation of ESG risk management into the risk management system.

ESG Risk Committee

The ESG Risk Committee is a standing committee of ING Bank Śląski dealing with ESG risk issues. Within the scope of its activities, it has decision-making functions vis-à-vis all organisational units of the bank and advisory functions vis-à-vis the Bank Management Board. The CRO acts as Chair of the ESG Risk Committee.

The Committee's tasks include:

- setting and changing the level of ESG risk appetite limits,
- creating a policy for managing ESG risks:
  - approving methodologies for managing ESG risks, including their metrics,
  - validating the tools used to assess ESG risks,
  - deciding on the implementation and modifications of regulations dedicated to ESG risks,
  - defining standards for credit analysis of ESG risks,
  - defining the general principles of the ESG risk assessment and monitoring process,
  - determining the principles for including ESG risks in collateral valuation,
- defining a process for the comprehensive management of ESG risks, including the definition of IT systems to support the management process,
- monitoring and assessing the level of ESG risks at stand-alone and consolidated levels,
- ensuring compliance with laws, supervisory regulations, deciding on the implementation of ING Group N.V.'s ESG risk guidance and recommendations and approving any other ESG risk issues.

The Committee consists of:

- President of the Bank Management Board,
- Members of the Bank Management Board,
- Bank Directors in the CRO Division,
- Bank Director – Tribe Financing,
- Director of the Strategic Clients Financing Department,
- Tribe Lead III – Bank Director Loans and Insurance,
- Director of the Investor Relations, ESG Reporting and Market Analysis Bureau.

As a general rule, the unit that informs the ESG Risk Committee and provides solutions for the management of ESG risks is the ESG Risk Management Department (the tasks of the Department are further outlined in the information below on the division into three lines of defence). The ESG Risk Management Department is responsible for keeping the *ESG Risk Management Policy* up to date.

ESG risk management under the three lines of defence

First line of defence

With regard to ESG risks, which are an element that reinforces traditional risks, the first line of defence identifies, assesses and monitors ESG risks as part of its standard process/role, described in separate regulations:

- Credit Risk Management Policy at ING Bank Śląski S.A.,
- ING Bank Śląski S.A. Operational Risk Management Policy,
- The Compliance Policy of ING Bank Śląski S.A.

Second line of defence

The units of the CRO Division ensure that ESG risks are duly and effectively addressed in all relevant processes managed by the unit. They advise the Governing Body on the actions to be taken to ensure compliance with applicable laws, rules, regulations and standards, and assess the possible impact of any changes in the legal or regulatory environment on the bank's operations and compliance framework.

Second line of defence units ensure that all risks are appropriately identified, assessed, measured, monitored, managed and reported. For individual credit transactions, they provide independent analysis and provide an expert opinion on risk exposures, including ESG risks. As ESG risks materialise through existing traditional risks, this analysis/assessment takes place as part of the standard activities performed within the CRO Division units.

The specialised ESG risk management unit within the second line of defence is the ESG Risk Management Department, which is responsible for creating the ESG risk management policy within the CRO Division and its implementation, including:

- development of methods to manage ESG risks, including their measurement,

- the development of tools used to measure ESG risks,
- implementing and updating ESG risk regulations,
- developing and updating standards for assessing ESG risks in the credit process,
- developing the general principles of the ESG risk assessment and monitoring process,
- how ESG risks are taken into account in collateral valuation,
- developing a comprehensive ESG risk management process including identification of IT systems used in the process,
- supervision of ESG models, including documentation, monitoring results and validation,
- monitoring of the level of ESG risks at stand-alone and consolidated levels,
- ensuring compliance with the law, supervisory regulations and best practice of ING Group N.V.

The ESG Risk Management Department has prepared an ESG Risk Management Policy, which sets out how ESG risk is managed at ING Bank Śląski, including how ESG risk management fits into the existing framework for managing credit, market, liquidity and funding and operational risks (more on this topic can be found here). Channels for transferring ESG risks, including environmental risks, to traditional risk categories are in turn described in *the document List of ESG Impacts, Risks, and Opportunities*.

In addition, within the CRO Division, sector specialists, through their transactional specialisation in a particular sector, add value in terms of, inter alia, lending directions through, for example, sector guidelines and spreading knowledge of the sector situation based on the analysis of individual transactions and available portfolio analyses. Among the credit risk factors analysed are also ESG risk factors.

The Centre of Expertise Compliance ensures that compliance risks arising from ESG risks are properly and effectively addressed in the relevant processes. It advises the Governing Body on the measures to be taken to ensure compliance with applicable laws, rules, regulations and standards, and assess the possible impact of any changes in the legal or regulatory environment on the bank's operations and compliance framework. Takes into account that, as sustainability principles and standards may evolve over time, a bank may be more exposed over time to risks related to liability, litigation and/or reputational damage that arise from climate and environmental issues (E) as well as social risk (S) and corporate governance (G) issues. It verifies whether there were planned mitigating actions and, if there were, whether they were designed correctly and executed.

Third line of defence

Internal Audit Department, which – in terms of ESG risks – takes into account and assesses in its reviews the extent to which the bank is prepared to manage these risks. It performs internal controls of the risk management framework, including ESG risks, taking into account changes in the risk profile and in products and/or business lines. The assessment covers the adequacy of ESG risk management policies and procedures and their compliance with the bank's internal policies and procedures and external requirements.

Reporting of ESG risk

The ESG Risk Management Department, as part of its internal reporting on ESG risks, prepares and periodically presents reports on the level of ESG risks to the Bank Management Board, Supervisory Board and ESG Risk Committee to enable decision-making and, if necessary, appropriate further action.

This reporting includes:

- periodic reports – these provide information on status and developments, and support regular ESG risk management decisions. Depending on their content and purpose, they may be delivered on a monthly or quarterly basis. An example of this is the monthly reports prepared for the Management Board on the environmental risk assessment of client exposures by sector. In 2025, we also worked on a dedicated ESG risk monitoring tool, which acts as the main system for visualising and periodically reporting internally on ESG risk information;
- (ad-hoc) reports – these are any reports prepared for the purpose of deciding on a course of action for the internal use of the ESG Risk Management Department or as requested by management.

Reports to regulatory authorities may also be prepared.

In addition, from 2024 onwards, we are reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD) and ESRS standards. More information on this topic can be found here.

ESG risk tolerance framework

Risk tolerance framework – corporate clients

The primary internal document that indicates the risk framework in relation to environmental and social issues is *the ESG Manual*. In this document, we have identified the sectors and areas excluded from funding and restricted. These are activities/areas with which – in our assessment – there is a particularly high risk of adverse environmental impact and a high risk of adverse social impact.

In accordance with *the ESG Manual*, we do not finance environmentally harmful activities, including:

- clients whose business is directly dependent to a degree of more than 5% on coal used in the power/heat sector (excluding known use of proceeds financing of non-coal assets),

- new coal-fired power and thermal power plants, oil, gas projects, including oil sands,
- fishing with harmful methods or against protected species,
- harmful or illegal tree felling,
- ship dismantling activities without the appropriate environmental certification,
- operations located in UNESCO World Heritage sites, wetlands listed in the Ramsar Convention, or those having a material impact on these areas or on critical natural habitats registered by the International Union for Conservation of Nature (IUCN).

We also do not finance socially harmful activities whereby:

- human rights violations/abuses occur, including forced labour, child labour, inadequate working conditions, use of violence,
- there is a risk to the health of workers and local communities as a result of environmental contamination, including contact with harmful chemical materials, transmission of animal diseases to humans, failure to comply with labour laws,
- the client produces and/or trades in controversial weapons: anti-personnel mines, cluster munitions, chemical and biological munitions, or phosphorus bombs, depleted uranium munitions and nuclear weapons in the case of clients from countries not party to the Non-Proliferation Treaty,
- the client is engaged in the cultivation, processing, production and sale of tobacco and tobacco products and e-cigarettes,
- client's asbestos-related activities, fur farming, gambling.

In *the ESG Manual*, we have identified selected standards, guidelines and initiatives whose application can be an important reference in the social risk assessment process, such as: Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organisation Conventions on Labour Standards, UN Global Compact, Guiding Principles on Business and Human Rights, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, OECD Guidelines for Multinational Companies.

The ESG manual provides further detailed guidance in relation to several areas:

- animal welfare,
- forestry and plantations,
- tobacco industry,
- industrial processing,
- chemical industry and the use of chemicals,
- defence and the arms industry,
- hard coal mining, coal-fired power industry, and related activities,
- other mining and power industry, petrochemical industry and metal manufacturing.

Our approach to defence financing and arms industry-related activities does not exclude establishing relationships with such clients. We believe that sovereign states, within the limits of the law, regulations, national and international conventions, have the right to maintain public order, to participate in joint military missions or peacekeeping missions, and to defend themselves and to have armed forces properly equipped. However, we believe that certain companies, weapons and actions violate our values and business ethics. We do not engage with controversial weapons because of their particularly destructive nature and the results of their use: mass casualties and destruction in the area under attack, from which it is difficult to exclude civilians. By key components of controversial weapons, we mean infrastructure, equipment parts and materials, services and programmes and systems (mechanical, electronic and digital) specifically designed for controversial weapons.

The exclusions and restrictions in *the ESG Manual* also apply to our bank's suppliers (KYS process – Know Your Supplier).

We have prepared RAS limits for credit risk for clients of the Business Banking and Wholesale Banking division, taking into account transition risk based on the results of the sector assessment of climate and environmental risks for the Business Banking and Wholesale Banking portfolios. We apply a proportional reduction in the credit risk limit, the amount of which depends on the ratings given to individual sectors as part of the transition risk materiality assessment.

We have introduced regular monitoring and warning signals for climatic RAS, in line with our existing practice of controlling RAS limits. The bank has standard procedures in place for managing potential exceedances of approved RAS limits. In accordance with these procedures, in the event of a breach, an analysis of the situation that has arisen is carried out and the information, together with a description of the corrective action taken or to be taken, is forwarded to the Management Board, which promptly informs the Supervisory Board.

In order to prevent excessive risk-taking, the limits set will be reviewed on a cyclical basis and, in the event of significant changes in market conditions, the specifics or the scale of the bank's activities, the limits will be reviewed promptly.

We pay increased attention to the credit analysis of corporate clients who operate in sectors we have identified as of higher environmental and social risk.

Risk tolerance framework – retail mortgage exposures

For the retail mortgage portfolio, we have updated our approach to identifying key transition risks and their likelihood of occurrence in the short, medium and long term, as part of our assessment of the materiality of climate and environmental risks. We have identified the part of the portfolio exposed to high transition risk, based on an analysis of regulation at European Union level. We assess the materiality of transition risk for this portfolio by considering both the likelihood and the scale of exposure to high transition risk. We have also implemented a methodology for determining the RAS for transition risk and determined the risk appetite by year to 2035 for new sales. The defined objectives of the RAS are, expressed in concrete figures, a gradual reduction in the share of mortgage loans exposed to high transition risk in new sales.

Definitions and methodology

In establishing the principles and framework for ESG risk management, we are guided by the *EBA guidelines EBA/GL/2020/06 on Loan origination and monitoring* of May 2020. From 30 June 2021, the bank is obliged, inter alia, to include an assessment of the ESG exposure of its clients' business in its lending process. Guided by these guidelines, we have included environmental, social and governance factors in our credit risk appetite and incorporated them into our credit assessment processes for corporate clients. Sectoral assessment of climate and environmental risks referring to the Double Materiality Assessment methodology (DMA) is now determined for those portfolios and those ESRS sub-topics (sustainability matters) where risk materiality has been identified through the DMA process and provides a benchmark for individual corporate client assessment in manual pathways.

In the introduced standards on ESG risk management, we have also taken into account the provisions of *the ECB Guide on Climate-related and Environmental Risks – Supervisory Expectations Relating to Risk Management and Disclosure* of November 2020, and the EBA Report on Management and Supervision on ESG risk for Credit Institutions and Investment Firms, EBA/REP 2021/18 of July 2021.

We have indicated in *the ESG Risk Management Policy* the methods, definitions and international standards used. Among other things, there we defined environmental, social and corporate governance risks, using the provisions of *the EBA Report on management and supervision on ESG risk for credit institutions and investment firms, EBA/REP 2021/18, July 2021*. In the List of ESG Impacts, Risks, and Opportunities, we identified the key ESG risks and their channels of transmission to traditional risks.

In 2025, we have been working intensively on the implementation of *the EBA/GL/2025/01 Guidelines on the management of ESG risks*, covering, inter alia, the requirements for identifying, measuring and monitoring these risks. In parallel, we have developed a Prudential Transformation Plan, defining objectives and actions to respond to transition and physical risks. We have also implemented a monitoring system for ESG risks based on the required indicators and metrics and developed processes for obtaining ESG data from large corporate clients.

We continually monitor regulatory risks arising from changes in the legal environment in relation to the financial sector – following the work of regulators and legislative proposals. We participate in the work of the Polish Bank Association on the interpretation of ESG regulations.

Processes to identify, measure and monitor ESG risk-sensitive activities and exposures

The first step is always to identify (or update) climate and environmental risk factors. It is carried out by the ESG Risk Management Department, relying, inter alia, on regulatory documents (e.g. *ECB Guide on climate-related and environmental risks*), as well as scientific literature, climate scenarios, data from external parties and publications from other national or international institutions. An inventory of risk factors with their transmission channels into traditional risk categories, as well as a list of publications taken into account, is included in the internal document *List of ESG Impacts, Risks, and Opportunities*.

As we view ESG risk as a factor that amplifies core risks (credit, market, liquidity, funding, and operational), most of the processes to identify, measure, monitor these risks have been built into the standard processes for managing these core risks.

Environmental risk within credit risk – identification, measurement, monitoring

- Identification, measurement and monitoring – portfolio approach

Portfolio materiality assessments of climate and environmental risks are now conducted for portfolios and ESRS sub-topics (sustainability matters) where risk materiality has been assessed through the double materiality process (DMA). More information can be found here. The methodology for assessing the materiality of climate and environmental risks describes the approach to quantifying these risks.

For Wholesale Banking, Business Banking and Retail Banking clients (mortgage portfolio) – the assessment of the materiality of climate and environmental risks results in the identification of the exposure most exposed to transition and physical risks (classification and share of portfolio), with the assessment done through a sectoral approach for Wholesale Banking and Business Banking clients. The retail cash loan portfolio was excluded from the scope of the analysis due to the small scale of the exposure relative to the retail portfolio and the inability to establish a direct link to transition or physical risk.

For the clients of the Wholesale Banking and Business Banking divisions, an important risk driver is emission intensity (including through real estate energy efficiency). For clients of the Business Banking division, there are additionally physical threats.

For clients in the retail banking segment (mortgage portfolio), the relevant environmental risk triggers are emission intensity (through the energy efficiency of the real estate) and physical hazards (flood risk).

As a matter of principle, environmental risk factors that have been identified as significant through the above-mentioned processes are mandatorily subject to monitoring and mitigation. In individual credit processes, however, we often examine and mitigate the presence of such environmental risks as well, which have not been recognised portfolio-wise as material.

- Individual processes for identifying, assessing and monitoring ESG risks – clients of the Wholesale Banking and Business Banking division

The KYC process excludes the risk of establishing a new relationship with a Wholesale Banking and Business Banking client with environmentally damaging activities, and allows us to identify clients with such activities among existing relationships, with the result that we stop offering them new products and services. Thus, the KYC process significantly mitigates environmental risks in the short-, medium- and long-term, thereby affecting the level of credit, liquidity and funding and reputational risks.

We perform an individual assessment of the transition and physical risks in the credit process of the Wholesale Banking division's clients based on *the ESG scorecard methodology* described in the document annexed to the ESG Manual for Wholesale Banking Clients.

As part of the Business Banking division's standard client lending process, we have included the identification, assessment and monitoring of an individual client's environmental risk in the credit application, which can affect the level of financing.

Elevated environmental risks in a client of the Wholesale Banking and Business Banking division may be a reason for a credit rating appeal.

The level of financing in automated and semi-automated processes can be influenced by a sectoral assessment that includes an environmental risk assessment.

The relevant regulations and internal rules are outlined the in documents: Credit Risk Management Policy, Sector Guidelines, Transition and Flood Risk Assessment Guidelines, Sector Assessment of Climate and Environmental Risks for Wholesale Banking and Business Banking Portfolios, ESG Manual for Wholesale Banking Clients, ESG Manual for Business Banking Clients, Corporate Client Credit Manual and Strategic Client Credit Manual.

For investment projects subject to the Equator Principles, we apply this socio-environmental principles standard in the assessment of transactions. Projects that do not comply with the Equator Principles are not financed by our bank.

- Individual processes for identifying, assessing and monitoring ESG risks – real estate collateral for clients of the Business Banking division and the Retail Banking segment

We include transition risk and physical risk in the value of real estate collateral in the retail mortgage exposure portfolio and in the vast majority of the corporate exposure portfolio in the Business Banking division. By lowering the value of the real estate accepted as collateral, we indirectly influence the amount of loans granted, through the limitation applied in the form of the maximum level of Loan-to-Value (LTV) parameter.

- Portfolio measurement and monitoring of physical risk in Template 5

For the next consecutive year, we are estimating the physical risks in the banking book in accordance with *Commission Implementing Regulation (EU) 2022/2453* of 30 November 2022 laying down implementing technical standards on disclosure of information on environmental, social and governance risks (Template 5).

This year, we have significantly improved the precision of the results by including a physical risk assessment at address level with accuracy to the building number. This was possible both in relation to exposures secured by real estate and in relation to exposures of the Business Banking division's non-mortgage-secured clients, for which we have business location addresses. The change in approach is particularly significant with regard to flood risk, due to the shift to highly accurate flood risk data provided by the Polish Waters State Water Holding. We determine the physical risk exposure for each exposure over an appropriate time horizon (referenced to the period to maturity) using an internal physical risk assessment model.

We indicate the exposure of the Wholesale Banking division's clients to physical risk in Template 5 based on the analyses carried out, determining the level of exposure in specific sectors.

A table with the data, together with a discussion of the estimates, can be found in the Appendices, section ESG risk figures.

- Portfolio measurement and monitoring of transition risks associated with real estate collateral in Template 2

In 2025, we introduced a method for estimating the energy efficiency of commercial real estate collateral, which we use in cases where an energy performance certificate is not available. A table with the data, together with a discussion of the estimates, can be found in the Attachments, under ESG risk figures.

- Portfolio measurement of transition and physical risk as part of stress testing and the ICAAP process

In 2025, climate stress tests for ESG credit risk have been carried out for all time horizons. The key insights and conclusions of the stress tests carried out, together with the calculation methodology, were discussed and approved by the ESG Risk Committee.

Scenarios based on NGFS scenarios were used to implement the exercise. The use of differentiated scenarios in the stress-testing process made it possible to assess the bank's exposure to climate and environmental risks depending on possible future directions.

Climate elements in the short and medium term have only been included for the portfolio identified as material from a transition risk and physical risk perspective. Climate factors have been incorporated into the projections as a complementary component to the standard stress testing methodology.

The long-term projections focused exclusively on projecting the development of the cost of risk up to 2035 (10-year horizon). A dynamic balance sheet approach was used to reflect the gradual evolution of the portfolio.

The results of the stress tests carried out indicate that climate and environmental risks have a moderate impact on the level of risk costs in both the retail mortgage portfolio and the corporate loan portfolio.

We have included physical and transition risk factors in the ICAAP process under credit risk by imposing an additional buffer on the capital requirement.

Social risk within credit risk – identification, measurement, monitoring

In the KYC process for the bank's largest clients (Wholesale Banking), the ESG risk assessment at the client level takes into account social factors such as, for example, human rights, labour rights, impact of the business on local communities, involvement in socially harmful activities. We do not finance clients with an unacceptable level of ESG risk, and for clients with a high level of ESG risk, we conduct an in-depth assessment.

We carry out individual social risk assessments in the credit process for clients of the Wholesale Banking division based on *the ESG scorecard* methodology described in the document annexed to the *ESG Manual for Wholesale Banking Clients*.

As part of the Business Banking division's standard client credit process, we have included the identification, assessment and monitoring of individual client social risks in the credit application, which can affect the level of financing.

We follow the specific guidelines in our *ESG Manual* for the arms, tobacco, chemical, industrial processing industries.

Reporting on the distribution of the portfolio in the client segment of the Business Banking division by level of social risk takes place on a semi-annual basis.

We do not accept collateral associated with social risks – the relevant provisions are outlined in the internal collateral manuals for each segment.

Corporate governance risk within credit risk – identification, measurement, monitoring

We have defined corporate governance risk factors in the ESG Manual and take them into account in the ESG risk assessment of the bank's largest clients (Wholesale Banking division), carried out as part of the KYC process, at the individual client level. Among other things, we analyse issues such as how the client reports the impact of the E and S factors, having a human rights policy, information on adverse NGO/media campaigns or possible stakeholder protests.

We assess the individual corporate governance risks in the credit process of the Wholesale Banking division's clients based on *the ESG scorecard* methodology described in the document annexed to the *ESG Manual for Wholesale Banking Clients*.

As part of the Business Banking division's standard client lending process, we have included the identification, assessment and monitoring of an individual client's corporate governance risk in the credit application, which can affect the level of financing.

ESG risk within liquidity risk – identification, measurement, monitoring

As part of our liquidity risk management, we conducted a Climate Liquidity Stress Test in 2024 with a horizon to 2050 to assess the impact of climate risk on liquidity risk. The results of the Climate Liquidity Stress Test showed that there was no material impact of climate risk on liquidity risk. The impact assessment was accepted by ALCO and was presented at the ESG Risk Committee in December 2024. The Climate Stress Liquidity Test will be conducted periodically. The conclusions of this analysis will be used in determining the bank's development directions.

We periodically carry out analyses of the impact on the bank's liquidity of client deposits with high climate risk as part of our liquidity risk analysis. The results of the analysis do not make it clear that client volumes with high climate risk represent a homogeneous volume of deposits that can be treated separately due to the expected costs of climate risk. The costs of climate risk can arise both from the need to cover damage – in terms of physical risk, and from transition costs (or the need to terminate operations) due to regulation. Consequently, the additional costs of climate risk may affect deposit volumes of clients with high climate risk.

ESG risks within market risk – identification, measurement, monitoring

We carried out an assessment of the materiality of climate and environmental risks as part of our market risk management. We assessed the impact of climate and environmental risks on the trading book exposures to be negligible.

ESG risks within operational risk – identification, measurement, monitoring

As part of the non-financial risk management system, including operational risk, ESG risk is treated as a factor that can affect the levels of the various risk subcategories, indicating climate/environmental risks and social and corporate governance risks.

The bank has identified 10 categories of operational risk, including business continuity disruption risk, improper employment practices risk, and the risk of breaches in the safety of individuals and resources, which are potentially the most susceptible to the impact of ESG factors.

The risk management process is described in the *ING Bank Śląski S.A. Operational Risk Management Policy*, in the document *Policy – Principles Of Reputation Risk Management at ING Bank Śląski S.A.*, while the principles of risk identification and assessment are defined in the Non-financial Risk Identification and Assessment Manual.

The regulation *Manual on the Implementation of Environmental Risk in Non-Financial Risk Management at ING Bank Śląski S.A.* describes the impact of environmental risk on non-financial risk, including compliance risk and the possible consequences of this risk for daily non-financial risk management activities. In addition, it defines criteria for identifying and recording environmental risks in banking systems.

ESG risks within compliance risk – identification, measurement, monitoring

As a result of the assessment of the impact of ESG risk factors, including climate and transition risks on compliance risk, areas requiring addressing in compliance processes were identified. In response, steps have been taken to systematically address these risks within compliance management areas.

The work carried out resulted in the development and implementation of the *Client Centricity Guidelines for Physical and Transition Risks*, which complement the Client Orientation Policy and provide a tool for mitigating ESG risks, particularly in the areas of greenwashing, physical risk and transition risk.

Requirements and controls are in place to mitigate the adverse effects of ESG risk factors within the compliance risk framework, including in particular:

- ensuring that all information addressed to (potential) clients, including marketing materials, concerning ING's financial products is accurate, clear and not misleading,
- offering products and services that meet the needs of clients throughout the life cycle of the relationship, taking into account their profile and the characteristics of the products,
- we are progressively introducing improvements and solutions to ensure equal access to our products and services for all clients, regardless of their living situation, economic status, health status or individual needs,
- the use of a consistent and recognisable complaints management process for all financial products, with complaints used as an important indicator of client satisfaction and a tool for assessing the suitability of the products offered.

Work related to the consideration of ESG factors in the analysis of compliance risks continues. Actions taken are aimed at further improving risk management processes taking into account the impact of ESG factors in the area of Compliance.

Mitigating ESG risks by building knowledge

We provide training as well as participate in external events on ESG risks. Training aims to build awareness of ESG risks and mitigate them through effective action by employees within the processes in which they participate.

ESG data

We are building our environmental risk databases, including high-precision location data for physical risk assessments, client greenhouse gas emissions (GHG emissions) data and precise building energy efficiency data. Data from the in-house physical risk assessment tool, address data for collateral and corporate client sites, emission data provided by the BIK and data from the public energy performance certificate database enable the estimation of exposure to physical climate risk, CO_2 emissions from the loan portfolio and the energy efficiency of the collateral real estate. For new financing of corporate income-generating real estate and retail mortgage exposures, we obtain and record information from energy performance certificates. We assign certificate data available in the public database to real estate that is already our collateral.

Thanks to the data we collect, we not only estimate the risks, but also actively manage them in our processes, e.g. through minimum entry criteria for income-generating commercial real estate or by including risks related to low energy efficiency and/or physical risks in the valuation of real estate collateral. Based on the data obtained, we determined the RAS in terms of the share of retail mortgage exposures and the share of corporate income-generating property financing exposures with transition risk, the KRI in terms of the share of real estate collateral with physical risk within retail mortgage exposures and exposures in the Business Banking, the RAS in terms of the share of corporate exposures within a given sector due to, inter alia, the transition risk of a given sector.

We are continuing with the ESG Data Model project, which aims to implement a single consistent ESG data model across the organisation and to develop a concept and roadmap for a targeted internal and external reporting process that is as automated as possible in line with regulatory requirements.

Cyber security and security of IT transactions

Introduction

Cyber security is a set of processes, best practices and technological solutions used to protect IT networks, devices, programmes and data from attacks, damage or unauthorised access. Cyber security is the resilience of information systems against actions that compromise the confidentiality, integrity, availability and authenticity of processed data or related services.

The cyber security threat landscape

The Bank analyses cyber threats based on information published by specialised national and international organisations, information provided by dedicated cyber security units within ING Group and based on its own analysis and experience.

The most serious global threats according to. ENISA (European Cyber Security Agency) in 2025:

- Phishing – fake emails, text messages and phone calls are the most common method chosen to launch an attack on an organisation's ICT infrastructure. Despite the growing awareness of users, these actions are proving

effective, not least thanks to the increasing use of artificial intelligence tools that generate realistic content and impersonate public figures or business partners.

- Ransomware – remains the most dangerous type of attack in terms of financial and operational impact. Quantitatively, it is not the dominant type of attack but is gradually increasing through the proliferation of the "Ransomware-as-a-Service" (RaaS) model, which literally means buying or leasing malware. This makes it easier for less tech-savvy cybercriminal groups to launch attacks.
- Artificial intelligence in the hands of criminals – AI is used not only to create content, but also to automate target recognition, generate malware (malicious software) code and modify attacks in real time. According to ENISA, in the first half of 2025, the majority of phishing campaigns included elements generated by language models (colloquially: artificial intelligence – AI) or deepfake.
- Politically or ideologically motivated attacks – accounted for 75 per cent of all incidents, mainly in the form of short-lived DDoS (Distributed Denial of Service, freely translated) campaigns, a cyber attack that involves overloading a server, service or website by simultaneously sending a huge number of requests from multiple sources. This has had the effect of slowing down or even making the service completely unavailable to genuine users. Although most of them did not cause lasting damage, their frequency and extent pose a serious challenge to the stability of the EU's digital infrastructure.

ENISA's analysis shows that the European digital ecosystem has entered an era of constant cyber pressure. Instead of individual incidents, we are dealing with a constant stream of attacks of various types.

The unit responsible for responding to cyber threats in the Polish financial sector, operating within the Polish Financial Supervision Authority (PFSA CSIRT), identifies the main types of threats:

- cyber threats: DDoS attacks, ransomware, phishing, malware, supply chain attack, attacks using AI-based tools (e.g. deepfake),
- physical threats: sabotage of infrastructure, theft of equipment,
- internal risks: employees acting to the detriment of the company, human error,

and methods of attack:

- socio-technical attacks: manipulation of employees to gain access to systems or information,
- vulnerability exploitation: exploiting known or unknown vulnerabilities (0-day) in software to launch attacks,
- malware attacks: the introduction of malicious software into a system to steal data, encrypt files or disrupt systems,
- physical attacks: direct actions aimed at damaging IT infrastructure or stealing equipment.

Cloud computing, i.e. the use of IT solutions and data processing in external computer centres offering cloud services, is a key element of the IT infrastructure in many organisations, but at the same time creates new attack vectors. The complexity of cloud environments, configuration errors and malware can lead to serious incidents.

A significant threat is attacks carried out against service provider infrastructure that is not directly managed by the bank. Business processes are increasingly using external services. This includes global services, used by many companies, as well as dedicated solutions under individual supplier agreements. Cyber criminals, through attacks on service providers, can disrupt the delivery of services provided by the bank, gain unauthorised access to bank data or launch an attack on the bank's IT infrastructure through the provider's infrastructure. Many high-profile incidents resulted not from direct errors by large companies, but from vulnerabilities in the systems of external partners.

Geopolitical events such as elections, conventional or hybrid conflicts influence the increased involvement of criminal groups, often supported by external forces to destabilise the political or economic situation in the country. A large number of phishing campaigns use themes relating to these events. Attempts to destabilise the operation of individual financial market players through attacks resulting in the unavailability of services (DDoS attacks), which have been observed for several years, also occurred in 2024.

Our cyber security action strategy

The cyber security strategy is stable, in line with the business strategy and the objectives for the development of the bank's ICT environment. It is focused on creating effective IT solutions and client interaction channels with high resilience to cyber threats. We follow the rules:

- security at the heart of everything we do in the ICT infrastructure area,
- security as an integral part of business awareness,
- security as a competitive advantage.

We place particular emphasis on:

- building secure and resilient IT solutions, in line with the security architecture and operational model,
- a multi-layered model for the protection of ICT environments,
- safeguarding all assets, whether they are internally or externally vulnerable,
- increasing the contribution of threat modelling and the use of expertise in technology risk assessment, at all stages of the implementation and operation of ICT solutions,
- the use of automated control mechanisms,
- building threat awareness and IT security competence,

- securing provision of services by external providers,
- compliance with internal and external regulations.

Our cyber security actions

All employees are responsible for ensuring the security of data and information systems, within their respective areas and tasks. We have also set up dedicated units to carry out this task in a specific way. The unit responsible for ensuring the protection of IT infrastructure, services and employees from cyber threats is the Expert Centre Cyber Security and IT Risk, grouping together functions derived from the operational model for the IT security area. Within this unit there are separate teams responsible for:

- detections and responses to threats (SDR),
- countering and reducing vulnerability (ASM),
- data leakage prevention (DLP), security architecture and IT risk management.

We conduct our actions on the basis of internal regulations relating to cyber security in the broadest sense, which include i.a. *Cyber Security Strategy* and:

Internal regulations relating to cyber security	
• **Risk policies**	• *Operational Risk Management Policy at ING Bank Śląski S.A.,* • *Policy "General principles of IT Risk Management",* • *Operational Resilience and Business Continuity Management Policy;*
• **IT risk standards**	• *Information Risk Policy – Cyber Resilience Standard,* • *Information Risk Policy – Standard of Basic Safeguards,* • *Information Risk Policy – End-User Software Standard,* • *Information Risk Policy – a Standard for Data Management,* • *Information Risk Policy – Platform Security Standard;*
• **IT Control Standards**	• Control Standard – Basic IT Risk Assurance, • Control Standard – Tax Management Process, • Control Standard – IT Security Detection and Response Process;
• **IT security standards**	• *IT Security Standard – Cryptography,* • *IT Security Standard – Identity and Access Management,* • *IT Security Standard – Web Applications,* • *IT Security Standard – External Connections,* • *IT Security Standard for Backup and Restore Solutions,* • *IT Risk Standard for External Suppliers.*

These and other regulations are further clarified in related downstream documents (e.g. procedures, manuals).

Due to the continuous development of new, advanced attack methods, the bank's security teams are constantly improving existing systems and building new, more effective detection and prevention mechanisms. In the past year, among others:

- we have strengthened the protection of the working environment by reducing entitlements and implementing new detection and response mechanisms;
- we have set up a Threat Intelligence function to analyse the external and internal threat environment. We carried out threat modelling to identify and implement effective resilience mechanisms;
- we have automated our incident response processes;
- we have improved access and privilege management, including automating the handling of privilege management and eliminating toxic privilege combinations;

- we have extended the use of multi-factor authentication (MFA) for user access to ICT systems;
- we raised awareness and competence of employees in the area of cyber security through educational campaigns, phishing tests and development programmes;
- we have improved security monitoring, code security scanning and security configuration control;
- we performed over 300 penetration tests (applications, systems, processes), Red & Blue Team exercises and simulations of advanced cyber-attacks on the bank's ICT infrastructure;
- we managed supply chain risks by defining supplier requirements, verifying and auditing supplier-implemented security mechanisms and monitoring incidents in external environments;
- we have updated security standards and requirements and modernised the security architecture.

We have ensured compliance for the cyber security area:

- *Act on the National Cyber Security System* (UKSC), the subject of which is the organisation of the national cyber security system and the definition of the tasks and responsibilities of the entities comprising the national cyber security system.
- *The Digital Operational Resilience Regulation* (DORA), which sets out a new European framework for effective and comprehensive digital risk management in financial markets.

Regulatory compliance and the effectiveness of the cyber security measures taken were verified through audits performed by external and internal entities. We have received a positive opinion from an external auditor confirming compliance with UKSC requirements and positive feedback in internal audits on, inter alia, cyber security scenarios, incident response and IT security operational activities.

All these measures are aimed at protecting the bank's resources from threats from within and from outside, thereby protecting our clients and the funds entrusted to us. We carry out many of these activities jointly with other units of ING Group N.V., as well as in cooperation with financial institutions and state authorities. As in previous years, we take an active part in the work of the Bank Cyber Security Centre Fincyber.pl, which operates within the Polish Bank Association.

Despite rapidly changing trends, attack scenarios and technologies, the bank's cyber security units, acting on the basis of and in accordance with regulations, efficiently and, above all, effectively counter threats.

Anti-fraud

The second important element from the field of cyber security is anti-fraud. The unit responsible for taking action on external and internal fraud is the Expert Centre – Anti-Fraud, which aims to limit losses for clients and the bank. The unit is also responsible for responding quickly when a crime is suspected and adapting preventive action to the activity of fraudsters. Among other things, the monitoring of incoming and outgoing transactions, the analysis of client reports of unauthorised transactions in accordance with the provisions of the Payment Services Act and the procedure "Handling of Fraud Complaints", as well as preventive measures to adequately safeguard banking processes and products against fraud attempts are performed within this expert centre.

By working closely with the bank's business units, we are continually improving our online banking systems, introducing new security mechanisms and reducing the risk of fraud, while ensuring clear and understandable communication with the client. We are also improving the mechanisms for detecting anomalies, both in the bank's transaction system itself and in transactions ordered by clients, thus catching suspicious transactions – those ordered by unauthorised persons. We also take care of the integrity of client mandated transactions, reducing the risk of internal fraud.

In online banking and mobile banking applications, we use various solutions to enhance client security, among others:

- Authorisation of operations (transactions, log-ins, data changes, etc.) with a one-time code or PUSH method – this method enables the authorisation of instructions in the internet banking system by means of an authorisation code or message confirmation in the mobile application. Along with the request for transaction confirmation, the client is provided with comprehensive information on the details of the transaction, which allows for additional verification of the instruction.
- Interactive mobile authorisation, which involves asking the client to provide additional, detailed information about the transaction being requested.
- Blocking mobile app screen sharing, so that third parties are unable to take control of the client's screen or even view the contents of the mobile app.
- FIDO2-compliant U2F key, which is an additional security feature when logging into the online banking system on a computer and effectively protects the user against phishing scams.
- Hard daily limit – a monetary limit up to which transfers can be made on a given day in online banking.
- Encrypted Internet connection – access to banking systems is possible only after entering an ID and password. Communication between clients' computers and the bank's server is encrypted with the TLS protocol. The ing.pl website and the online banking system are protected by high-trust digital certificates that secure the connection over the encrypted HTTPS protocol. This guarantees fully secure data transfer in an encrypted form, protects it from external changes and authenticates computers communicating with each other.
- 3D Secure (standard for on-line card payments) – when our clients pay with a card in an on-line shop that supports 3D Secure, they additionally confirm the payment with a one-time short text message code. In order to

use 3D Secure payments in our Bank, you don't need to run or activate anything – just a card that supports on-line payments.

- Masked password – logging into the internet banking system is done without entering the whole password – the system automatically draws only selected characters.
- Automatic logout in the event of user inactivity.
- Voice-code, as an additional authentication and authorisation factor with a dedicated message for transactions for which the bank suspects investment fraud. As standard, this mechanism is also used in the loan agreement processes and the pairing of the mobile device with the client's account. These messages also take the interactive form of asking the client for additional, detailed information about the transaction being commissioned, so that the client is aware of them.
- NFC authentication – confirming the client's identity using the NFC layer of the debit or credit card as a substitute for a voice message (Voice-Code) in the process of pairing the mobile device with the client's account, which provides both a higher level of security but also greater convenience – no need to listen to the recorded message.
- Behavioural verification – analysis of the user's interaction with the computer to detect possible interference by unwanted parties. During this verification, it is not checked what a given user does, but how he/she does it. Among other things, we collect and analyse information on how quickly and often the user clicks on individual keys on the keyboard, how they scroll the screen, how quickly and often they click the mouse. The user's profile is only built when the user logs into the online banking system and the user's behaviour is compared after each login.
- Transaction monitoring – the bank monitors the use of internet banking in real time, both in detection and prevention modes.
- Malware detection – a tool has been implemented to detect malware activity at the client's station when using online banking.
- Antispoofing – a tool that provides the ability for a client to verify the authenticity of a telephone call whether they are talking to a bank employee.
- Contextual messages for BLIK transactions alerting the client to the risks of the transaction being performed.

In addition, the employees at the centre conduct awareness campaigns on how to protect against fraud for different groups of clients, both consumers and corporate clients, and carry out awareness campaigns and training for bank employees, in accordance with the adopted training plan.

Business risks

Within business risk, there are several subcategories of risk, of which only macroeconomic risk is categorised as material risk.

We define macroeconomic risk as the risk arising from changes in macroeconomic factors and their impact on minimum capital requirements. We manage this risk by conducting regular internal stress tests in accordance with *the Stress Testing Policy*, which allows for ongoing monitoring of the sensitivity of the minimum capital requirements to macroeconomic factors.

Based on the results of internal stress tests, in accordance with *the Methodology for the Calculation of Economic Capital for Macroeconomic Risks*, we estimate additional economic capital to hedge against the effects of the materialisation of the tested scenario.

Sustainability Statement

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In this chapter, we present the Sustainability Statement, addressing the requirements of the Corporate Sustainability Reporting Directive (CSRD) In this chapter, we present the Sustainability Statement, addressing the requirements of the Corporate Sustainability Reporting Directive (CSRD).

General information

Preparation of the Sustainability Statement

Basis for preparation

BP-1.5

Our Sustainability Statement for the financial year ending 31 December 2025 covers ING Bank Śląski S.A. and its subsidiaries, together referred to as the ING Bank Śląski S.A. Group (Group structure is presented here). The scope of consolidation is the same as for the financial statements.

The scope of the information presented has been determined following a double materiality assessment process (hereafter: materiality assessment) in accordance with ESRS guidance 1 and based on the guidance provided in the IG-1 Materiality Assessment guidance published by the European Financial Reporting Advisory Group (EFRAG). Description of the process, basic methodological assumptions and results are presented here.

ESRS standards revision processes initiated on EU level in 2025, public debates around reporting and regulatory uncertainty in this area have influenced our approach to 2025 reporting. We have decided not to make any material changes to our Sustainability Statement compared to last year.

Omissions of information

In preparing the Sustainability Statement, we have made use of the option to omit certain information relating to intellectual property, know-how and innovation. We have not disclosed sensitive information that is central to our business strategy and development plans in order to protect our competitive position. This does not affect the overall materiality of the disclosed information. We have also taken the opportunity to omit the following disclosure requirements:

- E1-9 Anticipated financial impacts resulting from material climate-related risks or opportunities.

Estimates and data uncertainties

BP-2

In our Sustainability Statement, we use data for which a certain degree of uncertainty remains, primarily attributed to external factors. Since regulations evolve and markets adapt, there is a certain challenge relating to data availability. Where reliable data are unavailable, we have used estimations, averages, proxies, assumptions or a combination of these. We continue our efforts to improve data quality and we expect it to get better as the methodologies evolve and as the market adapts to the regulatory requirements relating to sustainability

In particular, estimates may relate to data such as::

- Financed emissions: For selected elements of the calculation, especially in cases where client emission or financial data, property energy-performance data, or operational data (e.g., vehicles) are missing, we apply proxy data (approximations) and reference factors in line with the PCAF methodology. We continuously work on improving data quality and expect it to increase as methodologies evolve and the market adapts to regulatory sustainability requirements.
- Energy/utility consumption: If complete source data is not available as of the reporting date (e.g., invoice delays or billing cycles), the data may be estimated based on the best information available.
- Forward-looking information: While the annual report generally includes information relating to the current reporting year, ESRS requires that we make an additional disclosure of forward-looking information, resulting in the use of management judgement in relation to this scope of information.

Changes in preparation or presentation of sustainability information

BP-2

The following are the most important changes regarding the preparation and presentation of sustainability information in relation to 2024:

- Changes to the methodology for conducting the materiality assessment process – described here.
- Change in the presentation of the results of the double materiality analysis – detailed descriptions of material impacts, opportunities and risks (IROs) have been moved from the thematic chapters to the General Disclosures chapter.

Sector-specific disclosures

During the current reporting period, we have reviewed the current sector disclosure requirements under the existing ESRS standards and the ongoing regulatory work to clarify the approach to sector disclosures and the materiality assessment process. Given the evolution of the guidelines, including the announced changes in approach to the process of identifying material sustainability topics, we have decided to maintain last year's approach in this regard. In the light of this decision and the analysis of current regulations, no additional topics specific to the entity were revealed. At the same time, we have ensured that for the topics identified in ESRS AR 16 that we have identified as material, we present them from the perspective of the specific sector in which we operate.

Incorporation by reference

Some ESRS requirements have already been included in our annual report due to other reporting requirements to which we are subject. To avoid duplication of information, "incorporation by reference" has been used for the following ESRS requirements in accordance with ESRS 1 paragraph 119:

ESRS disclosure / data point	Name	Place in the report
SBM-1.40	Strategy, business model and value chain	ING Bank Śląski: • Who we are • The scale of our activity • Business segments • Business strategy • Risks in the implementation of the business strategy
SBM-1.42	Strategy, business model and value chain	ING Bank Śląski: • Business model and value creation
GOV-1.21	The role of the administrative, management and supervisory bodies	Management Board statement on the application of corporate governance principles: • Supervisory Board • Management Board • Remuneration of the Management Board and the Supervisory • Diversity Policy for supervisory and management bodies
GOV-3.29	Mainstreaming sustainability-related outcomes into incentive schemes	Management Board statement on the application of corporate governance principles: • Remuneration and Nomination Committee • Remuneration of the Management Board members • Linking remuneration principles to sustainability matters

Internal control and management of the reporting process

GOV-5

Like other types of reporting, sustainability reporting is subject to the risk of errors due to, inter alia, incompleteness or inaccuracy of the information presented, potential errors in source systems, data quality, human error and external events. The overall operational risk management framework and the mechanisms for managing material sustainability matters, as described within this Sustainability Statement, support the mitigation of the above risks.

The sustainability reporting process is linked to the identification and assessment of risks to the ESG Strategy, which considers, inter alia, the risk of financial and reputational losses resulting from inadequate management of ESG matters (including lack of adequate organisational structures, ineffective oversight or ineffective controls). The control processes related to the preparation of the Annual Management Board Report on Operations of the ING Bank Śląski Group are an integral part of the control environment supporting the mitigation of risks in the reporting area.

- **Roles and responsibilities**: content and quantitative disclosure data are compiled by the employees responsible for the respective content areas and are then subject to multi-level reviews, including content verification and qualitative review. Roles and responsibilities in the process (preparation, verification and approval) are formally defined in the RACI responsibility matrix for sustainability reporting and reflected in the defined approval workflow.
- **Controls and procedures for quantitative and qualitative data:** the quantitative data used in the disclosures are covered by a quality control system, including documented procedures and controls for key data points. These controls define the owners, scope, frequency, data sources and the manner of execution and evidence required. Qualitative data are reviewed for consistency of content and compliance with reporting requirements.
- **Tool support and process automation:** the statement process is tool-supported in terms of the acquisition and processing of sustainability data in terms of environmental data, HR indicators or the internal Risk Navigator adverse event monitoring system, among others. In 2025, we implemented a dedicated annual report preparation tool that provides a central environment for preparing disclosures, coordinating work, performing reviews and approvals, which strengthens version control and access control. Central management of quantitative data in the report reduces the risk of inconsistencies and errors.
- **Process oversight and improvement:** the progress of the work, the quality of the data and key issues in the reporting process are subject to ongoing oversight and review, and final disclosures are approved by Members of the Bank Management Board. In addition, the Member of the Bank Management Board who oversees the CFO Division (including the unit responsible for the preparation of the Sustainability Statement) is kept informed of the progress of the entire process of developing the Statement. Conclusions from reviews and verifications, as well as market analysis, are used to improve the process and scope of disclosures, updates and procedures and strengthen controls in subsequent reporting cycles.

The statement has been attested by the external auditor at a level of limited assurance on the quantitative and qualitative data presented in accordance with the requirements of the *Accounting Act*, implementing the provisions of the *CSRD Directive*.

Sustainability impacts, risks and opportunities assessment process

IRO-1, IRO-2

As part of the process of preparing the 2025 reporting, we carried out a double materiality assessment (DMA) for the second consecutive year in accordance with ESRS 1 requirements. Our approach to assessing sustainability matters has not changed significantly compared to last year. We are constantly refining the methodology to ensure compliance with applicable regulations, including risk management, and to promote consistency across all reporting. The main changes in the 2025 methodology compared to 2024 are the following:

- **Inclusion of client-level data** – we have extended the data used to include client-level data (where available). This allowed us to strengthen the underlying data, enabling a more accurate and representative assessment.
- **Addition of revenue and profit aspect** – materiality assessments for individual ESRS topics are also weighted by the share of revenue (for clients of the Wholesale Banking and Business Banking divisions) and profit (for clients of the Business Banking division) from each sector (previously by exposure size only).
- **Revised methodology for assessing biodiversity topic/ sub-topic:** Direct drivers of biodiversity loss – the current approach still considers all pressure factors, but we assign percentage weights to them instead of a maximum score, in line with the scientific approach developed by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES).
- **Additional analysis of compliance risks** – for each element of the value chain, the analysis included greenwashing risks, reputational risks related to ING's public statements, risks related to non-compliance with the Client Centricity Policy and other risks relevant to compliance (whistleblowing, bribery and corruption, data protection).
- **Stakeholder engagement** – we have deepened this aspect of the double materiality assessment. Details are described here.

A sustainability matter is considered material when it meets the criteria of impact materiality, financial materiality or both. We define materiality perspectives as follows:

Impact materiality

The "inside-out" perspective

- Assessment of the organisation's actual or potential, positive or adverse impact on people and the environment.
- Refers to the impact caused or contributed to by our activities, linked to our operations, products and services and through our business relationships. For a financial institution, this is particularly true for the business of providing finance.

Financial materiality

The "outside-in" perspective

- Assessing how sustainability matters – including climate, environmental, social and regulatory changes – may affect the organisation's financial position, performance and business model, now or in the future.
- For a financial institution, this particularly applies to the identification and management of ESG risks, including climate and environmental risks.

Time horizons

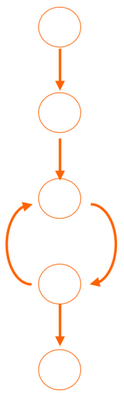
BP-2

The issue of sustainability can be material in different time perspectives. The time horizon is therefore an important element in assessing materiality. The ESRS requires companies to define the short-, medium- and long-term time horizon used in the materiality assessment process. We determined the adopted time horizons based on the European Banking Authority (EBA) guidelines for the banking sector in combination with the ESRS guidelines. We used the following time horizons in the materiality assessment process:

- short-term: up to 1 year,
- medium-term: 1 to 5 years
- long-term: over 5 years and duration of at least 10 years.

Steps in the process of assessing impacts, opportunities and risks

Our process for assessing material sustainability matters consisted of the following steps:



Step 1 Identification of business activities and relationships

Step 2 Identification of material sustainability matters

Step 3 Conducting a double materiality assessment

Step 4 Stakeholder engagement

Step 5 Validation of the results by the Bank Management Board

Identification of business activities and relationships

The starting point for double materiality assessment was to understand our business model, including the key activities, resources and dependencies (capitals) that we rely on and influence. We then related these elements to the structure of our value chain. For a detailed description of our value creation model, see here. The breakdown of our activities into the elements of the value chain that we used for the DMA process is described below.

Identification of the elements in the value chain

We have reviewed our business relationships and activities to identify which elements of our value chain are likely to be linked to material IROs. We used a three-step approach:

- We analysed our consolidated balance sheet and consolidated profit and loss account to identify the bank's core activities, assets and exposures that may be subject to sustainability-related IROs.
- We allocated financial items to the bank's main business areas and asset portfolios. This reflects our internal organisational structure and ensures that the owner of an element of the value chain is accountable and manages the implementation of sustainability objectives. Actions within the value chain are aggregated based on similarities in business activities, taking into account comparable products, services offered and the similarity of entities within the value chain.
- We excluded portfolios with a low likelihood of material IROs from the assessment. We focus on areas with the greatest potential impact.

In order to form an opinion on how and where sustainability matters may materialise, the identification of assets and exposures subject to impacts and risks requires the classification of activities according to their characteristics. This classification is made in particular on the basis of characteristics that include, inter alia, the maturity of the loan or position, the type of counterparty, geography, type of activity/service/product, sector of activity or type of collateral.

We have identified six key elements of our value chain. They reflect our core business and direct or indirect relationships across the value chain. As our core business is lending, through which we finance our clients and the economy, the main element of our value chain that influences sustainability matters is our loan portfolios within our individual business lines.

Due to data limitations, the assessment is mostly performed at the level of direct contractual relationships (Tier 1; e.g. large corporates we finance, retail clients we serve).

The double materiality assessment is carried out at the level of the ING Bank Śląski Group. Associates that are not fully consolidated in the financial statements are treated as other business relationships, i.e. as entities involved in the value chain (e.g. suppliers, investee companies) and as such are part of our materiality assessment

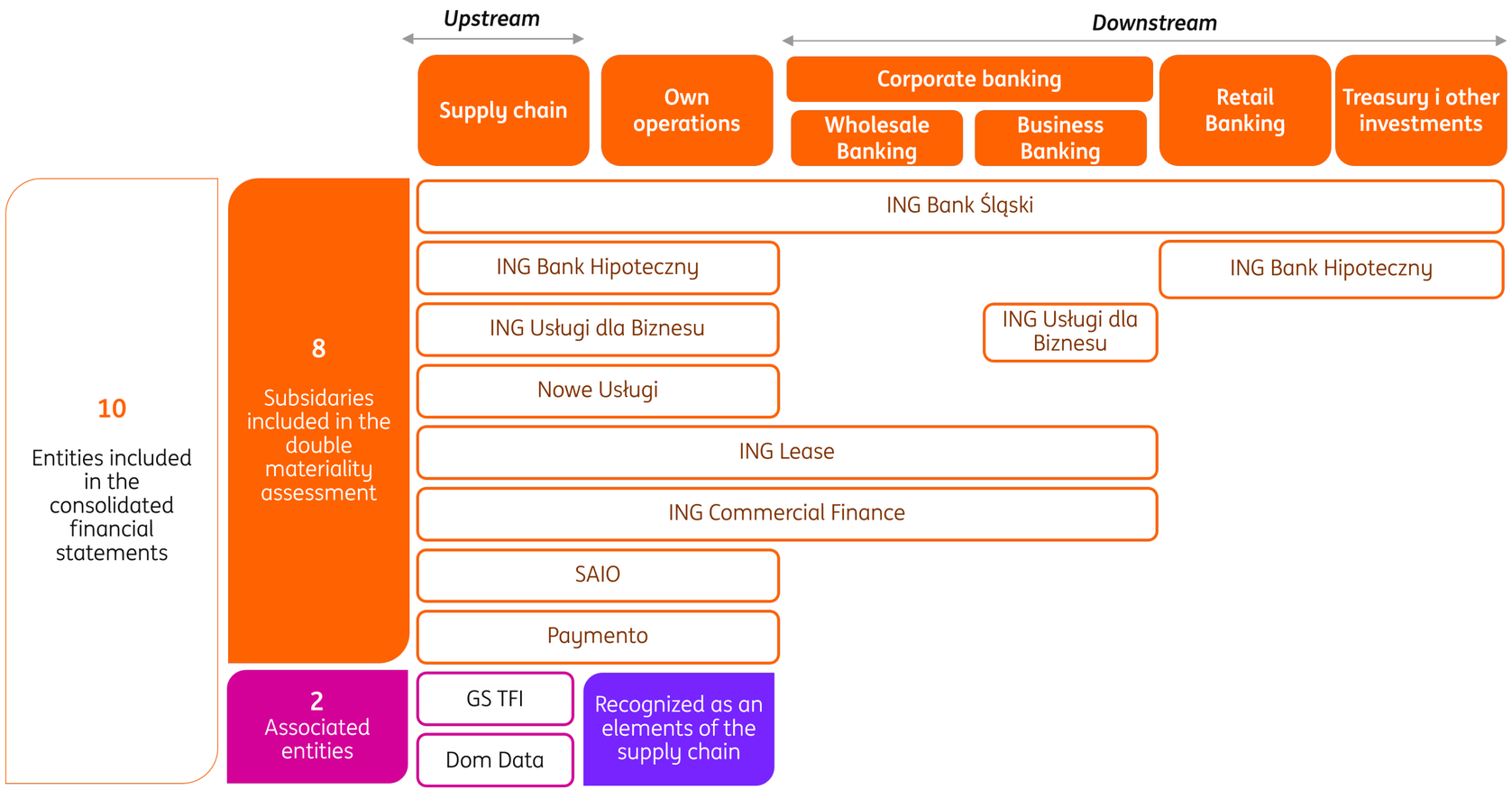
In the following pages, we present our value chain and the key actions within each part of it, as well as the mapping of ING Bank Śląski Group entities to its various elements.

Our value chain

SBM-1

	Upstream		*Downstream*			
	Supply chain	**Own operations**	**Corporate Banking segment**		**Retail Banking segment**	**Treasury and other investments**
			Wholesale Banking	**Business Banking**		
Actions, products and services	• Procurement processes, including the KYS (Know your supplier) process • Management of the relationships with the suppliers of goods and services	• Human resources management • Real estate management (e.g. office buildings, buildings, etc.) • IT process management	Development, marketing and distribution of financial products and services and client service: • Loans (including pre-settlement risk exposures) • Deposits (including savings accounts) • Payment and cash services • Trade finance • Trading book (i.e. assets and liabilities held for trading) • Financial markets • Funds in the NBP – obligatory reserve	Development, marketing and distribution of financial products and services and client service: • Loans (including pre-settlement risk exposures) • Deposits (including savings accounts) • Payment and cash services • Trade finance	Development, marketing, distribution, including client service, of products and services: • Mortgage loans • Consumer loans • Payment and cash services • Deposits (including savings accounts) • Stock broking activities • Assets under management • Insurances	• Support the growth of ING's business by ensuring that ING's capital, financing and liquidity are at an appropriate level. Treasury: • Investment portfolio • Hedging instruments • Receivables granted to banks • Funds in the NBP • Amounts due to other banks • Debt instruments • Equity • ING BSK Group investments: • Equity interest
Actors	• Suppliers of products and services The largest group of suppliers in terms of purchasing volume are external consultants, IT service providers, software and hardware and payment processing	• Employees	• Large companies, including financial institutions	• Entrepreneurs • SMEs and mid-corporates • Local governments	• Individual clients • Private banking clients	• Companies (including financial institutions) • Transnational entities • Governmental entities • Shareholders

ING Bank Śląski Group entities in the value chain



More about our capital group here

Identification of material sustainability matters

We use the list presented in ESRS 1 AR.16 as a starting point for identifying sustainability matters. Topics within sustainability matters are assessed in terms of the entire value chain. However, not all topics are material to all its elements.

The level of detail at which we carried out the materiality assessment was based on the availability of internal and external data. As a general rule, ESRS topics are assessed at the sub-topic level, with the exception of the social issues within topic S1 Own workforce, which are assessed at the sub-sub-topic level.

We have identified material environmental and social impact factors, as well as financial factors in relation to sustainability matters:

Impacts – are recognised through factors that cause changes in nature, man-made resources and quality of life. To ensure a holistic approach, we take into account a wide range of factors in the environmental, social and governance aspects and, where possible, their forward-looking nature:

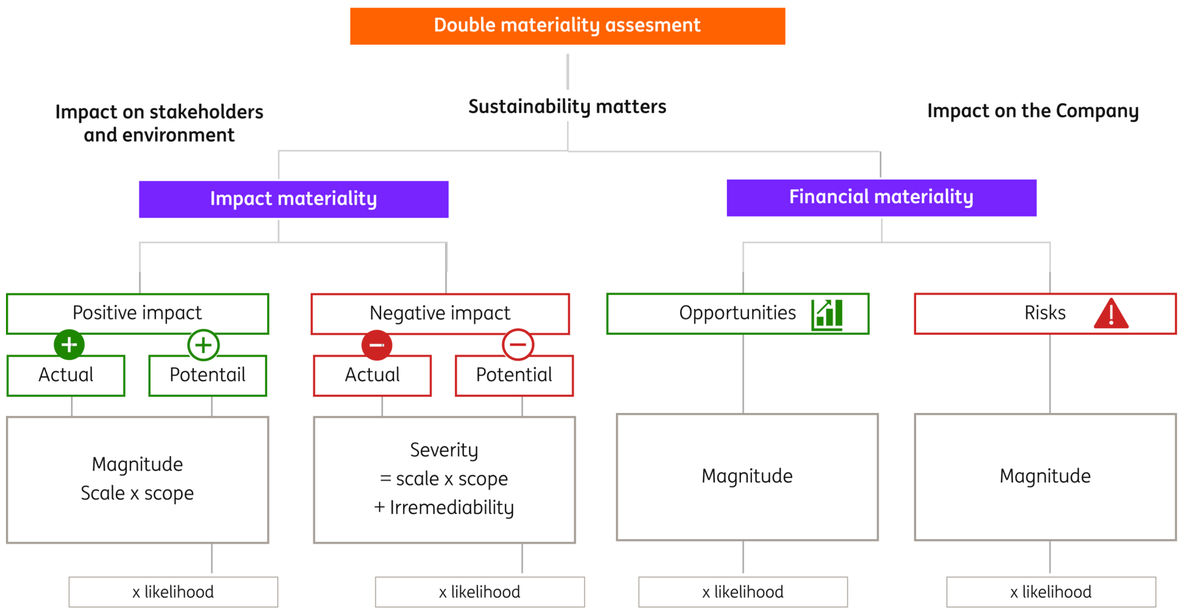
- Environmental factors refer to the natural resources used in the economy or the by-products of economic activities, e.g. emissions associated with production facilities, energy consumption or pollution discharges. These factors result from changes in the quantity or quality of natural capital created by the factors.
- Social factors affect the welfare, rights and social conditions of individuals and communities. Examples include employment practices and working conditions, human rights and social justice. Social impact factors highlight changes such as improvements or deterioration in living conditions, social inclusion or exclusion and changes in community health and safety.
- Governance drivers refer to the factors that impact an organisation's governance structures, practices and ethical standards. These factors include corporate governance practices, transparency, accountability, anti-corruption measures and compliance with laws and regulations. They affect the ethical position of the organisation and the overall quality of management.

Risks – we identify on the basis of factors materialising within traditional banking risk categories, distinguishing between different ESG risks, such as transition risks and physical risks for environmental issues, for example. We consider a broad spectrum of ESG risks, taking into account their specificities, such as their forward-looking nature or risks arising from the impact or dependence on nature and human capital. For more information on how ESG risks are integrated into the overall risk management process, see ESG risks.

Opportunities – are understood to be potential environmental, social or governance events or conditions that could materially enhance our business model or its ability to achieve its strategic objectives and create value and thus may influence both our and our stakeholders' decisions. The identification of opportunities is dictated by publicly disclosed sustainability commitments, where the opportunity is now clearly being exploited.

Materiality assessment

In the materiality assessment process, we used reputable external data sources: for example: ENCORE, UNEP FI and selected internal risk measures, internal data, voluntary reports and other disclosures required by applicable regulations. We used both quantitative and qualitative approaches to assess the level of impacts and risks and opportunities against pre-determined materiality thresholds. The assessment of materiality for adverse impacts and risks is based on a "gross" approach, i.e. without taking into account mitigation measures. The materiality of sustainability topics is determined for our entire value chain, following the approach outlined below:



Impact materiality for both actual and potential (positive and adverse), is determined by the severity/magnitude of the impacts combined with the likelihood of their occurrence. The severity/magnitude depends on the scale (how severe or beneficial the impact is), the extent (how widespread the impact is) and the irreversible nature (to what extent the adverse impacts could be corrected). Likelihood reflects the potential for the baseline impact to materialise over all time horizons.

Financial materiality is assessed on the basis of a combination of magnitude and likelihood, derived from an analysis of impacts, dependencies or context. An impact may be financially material from the moment it arises or become material over time, as determined by the materiality of the impact. Dependencies on natural resources – human and social – are assessed based on their impact on ING's ability to continue to use or acquire the resources required for its business processes, as well as on the quality and valuation of these resources. Contextual analyses include ING's dependencies on business relationships and reputational risks or benefits, viewed together in terms of financial materiality. Indicators derived from internal or external data can be supplemented by expert opinion and analysis.

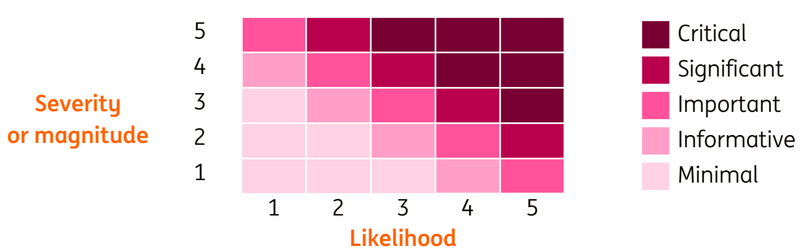
With regard to risks, its magnitude reflects the financial and non-financial effects that could lead to potential losses or increased costs, such as litigation or compliance costs. The assessment of the magnitude of the risk is the maximum of the scores derived from the following three dimensions:

- impact assessment,
- dependence on natural resources (human or social),
- the result of the contextual analysis.

Indicators derived from internal or external data can be supplemented by the expertise of specialists in the area. The likelihood reflects the time horizon considered in the materiality assessment, i.e. short-, medium- or long-term.

For opportunities, magnitude reflects financial and non-financial impacts potentially leading to additional revenues or reduced costs (e.g. energy costs). We conduct the assessment along the dimensions of "use of own resources" (the extent to which ING uses its resources to realise a specific opportunity as a result of developing a specific sustainability matter) and "reliance on relationships" (the potential reputational and financial benefits of meeting commitments and aligning ESG standards, while attracting investors and clients seeking credible sustainable investment options). The likelihood reflects the time horizon, as described above.

The combination of likelihood and magnitude, using the conversion matrix below, yields an overall risk score that can range from minimal to critical. A sustainability matter is identified as material if the risk of one or more of the above dimensions is assessed as material or critical.



Stakeholder engagement in the double materiality assessment process

An important step in the double materiality assessment was to conduct a dialogue and consultation with our stakeholders, internal and external. The way we communicate and interact with our key stakeholder groups on a daily basis is presented here.

Stakeholders (interested parties) according to the ESRS are divided into two main groups – stakeholders who are affected (positively or adversely) by the entity and users of sustainability statements. Some stakeholders may belong to both groups. Below we refer to them collectively as our stakeholders.

For the double materiality assessment, we carried out a number of actions to solicit the views of our stakeholders on how we assess our sustainability impacts, risks and opportunities. We also asked them to refer to the results of the double materiality assessment from last year, asking whether, in their view, with hindsight, the material topics are still material or whether they notice changes or report new findings. In our work, we also used secondary data, extending the analysis of stakeholder opinions and needs.

Engagement of internal stakeholders

We invited all ING Bank Śląski S.A. Group employees to complete an anonymous online survey as part of our annual ESG awareness survey. Employees completing the survey referred to all ESRS topics in order to intuitively identify areas of importance to ING. The survey included additional questions exploring issues directly related to employees, such as development tools and available training, internal communication and events, as well as ideas and feedback on ongoing activities.

In order to deepen and expand employee feedback, we also held a dialogue meeting with the Employee Council and trade union representatives. The meeting was led and summarised by an external facilitator.

We also consider our management as an important internal stakeholders, with whom we have consulted on an ongoing basis on the results of our analyses, supplementing with contextual analysis and a perspective on trends and directions of change, and validating the results of the materiality assessment. We also conducted a series of in-depth sessions with selected areas (e.g. business lines, compliance, HR), during which we discussed the results of the data-driven analysis in detail and conducted a contextual assessment.

Engagement of external stakeholders

To ensure that our value chain is adequately represented, we conducted a series of individual interviews and a dialogue session with our external stakeholders. A total of 20 people representing 12 organisations/ institutions attended the meetings. We spoke to representatives of public institutions and the regulatory environment, our clients, NGOs, social and environmental organisations, investors and the capital market community, business partners or industry organisations. The interviews, conducted according to the AA1000 standard, were moderated and summarised by an external expert. Stakeholders first discussed the sustainability impacts, risks and opportunities for ING, expressed expectations of us, and finally reviewed the timeliness of material topics from the

past year. The discussion at the meetings included three time perspectives: short-, medium- and long-term. Stakeholders were given a summary of the conclusions of the discussions after the interviews, which they could accept or add to.

Taking into account the conclusions of the ongoing dialogue

We see stakeholder engagement in joint dialogue as an ongoing process. Therefore, in addition to dedicated sessions and interviews, we have also gathered findings from ongoing dialogue in collaboration with business clients, such as round tables, or the external environment. The findings formed the input for the double materiality assessment and were included in the preliminary results of the conducted analysis. More about the ongoing dialogue and key issues raised by individual stakeholder groups here.

Stakeholder feedback and how it is taken into account in the double materiality assessment

Stakeholders assessed the preliminary results of the double materiality assessment as adequate for ING Bank Śląski Group's activities. The discussion of results was directionally deepened depending on the area represented by the stakeholder in question. Some stakeholders pointed out areas that could increase in importance in future years and those that are potentially worthy of additional analysis. Stakeholders also shared their views on the challenges facing the financial sector, our ESG initiatives to date and gave their expectations for future action.

We have carefully analysed and summarised the feedback provided through the ongoing dialogue, the survey, as well as during meetings and interviews. We gave particular weight to comments that were repetitive and supported by strong factual arguments.

The findings from the stakeholder engagement phase were analysed by the team conducting the double materiality assessment. For some topics, additional consultations with internal subject matter experts and in-depth contextual data analysis were then carried out. For topics for which a decision was required, we also involved members of the senior management in the process, including Management Board Members overseeing specific areas. The validation of the results carried out allowed us to confirm the outcome of the double materiality assessment, which was then presented to the ESG Council committee for approval by the Bank Management Board.

In the table on the next page, we present the most important and recurring issues raised by stakeholders.

Topics identified by stakeholders	Element of the value chain	Stakeholder category	Stakeholder views	ING's response
Climate – educating clients on climate risks and transition of Wholesale Banking and Business Banking	Wholesale Banking, Business Banking	External and internal experts, clients of Wholesale Banking and Business Banking division (panel, in-depth sessions with representatives of business segments, conclusions from ongoing dialogue)	Climate change requires urgent parallel action. In addition to mitigating climate change and reducing emissions, it is necessary to adapt to climate change by changing the profile of activities, relocating or mitigating the risks of extreme weather events. Therefore, stakeholders identified the bank's role as an educator and regulatory guide for businesses as one of their prevailing expectations.	Educational activities are one of the key elements of our ESG Strategy. We undertake initiatives to support our clients on their path toward a sustainable transformation, including by building their knowledge and awareness. ING also sees its role as an initiator of regular meetings with representatives of various stakeholder groups, which can play an important role in shaping market standards and act as a catalyst for change.
Circular economy and Water	Wholesale Banking, Business Banking	External experts (panel)	Stakeholders indicated that circular economy and water-related matters may be material for ING in terms of impacts and risks, as well as opportunities, depending on the composition of the portfolio. Resource shortages and regulations concerning resource recovery increase the relevance of circular economy models and investments based on critical raw materials. According to stakeholders, this trend points to a growing market potential.	The materiality analysis carried out at the client level, based on the data, did not show materiality. As methodologies and knowledge evolve in future years, the outcome may change. ING is continuously developing its approach to ESG risk management and portfolio impact analysis.
Own workforce	Own operations – employees	Employee Council and trade union representatives (panel), Employees (survey)	Positive assessment of our actions in the employee area, especially in terms of competence development, corporate culture and inclusion and diversity. Competitiveness in the labour market is increasingly based on the quality of the working environment and support for employee well-being. Good employment conditions have a direct impact on staff stability and organisational resilience, making this a key issue. During the interview, employees spoke very positively about the working conditions and the benefits on offer.	The actions targeted at employees stem directly from ING's organisational culture and are also an integral part of our business strategy. Effective communication and transparent employee relations support high engagement and confirm the effectiveness of the ongoing dialogue with employees.
Consumers and end-users	Retail Banking segment	External experts (panel), Ongoing dialogue	Stakeholders highlighted the importance of considering the needs of vulnerable groups in accessing services (older people and those at risk of digital exclusion). They also pointed to the need for simplifying language in contracts and applications and testing materials for comprehensibility by people with special needs. Additionally, stakeholders emphasised the importance of financial and climate education for clients.	We adapt our services to the needs of vulnerable groups, in particular older people and those at risk of digital exclusion, to enhance the accessibility and safety of using our products. We simplify our communication language and test the comprehensibility of materials, including for people with specific needs. An ageing society is a focus area within our strategic actions.. We also continue to expand our financial and climate education initiatives.
Sector-specific topics: AML, Cyber security	All, with particular emphasis on clients	External experts (panel)	The increase in the scale and sophistication of cyber-attacks is making client digital security a key element of financial sector credibility. According to stakeholders, investments in new protection technologies and user education are essential to effectively manage the impact and risks in this area.	Financial crime and cybersecurity are important to us from an operational and regulatory perspective, but at this stage we do not classify them as separate sustainability issues relevant within the context of the CSRD. These are described in detail in other sections of the report: Compliance risk and Cybersecurity

Validation of the results by the Bank Management Board

The final stage of our materiality assessment was the approval of the results by the Bank Management Board during the ESG Council committee and then forwarded to the Supervisory Board for review. The methodology for assessing the materiality of impacts, risks and opportunities and the entire process of identifying them was presented to the Supervisory Board as part of the *Sustainability Panel.*

Results of the materiality assessment

IRO-2

The table below provides an overview of sustainability matters and the results of our double materiality assessment at the ESRS topic level.

Topical ESRS	Sustainability matter	Impact materiality		Financial materiality	
		Negative	Positive	Risks	Opportunities
ESRS E1	Climate change	Critical		Critical	Critical
ESRS E2	Pollution	Important		Important	
ESRS E3	Water and marine resources	Important		Important	
ESRS E4	Biodiversity and ecosystems	Important		Important	Important
ESRS E5	Resource use and circular economy	Important		Important	Important
ESRS S1	Own workforce	Critical	Significant	Critical	Important
ESRS S2	Workers in the value chain				
ESRS S3	Affected communities				
ESRS S4	Consumers and end-users	Critical		Critical	
ESRS G1	Business conduct		Significant	Critical	

Critical | Significant | Important | Informative | Minimal

With regard to the ESRS environmental topics: E2 Pollution, E3 Water and marine resources, E4 Biodiversity, E5 Circular economy and social topics: S2 Workers in the value chain and S3 Affected communities, they did not cross the materiality threshold in any element of our value chain.

Changes in the double materiality outcome

The result of the double materiality assessment carried out this year differs from the previous year in one aspect. According to the current results of the analysis, topic E4 Biodiversity was assessed as not material across the value chain. In the materiality assessment process carried out in 2024, biodiversity was a material topic for the Business Banking area. This change is the result of an update to the methodology for double materiality assessment in quantitative terms. The 2024 methodology overestimated assessments in the impact section based on the maximum value of IPBES[3] pressure factors. The current methodology also takes all pressure factors into account, but with weights determined from the IPBES report[4]. The results of the revised quantitative approach were confirmed by the stakeholder survey – biodiversity was not identified as a material topic during the dialogue.

In view of the actions carried out throughout 2025, the expectations of our stakeholders to be transparent about our actions and to be accountable for the declarations made a year ago, we have decided to include chapter E4 Biodiversity in the 2025 report, despite the lack of materiality in the current period.

In the following pages, we present the identified material impacts, opportunities and risks for the remaining ESRS topics and sub-topics for which the materiality threshold was exceeded.

The list of ESRS disclosure requirements covered by the Sustainability Statement can be found here.

[3] IPBES – Intergovernmental Science and Policy Platform on Biodiversity and Ecosystem Services
[4] Global Assessment Report on Biodiversity and Ecosystem Services, 2019

Material impacts, risks and opportunities

SBM-3

ESRS sub-topic	IRO type	Description	Value chain	Business segment	Time horizon	Related capitals	Place in the report
E1 Climate change							
		The adverse impact on climate change in our value chain is mainly due to the financing of carbon-intensive sectors. Emissions from these sectors may contribute to higher average temperatures and potentially to longer-term extreme weather events of greater frequency and intensity. In the retail banking segment, the adverse impact manifests itself through the financing of high-carbon residential real estate.					here
Climate change mitigation		Climate change mitigation actions can create transition risks, leading to financial challenges for our clients and potential losses for us from client defaults and collateral impairment. In addition, losses may result from a failure to act in accordance with applicable laws and regulations, internal standards, risk appetite and public expectations of our activities. Failure to adequately mitigate transition risks can lead to reputational damage to the bank, legal sanctions or financial loss.					here
		We identify opportunities in relation to climate change mitigation in line with our publicly available voluntary commitments to: i) supporting clients to reduce emissions to achieve the global goal of net zero emissions by 2050, ii) financing new technologies and supporting clients to fulfil their role in the transition.					here
Climate change adaptation		Physical risks can arise from sudden events caused by phenomena such as storms and floods, as well as from progressive (chronic), long-term changes such as rising temperatures. They increase the likelihood of defaults and non-performing loans and may result in adverse financial effects for us.					here

Positive impact | **Negative impact** | **Risk** | **Opportunity** | **Value chain**: Upstream, Own operations, Downstream | **Time horizons**: Short, Medium, Long | **Business segments**: Retail Banking, Business Banking, Wholesale Banking | **Capitals**: Human, Intelectual, Financial, Relation, Natural, Manufactured

ESRS sub-topic	IRO type	Description	Value chain	Business segment	Time horizon	Place in the report
S1 Own workforce						
Working conditions: Secure employment	+	As an employer, we offer stable and long-term cooperation-oriented employment conditions and fair remuneration, the possibility to plan your development in the long term strengthens your sense of security and employment satisfaction.				here
	−	Actual adverse impact of limited scope due to employee reductions of around 1,450 FTEs between 2024 and 2026 resulting from the continuation of the multi-year project to evolve the organisational structure of the bank.				here
Work-life balance	−	As an employer, ING can potentially cause or contribute to work-related stress and pressure, e.g. through excessive workloads, tight deadlines or unclear expectations. Such factors may limit employees' actual ability to take advantage of work-life balance solutions, such as family leave or flexible working arrangements, which in turn may lead to reduced satisfaction and poorer health.				here
Equal treatment and opportunities for all: Training and skills development	+	A broad training offering addressed to employees provides them with opportunities to acquire new competencies and knowledge, opening the door to career advancement within or outside ING. Continuous skills development allows employees to keep abreast of industry trends and best practice, increasing resilience and adaptability in the face of market changes.				here
Diversity	+	Working as part of a diverse team gives employees the opportunity to see new perspectives, experiences and diverse approaches to overcoming challenges. Diversity, inclusion and belonging initiatives encourage learning and development, helping our employees to broaden their skills and viewpoints, which can enrich their personal and professional lives.				here
	!	Reputational risk in light of our commitments set out in the Sustainability Policy and public statements on diversity, belonging and inclusion.				here
Gender equality and equal pay for work of equal value	−	Lack of action or insufficient action on gender equality can contribute to gender inequalities in pay and career development, which can lead to dissatisfaction and adversely affect the living standards of discriminated workers and limit their development opportunities.				here
	!	Gender inequalities resulting in a low percentage of women in management positions and a pay gap, can lead to the risk of increased turnover and reputational exposure due to the growing social and regulatory attention to gender equality in the workplace.				here
Measures against violence and harassment in the workplace	−	Violence and harassment in the workplace can adversely affect the physical well-being and mental health of employees. This can lead to anxiety, stress, reduced sense of safety, depression, and long-term health consequences. Violence and harassment more frequently affect particularly vulnerable groups, including ethnic, racial, sexual minorities and other minorities.				here
	!	Cases of violence or harassment, as well as a lack of effective response to such situations, can result in damage to ING's reputation, the risk of legal proceedings and financial claims, as well as a loss of trust in the organisation and increased employee turnover.				here
Employment and inclusion of persons with disabilities	!	.Risk of legal and regulatory action related to accessibility in the workplace. It can also damage our reputation.				here

ESRS sub-topic	IRO type	Description	Value chain	Business segment	Time horizon	Related capitals	Place in the report
S4 Consumers and end-users							
Access to quality information, responsible marketing practices	Negative impact	Potential adverse effects related to Unfair Client Treatment, consisting in mis-selling, e.g. providing incorrect, unclear or misleading information about a financial product. Providing incomplete information or making unilateral changes to product terms and conditions can lead to uninformed decisions by clients and potentially lead them to financial difficulties					here
	Risk	Unfair client treatment risk refers to the potential harm or adverse impact on clients that arises as a result of unfair practices and is linked to the topics “responsible marketing practices”, “access to quality information” and “product and service accessibility and non-discrimination”. The sale of products that are not in line with clients’ interests, a lack of transparency on costs or risks or unfair marketing practices, including greenwashing, can result in reputational damage, administrative proceedings and financial costs.					here
Accessibility of products and services, non-discrimination	Negative impact	Potential adverse impact on clients relates to a lack of access to financial products and/or services, where the way in which products and services are offered is not well suited to the client’s capabilities or where there are instances of discrimination e.g. on the basis of age or origin.					here
Data privacy and security	Negative impact	A breach of the confidentiality or availability of our clients’ personal data, as well as the disclosure or use of information covered by banking secrecy without a legal basis and/or ING’s failure to comply with obligations set out in banking secrecy regulations, may result in financial loss for clients due to credit fraud taken out in their name, loss of control over their personal data (identity theft), restriction of their ability to exercise their rights, discrimination, emotional distress, lack of access to their funds, inability to make payments, and loss of confidential information protected by banking secrecy.					here
	Risk	A breach of the confidentiality of our clients’ personal data, as well as the disclosure or use of information covered by banking secrecy without a legal basis and/or our failure to comply with obligations set out in banking secrecy regulations, may result in reduced client trust, loss of revenue, and financial losses arising from litigation and regulatory sanctions, claims and compensation sought by clients, an increase in the number of client complaints, and the reporting of suspected offences related to the unlawful disclosure of banking confidential information.					here

Positive impact Actual, Potential | **Negative impact** Actual, Potential | **Risk** | **Opportunity** | **Value chain** Upstream, Own operations, Downstream | **Time horizons** Short, Medium, Long | **Business segments** Retail Banking, Business Banking, Wholesale Banking | **Capitals** Human, Intelectual, Financial, Relation, Natural, Manufactured

ESRS sub-topic	IRO type	Description	Value chain	Business segment	Time horizon	Place in the report
G1 Business conduct						
Corporate culture	+	The values and attitudes we promote and reinforce with our actions positively influence our employees. In shaping our corporate culture, we strive to behave ethically in the market and in relation to our clients.				here
	!	Risk of reputational damage and financial loss arising from violations of ING's values and principles, of laws and regulations and other internal policies.				here
Corruption and bribery	!	Risk of financial loss, reputational damage and loss of banking licence in the event of incidents of corruption and bribery committed by ING, our employees or third parties acting on behalf of ING.				here
Protection of whistleblowers	!	Risk of reputational damage and financial loss resulting from violations of ING's values and principles, laws and regulations and other internal ING policies as a result of inappropriate handling of reports.				here

SBM-3

Material impacts, opportunities and risks and their link to the business model and business strategy

The DMA process has allowed us to identify the material impacts, opportunities and risks (IROs) that arise from the nature of our business and our business model, and from the regulatory, social and environmental environment. The identified IROs are in a reciprocal relationship with our ESG strategy: on the one hand, they reflect the priorities derived from the adopted sustainability objectives and, on the other hand, they themselves influence their shape and the choice of areas treated as strategic. As a result, the materiality assessment process is an important part of building and updating our ESG strategy, which we describe in the following pages.

Sustainability matters that have affected the current financial situation

In terms of the three sustainability matters, we identified an impact on the current financial situation. Details are described in the individual thematic sections:

- Climate change
- Privacy and data security
- Secure employment

In relation to the remaining sustainability impacts, opportunities and risks, we have not identified any material impact on the financial position, financial performance and cash flows during the reported period.

Positive impact | **Negative impact** | **Risk** | **Opportunity** | **Value chain** | **Time horizons** | **Business segments** | **Capitals**

Actual | Potential | Actual | Potential | | | Upstream | Own operations | Downstream | Short | Medium | Long | Retail Banking | Business Banking | Wholesale Banking | Human | Intelectual | Financial | Relation | Natural | Manufactured

Sustainability in our business strategy

Sustainability is one of our competitive advantages supporting the implementation of our business strategy, "ING. In the Beat of Life", which we describe here. This approach derives directly from our mission and the values.

Our approach to sustainability

Our ambition is to be a partner to our clients, employees and society in sustainability. We are aware of the role that financial institutions play in the transition towards sustainability and guided by our principles and values, we want to respond to the challenges of today's world.

Understanding the magnitude of the global environmental challenges, as a bank we see our role first and foremost in supporting clients in their sustainability efforts through financing, education and dialogue geared towards finding solutions together. At the same time, we are continuing our own operations and loan portfolio reduction actions, in line with ING BSK's Roadmap for Reducing GHG Emissions.

We want to create a workplace where, inter alia, we nurture development, well-being and diversity, support the financial health of our clients and provide solutions that are user-friendly and accessible to all user groups. At the same time, we support our clients in entrepreneurship and financial management.

Successful implementation of sustainability objectives requires efficient cooperation not only within the organisation, but also more broadly with our environment. We engage in dialogue on sustainability matters, establishing partnerships that foster socially and environmentally material initiatives.

Our approach to sustainability is enshrined in the *Sustainability Policy of ING Bank Śląski Group S.A.* It outlines the principles that guide our actions in setting and achieving our ESG and sustainability strategic objectives, taking into account the needs and expectations of key stakeholder groups, including employees, clients, investors and the capital market, NGOs, the regulatory environment, the natural environment, business partners, including suppliers, society and the industry environment.

See our **Sustainability Policy**

For the period 2025-2027, we have adopted 7 strategic priorities in the ESG area. They are the result of extensive internal and external analysis, including, inter alia, an analysis of ESG commitments made to date and market trends. In setting our strategic priorities, we were also guided by the results of the double materiality assessment carried out in 2024, including the conclusions of the stakeholder dialogue.

The five strategic priorities focus on two interrelated areas: environmental transition (E) and equal opportunities and entrepreneurship (S). We identified two more as success factors and a strong foundation (G) to achieve the ESG objectives set. With our actions set out in the ESG strategic priorities, we support the implementation of selected UN Sustainable Development Goals.

Our sustainability objectives for 2025-2027 (the so-called ESG Strategy) and the status of key metrics are presented on the following pages.

Our sustainability objectives for 2025-2027

SBM-1, SBM-2

Strategic areas

Environmental transformation

1. **We support customers in their environmental transformation** by:
   - financing and offering sustainable products and services
   - building awareness and knowledge
   - taking action on biodiversity issues

2. **We manage the loan portfolio** - we strive for net-zero 2050 in accordance with the "ING BSK's Roadmap for Reducing GHG Emissions."

3. **We are continuing our own environmental transformation**:
   - in own economy
   - shaping a sustainable supply chain

Equal opportunities and entrepreneurship

4. **We strengthen entrepreneurship and level the playing field for customers,** including:
   - We support clients' financial health
   - ensuring security and availability
   - We support projects aimed at equalizing social opportunities and a fair transformation

5. **We create a working environment** in which we care about:
   - developing and being entrepreneurial
   - wellbeing (mental and physical health)
   - diversity, equality and inclusion of employees

Success factors

6. We co-create an ecosystem for sustainable development

- **We strengthen the ESG culture in the organization** by building knowledge, awareness and commitment of employees
- **We support innovations and initiatives** for the environment and society
- **We intensify activities** in the area of partnerships, joint sectoral initiatives, education and dialog

Our foundations

7. We are building a stable and resilient bank based on a strong ESG foundation

- We have embedded ESG and sustainable development in our business strategy
- We operate on the basis of permanent ESG management structures
- We manage ESG risk and define sectors and areas excluded from financing and subject to restrictions
- We adapt to the requirements of ESG regulations
- We effectively manage ESG data and take care of about their quality
- We conduct engaging and transparent ESG communication

SBM-1

Implementation status of the key metrics of our ESG Strategy

Environmental transformation

Key metric	Implementation status as at 2025 yearend	
Providing financing of PLN 5 billion for RES projects between 2024 and 2030 in the corporate segment.	Between 2024 and 2025, we have provided PLN 2.6 billion of such financing (of which PLN 2.1 billion in 2025).	
Every second zloty of a mortgage loan granted between 2025 and 2027 finances real estate with an energy demand of up to 76kWh/m2 /year.	In 2025, 59% of mortgage loans granted financed real estate with an energy demand of up to 76 kWh/m2/ year.	
Sales of ESG investment funds (Articles 8 and 9 of the SFDR) between 2025 and 2027 at PLN 1.8 billion, including PLN 600 million in 2025.	Sales of ESG investment funds (Articles 8 and 9 of the SFDR) in 2025 – amounted to PLN 1.9 billion.	
Defined action areas for reducing negative impacts on biodiversity in 2025.	There are 4 designated areas of action for nature and biodiversity included in the Sustainability Policy of the ING Bank Śląski Group: • risk and impact management, • portfolio management and client dialogue, • reporting and regulatory compliance, • promoting biodiversity.	
By the end of 2030, 80% of the clients covered by the cross-sector engagement-based transition plan have decarbonisation strategies understood as at least short- and medium-term decarbonisation targets approved by the company's management with identified initiatives to achieve them.	As at 2025 yearend, 4% of clients included in the cross-sector transition plan had the expected decarbonization strategies. More on the cross-sector transition plan and its progress here.	
Reduction of CO_2 emission intensity per m² of owned and leased office space by 51% by the end of 2027 compared to 2019 (on a market-based basis), including a 38% reduction in 2025 compared to 2019.	Reduction in CO_2/m2 emission intensity per m² in 2025 by 34% compared to 2019. The slightly under-performance is due to 1) a lower emission reduction effect in the initial years after the investment related to 1) the heating upgrade of the building at Sokolska street in Katowice than the plan implied, 2) lower outdoor temperatures in Q4 2025 than a year earlier, and 3) a change in the heat consumption parameter settings in the central buildings.	

Equal opportunities and entrepreneurship

Key metric	Implementation status as at 2025 yearend
Increasing in the number of clients with a pension product between 2025 and 2027 by 108,000, including 36,000 in 2025.	The incremental number of clients with a pension product was 55,600 in 2025.
Setting priorities in the area of just transition and social impact in 2025.	A definition of just transition was developed and 4 priorities were set in the area of equitable transition and social impact: • systematic analysis of the external environment, • building knowledge, awareness and understanding within the organisation, • dialogue and building an ecosystem for a just transition, • monitoring of the organisation to identify areas for the implementation of just transition and social impact
Maintain the Gender Pay Gap at no more than 31% (according to EBA methodology) between 2025 and 2027.	In 2025, the pay equity ratio is at 29% (the lower the value of the ratio the smaller the wage gap).

We are co-creating an ecosystem for sustainable development

Key metric	Implementation status as at 2025 yearend
100% of leaders and 80% of employees in the ING Group have ESG targets in their roles in 2027, including 100% of leaders and 60% of employees in 2025.	100% of leaders and 94% of ING Group employees had ESG targets in their 2025 assignments.
PLN 2 million per year allocated to the ING Grant Programme in 2025-2027.	In 2025, PLN 2 million has been allocated to the ING Grant Programme.
Volunteer actions within the main programmes of the ING for Children Foundation – ING volunteers will reach at least 10,000 children in 2025.	ING's volunteer actions reached more than 13,000 children in 2025.

Other strategic directions

We continued to phase out financing of coal mines, coal-fired power plants, coal-fired combined heat and power (CHP) plants, and coal-fired heat plants, as well as financing of clients engaged in coal trading (including coal used by households), and clients providing services or selling products dedicated to coal mining or coal-based power generation. Services or products that may also be provided to other sectors are not subject to this provision.

In line with our public commitments, after 2025 we will not finance clients, whose activities are directly dependent on thermal coal to an extent exceeding 5%. The degree of dependence of this activity is measured, in principle, by the amount of revenue generated from thermal coal. This does not apply to revenues derived from the sale of general-purpose products and services that may be used across various sectors (e.g. security or accounting services). In addition, in the case of companies in the electricity generation sector, we refer to installed generation capacity

As part of the process of identifying ESG risks, we identified sectors and areas excluded from financing and restricted. These are activities/areas with which – in our assessment – there is, inter alia, a particularly high risk of adverse environmental impact and a high risk of adverse social impact, e.g.:

- activities associated with adverse impacts on protected areas,
- activities associated with adverse impacts on forestry (including, among others, the sourcing of timber from illegal logging or the logging of forests with high conservation value),
- activities associated with adverse impacts on animal welfare. We require appropriate housing, transport and slaughter conditions to be ensured, maintaining the principle of the five freedoms of animals (freedom from hunger and thirst, fear and distress, physical and thermal discomfort, pain and injury, freedom from the inability to pursue natural behaviour),
- activities related to the cultivation, production and trade of tobacco and tobacco products. It does not apply to companies trading in tobacco, tobacco products or e-cigarettes if this is not the core business of such clients (e.g. FMCG, retail cigarette distribution, petrol stations, hotels, restaurants and cafés with vending machines) and to the value chain (e.g. packaging and transport companies),
- controversial weapons: production, maintenance or trade of anti-personnel mines, cluster munitions, phosphorus bombs, depleted uranium munitions and nuclear, chemical and biological weapons,
- fur farming and the manufacture of and trade in fur products.

Sustainability governance

GOV-1

In this section, we describe:

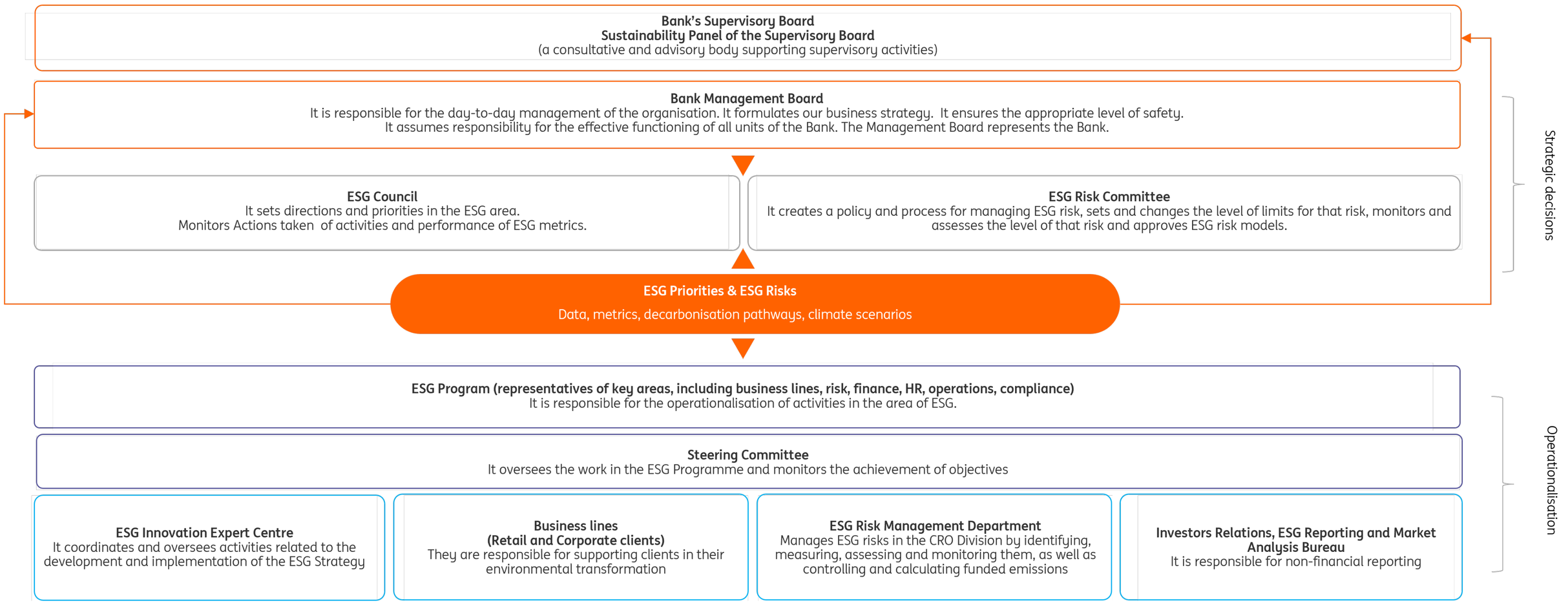
- how we approach management of sustainability matters,
- how supervision is carried out and what the role of the Management Board and Supervisory Board is, and
- what mechanisms support decision-making.

Detailed information on the managing bodies and the composition of our Management Board and Supervisory Board, including their roles, responsibilities, expertise and remuneration may be found in ING Bank Śląski S.A. Management Board statement on the application of corporate governance principles.

Sustainability governance structure

The Bank Management Board, the Supervisory Board and senior management staff are involved in sustainability management at ING Bank Śląski Group. In addition, we established special committees and teams working on further development of that area and implementation of the principles of sustainable development in the entire capital group. The diagram on the next page shows the governance structure of ING Bank Śląski Group in the area of sustainability.

Governance structure of the organisation for sustainability matters



GOV-1, GOV-2

Supervisory Board and Management Board

At the Management Board level, responsibility for the overall ESG agenda has been assigned to the Chief Risk Officer (CRO). At the same time, the Bank's Management Board actively involved in defining strategic objectives in the area of sustainability, linked to identified material impacts, risks and opportunities. The Management Board oversees the implementation of these objectives and monitors progress on a periodic basis. The Supervisory Board performs important advisory and consultative functions in the area of sustainability.

The Management Board and Supervisory Board approve the objectives of the business strategy, which includes sustainability objectives. The process for setting and approving sustainability objectives for 2025-2027 embedded in our business strategy can be found in our 2024 Report.

Sustainability Panel

At the Supervisory Board level, there is a Sustainability Panel, which has a consultative and advisory role in supervisory activities. The purpose of the panel meetings is to regularly inform, inspire and initiate discussions at Supervisory Board level on various ESG areas, in particular such as:

- ESG strategy – sustainability objectives and priorities, including monitoring progress in their implementation.
- Managing ESG matters.
- Promoting engagement on ESG topics (developing an ESG culture within the organisation), embedding ESG in business strategy and operations.
- Sustainability disclosures and reporting and ensuring compliance with applicable regulations.

ESG Council and ESG Risk Committee

The organisational structure of ING Bank Śląski includes the ESG Council and the ESG Risk Committee. These committees have decision-making functions vis-à-vis all organisational units of the Bank and advisory functions vis-à-vis the Bank Management Board for matters requiring its approval.

The ESG Council's mission is to create the right ecosystem to make ESG an important, sustainable and inherent element for the entire organisation. The committee oversees the progress and consistency of ESG and sustainability communication activities across the organisation. The committee's tasks include: approving the ESG Strategy and the actions and metrics to achieve the strategic objectives, continuously monitoring the progress of the actions and the performance of the objectives in implementing the ESG Strategy. The ESG Council is chaired by the President of the Management Board of ING Bank Śląski and comprises all Members of the Management Board, as well as the leads/directors of areas with the greatest impact on the achievement of ESG objectives. ESG Council meetings are held on average once a quarter.

The key issues addressed at the 2025 ESG Council meetings were:

- a summary of previous years and the achievement of ESG objectives,
- the approval of the ESG strategic objectives for 2025-2027,
- continuous monitoring of the implementation of the strategic objectives.

The main tasks of the ESG Risk Committee include: creating ESG risk management policies, approving ESG risk management methodologies, approving tools used for ESG risk assessment, determining standards for ESG risk credit analysis and the ESG risk assessment and monitoring process, as well as principles of ESG risk consideration in collateral valuation. All Members of the Management Board are Members of the ESG Risk Committee. We also write about the ESG Risk Committee here.

The most important issues addressed at the 2025 meetings of this committee were:

- monitoring the level of the bank's credit exposures exposed to physical and transition risk and the use of the RAS limit for transition risk for retail mortgage loans,
- approving amendments to the ESG Manual for Business Banking and Wholesale Banking,
- validating methodologies for assessing ESG risks and how to calculate the carbon footprint.

ESG Governance Supporting Units

ING Bank Śląski also has an ESG Innovation Expert Centre (coordinating actions related to the building and implementation of ESG targets, the calculation of financed emissions and the functioning of the ESG Council) and an ESG Risk Management Department (manages ESG risk in the CRO Division through its identification, measurement, assessment, monitoring and control and coordinates the functioning of the ESG Risk Committee).

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The Investors Relations, ESG Reporting and Market Research Bureau is responsible for coordinating the development and publication of sustainability disclosures

ESG Programme and ESG Data Model Project

The ESG Programme has been set up to carry out new, complex, multi-faceted tasks in 2022. Membership of the programme is made up of individuals from different units (representatives from key areas including business lines, risk, finance, HR, operations, compliance and subsidiaries) involved in the implementation of ESG's strategic

priorities. The ESG Programme Steering Committee monitors the status of the objectives set under each priority. The results of the ESG Programme activities are reported to the ESG Council.

In addition, ING Bank Śląski has also had an ESG Data Model Project in place since 2023, which aims to prepare a consistent ESG data model for various stakeholders and automated ESG reporting processes

Interdisciplinary collaboration and knowledge sharing

We want to make it natural for everyone in our organisation to think and act in terms of sustainability. We are strengthening our ESG culture by increasing employee awareness, knowledge and engagement in this area. In 2025, we encouraged employees to undertake a variety of development activities. By the end of 2025, 77% of Group employees (more than 6,000 people) will have completed the 4-module e-learning course "ESG and sustainability" (optional). For employees who needed specialised knowledge, we prepared the programme "ESG for professionals" – a series of in-depth workshops and webinars on greenwashing, ESG risks, building energy efficiency or decarbonisation, among others. In addition, we have expanded our development offerings to include an in-person workshop on the Climate Fresk methodology – on cross-cutting knowledge of the climate, the consequences of climate change and how we can adapt to and mitigate these changes. Certified facilitators have trained more than 150 people. In summary, in 2025, more than 2,600 employees (34%) have realised educational activities in the ESG area using a variety of offers, also continuing their development path in this area started in previous years.

For clients and companies looking for practical information on sustainability, we are running and developing a knowledge portal – ESG in your company (in Polish). The topics we focused on in 2025 were decarbonisation, energy efficiency, reporting according to voluntary sustainability reporting standards and biodiversity.

In 2025, an internal community of ESG Ambassadors consisting of passionate sustainability professionals from both the sales network and the main structures of the bank remained active. The ambassadors meet regularly to develop knowledge and practical skills together. The initiative aims to raise ESG awareness among advisers, develop their competencies and support them in their day-to-day work with clients in the medium to large corporate segment on sustainability and environmental transition issues. The meetings also provide a space to share experiences and best practices, fostering community involvement in the development of ESG topics within the organisation.

The Bank Management Board has been actively promoting the idea of responsible business within and outside the organisation for years, emphasising, inter alia, the major role of the banking sector in supporting the energy transition of Polish companies. Representatives of the Bank's management bodies regularly speak at events and contribute to publications dedicated to sustainability matters. Each year, representatives and employees of the Bank take part in key events addressing sustainability matters, including the European Economic Congress, the European Financial Congress, EEC Trends and the Open Eyes Economy Summit.

The Bank Management Board and Supervisory Board also expand their knowledge in the area of ESG, e.g. by participating in programme boards, discussion panels, speaking at congresses and conferences or taking part in in-depth sessions with internal experts, e.g. within the Sustainability Panel operating at the Supervisory Board.

Through the ING Grant Programme, we support innovative projects aligned with the United Nations Sustainable Development Goals. By the end of 2025, we have committed a total of PLN 8 million to support ESG innovation through the eight editions of the ING Grant Programme, which ran from 2022 to 2025.

We work with the NGO community and are involved in their projects. We are actively working to build the ESG ecosystem and develop partnerships in the area of sustainability. List of organisations of which we are a member and with which we regularly collaborate is available here.

Incorporation of sustainability matters in remuneration policies

GOV-3

An important element of strengthening our organisational culture in the area of sustainability is the inclusion of ESG objectives in employees' individual annual goals. In 2025, 100% of leaders and 94% of employees (against a target of 100% of leaders and 60% of employees) had an ESG and sustainability-related objective defined.

Responsibility for the achievement of ESG objectives is also expressed in the targets set for the Management Board for the year and is directly reflected in the level of their variable remuneration. For more information on the remuneration policy for the Management Board and Supervisory Board and the link between remuneration principles and ESG objectives, see the Corporate Governance Statement, section Linking remuneration principles to sustainability matters.

Due diligence processes regarding the sustainability matters

GOV-4

According to the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, due diligence is the process by which an organisation identifies actual and potential adverse environmental and social impacts associated with its operations, takes action to prevent or mitigate them, and holds itself accountable for those actions. Due diligence is an ongoing practice that responds to changes in the context of the entity's strategy, business model, operations, business relationships and operational activities that may trigger such changes. In the table below, we set out the elements of the due diligence process that we describe in our Sustainability Statement.

Main elements of due diligence processes	Section in the report
Embedding due diligence in governance, strategy and business model	• Sustainability in our business strategy • Sustainability governance • Risk Culture
Engaging with affected stakeholders in all key steps of the due diligence	• Relations with our stakeholders • Stakeholder engagement in the double materiality assessment process • Employee relationship management • Engaging with individual clients
Identifying and assessing adverse impacts	• Sustainability impact, risk and opportunity assessment process
Taking actions to address those adverse impacts	• Respect for human rights E1 Climate change: • Policies for managing climate-related impacts, risks and opportunities • Our transition plan S1 Own Workforce: • Working conditions • Equal pay • Ensuring a work environment free of discrimination and harassment • Mechanism of reporting breaches S4 Customer and end users: • Channels for reporting concerns and complaints available to individual clients • Marketing communication • Accessibility of products and services • Security of our clients' data and protection of privacy Policies
Tracking the effectiveness of these efforts and communicating	E1 Climate change: • Our transition plan S1 Own workforce: • We know how employees rate us S4 Customer and end users: • Channels for reporting concerns and complaints available to individual clients • Privacy and data security metrics

Respect for human rights

S1-1, S4-1

We know that our actions affect many stakeholder groups and we aim to understand the scale of our impact on human rights as best we can. We commit to respecting all internationally recognised human rights that are applicable to our operations, in particular the principles and rights set out in the *International Bill of Human Rights* and in the core conventions referred to in the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*. The human rights norms and standards that guide our business activities and our relationships with clients, employees, suppliers and other stakeholder groups include, among others, the regulations referred to in Article 18 of *Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020* on the establishment of a framework to facilitate sustainable investment (the EU Taxonomy), namely::

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,
- UN Guiding Principles on Business and Human Rights.

In December 2023, we published the Declaration of the ING Bank Śląski S.A. Group on Respect for Human Rights. The drafting of the Declaration was preceded by cooperation with external human rights experts. We conducted its annual review in December 2025. In the Declaration, we describe the actions taken regarding respect for human rights at different levels of our value chain.

With regard to our employees, these are in particular: the right to equal treatment and to the enjoyment of just and favourable working conditions; the right to health; the right to safe and healthy working conditions; the right to freedom of association; the right to collective bargaining; and freedom from discrimination on grounds of race, colour, gender, religion, political opinion, age and national and social origin.

In relation to our clients, we are committed to the availability of our products and services, the protection of privacy, reliable information and their financial health. These obligations stem from basic consumer rights such as the right to reliable information, equal accessibility to products and services, the right to education and the right to complain.

Commitments to respect human rights are also included in our basic internal regulations covering the scope of our employees and relationships with our clients: Workplace Regulations and Client Centricity Policy, which we describe in Social information.

Ensuring compliance with key international regulations in the area of human rights is part of the assessment of the EU Taxonomy Minimum Safeguards. In 2023, we conducted, for the first time, a self-assessment of compliance with the due diligence process guidelines and the requirements of the EU Taxonomy Minimum Safeguards for the activities of the ING Bank Śląski Group. We have renewed and expanded the analysis in 2024. The results of the 2025 analysis confirm that the ING Bank Śląski Group's operations are conducted in accordance with the requirements of the Minimum Safeguards. No cases of serious human rights incidents have been identified – for more information see our disclosure on Minimum Safeguards in the section UE Taxonomy. The analysis of the human rights impact in all segments of the value chain (from the supply chain, through own operations and the impact on employees, to the loan portfolio and the indirect potential impact through the financing provided) is an ongoing process. We deepen our knowledge of our suppliers (e.g. through surveys relating to ESG matters), monitor and analyse the voices and opinions of our employees and clients. We analyse the reports received on channels for reporting ethical concerns and violations. We write more about the here.

At an international level, the ING Group regularly publishes reports on its impact on human rights. Links to the reports in English are available here.

Relations with our stakeholders

SBM-1, SBM-2

The needs of our stakeholders are very important to us. We aim to understand these needs well and respond to them appropriately. We recognise that our stakeholders have different expectations. In our daily work, we strive to meet these diverse expectations. We maintain professional yet straightforward communication both internally and externally. We maintain constant and open dialogue also because the opinions of our stakeholders allow us to take into account the changing socio-economic conditions in our plans. Communication with the environment is a key element of our core activities and a natural consequence of our social engagement. In our dialogue with stakeholders we apply both highly parametrised tools (satisfaction surveys, audits) and daily contacts.

Throughout the year, we regularly engage with our stakeholders to listen to their views and understand their needs as best we can. We give a strategic dimension to the topics that are most material to them. The table later in this section summarises the dialogue with each of our key stakeholder groups.

Of particular importance is the consultation with stakeholders carried out as part of the double materiality assessment process, which we describe here. How we capture the results of the double materiality assessment – including the voices of our stakeholders – in our strategic objectives here.

At the same time, we express our position and present our point of view on matters that are important in the economic, social, or environmental context.

Our key stakeholder groups

Employees

This Group includes the people employed by the bank and its subsidiaries who contribute to the organisational culture and are responsible for the implementation of strategy, client service and security of operations. Their knowledge, competence and client-support orientation are key to the smooth running of our organisation. Clients Individuals, companies and institutions using our products and services who expect financial security, high-quality service and transparent terms and conditions. Clients are one of our most important stakeholder groups, as our product offering is the basis of our business operations. Their opinions and needs are extremely important to us, which is why we continuously collect, analyse, and strive to implement them into our products and services.

Investors and the capital market

Shareholders, analysts, rating agencies and capital market participants are interested in our financial and non-financial performance, transparency of disclosures and effective risk management. We ensure equal treatment of all participants in the capital market and place importance on broad access to information and effective communication with them. We comply with the Best Practice for GPW Listed Companies.

Regulatory environment

Supervisory institutions and national and EU administrations that create and enforce regulations on financial security, consumer protection, market stability and ESG requirements. Regulatory compliance is one of our priorities and the foundation of our operation. The changing regulatory environment requires constant monitoring of the regulatory horizon.

Environment, land and climate

The natural resources and climate affected by our activities – both through our own operations and the financing of the economy. The stakeholder is represented by environmental organisations and climate initiatives. In line with our commitments, we are continuing our work to reduce greenhouse gas emissions and support the transition of our clients. We identify risks and responsibly shape relationships with clients and partners who operate in areas impacting the environment.

Business partners (including suppliers)

Service providers, providing technology and solutions to support our business. We work with numerous vendors and business partners. We are a purchaser of various types of products and services – examples of purchasing categories include the supply of IT services, computer hardware and software, payment processing, liaison with external consultants, and office space rental services. We cooperate with our suppliers in accordance with business ethics principles and best market practices.

Society

Society in a broad sense, including citizens, consumers and the general public, represented, among others, by social organisations, expert communities and public initiatives. It expects us to act responsibly, to be transparent, to be financially educated and to have a positive impact on the economy and society.

Industry environment

Financial institutions and co-development organisations of standards and directions for the banking sector, with whom we collaborate in industry initiatives and sector dialogue. We are an active member of trade associations and organisations. Thanks to this, we can share knowledge, point out what is important to us, co-create standards, and participate in many material projects.

How we engage our stakeholders in dialogue	Why do we engage our stakeholders?	Main topics raised by stakeholders	How do we incorporate the results of stakeholder engagement into our operations?
Employees • Organisational Health Interview (OHI) periodic survey • Periodic meetings with employee organisations: with the Employee Council and trade union representatives • Periodic anonymous chats with Management Board Members and surveys • Individual interviews as part of the annual evaluation • Established channels for reporting ethical concerns and violations	• Reducing the risk of employee turnover • Keeping employee satisfaction high • Developing an organisational culture based on our values and behaviours as defined in the Orange Code • We are committed to creating a friendly and engaging workplace • We want to create a working environment where we care about developing and being entrepreneurial, mental and physical health, as well as diversity, equality and inclusion of employees.	• Equal pay • Work-life balance • Benefits – health care and development opportunities • Commuting and parking spaces • New technologies and automation	• We aim to reduce the pay gap between men and women • We are expanding our benefits package, including healthcare programmes and educational offer • We systematically introduce new solutions to support employee well-being and analyse feedback.
Clients • Continuous client satisfaction surveys, analysis of the voice of the client from different contact channels • Plain language in product communication • Social media • Advice within meeting places and online meetings • Hotline, chat in Moje ING app, form on website • Educational initiatives, round table discussions	• A better understanding of our clients' needs allows us to create an attractive offer tailored to their expectations • Building trust in ING to support the achievement of business objectives • We are responding to the expectations of financial education, open dialogue and active cooperation with clients.	• Quality and speed of service • Accessibility of services • System reliability • Attractive product range • The bank's educational role vis-à-vis its clients in terms of reducing adverse climate and environmental impacts and managing the associated risks	• We adapt our product offering and service to changing client expectations • We strive to make our services accessible to clients regardless of their needs or abilities • We are constantly looking for and implementing new solutions to ensure quality client service and the security of client data and funds.
Investors and the capital market • We are in constant contact with capital market participants – through the Investors Relations, ESG Reporting and Market Research Bureau and, for example, by organising quarterly conferences with the Bank Management Board on the occasion of the publication of financial results (in a hybrid format – on-site and online).	• Building and maintaining confidence in the stability, credibility and long-term health of the bank. • Providing transparent financial and non-financial communication to support informed investment decisions. • Strengthening the bank's reputation, which has an impact on rating agency assessments, including ESG ratings. • Responding to growing market expectations regarding ESG standards and the economic and social impact of the bank's activities.	• Quarterly financial and business performance of the bank • Impact of regulatory changes • Macroeconomic forecasts • Outlook for the banking sector • Level of implementation of AI solutions in the banking sector • ESG data	• We publish reliable and comparable financial and non-financial information in accordance with regulatory requirements and best market practice. • We regularly communicate results and strategic progress, including through reports, presentations, investor meetings and outcome conferences. • We maintain an ongoing dialogue with investors, responding to their information needs and expectations regarding strategic direction.
Regulatory environment • Participation in working groups of the Polish Bank Association (including the Bureau of the DEI Committee), the National Working Group. • We respond to enquiries on an ongoing basis and are in contact with supervisory authorities. We actively speak out on sectoral regulatory topics.	• Ensuring regulatory compliance. • Strengthening the organisation's resilience to regulatory change environment, including sustainability.	• Transparency of financial and non-financial information, including the quality of disclosures on risk, capital adequacy, liquidity and credit exposures.	• We monitor regulatory changes and adapt our policies and processes on an ongoing basis, including those relating to sustainability • We participate in working groups and industry consultations, co-creating market solutions. • We prepare the organisation for the new regulations through, inter alia, training, competence development and analyses of the impact of the upcoming changes on business models and internal processes.

Business partners (including suppliers) • We work with our suppliers in accordance with business ethics and market best practice on the basis of a Supplier Code of Conduct, which includes, inter alia, respect for human and labour rights by our contractors and business partners.	• Ensuring continuity and security of banking processes by working with reliable suppliers that meet high operational and regulatory standards. • Minimising technology, cyber security, ESG and subcontractor risks. • Building transparent, honest and long-term relationships. • Promoting high ethical standards and compliant business practices, which are key to the confidence and stability of the financial sector.	• Transparency of selection and evaluation criteria in procurement/tender processes • Constant and predictable communication with the bank and a clear process for handling the ongoing relationship • Timeliness of payments and efficiency in handling settlements • Stability and predictability of cooperation	• We use the KYS process to assess the credibility, operational standards and ESG practices of our suppliers. • We ensure transparency in the purchasing process, including clear selection criteria, clear terms of cooperation and timely payment. • We require compliance with our standards, including ethical, environmental and social standards (Supplier Code of Ethics) • We are building partnerships aimed at long-term cooperation and jointly improving the quality of services.
Society and environment, land and climate • We interact with community and environmental organisations on an ongoing basis through a variety of tools. We invite them to meetings, enter into partnerships and engage in joint initiatives.	• Responding to the growing expectations of clients, communities and regulators regarding ESG actions. • Reducing our adverse impact on the climate and taking action that contributes to international climate goals. • We improve our knowledge by collaborating with expert organisations and community initiatives.	• The bank's educational role vis-à-vis its clients in terms of reducing adverse climate and environmental impacts and managing the associated risks • Social responsibility, including financial education and support for local communities. • Ethical financing principles, especially avoiding projects that are harmful to the environment and society. • Financing the activities of non-governmental organisations as well as pro-environmental and pro-social initiatives.	• We have an on-going dialogue with the non-governmental community, with social and environmental organisations. • We are consistently implementing emission reduction measures in our own operations and on our loan portfolio • We manage ESG risks • We regularly report on our social and environmental impact actions • We run two corporate foundations: ING for Children Foundation, ING Polish Art Foundation. • We provide financial support to selected NGOs (donations, memberships) • We run the ING Grant Programme for start-ups and researchers
Investors and the capital market • We are in constant contact with capital market participants – through the Investors Relations, ESG Reporting and Market Research Bureau and, for example, by organising quarterly conferences with the Bank Management Board on the occasion of the publication of financial results (in a hybrid format – on-site and online).	• Building and maintaining confidence in the stability, credibility and long-term health of the bank. • Providing transparent financial and non-financial communication to support informed investment decisions. • Strengthening the bank's reputation, which has an impact on rating agency assessments, including ESG ratings. • Responding to growing market expectations regarding ESG standards and the economic and social impact of the bank's activities.	• Quarterly financial and business performance of the bank • Impact of regulatory changes • Macroeconomic projections • Prospects for the banking sector • Level of implementation of AI solutions in the banking sector	• We publish reliable and comparable financial and non-financial information in accordance with regulatory requirements and best market practice. • We regularly communicate results and strategic progress, including through reports, presentations, investor meetings and outcome conferences. • We maintain an ongoing dialogue with investors, responding to their information needs and expectations regarding strategic direction.

Environmental information (E)

We want to be one of the leaders in accelerating the transition to a low-carbon economy because it matters to our organisation, our clients, society and the environment.

In this chapter we present information on environmental sustainability matters that are material to ING:

- **E1 Climate Change**
  - Climate change mitigation
  - Climate change adaptation
- **E4 Biodiversity and ecosystems.**

In 2025, we identified (E1) Climate Change as a material topic within environmental sustainability matters. At the same time, we have taken a number of actions in the course of 2025 in relation to (E4) Biodiversity and ecosystems sustainability matter, which we identified as material to our Business Banking division clients in the double materiality assessment in 2024.

We continue to develop a holistic approach to integrating sustainability into our business processes and client relationships. This approach strengthens our resilience as a financial institution in the long term and positions us as a trusted partner for our clients, supporting them in overcoming the complex risks and opportunities arising from the transition.

Climate change (E1)

Climate change is one of the greatest challenges facing society. Our climate is changing due to the emission of greenhouse gases (GHG) into the atmosphere. To mitigate the effects of climate change, it is necessary to reduce these emissions. Part of the solution involves transitioning to cleaner, renewable sources of energy such as wind and solar, as well as introducing changes to our technologies and systems.

At the same time, adapting to climate change is essential to reducing vulnerability to its impacts. For us, ensuring the resilience and commercial success of our business includes managing climate-related risks while also seizing the opportunities arising from financing the transition.

The financial sector has a significant role to play in combating climate change and supporting the transition to a more sustainable economy. We take this role seriously and aim to be one of the leaders in sustainable finance.

In this chapter, we present our approach to managing climate-related impacts, risks and opportunities, as well as key policies, actions, metrics and targets — both in relation to our own operations and our portfolio. We present the disclosures required under Article 8 of Regulation 2020/852 (EU Taxonomy) here.

Identified impacts, risks and opportunities

SBM-3

As a financial institution, our greatest impact on climate change is through the financing of our clients. Regarding the impacts, risks, and opportunities associated with climate change, we have identified the following as material to our operations:

- **Climate change mitigation** – with regard to our clients of the Wholesale Banking and Business Banking divisions and the retail banking segment;
- **Climate change adaptation** – with regard to clients of the Business Banking division and the retail banking segment.

Material topic	IRO type
Climate change mitigation	⊖ ⚠ 📊
Climate change adaptation	⚠

⊕ Actual positive impact
⊖ Actual negative impact
⊕ Potential positive impact
⊖ Potential negative impact
📊 Opportunity
⚠ Risk

Full description of material impacts, opportunities and risks can be found here

Climate change mitigation

Climate change mitigation refers to the process of reducing greenhouse gas (GHG) emissions and keeping the increase in global average temperature to 1.5°C above pre-industrial levels, in line with the objectives of the Paris Agreement. For us, this translates into the need to manage emissions related to our financial activities. From the perspective of the ESRS sub-topics, we consider the issue of climate change mitigation in the category of transition risk.

Negative impact

The negative impact on climate change in our value chain is mainly due to the financing of carbon-intensive sectors. Emissions from these sectors could contribute to rising average temperatures and potentially to longer-term extreme weather events of greater frequency and intensity if our clients do not embark on the transition.

We differentiate our approach to identifying negative impact in our loan portfolio in terms of the sector of client activity and the type of entities within a given sector in our value chain (e.g. undertakings, government entities, natural persons):

- lending within the Wholesale Banking and Business Banking division – the negative impact is due to the financing of business activities or products of undertakings operating in carbon-intensive sectors;
- residential and commercial real estate – in the short to medium term we see real estate with low energy efficiency as having a material negative impact. In the long-term, we assume that a material negative impact will be on real estate deviating from the net-zero GHG emissions objective.

Risks

Actions to move towards a low-carbon economy can create transition risks, leading to financial challenges for our clients and potential losses for our bank from client defaults and loss of collateral value. In addition, losses may result from a failure to take actions in accordance with applicable laws and regulations, internal standards, risk appetite and public expectations of our bank's services and operations. Failure to adequately mitigate transition risks can lead to reputational damage to the bank, legal sanctions or financial loss.

- For clients in the Wholesale Banking and Business Banking division, transition and mitigation of negative impacts may require investment in new technology, modernisation and other measures, which will lead to an additional financial burden. Some sectors will have to make significant changes to existing business models, which increases the uncertainty of transition success.
- Transition risk for high-carbon undertakings also arises from uncertainty about the scale and timing of low-carbon investments: underinvestment can lead to non-compliance and higher costs in the future, and overinvestment or misdirected investment can result in stranded assets (for example, investments that lose value before they pay off).
- In the case of residential and commercial real estate, the risk transmission channel could be, for example, the volatility of energy prices or the impact of the implementation of the Energy Performance of Buildings Directive (EPBD[5]) and the associated renovation costs on individual client income/profitability of undertakings and their ability to maintain liquidity, and thus on the eligibility of clients to finance upgrades to such real estate.

Opportunities

We identify opportunities in relation to climate change mitigation in line with our publicly available commitments to: support clients in their environmental transition; and reduce emissions to achieve the global objective of net zero emissions by 2050 by managing the loan portfolio on the basis of the adopted transition plan. Actions to reduce greenhouse gas emissions is part of our business strategy and sustainability priorities. We are implementing a cross-sector transition plan, which aims to support clients in the transition to more sustainable business models and engaging in dialogue with companies operating in the most carbon-intensive sectors of the economy and of the bank's portfolio.

These commitments express our ambition of the transition towards a sustainable economy. Leveraging our organisation's market position and building on our public climate objectives, provides us with tangible mitigation opportunities in the area of retail mortgage finance and clients in the Wholesale Banking and Business Banking divisions. We identify opportunities in the area of environmental transition – we actively undertake initiatives contributing to the achievement of our commitments set out in our Roadmap for reducing GHG emissions ING Bank Śląski Group, available on our website. These include, for example, a strategy to facilitate our clients' transition to low-carbon operations and assets, in particular by financing their actions in this area and offering sustainable products and services, as well as building awareness and knowledge.

- In the corporate banking segment: in the Wholesale Banking client division, we aim to increase the volume of sustainable financing. We also provide sustainable financing to our Business Banking division clients. We have an ambition to finance renewable energy generation, which involves investment within the Polish economy. The electricity generation sector plays a strategic role in the decarbonisation of the Polish economy. It is undergoing an intensive transition aimed at increasing renewables and reducing greenhouse gas emissions. We believe that the investments financed can support the energy transition through the possible impact on economic growth, ensuring energy security, as well as greater competitiveness of Polish industry,
- In the retail banking segment, we finance sustainable residential buildings and renovations through a dedicated product offering. We offer a mortgage for an energy-efficient home, a mortgage for an energy-efficient real estate upgrade, a Loan for Better, to support our individual clients with energy-efficient homes and flats. In addition to our product offering, we have made available a free tool in 2025 – the energy efficiency calculator for buildings which helps to plan renovations to improve energy consumption in single-family homes. Additionally, we provide on our website a search engine for grants for energy-saving investments in the home. We systematically analyse market trends and research findings in order to best respond to the current challenges of the transition to a low-carbon economy.

In order to make effective use of the opportunities and possibilities arising from the transition, we also ensure that we effectively hedge against the risk of greenwashing. We have defined criteria for qualifying products and

[5] Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings; published in the Official Journal of the European Union on 8 May 2024 and applicable from 28 May 2024 (Energy Performance of Buildings Directive – EPBD).

transactions in terms of ESG (sustainability). We systematically implement mandatory manuals that define clear criteria and provide practical guidance tailored to each business line.

Climate change adaptation

We define climate change adaptation as the process of adjusting to actual and predicted climate change and its effects. We link the matter to physical risk. This includes implementing mechanisms and strategies to manage the effects of physical climate-related events and reduce their negative financial impact.

Risks

Physical hazards can arise both from sudden events caused by phenomena such as storms or floods and from progressive, long-term changes, such as rising temperatures. These factors increase the likelihood of defaults and the emergence of non-performing loans and can lead to negative financial consequences, including but not limited to:

- residential and commercial real estate – the frequency and intensity of extreme events that affect clients' real estate can lead to asset write-downs, asset devaluations and a potential reduction in the availability of asset insurance in high-risk locations. The loss of borrowers' ability to service repayments on real estate financing loans or the loss of access to financing for real estate renovation – due to the difficult financial situation caused by natural disasters – could potentially contribute to increased bank's losses.
- clients of the Wholesale Banking and Business Banking division:
  - for undertakings – increased operating costs, reduced revenue due to a drop in demand, impact on raw material availability, damage to production facilities, damage to infrastructure, work stoppages, higher insurance costs – can result in unexpected costs and significant losses. Consequently, this can lead to a reduction in income and profits for borrowers, affecting their ability to repay loans. Loss of revenue and higher insurance premiums can increase the risk of client insolvency.
  - for governmental entities, the revenue implications of physical risk events may result primarily from reduced tax revenue and increased expenditure. Lower tax revenues can result from the loss of value of undertakings, reduced household income and an overall reduction in production. Higher government spending is likely to be used to address and partially offset negative economic impacts and to cover the costs of climate change adaptation. As a result, government entities, including sub-national ones, may also face higher borrowing costs or related to limited access to debt markets.

Policies for managing climate-related impacts, risks and opportunities

E1-2, MDR-P

The management of climate impacts, risks and opportunities is embedded in many of our internal regulations. In 2025, the framework for this governance has been further strengthened by the adoption of the Sustainable Development Policy, which sets out general orientations and principles for action in the environment and climate area – its content can be found here. Climate opportunities are addressed through the sustainable development objectives included in the bank's business strategy and through directional documents, including ING BSK's Roadmap for Reducing GHG Emissions, supporting the management of the loan portfolio. In addition, we have policies, manuals, guidelines and methodologies in place in the area of ESG risk management that support us in managing these risks. Our strategic objectives and ambitions for managing impacts and risks related to climate change mitigation (transition risk) and climate change adaptation (physical risk) are implemented through the ESG Risk Management Policy and the regulations detailing it.

Document name	Related material sustainability matters
Sustainable development policy	• Climate change mitigation • Climate change adaptation
ESG Risk Management Policy	• Climate change adaptation • Climate change mitigation

Policies relating to climate change are in place at ING Bank Śląski and, to the extent relevant to the business, at the bank's subsidiaries. These are communicated to employees through publication on the intranet and trainings.

ESG Risk Management Policy

The *ESG Risk Management Policy* (ESG Policy) is a comprehensive policy that aims to set out how we manage ESG risk within the services we provide, at portfolio and sub-portfolio level and at individual client and transaction level. The policy applies to the retail banking segment and to the corporate banking segment (i.e. clients of the Business Banking and Wholesale Banking divisions) in terms of the credit and non-credit products and services offered. In addition, the ESG Policy:

- sets out how the ESG risk management process fits into the existing framework for managing credit, market, liquidity and financing and non-financial risks,
- indicates how ESG risk information coming from the risk management process is reported and used as a basis for decision-making at all organisational levels of the bank.

The scope of the ESG Policy includes, inter alia, key definitions related to ESG risks, identification of the nature and specificity of ESG risks, identification of ESG risk drivers and transmission channels and impact on traditional risks. The document also defines the ESG risk management structure, indicating the roles of the different bodies and

organisational units of the bank. It also describes how ESG risks, including physical and transition risks, are managed:

- at the portfolio level: the process of identifying, assessing, monitoring and reporting ESG risks, key metrics and targets and ESG risk appetite, methods, standards, tools and data for managing ESG risks within credit risk.
- at the client and transaction level: within the KYC (Know Your Customer) process and the credit process.

As ESG risks have an impact on traditional financial and non-financial risks, the ESG Policy also indicates the overall approach to managing ESG risks in relation to traditional banking risks. It also defines ESG risk management control targets.

In establishing the ESG Policy, we are guided, inter alia, by the EBA (European Banking Authority) Guidelines *EBA/GL/2020/06*[6] of 29 May 2020 on loan origination and monitoring, which, as of 30 June 2021, requires banks, inter alia, to take into account in the lending process an assessment of the exposure of their clients' activities to ESG factors. In the risk management standards we introduced we also take under consideration the provisions of the following regulations:

- *European Central Bank Guidance on Climate and Environmental Risks – Supervisory expectations regarding risk management and disclosures*[7], November 2020 – indicating expectations addressed to banks under the direct supervision of the ECB.
- *European Banking Supervision Report on the management and supervision of ESG risks for credit institutions and investment firms*[8], EBA/REP 2021/18, July 2021 and *EBA Guidance Note EBA/GL/2025/01 of 8 January 2025 on the management of ESG risks*[9].

Legislative process ESG risk management policies is carried out in accordance with ING Bank Śląski S.A.'s Legislative Manual and includes the opinion and approval of the required entities, selected according to the rank of the document and their role in the ESG area. This ensures that the interests of key stakeholders are taken into account.

The Bank's Management Board is responsible for implementing, reviewing and updating the ESG Risk Management Policy. Once approved, the document is published in the legislation system and made available to units on the intranet. The review takes place at least once a year. The policy is supplemented by detailed manuals, methodologies and guidelines, which also go through an opinion process and are approved by the ESG Risk Committee or other relevant bodies.

Internal regulations related to the ESG Risk Management Policy

As part of the risk management cycle, we actively mitigate identified risks and negative impacts within our risk appetite. Our actions related to the implementation of the ESG Policy are described here. We use strategies such as reducing, avoiding, accepting or transferring risks. We incorporate them into policies and procedures in various categories of traditional banking risk. In the following paragraphs, we outline key initiatives in business lines for which climate change is a material risk.

Internal regulations related to ESG Risk Management Policy	
Related to the assessment of ESG impacts, risks and opportunities	• *List of impacts, risks and opportunities in the ESG area.* • *Methodology for assessing the materiality of ESG impacts, risks and opportunities (IRO).*
Guidelines for sustainable financing	• *The ESG (sustainability) qualification manual for products and transactions – includes qualification criteria established based on regulatory requirements (e.g. EU Taxonomy, Pillar III disclosures) and market standards.* • *ESG (sustainability) qualification procedure for credit products.* • *Sustainable Finance Guidelines in the area of Wholesale Banking.*
Business Banking division	• *The ESG manual for clients of the Business Clients Division (ESG manual)* – sets out the framework for our risk tolerance with regard to environmental and social matters. In it, we have identified the sectors and areas excluded from funding and restricted. These are activities/areas which – in our opinion – are associated with, among other things, a particularly high risk of negative environmental impacts.
Wholesale Banking division	• *ESG Manual for Wholesale Banking Clients (ESG Risk Assessment)* – defines the principles for assessing and monitoring ESG risks as part of the KYC and credit process and the roles and responsibilities of the various lines of defence. The principles and standards described support the determination of whether ESG risks associated with a client and/or transaction are acceptable to us and/or how these risks can be mitigated and monitored during the course of a business relationship with a client.

[6] Guidelines on loan origination and monitoring | European Banking Authority
[7] *ECB Guide on climate-related and environmental risks – Supervisory expectations relating to risk management and disclosure*
[8] *EBA Report on management and supervision on ESG risk for credit institutions and investment firms*
[9] *EBA Guidelines on the management of environmental, social and governance (ESG) risks*

Retail banking segment	• *Retail Loan Collateral Manual* – includes provisions on the inclusion of transition and physical risk in the value of the real estate. • *The manual – Regulations for Mortgage Products* – includes a description of additional process steps and fields related to the consideration of transition and physical risks in the value of residential real estate accepted/to be accepted as collateral from clients in the Poland MTG rating system.
Portfolio-level ESG Risk Management	• *Methodology – Sectoral assessment of climate and environmental risks for portfolios of the Wholesale Banking and Business Banking divisions.* • *Methodology – Assessing the materiality of climate and environmental risks for the retail portfolio (Retail Banking).* • *Methodology for assessing the materiality of climate and environmental risks for the CRE portfolio.* • *Methodology for incorporating transition and physical risk assessments into the value of real estate collateral.* • *Methodology for determining the transition risk appetite (RAS) for the housing loan portfolio of ING Bank Śląski SA Group.* • *Methodology for determining KRIs (Key Risk Indicators, key risk measures) for physical risk for loans granted in the MTG segment and loans secured on real estate in the SME&MC segment.* • *Manual for climate stress tests.* • *Manual – Assessment and results of the materiality analysis of transition risks in the Bank's loan portfolio for the development of mitigation plans.* • *Collection of methodologies Calculation of the Bank's carbon footprint under categories 13 and 15 of Scope 3.* • *Methodology for the estimation of primary energy (EP), final energy (EK) indicators and the determination of energy efficiency classes (EPCs) for commercial real estate.* • *Assessing the materiality of climate and environmental risks as part of market risk.* • *Methodology for assessing the materiality of climate and environmental risks in the area of operational risk.* • *Methodology for assessing the materiality of climate and environmental risks for compliance risk.*

Metrics and targets

The monitoring of ESG risks is part of an integrated risk management system and is based on ESG data acquisition, aggregation and analysis processes and management reporting. The framework includes identifying indicators, setting thresholds and limits (where applicable) and updating dedicated management information in this area.

The data used in the ESG risk monitoring process comes from two main sources:

- internal,
- external – information obtained from clients, specialised ESG providers and public registers and databases.

The main indicators used by the bank to assess and monitor transition and physical risk in our portfolios are shown in the table below. Amongst others, we monitored all risks identified as material in the double materiality assessment carried out in 2025 (for 2024), i.e.:

- transition risks for the Wholesale Banking, Business Banking and Retail Banking divisions,
- physical risk for the Business Banking division and the retail banking segment,
- biodiversity risk – within the Business Banking division.

Indicators used to assess and monitoring of transition and physical risks

Indicator	Monitored loan portfolio
Transition risks	
Exposure in sectors with high transition risk (critical and material)	• *Wholesale Banking* • *Business Banking*
Exposure to coal clients	• *Wholesale Banking* • *Business Banking*
Exposure to the energy sector by type of energy (wind, solar, other)	• *Wholesale Banking* • *Business Banking*
Exposures secured by low energy efficiency residential real estate (according to ING BSK internal scale)	• *retail mortgage loans*
Ongoing execution of the risk appetite statement (RAS) for new sales of retail mortgage loans	• *retail mortgage loans*
Ongoing execution of credit limits under the risk appetite statement (RAS) set for the WB and BB portfolios, taking into account the ESG risk component	• *Wholesale Banking* • *Business Banking*
Physical risk	
Exposure to sectors with high physical risk	• *Business Banking*
Exposures with high physical risk – identified by collateral address (for mortgage collateral) or registered address (for other exposures)	• *Business Banking*

Exposures secured by residential real estate with material physical risk	• *retail mortgage loans*
Biodiversity loss risk	
Total exposure to sectors with high biodiversity risk	• *Business Banking*
Exposure in sectors with material biodiversity risks	• *Business Banking*

Information on the current performance of the above indicators is reported to the Bank's Management Board and Supervisory Board on a quarterly basis.

In 2025, we prepared an ESG Risk Monitoring Methodology, which was approved by the ESG Risk Committee in December 2025. The document comprehensively describes the scope of monitoring, data sources and management of ESG information, ESG risk indicators and metrics to be monitored, early warning thresholds, escalation and corrective action issues, and roles and responsibilities in monitoring ESG risks. We plan to operationally implement the Methodology and the dedicated ESG risk monitoring tool, which acts as the main system for visualising, analysing and reporting ESG risk management information, in Q2 2026 at the latest. The tool has been developed; we are at the stage of collecting feedback from internal stakeholders prior to operationalising the tool. This tool allows ongoing tracking of the level of ESG indicators, identification of trends and early detection of deviations from target values.

Other material established indicators related to climate change mitigation that we monitor include, for example, the level of emissions from our loan portfolios described in the section Greenhouse gas emissions and objectives related to decarbonisation pathways described further in the section Our transition plan.

Actions related to the implementation of the ESG Risk Management Policy

E1-3

We integrate transition risk and physical risk into our business and ESG strategy. Key actions include: engagement with clients, data collection, establishing risk appetite, integrating ESG risks into the lending process and collateral valuation.

Our actions taken and planned towards the sectors and clients included in the transition plan, i.e.: towards the residential and commercial real estate sector, the power generation sector (including thermal coal activities) and towards clients within the scope of the cross-sector transition plan – are described in the section Our transition plan. This section also indicates in detail our actions related to the cyclical estimation of emissions from loan portfolios.

We set decarbonisation objectives for sectors with material negative impacts and support these objectives through lending criteria, data acquisition, monitoring. We work with selected clients to understand their transition plans and support them in implementing these plans. ESG risk manuals set our standards and limits for financing transition and physical risks.

In line with the risk appetite, we accept certain transition risks but monitor and manage them, setting a risk appetite framework (RAS). For physical risks, we establish key risk indicators (KRIs). Risk mitigation measures include, for example, insurance against physical risks and the inclusion of transition and physical risks in the valuation of real estate collateral. Active risk management is also supported by sector-specific guidelines developed for each sector, taking into account our approach to ESG risks.

Key actions related to the implementation of the ESG Risk Management Policy

The following are the other key ESG Policy implementation actions relating to climate change matters carried out or being undertaken in 2025:

- We conducted internal climate stress tests and climate resilience analysis to assess the impact of climate change risks across all time horizons based on NGFS[10] scenarios. The analysis carried out (stress test) illustrates the level of risk costs under different scenarios over three time horizons – short (1 year), medium (3 years) and long (10 years).
- We take transition and physical risk into account in the rating process through the possibility of deteriorating the client rating of the Business Banking and Wholesale Banking division relative to the risk class proposed by the rating model when material environmental/climate risk is identified.

Actions in relation to transition risks

- We are delivering on our declaration to move away from financing thermal coal mining, trading or electricity/heat generation activities.
- We have identified the sectors most exposed to transition risks (based on an internal methodology for sectoral assessment of climate and environmental risks) and:
  - in manual processes, we require each credit decision package to refer to this risk and identify its mitigants, including for Wholesale Banking and Business Banking clients with a weaker financial standing, we require information on emissions and transition plans,
  - in semi-automatic and automatic processes, transition risk is one of the factors influencing the overall assessment of the sector and thus affects the credit limits offered.
- We built, validated and monitored a scoring model for transition risk in the Business Banking division. The results from the sector-level model were used to carry out an analysis of the materiality of transition risk in the area. We are working on the model being used in the credit process to assess the transition risk of a particular client. We

[10] *Network for Greening the Financial System*

expect the model to identify as accurately as possible those clients who are particularly at risk of transition, enabling an appropriate gradation of risk.

- We periodically estimate emissions from the loan portfolio.
- For the provisioning models for the Wholesale Banking and Business Banking divisions, we have assumed an adjustment for this risk not included in the models until the models have been updated with a parameter for climate transition risk.
- We have implemented a process for capturing and collecting ESG data from large corporate clients in line with the EBA Guidelines on ESG Risk Management.
- We include transition risk in the value of real estate collateral in the portfolio of retail mortgage exposures and in the vast majority of the portfolio of corporate exposures of clients of the Business Banking division.
- We periodically review the portfolio of retail mortgage loans for the energy efficiency of the real estate accepted as collateral and monitor the proportion of real estate with a high transition risk.
- We collect information on the energy efficiency of the collateral real estate (for existing and new loans).
- We use an algorithm to estimate energy efficiency for residential real estate for which there is no energy performance certificate. In addition, we have introduced an algorithm for estimating energy efficiency for commercial real estate in 2025.
- We apply the financing criteria for income-generating real estate to clients of the Wholesale Banking and Business Banking divisions, according to which we do not finance real estate with low energy efficiency.
- We are reducing emissions in the areas of retail mortgage loans and income-generating real estate finance lending (see Our transition plan for details).
- In the retail banking segment, we promote products designed to finance energy-efficient real estate and to finance energy efficiency improvements in real estate.

Actions related to the Risk Appetite Statement (RAS)

- For the Wholesale Banking and Business Banking client portfolios, we include transition risk within the sectoral RAS limits (risk appetite parameter). We apply a proportional reduction in the credit risk limit, the amount of which depends on the ratings given to individual sectors as part of the transition risk materiality assessment.
- In the retail mortgage segment, we periodically set a maximum share of new financing earmarked for the lowest performing real estate (RAS – risk appetite parameters for new sales).

ESG risk assessment tool for the Wholesale Banking division

- In the Wholesale Banking division, we launched an enhanced ESG risk assessment tool in 2025, which integrates environmental, social and governance factors, based on data from external recognised databases and internal data. The tool ensures that risks are identified, assessed and managed throughout the credit cycle, improving the efficiency and consistency of lending:
  - Verification of risk materiality: the tool, based on sector data, determines whether a client or transaction is likely to have a material impact arising from or dependent on ESG matters – the tool establishes an initial assessment of ESG and reputational risks in relation to material factors.
  - Qualitative review: the business unit identifies mitigating factors and checks compliance with internal standards and sectoral constraints.
  - High-risk escalation: when a material risk is identified, a specialised entity conducts an investigation and makes a recommendation, which may include additional conditions or a negative assessment of the client/transaction.
  - Credit risk review: validate assessments of ESG factors and credit risk mitigants.

Action in relation to physical risks

- We include the risk of river flooding in the value of real estate collateral in the portfolio of retail mortgage exposures and in the vast majority of the portfolio of corporate exposures in the Business Banking segment.
- Flood insurance is mandatory in the retail mortgage exposure portfolio, regardless of the location of the real estate.
- In the Business Banking division's portfolio of corporate client exposures, if a risk of river flooding is identified for a real estate, then it is mandatory to obtain flood insurance or, if no such insurance can be obtained, a derogation credit decision is mandatory.
- We have established and monitor levels of key risk indicators (KRIs) for physical risk for retail mortgage lending and for loans secured by real estate in the Business Banking division. The KRI allows to establish a quantitative appetite for physical risk, which translates into a better understanding, monitoring and control of risk.
- We carry out physical risk estimation in the banking book in accordance with *Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 laying down implementing technical standards on disclosure of environmental, social and governance risks (Template 5).*
- We are developing our tools for accurately assessing physical risk with new data sources and working on the precision of the results obtained. In our physical risk assessment model, we have taken into account flood data

from the State Polish Holding Polish Waters. In the reporting and portfolio analyses performed on an address basis, we assess physical risk with accuracy to the building number.

- In the individual credit process of a Business Banking division client, in the manual path, we examine the level of river flood risk in relation to the real estate in which the client operates. Where we identify risks, we require confirmation of a flood insurance policy or the identification of material mitigants (neutralising factors) as part of the credit decision.
- In the individual credit process of a client of the Wholesale Banking division, the exposure to physical risk, we assess in a sectoral approach, while additionally examining the physical risk at a specific address in a targeted financing situation.
- We are developing our approach to assessing the share of exposures that are sensitive to sudden or prolonged physical risks in the exposure to undertakings and we monitor this share on a cyclical basis.

Actions in the area of compliance risk

- Our bank's organisational structure and implemented policies and manuals in the area of ESG risk management ensure that ESG risks are properly supervised.
- Established in 2023, the ESG Data Model Project, among other things, ensures regulatory compliance of the bank's ESG reporting.
- As part of Client Orientation Policy, factors such as greenwashing, physical risk and transition risk have been included in the Client Unfairness risk.
- What actions we have taken:
  - We are monitoring the implementation of our publicly made declarations, such as those to move away from financing activities linked to the mining, trading or generation of electricity/heat from thermal coal, or those substantially involving the production, cultivation, processing and sale of tobacco.
  - We have introduced a new *Manual for ESG (sustainability)* product and transaction qualification.
  - We consider clients' ESG needs and preferences in our product approval processes. We review environmental, social and corporate governance communications for greenwashing.
  - We have implemented *Manual – Greenwashing Risk Prevention Guidelines and Greenwashing Risk Management Manual*. In the next stage, we plan to develop a manual on physical and transition risk. All documents are in addition to *Client Centricity Policy*.
  - Thanks to staff awareness actions, a range of training courses and the introduction of mandatory greenwashing assessments in all new and modified products, the risk is reduced.
  - We will implement further solutions in the area of compliance aiming to integrate ESG matters into compliance management processes. Our actions are aimed at ensuring compliance with applicable standards and regulations.

ESG risks in other areas

- We also manage other risks in the ESG area, while not describing them in detail, among others:
  - due to the estimated low impact of these risks (e.g. ESG risk within market risk, liquidity risk, operational disruption of business continuity and security of people and resources due to physical climate risk),
  - due to the historically firmly established and effective system for managing these risks (e.g. social risks arising from poor human resources practices, social and environmental risks associated with working with suppliers).

Financial impacts and resilience of the business model

SBM-3

In this section, we describe how we address the effects of material impacts, risks and opportunities on our strategy and business model. When new negative impacts or risks are identified, we integrate them into our risk management framework and monitor them on an ongoing basis.

The impacts, risks and opportunities identified do not directly influence decision-making. However, the indicators indicated in the Metrics and targets section are regularly presented to the ESG Risk Committee and the Bank's Management Board to enable these bodies to make informed decisions and exercise oversight.

Impact, risk and opportunity management

Risks and opportunities in terms of climate change matters can cause financial impacts. In order to identify risks, we have adopted two different two approaches to determine the current financial impact in relation to transition risk and physical risk. At present, it is not possible to fully incorporate climate risk into the expected credit loss models (as required by IFRS9)[11] for credit risk measurement, due to limited historical data and limitations in ESG risk assessment at the client level. With regard to transition risk – in order to take into account the effects of the climate transition, we applied, as we did last year, a management adjustment to the indications of the expected credit loss model for the valuation of credit risk. The adjustment on this account related to the corporate banking segment (Wholesale Banking and Business Banking division) and amounted to PLN 25 million (compared to PLN 30 million at the end of 2024). For more information, see Credit risk.

[11] IFRS 9 models – models used by the Bank (understood as a method, system or quantitative approach that applies statistical, economic, financial or mathematical theories, techniques and assumptions to transform input data into quantitative or qualitative estimates/parameters, or whose inputs are partly or entirely qualitative or judgement-based), together with all components used to estimate expected credit losses in accordance with IFRS 9.

It is intended that the adjustment reflects, among other things, the impact of the deterioration in the rating of clients with high transition risk expected over a longer time horizon and the high transition risk resulting from the fact that they are likely to find it more difficult to obtain refinancing. We recognise that transition risk affects credit risk in the long term for clients in sectors that we consider to be exposed to high transition risk.

For the opportunities identified, we measure the financial impact against our public commitments and progress towards these objectives. For more information, see Our transition plan for renewable energy generation.

Climate stress tests

Within ING Group, we are continuously refining our stress testing methodology to assess the impact of climate risks on undertaking and retail mortgage exposures from a credit risk perspective under different climate scenarios.

The short- and medium-term climate stress testing methodology is based on existing methodologies used by ING Group for stress testing (e.g. ICAAP, EBA), with climate-related overlays. In contrast, for the long term, a dedicated methodology, hereafter referred to as climate resilience analysis, has been developed to assess the impact on provisions under different scenarios and assumptions for the portfolio.

Climate scenarios

For both climate stress testing and climate resilience analysis, dedicated climate scenarios developed using the published short-term and long-term NGFS scenarios (Phase V) are used as primary inputs. These scenarios cover different narratives and explore impact:

1. baseline scenario/continuation of current policy,
2. the scenario of a smooth transition to a net neutral economy,
3. delayed and abrupt transition scenarios,
4. low transition risk scenario, but high physical risk.

These scenarios affect forecasts of macroeconomic variables (e.g. GDP, unemployment rate, real estate prices, etc.), which take different values and follow different paths, which in turn affect forecasts of the main credit risk parameters (e.g. risk migrations, PD, LGD, etc.). We refer to this part of the stress tests as the 'macro' transmission channel.

Climate overlays

For short- and medium-term climate stress tests, we include dedicated climate overlays to capture the impact of transition risk, physical risk and nature risk at a more detailed level. We refer to this part of the tests as the 'micro' transmission channel.

For undertakings, these dedicated overlays are implemented in the form of PD multipliers in 16 NACE sectors (NACE). The multipliers are obtained using an ING Group tool called EEST (*Environmental Elasticity Scenario Tool – Environmental Elasticity Scenario Tool*), which assesses the impact of transition, physical risk and nature-related shocks on market price and volume by sector, and then the impact of these shocks on the client's financial position. The resulting financial stress is then reflected in the PD.

For mortgage loans, transition risk is modelled by estimating the relationship between household income and the probability of default (PD), taking into account rising carbon prices, energy costs and the cost of repairs required for energy-inefficient real estate. A PD multiplier is then obtained for the portfolio, for each level of energy efficiency. Physical risk is assessed using an internal tool used within ING Group to assess physical risk, which combines hazard maps and real estate-level exposure data to estimate expected losses. The LGD is adjusted based on modelled damage functions and loss estimates for material physical risk.

Climate stress test results

The results of the climate stress test indicate a moderate increase in credit risk in the Business Banking and Wholesale Banking portfolios, while our exposures arising from retail mortgage loans remain relatively resilient to climate change. The results of the climate stress test point to financial impacts that can be managed with the existing risk-mitigation measures.

Climate resilience analysis

SBM-3

Climate resilience analysis is a process used to assess how resilient a bank's business model is to structural changes in different climate transition pathways over the long term.

The approach to climate resilience analysis focuses in particular on the assessment of transition risk, physical risk and nature risk in relation to the loan portfolio from a credit risk category perspective. It varies according to the business line and the ESG risk factors assessed for it.

We distinguish the following types of portfolios:

- Undertakings – corporate financing within the Wholesale Banking and Business Banking divisions
- Real estate financing, distinguishing between residential and commercial real estate.

In principle, identifying the materiality of a given sustainability issue at the level of a particular segment of our value chain in a double materiality analysis, i.e. in a top-down approach, entails the need to quantify credit risk parameters (where applicable).

Our climate resilience analysis is based on a long-term stress test for credit risk. The long-term stress test is carried out using similar methods to the short- and medium-term climate stress test. The main difference is the level of detail in the calculations performed and the refinement of some key assumptions of the climate stress test.

Results of climate resilience analysis

The climate resilience analysis carried out indicates a projection of expected credit losses under the various climate scenarios considered.

Although the adverse scenarios indicate a slight increase (deterioration) in the indicators analysed compared to the baseline, the results of the analysis demonstrate the overall resilience of our bank's business model and strategy to climate risks, with a recommendation to continue to take climate and environmental matters (transition risk, physical risk) into account at the stage of borrower risk assessment, sector analyses or valuation of real estate collateral. The results of the analysis indicate that we are able to manage the potential financial impacts and our organisation remains resilient to the effects of climate change, supported by proactive risk management and effective existing mitigation measures.

We are continuously developing the process of integrating the issue of potential financial impact arising from environmental/climate risks into the credit risk management process, including to address requirements arising from the ever-changing environment.

Linking climate resilience analysis to strategic planning

As part of a double materiality assessment, we identify the sustainability impacts, risks and opportunities that are material to us. We use the results of climate stress tests and climate resilience analysis as a tool to assess how transition and physical risks and their impact on revenues and exposures may change under different extreme scenarios.

The results of the double materiality assessment, including identified material impacts, risks and opportunities, are incorporated into management processes, risk management and business strategy. They serve as a reference point for us to set ESG strategic priorities. In the iterative process, input parameters and assumptions are adjusted based on contextual analysis to strike a balance between business ambition, risk appetite and strategic directions.

In the strategic planning process, in order to translate ESG strategic ambitions into measurable and enforceable actions, we set a set of quantitative targets, decarbonisation priorities and key risk indicators that are derived from, among other things, materiality assessments or sectoral decarbonisation pathways. Their implementation is supported by an established (where applicable) RAS that defines our current and future risk appetite. Objectives and priorities are then transformed into business action plans and engagement plans with clients. The financial planning process distributes bank-wide strategic objectives to individual business lines and support areas.

Transition risks

IRO-1

Transition risk refers to the financial loss to an organisation that may result – directly or indirectly – from the adaptation process towards a low-carbon and more environmentally sustainable economy. This may be due to the relatively sudden adoption of climate and environmental policies, technological advances or changes in market sentiment and preferences.

High-carbon sectors may incur significant costs during decarbonisation, as well as likely additional indirect costs from decarbonising their suppliers. However, this does not mean that borrowers in these sectors will inevitably default. Transition planning and risk management enables a successful transition. We associate material transition risks with assets that could become stranded assets in rapid decarbonisation scenarios, primarily outstanding loans. We are using a structured approach here. We do not classify all exposures with high emission risk as stranded exposures, we consider this approach too conservative. In contrast, it remains a challenge to assess the transition risk of individual clients/exposures over the longer term due to the uncertainty associated with long-term financial planning and the collection of transition plans.

Transition risk also includes improving the energy efficiency of the real estate we finance. Until the Energy Performance of Buildings Directive is transposed into national law (expected in May 2026), regulatory uncertainty persists making it difficult to estimate the size of exposures associated with real estate that will not meet minimum energy efficiency thresholds. This limits the possibility of directly linking energy efficiency classes to transition risk. For more information on this topic, see Our transition plan, in the section wrapping up our approach to commercial and residential real estate.

Assessment of exposure to transition risks

In line with the expectations of the European banking supervisor EBA[12], the aim of prudential plans is not to stigmatise sectors of the economy and exit or withdraw investment from carbon-intensive sectors, but to reflect on the required technological, business and behavioural changes of financial institutions and to prepare structured transition plans, including consideration of engaging and, if necessary, supporting their clients. The fact that the borrower belongs to a high-carbon sector or to a sector with a shrinking market due to the energy transition does not automatically mean that the client will inevitably default on its obligations to the bank. Adherence to regulatory expectations for structured transition planning and the use of good risk management practices can lead to an effective transition.

With regard to undertakings, we assess our exposure to transition risk on a portfolio basis through in-depth analyses in accordance with the internally developed methodology for *Sectoral Assessment of Climate and Environmental Risks for the Business Banking and Wholesale Banking portfolios*. The assessment is determined at sector level according to our internal sector classification, on a scale of 1-5 (corresponding to risk levels: 1 –

[12] EBA Consultation Paper: Draft Guidelines on the management of ESG risks (EBA/CP/2024/02, par 15)

minimal, 2 – informational, 3 – important, 4 – material, 5 – critical). Separately for Wholesale Banking and Business Banking, we have identified our exposure in each risk level. In the longer term, we rely on the results of the stress tests described in section Climate resilience analysis.

A sectoral assessment is carried out for those sustainability matters and for those portfolios for which risk materiality has been identified through the double materiality assessment process.

Another channel for the transmission of transition risks is the need to improve the energy efficiency of the real estate. For the retail mortgage portfolio, we have implemented a portfolio approach to identify a portfolio of high transition risk, which we associate with the inability of clients with exposure secured by a high-carbon real estate to upgrade it. This approach is described in the methodology *Assessing the materiality of climate and environmental risks for the retail portfolio (Retail Banking)*. For the time being, we use this approach for risk monitoring and internal analysis and continue to develop it. We have also set risk appetite limits for new sales in the retail housing loan portfolio in accordance with the *Methodology for determining the risk appetite for transition risk (RAS) for the residential loan portfolio of the ING Bank Śląski S.A. Group.*

We have also developed an approach to quantifying climate and environmental risks for the commercial real estate portfolio by:

- income-generating real estate,
- non-income-generating real estate.

The magnitude of environmental and climate risk for the credit risk category is reflected in the share of exposures that would be affected by environmental/climate materialisation. The choice of approach is inspired, inter alia, by EBA's report on the management and supervision of ESG risks for credit institutions and investment firms. We have described our approach in an internal methodology *Assessing the materiality of climate and environmental risks for the CRE portfolio*.

Disclosure on EU benchmarks aligned with the Paris Agreement

ING Bank Śląski S.A. as a financial institution and the other entities in the ING Bank Śląski S.A. Capital Group do not meet the criteria in Article 12(1)(d) to (g) of the Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020[13]. In addition, the bank is not aware that it has been excluded from any EU benchmark in accordance with Article 12(2) of that Regulation. Consequently, the bank and its subsidiaries are not excluded from the EU benchmarks adapted to the requirements of the Paris Agreement.

Physical risk

IRO-1

When examining physical risks, we assess exposure to river flooding, coastal flooding, fires, landslides, water scarcity, heat stress, droughts, among others. The main data sources in the sectoral approach are ENCORE, Exiobase and World Bank publications, and in the location-based approach are Aqueduct, Copernicus, or JRC databases, among others.

Process for identifying climate-related physical risks

We perform physical risk assessment at the client/transaction level for Wholesale Banking clients as part of the credit process based on the methodology of the *ESG scorecard* as described in the document attached to the *ESG manual for Wholesale Banking clients*. According to this methodology, if we are deliberately financing an asset for which we have an address, we examine the physical risk at the level of that address using a dedicated tool (*Physical Risk Model*), taking into account the exposure of the sector in which the client operates. In other situations, we rely on a sectoral approach.

We perform a portfolio assessment of physical risk in the Wholesale Banking client division based on the individual assessment described above and, in the absence of such an assessment and for the Business Banking client portfolio, we apply the sectoral approach described in the methodology of the *ESG scorecard*.

We address the physical risks that – according to sectoral portfolio analyses – have proven to be relevant for clients of the Business Banking division in the credit process (manual pathway for flood risk analysis). In addition, we examine flood risk for existing and new real estate collateral in the lending process for clients of the Business Banking division. We examine its portfolio level periodically as part of our KRI monitoring.

We perform a portfolio physical risk assessment in the retail banking segment (mortgage products) by verifying the level of physical risk in the address of the real estate being financed. We use the tool indicated above for this purpose – *Physical Risk Model*. The methodology for this analysis is described in detail in document *Assessment of the materiality of climate and environmental risks for the retail portfolio (Retail Banking)*. The approach based on the exact address of the real estate is a more granular approach than that required under ESRS E1-AR.11.c, i.e. based on the classification of territorial units for statistical purposes – on a NUTS basis[14].

The physical risk that, according to the portfolio analyses, has proven to be material for clients in the retail banking segment – i.e. the risk of river flooding – we address in the credit process. We examine its portfolio level periodically as part of our KRI monitoring.

[13] Delegated Regulation Commission (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for EU climate transition benchmarks and EU benchmarks adapted to the Paris Agreement
[14] NUTS – a common classification of territorial units for statistics established by the EU to facilitate the collection, compilation and dissemination of harmonised regional statistics

IPCC scenario – RCP 8.5

For the hazard analysis, we use the risk levels in RCP scenario 8.5 (high emissions) within the scenarios set by the IPCC (*Intergovernmental Panel on Climate Change*). The RCP 8.5 scenario assumes a continuation of current emission trends and limited mitigation efforts: emissions increase throughout the century, causing significant global warming and a potential temperature increase of 4°C or more above pre-industrial levels. This is a scenario often referred to as the highest-emission scenario (conservative scenario).

Inputs

In the case of the sectoral approach – we base this on the main NACE code (PKD – Polish Classification of Activities) of the client's activity, designating the vulnerability of individual activities to specific physical risks. For the location-based approach, we rely on the address data of the real estate and the period to maturity of the exposure (related to the time horizon over which we determine the level of risk for a given hazard).

Transmission of ESG risks to other banking risks

We treat transition and physical risks with the same attention as the financial and non-financial risks defined so far.

We aim to manage these risks effectively by identifying, assessing, evaluating, measuring, monitoring and taking action to reduce the negative climate and environmental impacts of our loan portfolios (including the actions described in Our transition plan) and the impact of transition and physical risk factors on the bank.

As we view ESG risks not as a separate risk, but as a set of factors that can amplify the severity and/or increase the likelihood of traditional risks being realised, the management of these risks is integrated into existing policies, processes and procedures for traditional risks. Aiming to manage ESG risks in a holistic manner, we are integrating them into the existing risk management framework as the available methods and tools develop.

We performed a comprehensive analysis of the impact of ESG risks on classic banking risks and identified channels of transmission. We documented the results of the analysis in an internal document *List of ESG impacts, risks and opportunities*. We also assessed the materiality of climate and environmental risks within traditional banking risks: credit, market, liquidity, operational, compliance.

We consider reputational risk as an overriding risk. It is specific in nature – it can be realised within any type of risk, i.e. it is a consequence of other risks. In *Policy – Principles for Reputational Risk Management at ING Bank Śląski S.A.* ESG risk has been included as a risk factor in the reputation risk management process.

The assessment of the materiality of the concentration of exposures exposed to ESG factors takes place as part of the process of periodic review of concentration risk factors, the conduct of which is described in the procedure *Periodic Review of Factors Related to Concentration Risk of Exposures at ING Bank Śląski S.A.* Our current approach to assessing ESG risk factors in business risks is described in *Report of the 2025 Risk Materiality Assessment Workshop*.

In 2026, we plan to further develop our approach to assessing the materiality of ESG risks in business risks. For more details on the ESG risk management actions we have taken in the above areas, please see ESG Risk.

Our transition plan

E1-1

In ING's long-term strategy announced in November 2025, "ING. In the Beat of Life", sustainability was identified as one of the key strengths, supporting the achievement of business objectives and the building of ING's long-term resilience. At the same time, we declared in our promise to clients that we want to be the first-choice partner in economic transition, including energy transition.

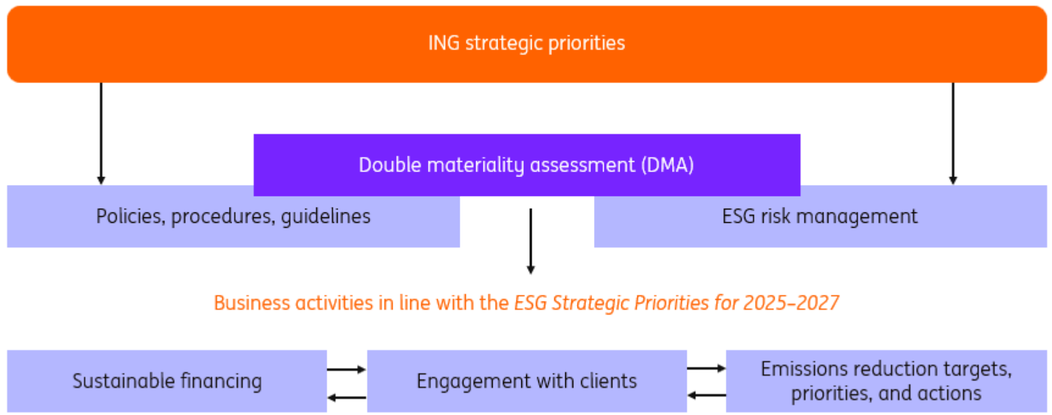
We are aware that the global transition towards a low-carbon economy and a more sustainable society is a long-term process, requiring systemic change, collaboration with clients, a stable regulatory and legal framework, the development of new technologies and broad public engagement. We see this transition as an opportunity to improve operational efficiency, implement innovations and build competitive advantage – both ours and our clients'. Therefore, combining climate ambition with aspects of risk management and stakeholder value creation is the cornerstone of an integrated approach to sustainability at ING and is reflected in the transition plan we have adopted.

Our efforts are focused on supporting the long-term goal of the Paris Agreement – to limit the increase in global average temperature well below 2°C, and ultimately to 1.5°C, relative to pre-industrial levels.

As a bank, we play a key role in driving environmental transition by financing solutions that support emission reductions and the development of sustainable technologies. We are focusing first on the sectors with the greatest impact on emissions, such as energy generation, residential and commercial real estate, supporting their transition to more sustainable operating models.

Our approach to transition plans

Our approach to transition planning combines the strategic perspective of transition plans with the prudential approach typical of financial and non-financial risk management. It includes elements of materiality assessment, business strategy, ESG risk management, product strategy and engagement with clients to ensure an integrated approach to addressing material ESG risks.



1. Strategic directions of ING

Our approach to managing climate-related impacts, risks and opportunities is based on a long-term strategic vision that guides ING's development. The vision is based on an analysis of demographic, social, economic and technological changes and trends, macroeconomic conditions, regulations and stakeholder expectations. It provides the foundation for setting priorities, allocating resources and responding to challenges, including those related to sustainable development.

2. Integration of ESG risks into internal policies, procedures and guidelines

Our internal policies, instructions, guidelines and methodologies in the area of ESG risk management are central to the implementation of the transition plan – they set out how to identify, assess, mitigate and monitor material negative impacts and risks associated with climate change. These are complemented by regulations that integrate ESG risk management into credit processes, ensuring that sustainability matters are an integral part of decision-making across all business lines. We write more about our internal regulations for managing climate change impacts and ESG risks in Policies for managing climate-related impacts, risks and opportunities.

3. ESG risk management

Effective ESG risk management, including the systematic identification, assessment and minimisation of negative impacts and transition risks, underpins ING's transition plan. We conduct a double materiality assessment (DMA), which identifies material impacts, risks and opportunities relevant to our organisation. We monitor ESG risks and integrate them into decision-making processes at all levels – from management oversight and review by the ESG Risk Committee to assessment at business line, portfolio and counterparty levels. We are supported in this process by dedicated ESG risk monitoring tools. For details on the ESG risk management process, see Actions related to the implementation of the ESG Risk Management Policy.

4. Sustainable finance

As a financial institution, we see our role primarily in promoting and undertaking, together with our clients, energy transition initiatives and other projects aimed at reducing society's dependence on fossil fuel-based energy and switching to renewable sources. Our ambition is to be a partner to clients in their sustainability and environmental transition through, among other things, financing and offering sustainable products and services. They enable clients to access capital tailored to their transition needs and provide strategic decarbonisation lever. The sustainable financing transactions we implement to mitigate climate change can take a variety of forms, e.g. targeted financing allocated by clients to invest in low-carbon technologies, renewable energy sources, energy-efficient real estate. Sustainability-Linked Loan (SLL) financing is also available for corporate clients. It is an incentive-based solution in which the interest rate is correlated to the achievement of ESG targets concerning, for example, CO_2 reduction or energy efficiency improvements.

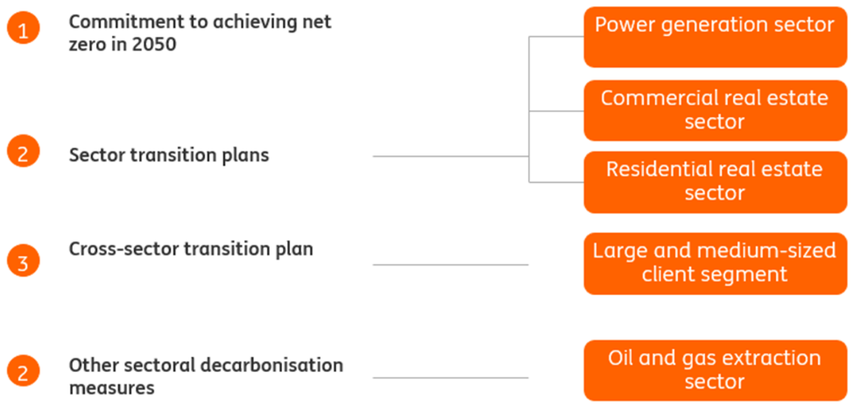
5. Dialogue and engagement with clients

Dialogue and engagement with clients is key to successfully implementing our transition plan. In practice, this means exchanging knowledge, sharing experience and jointly seeking the best solutions and creating strategies that benefit both our clients and society. We work with clients to understand their transition priorities and challenges and identify their needs for sustainable finance, products and services. The holistic approach to engagement with clients is implemented primarily through two of ING's strategic initiatives: cross-sector transition plan, about which we write in more detail in section Cross-sector transformation plan and Client Transition Plans, which we write about in section Supplementary information.

6. Objectives, priorities and key actions for decarbonisation

Based on a double materiality assessment, we have concluded that the material impact, risks and opportunities in mitigation arise from the financed activities of our corporate and retail clients. Although our own operations are an important topic for us, our greatest impact on the environment and climate is through the financing we provide. Our transition plan therefore focuses on how we drive transition in our financial operations. In line with ESG Strategic Priorities 2025-2027 we aim for net-zero 2050 in line with ING BSK's Roadmap for Reducing GHG Emissions.

Roadmap for reducing GHG emission in ING Bank Śląski Group



As part of our efforts to mitigate climate change risks for our loan portfolio, we have taken a strategic approach to selecting sectors for which emission reduction targets, priorities and actions have been set first. The approach is based on the following steps:

1. **Prioritisation of carbon-intensive sectors based on global emissions:** according to the report IEA World Energy Outlook 2025, the majority of global CO_2 emissions come from the production of electricity and heat through the combustion of fossil fuels, as well as from final energy consumption in industry, transport and buildings.. With this in mind, we carried out a transition risk materiality analysis for the creation of mitigation plans for the following carbon-intensive sectors: energy, fossil fuel combustion, aviation, automotive, maritime transport, iron and steel, coke and metal ore production, cement, slag and lime production, chemicals, residential and commercial real estate.
2. **Identification of key elements of the value chain**: the sectors identified above comprise extensive value chains in which the various subsectors differ in their own emissions levels, decarbonisation opportunities and pace of transition. As part of this analysis, for each sector we have identified the key links with the greatest climate impact and the need to focus transition action on them. For example, in the energy sector – encompassing generation, transmission, distribution and sales – it is energy generation that is key to the decarbonisation of the entire sector and many other industries, such as transport and construction.
3. **Assessing the scale of impact and materiality of transition risk in the bank's loan portfolio**: is primarily based on the structure of our portfolio, with a particular focus on sectors, including sub-sectors with the highest exposure, income generation, highest intensity of financed emissions.
4. **Analysis of the sector's decarbonisation potential and the regulatory and legal context:** in which we considered the availability of NZE2050 scenarios and decarbonisation pathways taking into account the specificities of the sector / subsector, national transition priorities, current and planned decarbonisation support regulations and programmes applicable to the sector / subsector, economic conditions, as well as potential legal and technological barriers.

On the basis of this materiality analysis and the analysis carried out for the document ING BSK's Roadmap for Reducing GHG Emissions we have adopted residential and commercial real estate and the power generation sector as priority sectors in our transition plan. They play a key role in the decarbonisation process. Buildings are responsible for a large proportion of emissions and retrofitting them is essential to meet climate objectives. While our exposure to the power generation sector is not large – thanks to the consistent reduction of carbon-intensive assets since 2017 – its role in transforming the economy by shaping the energy mix remains crucial. This is why we are focusing on financing renewable energy sources to maximise our impact on reducing emissions.

In a second step, we extended our approach with a cross-sector transition plan.

Scope and progress of our transition plans

The initial actions aimed at mitigating climate-related risks for our credit portfolio were based on a gradual reduction of exposure to high-emission sectors such as coal mining, coal-fired power generation, and oil and gas extraction.

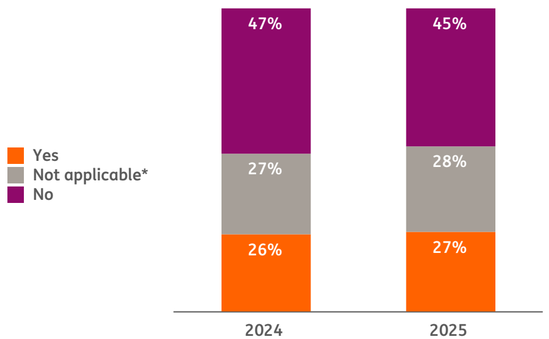
In the first part of the document ING BSK's Roadmap for Reducing GHG Emissions, published in 2023, we expanded this approach. We undertook specific actions, extending them to additional sectors (as part of the so-called Stage 1). According to data as of the end of 2025, this stage covers 27% of assets responsible for 3% of financed emissions in categories 13 and 15.

The cross-sector transition plan (the so-called Stage 2) is a continuation of these efforts. We expanded the scope further, covering an additional 1.5% of assets responsible for 10% of emissions (based on 2025 data).

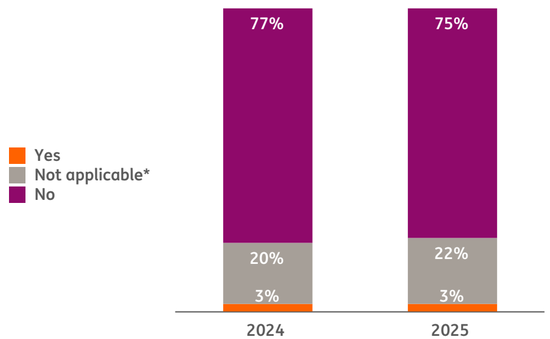
A total of 28% of assets responsible for 22% of financed emissions in categories 13 and 15 (according to 2025 data) will be excluded from decarbonization activities. These are primarily our investment portfolio, consisting mainly of government bonds, for which - in line with applicable guidelines - no decarbonization targets are set.

Portfolio coverage by local decarbonisation targets and priorities – % of total assets (2024-2025)

Stage 1

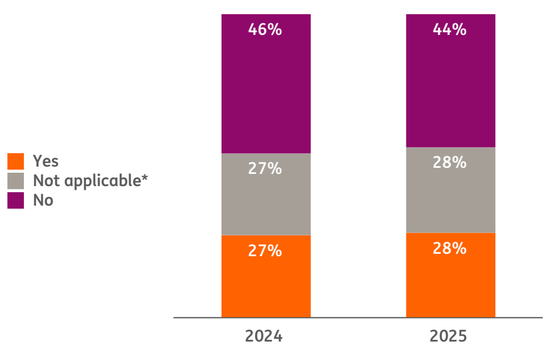


Portfolio coverage by local decarbonisation targets and priorities – % of emissions (2024-2025)

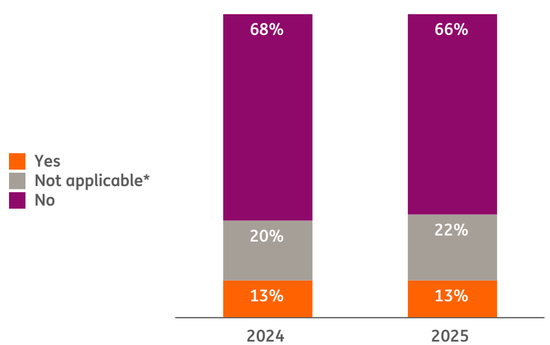


Portfolio coverage by local decarbonisation targets and priorities – % of total assets (2024-2025)

Stage 1 + 2



Portfolio coverage by local decarbonisation targets and priorities – % of emissions (2024-2025)



** Excluded from decarbonisation measures are assets on which decarbonisation targets are not set under current guidelines, primarily the bank's investment portfolio.*

Overview of targets under the transition plans

E1-4

Below is a summary of the key figures for the transition plans. Depending on the objective chosen by us, different scopes of emissions are taken into account, ranging from direct emissions (Scope 1), resulting from undertakings' activities (in the energy generation sector), to indirect emissions related to energy consumption (additionally Scope 2), to emissions generated along the entire value chain (cross-sector transition plan and oil and gas extraction sector; including Scope 3).

In order to effectively measure the achievement of decarbonisation targets, we use different metrics tailored to the characteristics of a particular sector or transition plan. They are not limited to the intensity of emissions. They have been selected to reflect as accurately as possible the progress made in reducing emissions and the alignment of the portfolio with the chosen decarbonisation strategy. Baseline, current and target values make it possible to assess the dynamics of change and the effectiveness of the measures implemented.

The extent of coverage of financed emissions by a given transition plan makes it possible to determine how much of the loan portfolio is covered by emission reduction targets and priorities. In addition, the gross carrying amounts and their share of total assets indicate the importance of each sector in the financing structure. The summary also takes into account the share of each emission scope (Scopes 1, 2 and 3) in the financed emissions, allowing a comprehensive assessment of a given sector's impact on the climate and the environment.

Our transition plan in a sectoral approach

Scenario selection and target setting

In order to adjust the loan portfolio to net-zero GHG emissions, it is important to use climate scenarios as benchmarks. These benchmarks are intended to help set interim and final targets for individual sectors on the way to achieving the Paris Agreement. The scenarios used should be based on the latest scientific information from recognised institutions such as the *International Energy Agency (IEA*) or CRREM (*Carbon Risk Real Estate Monitor*), where available.

When assessing the compliance of our loan portfolio with scientifically determined sector pathways, we do not use offsets and do not plan to use them in the future in order to achieve the objectives of the sector approach.

Our objectives and approach to aligning them may change due to regulation, data availability and quality, pathway availability, methodology updates, changes (or lack thereof) in public policy and government action, and other factors affecting our clients, the sectors (in which they operate) or society as a whole.

A different approach to that based on scenarios is used for the power generation and oil and gas extraction sectors. For the first of these sectors, in order to mitigate transition risks, we have adopted an approach based on excluding financing for thermal coal activities and continuing to provide financing for renewables. In the upstream oil and gas sector, we have made a commitment to reduce our financing to the industry.

Residential and commercial real estate sector and energy generation

In November 2023, we published the document ING BSK's Roadmap for Reducing GHG Emissions, in which we committed to take specific actions to reduce the emissions of our loan portfolio. On the basis of our analysis, we decided to develop carbon intensity reduction plans for residential and commercial real estate and those related to energy generation as a first step. Our choice was dictated by the following factors:

- selection of priority sectors according to the guidelines of NZBA (Net Zero Banking Alliance), which accounted for a significant proportion of our portfolio and financed emissions,
- a significant share of emissions from buildings and energy generation (39%[15] according to 2022 data) in global GHG emissions,
- the existence of generally accepted, applied transition pathways that are already being implemented by many undertakings in these sectors,
- the availability of data to estimate the emissions of these sectors and to chart an emissions intensity reduction pathway aligned with the Paris Agreement goals and leading to net climate neutrality by 2050. As a next step, it will be necessary to obtain data from clients on the actual emission reductions they have achieved in order to compare them with the decarbonisation pathway assumptions,
- the key role of the energy sector in reducing the carbon footprint of the economy as a whole through its high share of global emissions (according to IEA data, the sector accounts for approximately 41% of global CO_2 emissions from fuel combustion[16]) and its high potential for impact on reducing emissions in Scope 2 different industries and economic activities in particular.

Setting pathways and targets

For the residential and commercial real estate sector, we have set as a benchmark emission reduction pathways aligned with the Paris Agreement and leading to limiting the increase in average temperature to 1.5°C. For the power generation sector, our actions relate to continuing our policy of phasing out the financing of coal and lignite-based generation[17] and setting targets for financing renewables.

2022 has been adopted as the base year for the sector transition plans under the so-called Stage 1 (power generation, commercial real estate and residential real estate sectors). This was the first year for which we had satisfactory data for the three selected sectors. At the same time, we have not identified any external factors that would disturb the volume of energy consumption and the associated GHG emissions.

In addition, following the decarbonisation pathways for the commercial and residential real estate sectors and the creation of support plans aimed at reducing emissions, we are working on setting interim targets. We are taking action internally to come up with objectives that will be considered ambitious yet achievable. While we see the need to take action now, we recognise that the energy transition is a matter of action for many stakeholders, whom we as a bank seek to activate towards the common goal of net-zero GHG emissions in 2050. In addition, we are operating under a limited data set that is necessary to set long-term goals. These two reasons mean that setting targets for which we as a bank will take responsibility requires time and adequate resources.

For the decarbonisation of the residential sector, networked sources of electricity and heat are crucial. Although the networks are included in the current methodologies and scenarios, these are factors that we have no direct influence over in its mortgage portfolio. In addition, due to the individual nature of clients and long-term financial commitments, banks have limited ability to directly influence owners' decisions regarding energy upgrades to their real estate. For the sector to successfully achieve its decarbonisation goals, in addition to the role that financial institutions can and must play, the efforts of a wide range of stakeholders are therefore required, including government, the energy sector, players in the construction sector and, last but not least, real estate owners. This broad group of stakeholders must work together to strengthen decarbonisation efforts in order to bring about the system-level changes that are needed for the sector to start realising net zero emission pathways (e.g. CRREM 1.5°C for Poland). The approach we have now developed, therefore, reflects our contribution and actions to support the

[15] Source: https://ourworldindata.org/emissions-by-sector.
[16] Source: World Energy Outlook 2025, IEA.
[17] Specific exclusions are contained in the Bank's internal Bank's regulations – The ESG Instruction for Wholesale Banking Clients and The Instruction – Environmental Risk. Environmental Risks, Environmental, Social and Corporate Governance Risks (ESG Instruction for Clients of the Business Clients Division).

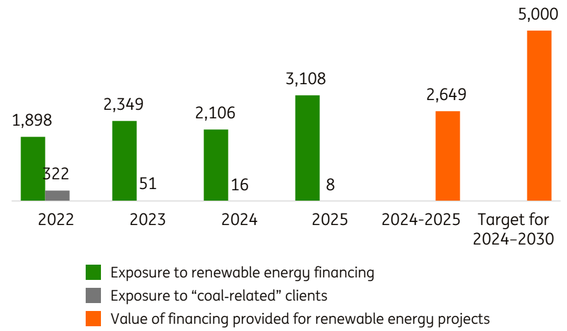
transition of this sector. Once a realistic scenario has been developed, it will be possible to move from ambition to specific future goals.

At the same time, we are working on setting and adopting an interim 2026 target for 2030 for reducing the emissions intensity of the commercial real estate portfolio and a supporting decarbonisation action plan.

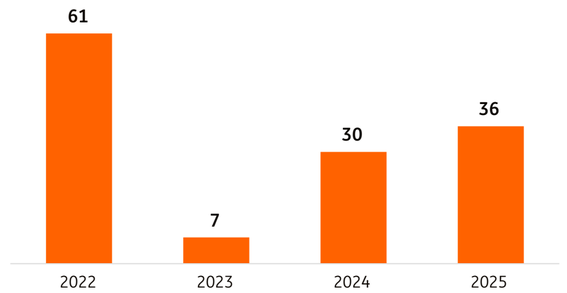
Energy generation

The electricity generation sector plays a strategic role in the decarbonisation of the Polish economy. It is currently undergoing an intensive transition with the aim of increasing renewables and reducing greenhouse gas emissions. However, conventional power generation, based mainly on hard coal and lignite, still plays an important role, although its share is steadily declining in favour of RES. In the draft National Energy and Climate Plan to 2030 with an Outlook to 2040 published in December 2025. (NERP) The Ministry of Energy assumes that in 2030 more than half of Poland's electricity will be generated from RES, and in 2040 this share will increase to 65-68%. The implementation of the NERP involves huge investments – the total volume of outlays until 2030 is estimated to be around PLN 1.1 trillion[18]. The funds will be directed not only to new capacity, but also, for example, to the modernisation of electricity grids, the massive thermal modernisation of buildings, the development of energy storage, as well as hydrogen and biomethane technologies. Actions at European and national level, the Polish state's targets for the development of renewable energy sources and the place of these sources in national energy policy are our starting point for defining our involvement in the power generation sector and support our objectives for financing RES investments. In line with ESG's strategic priorities for 2025-2027 we have committed to provide 5 billion PLN of financing for renewable energy projects in the corporate segment between 2024 and 2030. At the same time, we monitor the fuel mix in power generation activities, aiming to maximise the share of renewable energy sources. For the power generation sector, we focus on direct GHG emissions from power generation (Scope 1), which account for the vast majority of the sector's climate impacts.

Status of progress on the commitment related to providing financing for renewable energy sources (RES)



Financed emissions of the energy generation sector (Scope 1) (thousand tonnes CO_2e)*



**Data for 2022–2023 have not been recalculated using the current methodology; therefore, their comparability with 2024–2025 is limited.*

In 2025, our emissions associated with this sector (for Scope 1) were 36 thousand tonnes of CO_2e, which represents a 23% year-on-year increase. As of the end of 2025 r, our on-balance-sheet exposure to clients whose activities depend directly on thermal coal in more than 5% amounted to PLN 8 million gross, having decreased by 50% year-on-year.

With regard to financing related to renewable energy sources, in 2025 we provided PLN 2,129 million in such financing, and PLN 2,649 million in total over the years 2024–2025, achieving 53%of our target of PLN 5 billion for 2024–2030. Our on-balance-sheet exposure related to renewable energy sources amounted to PLN 3,108 million at the end of 2025, which represents a 48% year-on-year increase due to the origination of new loans.

Scope of targets and metrics covered

- For the power generation sector, we adopt reporting boundaries that include the financing of clients whose core business is electricity generation, and for the purpose of assessing progress toward the renewable energy financing target, we take into account the financing of RES by the corporate segment.
- When measuring the exposure target, we do not require data from an external provider, as the indicator is based on the value of current exposures in our financial system.

[18] Presentation: National Energy and Climate Plan for 2030 with an Outlook to 2040, Ministry of Energy

Identified sectoral challenges and future development

The transition of the energy generation sector requires systemic changes that allow a gradual shift away from fossil fuels and the development of infrastructure to support renewable energy sources. We see the following challenges that need to be addressed to enable faster decarbonisation of the sector:

- **High dependence on coal -** Poland still generates much of its energy from hard coal and lignite, making it difficult to reduce emissions quickly. In addition, the development of RES will not replace the need for a stable, weather-independent energy source. This gap will need to be filled by fossil fuels until the first nuclear power plant becomes operational. At the same time, permitting schedules, available grid infrastructure, incentive schemes designed to stimulate investment, and the development of dispatchable generation and energy storage technologies, including hydrogen, are crucial to maximising the use of renewable energy.
- **Insufficient grid infrastructure -** limited potential of available connection capacities to connect and integrate new RES capacities. Transmission and distribution networks need to be upgraded to accommodate the increasing share of RES and to ensure system flexibility. This is compounded by the inadequate level of preparedness of the actors involved to carry out network modernisation processes on a scale several times larger than historical investment levels.
- **Economic barriers -** the power generation sector faces significant uncertainty regarding future electricity prices and related instruments such as property rights and greenhouse gas emission allowances. The materialisation of this risk may limit the ability of undertakings to make investments, thus affecting the pace of the energy transition.
- **Just transition –** balancing energy security and the need to ensure access to affordable electricity with the necessity of reducing emissions.

Decarbonisation levers

- **The rapid uptake of renewable energy -** especially solar and wind, which is currently one of the most cost-effective sources of electricity - is key to the transition. Scaling up renewables also requires the modernisation of electricity grids into a flexible, intelligent system capable of balancing variable supply and demand and the development of energy storage (e.g. battery storage) and demand management systems. This will enable a greater share of unstable RES sources in the system without the risk of blackouts.
- **Decarbonising the energy mix** – phasing out coal remains a key factor in the transition process. Coal is the most carbon-intensive form of electricity generation and therefore needs to be phased out or switched to other uses.
- **Transition technologies** – due to the increasing integration of renewables and the phasing out of coal, transition technologies are critical to maintaining energy security. Natural gas, often seen as a transitional fuel, plays an important role in this change. At the same time, technologies such as energy storage, demand-side regulation systems and smart grids are key to integrating high shares of renewable energy.
- **Lower cost of emission allowances** – decarbonisation of the energy sector translates into a lower burden of purchasing emission allowances under the European Emissions Trading Scheme (EU ETS – Union Emissions Trading System). For some operators, these costs represent a significant burden, limiting their investment capacity.

Our actions

In response to these challenges and taking into account the decarbonisation levers identified above, we are consistently adapting our financing strategy to support projects that reduce greenhouse gas emissions and accelerate the energy transition and sustain existing commitments:

- we continue to finance renewable energy projects such as wind farms and photovoltaic installations;
- we are moving away from financing coal mines, coal-fired power plants, coal-fired thermal power plants, coal-fired district heating plants and from financing clients who trade in coal (including coal used by households), as well as clients who provide services or sell products dedicated to coal mining or coal-fired power generation. Services or products that may also be provided to other sectors are not subject to this stipulation;
- after 2025, we will not finance clients whose business is directly dependent on thermal coal to the extent of over 5%[19].Financing to these clients can be provided under a formula of targeted financing for assets not related to coal mining or coal-fired power generation, and if the structure of the financing allows this to be documented.
- At the end of 2025, our balance sheet exposure to clients whose business is directly dependent on thermal coal to the extent of more than 5% was 8 million gross, down 50% year-on-year. As this is an exposure to companies in restructuring, the ability to repay these exposures was limited.

Commercial real estate

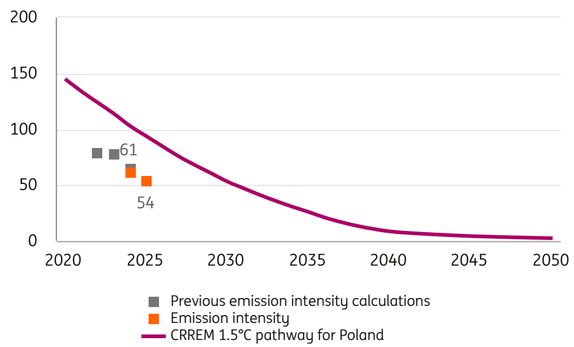
The International Energy Agency has estimated that the operation of buildings is globally responsible for 30% of global final energy consumption and 26% of energy-related emissions (8% of direct emissions and 18% of indirect emissions related to electricity and heat production)[20].

Commercial and public buildings are more energy-intensive than residential real estate. The decarbonisation of the commercial real estate sector therefore plays an important role in the transition process. That is why we have established a transition plan for the sector. The commercial real estate sector is facing increasing pressure from

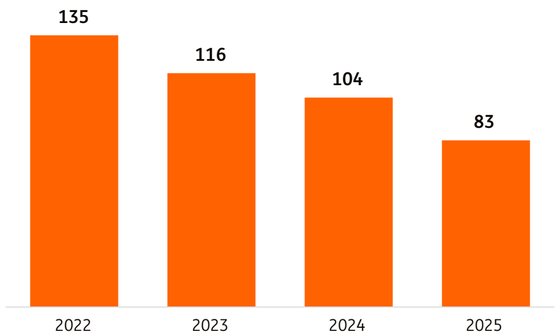
[19] The degree of dependence of this activity is measured, in principle, by the amount of revenue generated from thermal coal (either from direct sales of thermal coal or services/products dedicated to its extraction). The entry does not apply to revenue from the sale of products and the provision of so-called general-purpose services, which can be used in various sectors (e.g. security services or accountancy services). In addition, in the case of companies in the electricity generation sector, we refer to installed generation capacity.
[20] Source: IEA.org, including: https://www.iea.org/energy-system/buildings

changing regulations at European Union level (the Energy Performance of Buildings Directive, EPBD) and investor expectations, in terms of decarbonisation. We anticipate that retrofits, electrification and the use of smart technologies in buildings (e.g. smart building energy management systems) will lead to a gradual reduction in GHG emissions, and that decarbonisation efforts in the sector are expected to progress further as the regulatory and legal framework, transparency and data availability develop.

Emission intensity per m2 of commercial real estate portfolio against a CRREM 1.5°C pathway for Poland



Financed emissions of the commercial real estate portfolio (Scope 1 and 2) (thousand tonnes CO2e)



**Data for 2022–2023 have not been recalculated using the current methodology; therefore, their comparability with 2024–2025 is limited.*

Commercial real estate summary

	2022	2023	2024	2025	Change 2025 vs 2022	Change 2025 vs 2024
Gross carrying amount of total portfolio (PLN million)	9,483	8,463	8,251	8,439	-11%	2%
Gross carrying amount of the portfolio covered by the transition plan (PLN million)	9,479	8,458	8,246	8,436	-11%	2%
share in total	100%	100%	100%	100%		
Financed emissions included in the plan (scope 1 & 2, tonnes CO_2e)	134,754	115,862	104,298	82,701	-39%	-21%
per 1 PLN million of exposure	14.2	13.7	12.6	9.8	-31%	-23%
Emission intensity (kg CO_2e/m^2)	78.4	77.9	60.7	53.6	-32%	-12%

In 2025, the estimated emission levels (Scope 1 and 2) for the income-producing commercial real estate portfolio fell by 21% compared with 2024, reaching 83 thousand tonnes of CO_2e. Over the same period, the loan balance measured as gross carrying amount increased by 2% compared with 2024.

At the end of 2025, emission intensity per square metre of financed properties amounted to 53.6 kg CO_2e/m^2, compared with 60.7 kg CO_2e/m^2 in 2024.

During the reporting period, an updated emission calculation methodology for residential and commercial real estate was implemented, based on a higher level of data granularity. As a result, recalculations for 2024 were also performed (more information on the methodology change is available here). Due to methodological differences between the approaches, it was not possible to recalculate the baseline year (2022). The new methodology serves as a reference point for ongoing monitoring of decarbonisation progress.

Scope of metrics covered

In the area of commercial real estate, the calculations related to financed emissions cover the entire income-producing real estate portfolio of ING Bank Śląski (excluding the ING Lease portfolio). To perform these calculations, we use, among other sources, data contained in available energy performance certificates, information provided by PCAF, as well as our own calculations.

The calculations related to emission intensity cover only the part of the portfolio for which we have sufficient data on key parameters of the financed properties (78% of the total portfolio by gross carrying amount at the end of 2025, compared with 67% at the end of 2024).

Scenario and pathway

We compare the CO_2e emission intensity (in kg CO_2e/m^2) with the 1.5-degree emission pathway (version 2.02 of January 2023), developed by CRREM in collaboration with SBTi. The portfolio pathway is weighted based on the carrying values by real estate type present in our loan portfolio in the base year. The CRREM 1.5°C pathways are scientific decarbonisation trajectories that define the maximum allowable greenhouse gas (GHG) emissions and energy intensity levels that buildings must achieve each year to comply with a 1.5°C global warming scenario, as set out in the Paris Agreement. We cover both Scope 1 and Scope 2 emissions (CO_2, HFCs and PFCs).

Data providers, data quality and limitations

When calculating the carbon footprint for income-generating real estate, we first rely on information from the Energy Performance Certificates (EPCs) held about energy demand and CO_2 emissions. For the remainder of the portfolio, the level of energy consumed is estimated based on an internally implemented algorithm according to a new methodology for estimating primary energy (EP), final energy (EK) and energy efficiency class (EPC) ratings for commercial real estate, and final emissions are calculated using emission factors provided per real estate type by PCAF. As in the case of residential real estate, it is expected that the share of certified real estate in the portfolio will increase and, as a result, the quality of the data will improve.

Identified sectoral challenges and future developments

The real estate sector plays a key role in the transition of the economy, both in terms of its carbon footprint and its potential to reduce its carbon footprint. Despite growing environmental awareness and progressive regulatory changes, we continue to identify challenges that need to be addressed to enable faster decarbonisation of the sector. Among the most important of these are:

- **Risk of stranded assets** – older buildings without plans to upgrade quickly lose market value and attractiveness to tenants and investors.
- **High CAPEX expenditures** on energy efficiency retrofits and improvements (HVAC[21], building insulation, heat pumps, energy management systems) associated with the cost of materials, labour, application of advanced technologies often exceed the financial capacity of smaller owners.
- **Lack of a uniform data system** – The limited availability of reliable, comparable data on facility energy consumption and emissions translates into an inability for financial institutions to accurately measure the true carbon footprint of their assets and makes it difficult to define specific emission reduction targets.
- **The lack of consistent regulations and incentives**, such as subsidies or standards, makes it difficult to effectively mitigate transitional risks and accelerate decarbonisation.

Decarbonisation levers

- **Lending policies in the area of new sales** – Financial institutions, through financing terms, can actively promote investment in energy-efficient commercial real estate. Banks, as in the residential segment, have the opportunity to influence the structure of new sales by supporting the development of the energy-efficient real estate market.
- **Upgrades of existing assets** – Energy retrofitting of buildings already in the portfolio is important for reducing emissions. This requires not only the right financial tools, but also active dialogue with clients and advisory support.
- **Environmental certifications as a market standard** – BREEAM, LEED or WELL are becoming a requirement for large transactions and corporate leases.
- **Regulatory requirements** – Increasing regulatory requirements for energy efficiency and CO_2 emissions may provide the impetus to decarbonise the estate. They can affect both investment decisions and the value of assets in the long term. For example, the revised EPBD requires zero emissions for new public buildings from 2026 and for all buildings from 2028. This supports the goal of zero net emissions by 2050.

Our actions

In response to the transition challenges of the commercial real estate sector and the decarbonisation levers identified, and recognising the systemic complexity of the commercial real estate sector, we are proactively adapting our strategy by focusing on four mutually reinforcing priorities:

- **Accelerate decarbonisation of the portfolio**: steering the portfolio towards lower carbon intensity by increasing the proportion of high quality real estate within new sales and enabling upgrades to existing stock. We influence the new financing of commercial real estate through the credit policies we implement, which define the conditions that a financed real estate must also meet with regard to its energy efficiency. To this end, we have introduced thresholds in terms of maximum primary energy demand for commercial real estate in the client area of the Business Banking division. In addition, in the Wholesale Banking division, we benchmark each real estate financing transaction against the CRREM pathway to complement the risk analysis with an assessment of the point at which an asset may become an “stranded asset”, i.e. a real estate at risk of impairment due to failure to meet climate transition requirements.
- **Client support in transition**: dialogue with clients on the increased risk of the emergence of so-called ’stranded assets’, modernisation needs in the context of maintaining real estate values over the long term.
- **Monitoring national policy development** in the area of commercial real estate and grid emission reductions and shaping an enabling ecosystem: actively working with industry and ecosystem partners to promote regulatory frameworks, data access and public incentives that will enhance systemic change.

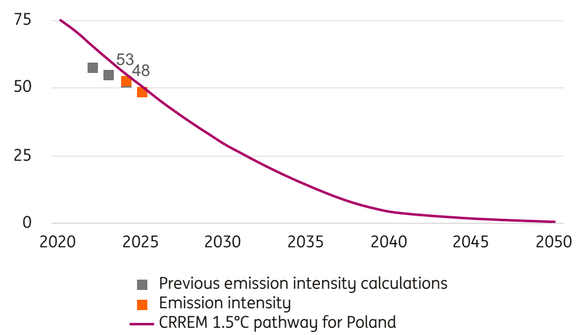
[21] HVAC. Heating, Ventilation and Air Conditioning) is a collection of technologies and equipment responsible for regulating temperature, humidity, air quality and thermal comfort in buildings.

- **Improving data availability and quality**: a systematic increase in the share of the portfolio of real estate with an energy performance certificate and, as a result, an increase in data quality.

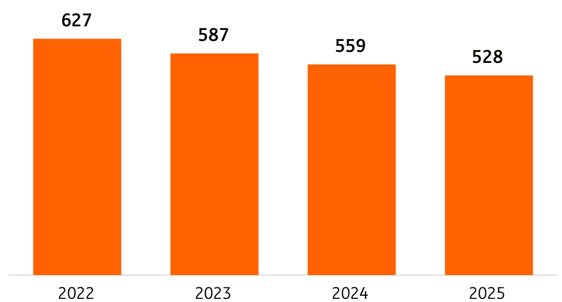
Residential real estate

Across the European Union, buildings are responsible for approximately 40% of the energy consumed and 36% of direct and indirect energy-related greenhouse gas emissions, with heating, cooling and domestic hot water accounting for 80% of the energy consumed by households[22]. In Poland, households account for a significant share of national primary energy consumption (20.3% according to the CSO for 2024[23]). At the same time, the retail mortgage portfolio accounts for 3.4% of our financed emissions (Scope 1 and 2) and represents 25% of our assets as at the end of 2025. Given its materiality in terms of our overall portfolio, we have established a transition plan for this sector.

Emission intensity per m2 of residential real estate portfolio against CRREM 1.5°C pathways for Poland



Financed emissions of the residential real estate portfolio covered by the plan (Scope 1 and 2) (thousand tonnes CO2e)



**Data for 2022–2023 have not been recalculated using the current methodology; therefore, their comparability with 2024–2025 is limited.*

Residential real estate summary

	2022	2023	2024	2025	Change 2025 vs 2022	Change 2025 vs 2024
Gross carrying amount of total portfolio (PLN million)	55,299	55,964	61,590	69,611	26%	13%
Gross carrying amount of the portfolio covered by the transition plan (PLN million)	51,438	52,856	57,164	64,122	25%	12%
share in total	93%	94%	93%	92%		
Financed emissions included in the plan (scope 1 & 2, tonnes CO_2e)	627,104	586,906	559,268	528,203	-16%	-6%
per 1 PLN million of exposure	12.2	11.1	9.8	8.2	-32%	-16%
Emission intensity (kg CO_2e/m^2)	57.5	54.6	52.5	48.5	-16%	-8%

In 2025, the estimated CO_2e emissions (Scope 1 and 2) for the retail mortgage-backed loan portfolio amounted to 528 thousand tonnes of CO_2e, decreasing by 6% compared with the previous year, despite a 13% increase in the loan balance measured as gross carrying amount.

At the end of 2025, emission intensity per square metre of financed properties amounted to 48.5 kg CO_2e/m^2 compared with 52.5 kg CO_2e/m^2 a year earlier. The year-on-year decrease in emission intensity is primarily due to:

- a higher share of newer buildings in the portfolio. The share of the newest, lowest-energy-consumption properties (built after 2020), measured by financed floor area, reached 35% at the end of 2025, compared with 28% at the end of 2024;
- a reduction in the emission factor for households in 2025, mainly due to a lower electricity emission factor as well as methodological changes described below. The emission factor indicates the amount of CO_2e generated per kWh of energy consumed and is used to estimate emissions for properties without energy performance certificates;
- an increase in coverage by actual energy performance certificate data, up to 30% in 2025 compared with 21% in 2024.

During the reporting period, an updated methodology for calculating emissions in the residential and commercial real estate areas was implemented, based on a higher level of data granularity. As a result, recalculations for 2024 were also performed. Due to methodological differences between the approaches, it was not possible to recalculate

[22] Draft National Energy and Climate Plan to 2030 with an outlook to 2040
[23] Household energy consumption in 2024, GUS

the baseline year (2022). The new methodology serves as a reference point for ongoing monitoring of decarbonisation progress.

Scenario and pathway

We compare the CO_2e emission intensity (in kg CO_2e/m^2) with CRREM's 1.5-degree GHG emission pathway (version 2.02, combined for single- and multi-family real estate from January 2023), developed by CRREM in collaboration with SBTi. The portfolio pathway is weighted based on the carrying values by real estate type present in our loan portfolio in the base year.

The level of emissions for residential real estate at the end of 2030, resulting from the CRREM pathway, assumes a 52% reduction in the carbon intensity of Poland's economy compared to the 2015 state. In contrast, the current Polish Energy Policy until 2040 (PEP2040) assumes a 14% reduction in emissions over the same period. We therefore regard the CRREM pathway as an ambitious benchmark, the achievement of which also depends on action on the part of the state authorities. As a bank, we will make every effort to reduce emissions from our loan portfolio within the scope of our influence. As highlighted in the report *Decarbonising Residential Buildings: A Multi-Stakeholder Journey* commissioned by ING Group N.V. and written by Guidehouse – which also covered the Polish residential real estate market – achieving CRREM compliance is not something that any single organisation can achieve in isolation. This requires a concerted effort from all stakeholders, including policy makers, investors, developers, utilities and end users. Only through shared ambition, aligned incentives and enabling regulation can the sector fully align with CRREM's trajectory.

Scope of metrics covered

According to the PCAF methodology, properties under construction are excluded from the calculation of financed emissions. At the same time, residential real estate remaining under construction are included in the sectoral decarbonisation plan. Subsequently, credits for which data from Energy Performance Certificates (EPCs) are not available and an estimation of emissions intensity based on the year of construction is not possible due to data availability are excluded from the calculation of emissions intensity. An additional approach is used to calculate the financed emissions, allowing these credits to be included in the calculation. The calculations of financed emissions and emission intensities overlap to the remaining extent.

Data providers, data quality and limitations

In order to calculate the financed emissions associated with residential real estate, we first use the emissions intensity data contained in the available Energy Performance Certificates (EPCs) and the floor area of the buildings from the land registers or notarial real estate deeds. For real estate for which we do not have data from Energy Performance Certificates (EPCs), we use an emissions calculation based on the energy demand of the real estate in relation to the year of construction and real estate type (as calculated by an external consultancy agency) and the floor area of the building. When aggregating the calculated emission intensities to the portfolio level, we also apply a weighting factor of the loan-to-value ratio (LTV) of the real estate at the time of the liability, and include the floor area of the real estate in our calculations, in accordance with PCAF and SBTi guidelines.

Due to the obligation to have an energy performance certificate at the time of selling or renting a real estate, we expect to further increase the share of the portfolio of real estate with certificates and thus increase the quality of the data.

Identified sectoral challenges and future developments

The challenges of improving energy efficiency and implementing innovative technologies largely overlap with those of the commercial real estate sector, which we write about here. However, the following challenges provide a slightly different character:

- **Low renovation rate**: Poland has adopted Long-term renovation strategy (DSRB). It contains a series of guidelines to support the renovation of buildings in Poland, which are expected to improve the energy efficiency of buildings, air quality and contribute to the reduction of CO_2 emissions. Our estimates indicate that the average annual rate of thermal upgrading currently adopted under the DSRB programme of around 3.8 per cent is insufficient to achieve the average CO_2 -equivalent intensity required by the CRREM pathway. Currently, the average annual rate of modernisation in Poland is around 1%.
- **Unfavourable national energy mix**: a significant proportion of residential real estate emissions are energy emissions, dependent on the national energy mix. It is significantly influenced by Poland's climate and energy policy, including its long-term vision to strive for climate neutrality and the regulatory mechanisms stimulating the transition process of the national electricity sector.
- **Consumer behaviour**: an important factor hindering the decarbonisation of the residential real estate sector is insufficient knowledge of the benefits of thermal modernisation, available technologies and possible support instruments. This is confirmed by the results of a survey People's attitudes to thermo-modernisation[24] according to which 27% of house and flat owners reject thermo-modernisation, citing high costs as the main reason. Governments and financial institutions have an important role to play in driving changes in consumer behaviour by urging, encouraging and supporting homeowners to consider sustainability when building or renovating their homes.

Our actions

To drive the transition of our residential real estate portfolio, we have developed a set of strategic decarbonisation levers that are both feasible and scalable. These levers reflect our dual role as a financier and enabler of housing transition, balancing commercial feasibility with environmental impact. They aim to influence the two most critical decarbonisation factors in the portfolio: the CO_2 intensity of new mortgage loans and the renovation of real estate

[24] Source: People want to know if thermo-modernisation will pay off for them | Press release (available in polish)

already in our portfolio. Complemented by activating and supporting clients in transition and working with real estate organisations, these levers underpin our strategy to reduce emissions intensity, support clients and shape an enabling ecosystem:

- **Accelerate decarbonisation of the portfolio**: steering the portfolio towards lower carbon intensity by increasing the proportion of high quality real estate within new sales and enabling refurbishment of existing stock. In line with our ESG strategic priorities, we have made a specific commitment in this regard: every second zloty of mortgage granted between 2025 and 2027 finances real estate with an energy demand of up to 76 kWh/m^2/year. Our aim is to offer clients long-term financing on preferential terms that will enable them to purchase or build energy-efficient real estate or undertake necessary modernisation measures. We offer an Energy Efficient Home Mortgage, Energy Efficient Retrofit Mortgage and Loan for Better.
- **Client support during transition**: low awareness in the area of building energy efficiency as indicated above is one of the barriers to transition of the sector. Therefore, our aim is to raise awareness and educate clients and provide relevant tools and services to support homeowners in their housing choices and retrofit decisions. We do this by:
  - **Inspiring clients**: on our website we have provided resources for those interested in an energy-efficient home. They will find knowledge and tools that can come in handy when building or renovating a house, e.g. a search engine for subsidies, or videos on, among other things, what to look for to make the investment worthwhile. On our websites we have made available: regular publications by experts on energy efficiency and thermo-modernisation – e.g. a series of videos on "*The most common questions about an energy-efficient home*" in cooperation with Globenergia or a series of articles on energy efficiency topics in the company in cooperation with the Energy Conservation Foundation.
  - **Providing tools**: in 2025, we made available a free building energy efficiency calculator to help clients estimate the energy efficiency of their home and prepare a retrofit plan tailored to their needs. Additionally, a free search engine is available on our website, which lists national and local programmes offering grants and technical support
- **Substantive support:** credit advisors are trained to talk to clients about building energy efficiency and renovation. In addition, periodic meetings are held with ESG Promoters to promote energy efficiency knowledge and the use of the calculator in sales conversations.
- **Monitoring national policy development** in the area of residential real estate and grid emission reduction and shaping an enabling ecosystem: actively working with industry and ecosystem partners to build awareness and knowledge, promote available financial support programmes, grants for thermal upgrading, including, for example, the Energy Conservation Foundation and Globenergia.

Branch of industry	Methodology for calculating the emission intensity of the portfolio	Scope of emissions covered by the plan	Greenhouse gases included	Scenario	Base year	Target year	Measure	Value				Intensity of financed scope emissions 1 & 2 (tonnes CO_2e/PLN million)	Gross carrying amount of the portfolio covered by the plan	Gross carrying amount (PLN million)	Share			
								Base	2024	2025	Target	2025	2025	2025	in total assets 2025	in financed emissions scope 1 & 2 2025	in financed emissions scope 3 2025	in financed emissions scope 1, 2 & 3 2025
Power generation	PCAF	1	CO2, CH4, N2O	N/A	2022	2030	Value of financing granted (PLN million)	N/A	520	2,129	5,000*	19	100%	2,416	0.9%	0.3%	1.2%	0.7%
Oil & Gas extraction	PCAF	1, 2 & 3	CO2, CH4	N/A	2019	2040	Gross carrying amount (PLN million)	9	0.4	0.8	8	6,727	100%	1	0.0%	0.0%	0.0%	0.0%
Residential real estate**	PCAF, CRREM	1 & 2	CO2, HFC, PFC	CRREM	2022	2050	kg CO_2/m^2	57.5	52.5	48.5	not defined	8	92%	64,122	22.7%	3.4%	N/A	2.0%
Commercial real estate**	PCAF, CRREM	1 & 2	CO2, HFC, PFC	CRREM	2022	2050	kg CO_2/m^2	78.4	60.7	53.6	not defined	10	100%	8,436	3.0%	0.5%	N/A	0.3%
Cross-sectoral plan	PCAF	1, 2 & 3	CO2, CH4, N2O, HFC, FHC, PFC, SF6	N/A	2023	2030	% of clients covered by the plan classified at least in Category D	1.7	1.7	4.0	80.0	346	100%	4,348	1.5%	9.8%	9.3%	9.6%

**5 billion of financing provided for RES in 2024- 2030 in the corporate segment **In the reported period, an updated emissions calculation methodology was implemented in the residential and commercial real estate area, based on a higher level of data detail. Due to differences in methodology between the approaches, it was not possible to recalculate the base year. The new methodology provides a benchmark for further monitoring of decarbonisation progress.*

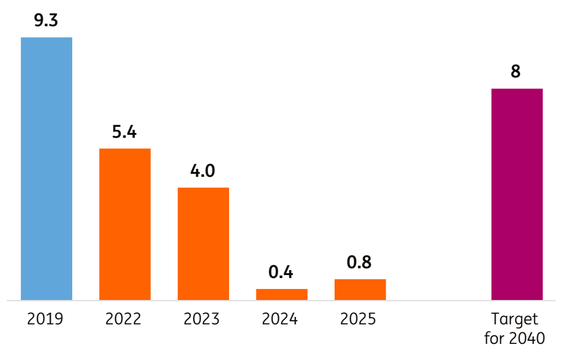
In order to establish uniform rules, in line with market and regulatory requirements, for setting, monitoring, updating and reporting the Bank's decarbonisation targets, we have implemented the 2025 *Manual for setting the bank's decarbonisation targets and priorities*. This document specifies the requirements for the decarbonisation pathways used at ING, their documentation, the selection of decarbonisation targets and priorities together with the methodology for their calculation. In addition, it serves to establish responsibilities and accountabilities within the organisation for managing the process of goal and priority setting, monitoring and reporting. At the same time, it introduces the obligation to adequately document the plans adopted, including the methods, assumptions, criteria, target values and actions planned to achieve the target values, together with the changes made and planned.

Additional sectoral mitigating actions

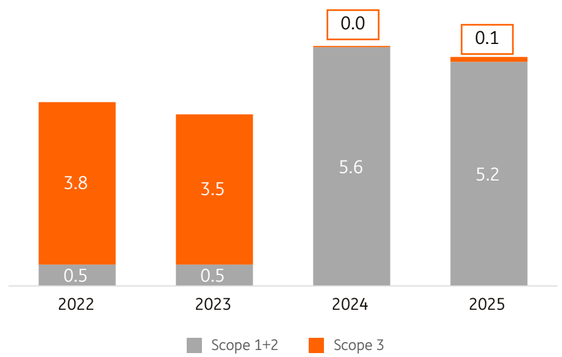
Oil and gas extraction

As a financial institution, we recognise the crucial role of the oil and gas sector as a whole, including in particular upstream (*Upstream Oil & Gas*) in the energy transition and the challenges of its decarbonisation. On the other hand, natural gas is a transitional fuel for the Polish economy, thanks to which the energy transition of local businesses towards renewable energy sources can take place in an adaptive and well-planned manner. We want to help our clients effectively implement transitional change, while not compromising on our environmental goals.

Status of the commitment to reduce exposure to upstream oil and gas financing (PLN million)



Financed emissions (Scope 1, 2 and 3) (thousand tonnes CO_2e)



**Data for 2022-2023 have not been recalculated using the current methodology and therefore their comparability with 2024-2025 is limited.*

In 2025, our emissions associated with the oil and gas extraction sector (Scope 1, 2 and 3) amounted to 5.3 thousand tonnes of CO_2e, representing a 5% decrease compared with 2024. The difference relative to the 2022–2023 data results from the adoption of PCAF emission factors instead of GUS and Eurostat data - more information on this is provided here.

At the end of 2025, our on-balance-sheet exposure to corporate clients operating in the fossil fuel extraction industry (Upstream Oil & Gas) amounted to PLN 1 million.

Our exposure in 2025 did not increase through new financing; the observed changes in value stem from the variable utilisation of existing credit limits, which in the previous year had remained largely unused.

Scope covered by reported targets and metrics

- With regard to the Upstream Oil & Gas sector, we adopt reporting boundaries that include the financing of clients whose core activities include the following areas: oil production, oil and gas drilling, natural gas production, activities supporting oil and gas operations.
- When measuring the exposure target, we do not require data from an external provider, as the metric is the value of current exposures in our financial system

Our actions

One of the targets we have adopted is a commitment to reduce the share of our financing to the fossil fuel industry (this does not include coal, which we do not finance) by 19% by 2040 in relation to 2019. In addition, we do not finance oil sands projects and related infrastructure projects.

Cross-sector decarbonisation plan

In contrast to the sectoral approach activities described here, which focus on specific sectors, the next phase of our transition plan involves engaging in a dialogue with the Business Banking division's high-mission clients across a range of industries. This approach aims not only to set emission reduction targets, but also to support clients in achieving them through long-term dialogue, partnership and the provision of the necessary tools and knowledge.

We have detailed our approach to the cross-sector transition plan in the document ING BSK's Roadmap for Reducing GHG Emissions. Part 2 published in December 2024.

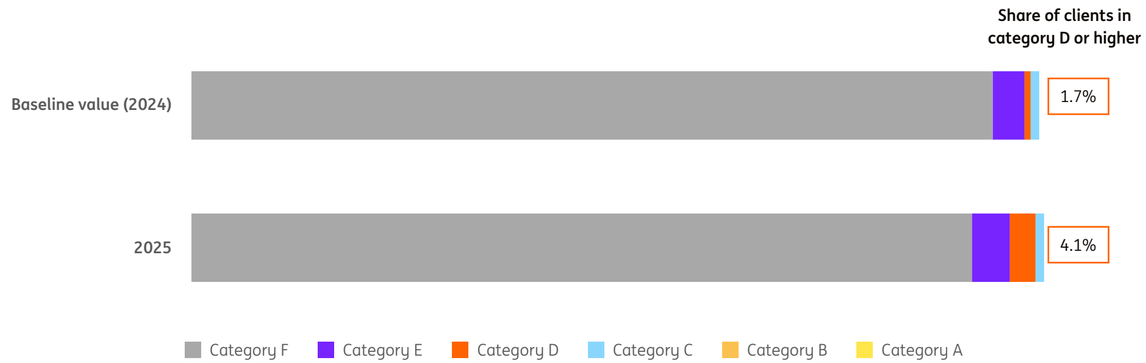
Objective of the cross-sector transition plan

The main priorities of the cross-sector transition plan are:

- supporting clients in decarbonisation activities that are tailored to their specific needs and business objectives,
- identify whether high transition risk clients are taking proactive steps towards transition and how they are aligning their transition strategies and business model with the 1.5°C pathway / net zero emissions target,
- mitigating the transition risks associated with the transition to a low-carbon economy,
- stakeholder engagement and strengthening strategic dialogue with stakeholders – building long-term engagement with key stakeholders, including clients and external partners in the process of developing decarbonisation strategies,
- monitoring and reporting progress – establish mechanisms to monitor and report progress on the implementation of decarbonisation strategies, allowing the effectiveness of actions taken to be assessed on an ongoing basis and necessary adjustments to be made.

A key priority of the cross-sector transition plan is to encourage a select group of clients covered by the plan to develop and implement decarbonisation strategies. To this end, we collect information on our clients' decarbonisation plans and assess them to classify them into the appropriate categories on a scale from A (most advanced) to F (least advanced). The criteria for qualifying clients into each category are outlined below.

Structure of clients covered by the cross-sector transition plan and the share of clients in category D or higher



Categories of clients covered by the cross-sector transition plan

Category	Definition
Category A	companies that have achieved net-zero
Category B	companies count at least Scope 1 and 2 emissions and have at least short- and medium-term decarbonisation targets approved by the company's management with identified initiatives to achieve them, and: • decarbonisation targets, are consistent with the decarbonisation pathway (sectoral or SME); or • the company has declared itself climate neutral; or • has joined the SBTi and meet the milestones set – we are able to observe the implementation and progress of the strategy for a minimum of three years,
Category C	companies count at least Scope 1 and 2 emissions and have at least short- and medium-term decarbonisation targets approved by the company's management with identified initiatives to achieve them, and: • decarbonisation targets, are consistent with the decarbonisation pathway (sectoral or SME); or • the company has declared itself climate neutral; or • has joined the SBTi
Category D	companies count emissions at least in scopes 1 and 2 and: • have at least short- and medium-term decarbonisation targets approved by the company's management with identified initiatives to achieve them
Category E	companies count emissions at least in terms of 1 and 2
Category F	companies did not respond or did not initiate decarbonisation measures, we consider the counting of Scope 1 and 2 emissions as the start of such measures

In response to the limited availability of public information on the decarbonisation efforts of large and medium-sized clients, we have developed a survey that acts as a key tool for dialogue with clients. It aims not only to obtain data on their decarbonisation strategies, but also to review their resilience to ESG risks. The questionnaire includes, among other things, questions to qualify clients into the different categories mentioned above, including questions on the client's carbon footprint by scope, decarbonisation targets and supporting investments (initiatives). This process is carried out on a cyclical basis – the survey is sent out annually. This approach makes it possible not only to monitor clients' progress towards climate targets, but also to have a substantive dialogue to support their transition in line with regulations and market expectations.

A second survey of clients covered by the initiative was carried out in 2025. It confirmed the varying levels of progress in the area of decarbonisation, still with a preponderance of clients in the early stages of action. The majority of clients were classified in the lower categories, highlighting further need for greater awareness and support in developing decarbonisation strategies. We recognise this challenge and remain committed to helping clients develop their decarbonisation initiatives.

At the end of 2025, 4.1% of clients covered by the cross-sector transition plan were classified as Category D or above (1.7% – base year 2024).

Scope of targets and metrics covered

The scope of assets includes a select group of clients representing 2% of the bank's assets and responsible for 10% of financed emissions as estimated at the end of 2025.

Scenario and pathway

The plan does not include measurable, scientifically based targets for reducing GHG emissions under Scopes 1, 2 and 3. As expected of financial institutions, banks should support the transition of their loan portfolios by working with clients to develop plans that are consistent with scientifically determined pathways of descent, such as the Paris Agreement objectives or the 1.5°C scenario. However, for this client group, we considered that the current stage of transition and the availability of data in the large and medium-sized undertakings are insufficient to require clients to fully comply with these standards.

This dedicated plan has been created as an initiative to support clients of the Business Banking division to understand the challenges of decarbonisation and prepare for more advanced action in the future. It represents phase I of our collaboration with clients in this segment, focusing on raising their awareness and gathering the data necessary to develop more precise emission reduction strategies.

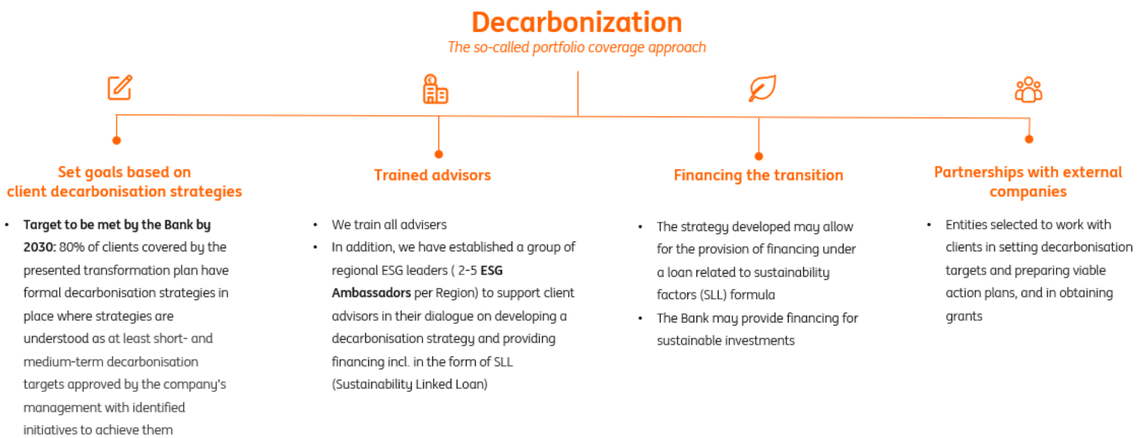
We recognised that the premature introduction of stringent requirements could limit clients' ability to successfully implement transition activities. Our focus in this phase is therefore to support them in building the foundations for future, more comprehensive plans aligned with science-based emission reduction pathways.

Basic assumptions of the cross-sector transition plan

We have based our decarbonisation efforts on a comprehensive transition plan aimed at reducing GHG emissions through active dialogue with a select group of large and medium-sized clients, whose operations have high levels of emissions and account for a significant proportion of our portfolio's emissions. This initiative focuses on supporting these clients to develop and implement decarbonisation strategies.

The goal is for 80% of these clients to have decarbonisation strategies by 2030, understood as at least short- and medium-term goals approved by the company's management, together with initiatives to support the strategy's targets (the so-called portfolio coverage metric).

Key points of the portfolio transition plan



The achievement of the core objective is supported by additional operational targets and ambitions set annually to accelerate action and increase client engagement in the decarbonisation process:

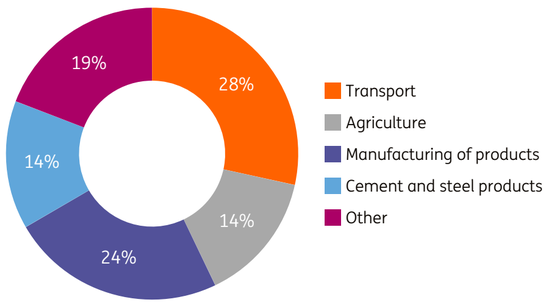
- annual **target for number of engagements with clients**: each year a target is set for the number of interactions with clients in the form of, for example, face-to-face meetings with clients where the development of decarbonisation strategies is discussed. The aim of these interactions is to dialogue, educate and support clients in the process of setting and implementing decarbonisation goals, which has a direct impact on increasing the number of clients in Category D. Regular interactions with clients aim to build awareness, identify potential barriers and develop personalised transition strategies.

  In 2025, we have achieved the following objective adopted in this regard: we will engage in a dialogue around the engagement strategy with 50% of the clients covered by the initiative. The basis of our dialogue was individual meetings between advisors and clients, as well as roundtable interactions on clients' decarbonisation measures. Their aim was to understand the client's specific situation, challenges, risks and transition opportunities and the status of the transition towards a more sustainable economy, and whether and how we can support and accelerate the client's progress towards decarbonisation. Because of the significant share of agricultural and transport companies included in the initiative, the 2025 roundtables were dedicated to the opportunities and challenges of transforming clients in the above sectors. In total, we organised 10 industry roundtables with companies from the Business Banking segment. We organised the meetings together with our content partners.

- the annual ambition regarding **the volume of Sustainability-Linked Loans (SLL)**. The purpose of setting such an ambition is to support clients by offering financial products directly linked to the client's sustainable or transitional investments and/or to the achievement of their sustainability targets, which additionally motivates and accelerates their transition.

Most of the clients covered by the initiative are only in the early stages of transition – they do not yet have comprehensive emissions measurements or formally set decarbonisation targets that form the basis for the provision of Sustainability-Linked Loans (SLL). In addition, 2025 was marked by regulatory uncertainty and confusion around ESG due to changes introduced by the Omnibus simplification package. Ultimately, the obligation to prepare sustainability reports was limited to a small group of the largest undertakings. As a result, many companies have halted or significantly reduced their reporting preparations, including in the climate area – e.g. calculating their carbon footprint or developing transition plans. Due to these constraints, it has not been possible to meet the ambition set for 2025, set at PLN 80 million, and provide SLL funding to clients covered by the initiative.

Sectoral division of client groups covered by the decarbonisation plan by exposure value



The approach based on so-called portfolio coverage targets represents our commitment to taking long-term action around dialogue and engagement with the client. Commitment means a long-term relationship that needs to be built before we as a bank can see results in terms of the strategies clients have created. This initiative requires intensive, direct contact with clients, which is crucial to fully understand their specific needs and to support them in developing and implementing their decarbonisation strategies. This type of advanced collaboration requires significant resources and a strong commitment. We have therefore decided to focus our activities primarily on a smaller group of clients from the large and medium-sized business segment in the Business Banking area. This allows for the delivery of more personalised support, which is essential to achieve ambitious climate goals.

Management of the transition plan

Oversight of the transition plan

In our bank, an effective governance structure and clearly assigned roles and responsibilities play a key role in managing the transition plans. We have adopted a collaborative approach between business units and central centres of competence, enabling the effective implementation of sustainable development goals, including decarbonisation.

Setting targets and action plans

The ESG Innovation Expert Centre is responsible for setting strategic objectives and detailed action plans for the climate transition of our loan portfolio. Together with the relevant business lines, the unit develops objectives, priorities and identifies key initiatives to underpin the transition effort. Leveraging expertise, Centre of Expertise ESG Innovation and the corresponding units in the business lines described in the subsection Our transition plan resources support sustainability at the bank, taking into account market best practice and regulatory requirements. .

Implementation of actions

Responsibility for achieving the set targets and priorities rests with the business lines (divisions). They are the ones who, using the framework set, implement specific actions in their operational activities. Business lines also provide monitoring of task progress and ongoing reporting of results.

Operational support

Business lines can count on the support of Centre of Expertise ESG Innovations and other units of the bank, depending on the nature of their activities. For example, the Risk, compliance or IT department supports in ensuring regulatory compliance, implementing technology solutions or analysing ESG risk.

Central coordination and ESG Programme

Actions related to the implementation of sustainability plans are coordinated through the ESG Programme, a central initiative that integrates the efforts of all the bank's units in the ESG area. This programme involves overseeing the implementation of the sustainable development strategy, with decarbonisation as one of the key priorities. By coordinating centrally, the ESG Programme enables consistency and efficiency in the implementation of bank-wide activities.

Supervision by the Bank Management Board

The Bank Management Board plays a key role in overseeing the implementation of the transition plans. Regular reporting to the Management Board, taking place at regular ESG Council meetings, ensures that activities are in line with the strategic targets set and allows adjustments to be made if necessary. The ESG Council is also the body that approves transition plans. We write more about the governance structure for sustainability matters here.

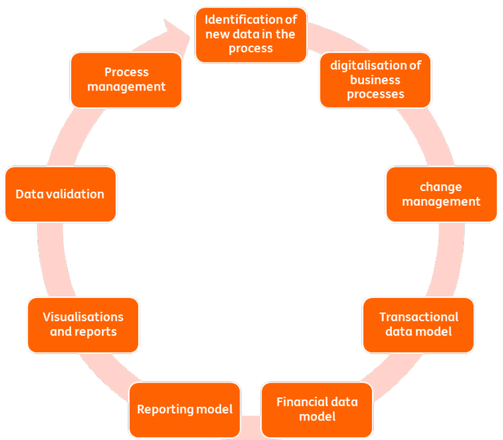
Our resources related to transition plans

Internal planning process

As a bank, we support the transition of our clients through financing – this is how we implement our own transition plan in the first place. ING uses an internal planning process to integrate climate matters into its business strategy. We do this by setting boundaries within Risk Appetite Statements (RAS), defining specific sustainability targets through established KPIs and implementing these measures throughout the organisation. This allows us to stimulate the development of assets that are in line with our sustainability strategy and reduce financing for those that are not within our climate risk tolerance.

The assumptions made do not require significant expenditure and operational expenditure in terms of both current and planned activities to implement the transition plan.

Our technological capabilities



Our key challenge in building ESG processes is to manage the data we need to understand and navigate the dynamic sustainability environment, and to effectively support our clients in accelerating the implementation of a sustainable approach to their business. We are constantly working to develop our technology, database and control solutions to increase the flexibility and efficiency of our operations. We base our work on a strategy that clearly defines 9 fundamental pillars of ESG data management. This approach enables us to effectively address current and future data requirements, as well as guaranteeing the security of implementation of process changes

Pillars of ESG data management

At ING Bank Śląski, strengthening the ESG culture by building knowledge, awareness and employee engagement is one of the strategic priorities we have adopted in this area for 2025-2027. We are aware that continuous learning and upskilling in sustainability is one of the success factors for the successful implementation of our ESG priorities, including the environmental goals of pursuing climate neutrality and actively supporting clients in their environmental transition. In support of these needs, we have implemented and systematically developed a comprehensive ESG education programme to equip employees with the current knowledge and skills necessary to build their commitment to sustainability.

For all employees, we have prepared a basic development offer, which includes:

- comprehensive, 4-module and optional training ESG and sustainability. From 2023 to the end of 2025, more than 6,100 (77%) of ING Bank Tracks Group employees have completed this e-learning;
- week-long event Sustainability Week – 5 days, 11 events and over 22 hours of diverse discussions, debates, webinars and workshops. The theme for 2025 was Inspire yourself to take action. We wanted to provide employees with concrete knowledge, best practices and inspiration that they can use in their daily work and when supporting our clients in their transition.
- climate mosaic – a workshop on cross-cutting climate knowledge, the consequences of climate change and how we can adapt to and mitigate these changes. In 2025, certified facilitators have trained more than 150 people.

At the same time, for employees who need specialised knowledge in a specific area of ESG, we have developed the *"ESG for professionals"* programme. A series of more than 30 webinars, workshops and training sessions will cover a wide range of ESG matters. In addition, employees were able to benefit in 2025 from an individual development pathway in the ESG area, through participation in postgraduate studies, specialised courses and training. An example of such an initiative was the ZBP Qualification Standard Certified ESG Advisor -which 18 bank employees obtained in 2025. The standard is intended for employees of financial institutions, advisers to business and retail clients, and anyone in the financial sector who is interested in acquiring new knowledge and skills in the area of ESG. The sectoral standard aims to confirm the areas of knowledge and skills desired for advisers in the context of ESG requirements.

In 2025, more than 2,600 employees (34%) have realised ESG learning activities using a variety of offerings.

Our ambition is to differentiate ourselves in the market with knowledge and actions to support clients in their sustainable transition. That is why the Wholesale Banking division has an ESG Centre, through which we comprehensively support clients and area employees in activities related to ESG topics. In addition, Business Banking has a group of ESG Ambassadors in the regions. It aims to create competitive advantage and business opportunities based on ESG, implementing the main tenets of the cross-sector transition plan we write about here. Also in the retail area, the ESG Promoter community is active, where employees learn, among other things, how to talk to clients about energy efficiency.

Our stakeholders: partnerships and collaborations

We believe that actions we take have a transitional impact on our clients and the economy. The right scale can be achieved by acting with others, which is why we rely on valuable collaborations and partners to support us and our clients in the transition towards sustainability. We jointly develop our product offering, educate (Responsible Business Forum, UN Global Compact Poland, UNEP/GRID-Warsaw), participate in the public debate (Polish Bank Association, POLSIF) and acquire expertise in selected sectors.

Many challenges are common to the sector, so we also share knowledge with other financial institutions and their organisations. An example of this approach is the cooperation with Sustainable Investment Forum Poland, where we are part of a working group dealing with ESG risk matters. In 2025, the group, in cooperation with the Polish Bank Association and the Credit Information Bureau, developed ESG risk surveys to meet the requirement to obtain and collect data on a selected group of clients and key assets under the European Banking Authority guidelines on the management of environmental, social and corporate governance (ESG) risks.

Read more about our partnerships and collaborations here.

Disclosure of information related to decarbonisation levers

The levers of decarbonisation can be considered both as actions concerning the financial sector as a whole and those that are within our control. Quantitative data on these decarbonisation levers is not yet sufficiently available, as the vast majority of our clients are not subject to CSRD requirements.

For the elements supporting decarbonisation that remain within our control, key elements of our portfolio transition include our approach to working with clients in assessing their transition plans, established financing targets (e.g. renewable energy financing targets), and exclusions and restrictions on financing for clients whose activities do not align with transition targets.

As we continue to gather information from our clients and clients, we expect more data to be available in the future to refine our transition plan. This will enable us to identify and quantify the impact of decarbonisation mechanisms on our future targets.

Supplementary information

Wholesale Banking initiative

Within the Wholesale Banking division, we collect data from these clients as part of the Client Transition Plans (CTPs) – concerning, among other things, emissions in individual scopes, and plans to reduce them. An annual review of the plans in 2025, where we track companies' sustainability maturity and progress against targets. Through the CTP process, we strengthen engagement with clients and better understand the challenges they face. Internally, we focus on training lawyers so as to best match our activities to the needs and sophistication of our clients' transition.

Difference in the use of absolute values of financed emissions versus emission intensity

The sector methodologies chosen for the residential and commercial real estate portfolios are based on metrics and pathways based on emissions intensity values. For the upstream oil and gas sector, we are guided by our financial commitment. In the chapter on sector transition plans, we present the financed emission factors (based on the relevant emission range for the sector) alongside the emission intensity factors.

Calculating the absolute value of emissions financed related to the emissions intensity targets we are aiming to set would require a number of assumptions to be taken into account, such as the projected GHG emissions of the counterparties, the goodwill of the counterparty, changes in the client and asset mix of the bank's corporate segment, and the overall size and composition of the balance sheet.

With these assumptions described above remaining fully stable, financed emissions would change in line with changes in emissions intensity. However, it should be stressed that this is a hypothetical situation. For this reason, we are focusing our transition plan for the commercial and residential real estate sector on managing the emissions intensity of our contractors, rather than the absolute volume of GHG emissions.

GHG emissions

E1-6

Approach to measuring greenhouse gas emissions

As of the end of 2025 , we measured our total CO_2e emissions across all three scopes, although we consider only the financed emissions associated with our direct lending and investment activities to be material. These include Scope 3 Category 13 and 15 financed emissions. Other emissions are reported in line with our existing practice.

We calculate our total emissions in accordance with The Greenhouse Gas Protocol Corporate Accounting and Reporting Standard, and financed emissions (Scope 3 Category 15) in accordance with the Global GHG Accounting and Reporting Standard for the Financial Industry, developed by the Partnership for Carbon Accounting Financials (PCAF).

In estimating financed emissions, we use both financed emissions factors and emission intensity metrics in a complementary manner. The analysis of these emissions allows us to identify key hotspots within our individual loan portfolios. For each asset class, we apply the methodology set out by PCAF or - in the case of Category 13 - an internal methodology based on the GHG Protocol, selecting the most relevant emission factors tailored to the sector's business activities.

Emission data and financial data form the basis of these calculations. Emission data are sourced, among others, from Eurostat, PCAF, BIK (the Polish Credit Information Bureau), and directly from building energy performance certificates (for income-producing real estate and mortgage portfolios). Financial data are derived from internal databases. Financed emissions for selected parts of our portfolios are calculated using sector-level emission factors, which we apply in cases where reported client data are unavailable. In principle, the emission factors used are updated annually (particularly the sector-specific emission factors).

Nominal greenhouse gas emissions

The table below presents aggregated CO_2e emission data for 2021-2025 for the bank's capital group, meaning calculations cover the bank and its subsidiaries (based on operational control). For our Scope 1 and 2 emissions (our own operational emissions), we adopted 2019 as the baseline year; therefore, this year is also included in our disclosures. Scope 2 and Scope 3 emissions are presented in both the market-based and location-based approaches. Financed emissions under Scope 3 have been reported since 2021. In 2025, we continued to develop our financed emissions calculation methodology (Scope 3: categories 13 and 15) - we updated the approach and recalculated the 2024 data. Data for 2019–2023 were not recalculated; therefore, comparability with 2024–2025 is limited. More information on the methodology change is provided here.

CO_2e emissions

tonnes of CO_2e							Change 2025 vs	
	2019*	2021	2022	2023	2024	2025	2019	2024
Scope 1	5,219	3,223	3,788	3,795	3,932	3,599	-31%	-8%
Scope 2 – market-based	6,536	6,229	5,018	4,431	3,494	3,384	-48%	-3%
Scope 2 – location-based	28,176	22,560	21,691	19,444	15,379	13,446	-52%	-13%
Scope 3 – market-based**	6,530	11,441,185	11,126,173	10,623,103	25,898,939	26,869,640	-**	+4%
Scope 3 – location-based**	6,530	11,441,185	11,130,206	10,626,735	25,902,281	26,872,074	-**	+4%
Total – market-based	**18,285**	**11,450,637**	**11,134,979**	**10,631,329**	**25,906,365**	**26,876,623**	**-****	**+4%**
Total – location-based	**39,924**	**11,466,968**	**11,155,685**	**10,649,974**	**25,921,592**	**26,889,119**	**-****	**+4%**
Total 1-2 – market-based	11,755	9,452	8,806	8,226	7,426	6,983	-41%	-6%
Total 1-2 – location-based	33,394	25,783	25,479	23,239	19,311	17,045	-49%	-12%

2019 is the baseline year – at that time we did not calculate financed emissions. The methodology for calculating emissions in Scope 3 Categories 13 and 15 changed during the period under review; therefore, the comparability of data for 2019–2023 with data for 2024–2025 is limited. Data for 2024–2025 include financed emissions from Scopes 1 and 2 and, partially, Scope 3 for Category 15.***Data are not comparable due to differences in the calculation scope.*

Our total emissions for2025 amounted to 26,877thousand tonnes of CO_2e using the market-based method and 26,889 thousand tonnes of CO_2e using the location-based method. This value is 4% higher than the previous year and results from higher emission intensity of our assets.

Compared with 2019, our emissions for the combined Scopes 1 and 2 decreased by 41% using the market-based method and by 49% using the location-based method, primarily due to lower emissions associated with heat and electricity consumption. The total of all three scopes is not comparable with 2019 , as financed emissions (Scope 3 Categories 13 and 15) have only been calculated since 2021. In 2025, they accounted for 57% of our total emissions.

CO_2e emissions for by group company

tonnes of CO_2e	Group	ING Bank Śląski	ING Lease	ING Commercial Finance	ING Bank Hipoteczny	Other companies
			2025			
Scope 1	3,599	3,245	221	114	8	10
Scope 2 – market-based	3,384	3,275	63	30	7	7
Scope 2 – location-based	13,446	13,015	251	120	29	30
Scope 3 – market-based*	26,869,640	22,635,506	2,076,970	2,113,761	43,394	8
Scope 3 – location-based*	26,872,074	22,637,862	2,077,016	2,113,783	43,400	13
Total – market-based	**26,876,623**	**22,642,026**	**2,077,254**	**2,113,905**	**43,409**	**25**
Total – location-based	**26,889,119**	**22,654,122**	**2,077,488**	**2,114,017**	**43,437**	**53**
Total 1-2 – market-based	6,983	6,520	284	144	15	17
Total 1-2 – location-based	17,045	16,260	472	234	37	40
			2024			
Scope 1	3,932	3,554	246	115	8	9
Scope 2 – market-based	3,494	3,398	55	27	7	7
Scope 2 – location-based	15,379	14,956	243	119	32	29
Scope 3 – market-based**	25,898,939	21,715,006	2,078,345	2,061,892	43,688	7
Scope 3 – location-based**	25,902,281	21,718,257	2,078,398	2,061,918	43,695	14
Total – market-based	**25,906,365**	**21,721,958**	**2,078,647**	**2,062,033**	**43,704**	**23**
Total – location-based	**25,921,592**	**21,736,767**	**2,078,887**	**2,062,151**	**43,736**	**52**
Total 1-2 – market-based	7,426	6,952	302	142	16	16
Total 1-2 – location-based	19,311	18,510	489	233	41	38

** The data include financed emissions from Scopes 1 and 2 and partially Scope 3 for the following asset classes: general-purpose financing, project finance and machinery leasing.*

In 2025, ING Bank Śląski accounted for 90% of Scope 1 emissions, 97% of Scope 2 emissions and 84% of Scope 3 emissions. The bank's subsidiary that contributed the most to the capital group's emissions was ING Lease, with a respective share of 6%, 2% i 8% in Scopes 1, 2 and 3.

Scope 1 emissions

Our Scope 1 emissions in 2025 were 8% lower year-on-year, mainly due to a reduction in emissions from refrigerant leakage. Fuel combustion from the vehicle fleet of the bank and its subsidiaries accounted for 85%of these emissions (compared with 78% the year before).

The change in Scope 1 emissions in 2025 compared with 2019 amounted to -31%. The main factor behind this decrease is the reduction in diesel-related emissions (vehicle fleet), resulting from the shift in the composition of our

fleet and the phase-out of diesel-powered vehicles (partly offset by an increase in emissions from petrol-powered vehicles).

CO_2e emissions from scope 1

tonnes of CO_2e							Change 2025 vs	
	2019	2021	2022	2023	2024	2025	2019	2024
Natural gas	595	528	482	444	390	329	-45%	-16%
Fuel oil	67	33	44	53	30	4	-93%	-85%
Coal	3	3	-	-	-	-	-100%	-%
Petrol fuel	1,753	2,099	2,599	3,059	3,083	3,052	+74%	-1%
Diesel – car fleet	2,121	417	284	30	7	3	-100%	-54%
Diesel – generators	47	66	56	40	31	30	-36%	-3%
Refrigerants	633	76	323	170	392	180	-72%	-54%
Total	**5,219**	**3,222**	**3,788**	**3,796**	**3,933**	**3,599**	**-31%**	**-8%**

In our emissions profile, there are direct biogenic CO_2 emissions resulting from the combustion of fuel (petrol and diesel) in the vehicle fleet of our bank, as well as from the use of fuel in power generators and heating oil used for heating purposes. The value of these emissions amounted to 180.9 tonnes of CO_2 in 2025 (185.0 tonnes of CO_2 in the previous year).

E1-5

Below we present a summary of our energy consumption and the structure of our energy mix, which form the basis for calculating emissions under Scopes 1 and 2. These data complement the previously presented information on greenhouse gas emissions.

Energy consumption and energy mix

MWh						Change 2025 vs	
	2019	2022	2023	2024	2025	2019	2024
Fuel consumption from coal and coal products	10	-	-	-	-	-100%	-%
Fuel consumption from crude oil and petroleum products	15,358	11,822	12,683	12,571	12,335	-20%	-2%
Fuel consumption from natural gas	3,281	2,660	2,449	2,154	1,813	-45%	-16%
Fuel consumption from other fossil fuels	16,813	13,601	12,378	10,253	9,453	-44%	-8%
Total energy consumption from fossil fuels	35,462	28,083	27,509	24,978	23,601	-33%	-6%
Share of fossil fuels in total energy consumption (%)	53%	53%	54%	54%	55%	+1.9 p.p.	+0.9 p.p.
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	31,921	25,035	23,068	21,232	19,168	-40%	-10%
Consumption of renewable energy produced independently without the use of fuel	4	138	305	385	525	+13471%	+36%
Total consumption of renewable and low-emission energy	31,925	25,174	23,373	21,617	19,693	-38%	-9%
Share of renewable energy sources in total energy consumption	47%	47%	46%	46%	45%	-1.9 p.p.	-0.9 p.p.
Total energy consumption	**67,387**	**53,257**	**50,882**	**46,595**	**43,294**	**-36%**	**-7%**

Scope 2 emissions

Scope 2 emissions using the market-based method decreased in 2025 by 3% compared with 2024. This was primarily driven by lower consumption of district heating. In 2025 , all the electricity we consumed (partly based on estimates) was covered by certificates (81.3%), guarantees of origin (15.9%), or generated from photovoltaic panels installed on our own properties (2.8%). As a result, electricity-related emissions under the market-based method are zero.

The reduction in Scope 2 emissions in 2025 relative to the baseline year amounted to 48%. his change is driven by a lower emission intensity of district heating purchased, which in turn results from the decreasing number and total floor area of our locations over the years.

Scope 2 emissions under the location-based method fell by 13% year-on-year in 2025 and by 52% compared with 2019. The main factor behind the decrease is the reduction in electricity-related emissions, although district heating also contributes to this positive trend. The decline is primarily due to reduced office space usage, but the impact of our numerous energy-saving initiatives is also evident.

CO_2e emissions								
tonnes of CO2e							Change 2025 vs	
	2019	2021	2022	2023	2024	2025	2019	2024
			Scope 2 – market based					
Electric energy	672	595	-	-	-	-	-100%	-%
Cooling	829	432	691	622	204	251	-70%	+23%
District heating	5,035	5,202	4,327	3,809	3,290	3,133	-38%	-5%
Total	**6,536**	**6,229**	**5,018**	**4,431**	**3,494**	**3,384**	**-48%**	**-3%**
			Scope 2 – location based					
Electric energy	22,312	16,926	16,613	14,897	11,525	9,543	-57%	-17%
Cooling	829	432	751	737	564	770	-7%	+37%
District heating	5,035	5,202	4,327	3,809	3,290	3,133	-38%	-5%
Total	**28,176**	**22,560**	**21,691**	**19,443**	**15,379**	**13,446**	**-52%**	**-13%**

Scope 3 emissions

Our Scope 3 emissions, both using the market-based and location-based methods, increased by 4% year-on-year, mainly due to higher emissions in Category 15 – Investments.

We note that we do not calculate emissions for the following categories:

- Category 4 – Upstream transportation and distribution
- Category 8 – Upstream leased assets
- Category 9 – Downstream transportation and distribution
- Category 10 – Processing of sold products
- Category 11 – Use of sold products
- Category 12 – End-of-life treatment of sold products
- Category 14 – Franchises

because these types of activities are not part of the operations of our capital group.

On the other hand, we do not report emissions for:

- Category 2 – Capital goods
- Category 7 – Employee commuting

as these are not material emission sources for a credit institution. We do report:

- Category 1 – Purchased goods and services (partially)
- Category 3 – Fuel- and energy-related activities (not included in Scope 1 or 2)
- Category 5 – Waste generated in operations
- Category 6 – Business travel

even though they are not material for our business - continuing our existing disclosure practice. We consider only **Category 13 – Downstream Leased Assets and Category 15 – Investments** to be material Scope 3 emission sources. This reflects the results of our double materiality assessment, where climate impacts were found to be material exclusively within the downstream part of our value chain — effectively our credit portfolios.

In 2025, we estimated and reported Scope 3 financed emissions for 2024–2025 for the following asset classes: general-purpose financing, project financing and machinery leasing. In 2025, these emissions amounted to **12** million tonnes of CO_2e, increasing by 2% year-on-year. Business Banking accounted for 81% of these emissions, while Wholesale Banking accounted for the remaining 19% .

Financed CO_2e emissions by asset category

	Funded emissions total (CO_2e tonnes)	Scope 1 + Scope 2 (CO_2e tonnes)	Scope 3 (CO_2e tonnes)	Carrying amount gross (PLN million)	Emission intensity (Tonnes CO_2e per 1 PLN million of exposure)	Data Quality Score
			2025			
Commercial real estate	82,701	82,701	-	8,436	9.8	3.4
General-purpose financing and project finance	18,382,449	6,884,570	11,497,879	117,039	157.1	4.6
Machinery and equipment leasing	1,061,448	1,014,304	47,144	6,107	173.8	5.0
Vehicle leasing	1,015,483	1,015,483	-	6,441	157.7	3.7
Mortgage loans	528,203	528,203	-	64,122	8.2	3.6
Treasury	5,797,550	5,797,550	-	56,900	101.9	1.0
Total	**26,867,835**	**15,322,812**	**11,545,023**	**259,045**	**103.7**	**3.5**
			2024			
Commercial real estate	104,298	104,298	-	8,246	12.6	3.7
General-purpose financing and project finance	18,013,005	6,777,198	11,235,807	112,753	159.8	4.6
Machinery and equipment leasing	1,021,788	979,331	42,457	5,938	172.1	5.0
Vehicle leasing	1,056,524	1,056,524	-	6,258	168.8	3.7
Mortgage loans	559,268	559,268	-	57,164	9.8	3.7
Treasury	5,142,200	5,142,200	-	50,476	101.9	1.0
Total	**25,897,084**	**14,618,819**	**11,278,264**	**240,835**	**107.5**	**3.6**

CO_2e emissions from scope 3

tonnes of CO2e	2019	2021	2022	2023	2024	2025	Change 2025 vs 2019	Change 2025 vs 2024
Category 1	217	131	87	55	49	54	-75%	11%
Paper	190	122	81	47	42	46	-76%	10%
Water supply	28	9	6	8	7	8	-71%	21%
Category 3 – WTT emissions – market-based	5,617	6,127	1,720	1,647	1,465	1,364	-76%	-7%
Category 3 – WTT emissions – location-based	5,617	6,127	5,754	5,279	4,807	3,798	-32%	-21%
Category 5	143	91	71	67	28	21	-85%	-23%
water treatment	57	17	11	9	8	7	-87%	-11%
Municipal waste	75	74	60	58	19	14	-81%	-28%
Recycled waste	11	-	-	-	-	-	-100%	-46%
Category 6	553	42	170	258	315	365	-34%	16%
Rail journeys	197	13	64	110	151	175	-11%	16%
Air travels	200	3	52	93	113	135	-33%	20%
Taxi trips	7	7	14	14	14	16	124%	15%
Travels in private cars	149	19	40	41	38	39	-74%	3%
Category 13*	-	-	1,615,988	1,675,707	2,010,886	2,004,113	-%	-%
Category 15*	-	11,434,796	9,508,135	8,945,369	23,886,198	24,863,722	-%	4%
Total – market-based*	**6,530**	**11,441,187**	**11,126,171**	**10,623,103**	**25,898,939**	**26,869,639**	**-%**	**4%**
Total – location-based*	**6,530**	**11,441,187**	**11,130,205**	**10,626,735**	**25,902,282**	**26,872,073**	**-%**	**4%**

**2019 is the baseline year. The comparability of data for 2019–2023 with data for 2024–2025 is limited.*

Our financed emissions increased by 4% year-on-year to 27 million tonnes of CO_2e. Business Banking accounted for 61% of these emissions, Treasury and other investments for 22% , Wholesale Banking for 15%, , and Retail Banking (mortgage loans) for 2%. We calculated these emissions for PLN 259 billion of our assets, which represent 92% of our total assets.

Financed CO_2e emissions (categories 13 and 15) by value chain element

	2024			2025		
	Funded emissions CO_2e (tonnes)	Carrying amount gross (PLN million)	Emission intensity (Tonnes CO_2e per 1 PLN million of exposure)	Funded emissions CO_2e (tonnes)	Carrying amount gross (PLN million)	Emission intensity (Tonnes CO_2e per 1 PLN million of exposure)
Retail Banking	559	57,164	9.8	528	64,122	8.2
Business Banking	15,647	54,655	286.3	16,484	56,173	293.5
Wholesale Banking	4,549	78,540	57.9	4,058	81,851	49.6
Treasury and other investments	5,142	50,476	101.9	5,798	56,900	101.9
Total	**25,897**	**240,835**	**107.5**	**26,868**	**259,045**	**103.7**

** The data include financed emissions from Scopes 1 and 2, and partially Scope 3, for the following asset classes: general-purpose financing, project financing and machinery leasing.*

Overall GHG emission intensity indicators

n the table below, we present our emission intensity indicators against key denominators (net revenue, total assets and number of FTEs). We emphasize that, for Scopes 1 and 2, the appropriate way to analyse emission intensity is to express emissions per FTE. When analysing emission intensity that includes Scope 3 Categories 13 and 15 (emissions related to our assets, i.e., primarily receivables from our clients), the indicators that better reflect the nature of our sector are those per net revenue or per total assets. We note that we have been calculating our asset-related emissions only since 2021, which explains the step-change in intensity indicators between 2020 and 2021 and complicates comparisons with 2019, our baseline year for Scope 1 and Scope 2 emissions.

Performance indicators related to CO_2e emissions

kg CO_2e	2019	2021	2022	2023	2024	2025
	Emissions per PLN 1 of revenue*					
Net revenue	7,160	5,681	10,737	15,444	16,225	17,374
Scope 1	-	-	-	-	-	-
Scope 2 – market-based	-	-	-	-	-	-
Scope 2 – location-based	-	-	-	-	-	-
Scope 3 – market-based	-	2.01	1.04	0.69	1.60	1.55
Scope 3 – location-based	-	2.01	1.04	0.69	1.60	1.55
Total – market-based	**-**	**2.02**	**1.04**	**0.69**	**1.60**	**1.55**
Total – location-based	**0.01**	**2.02**	**1.04**	**0.69**	**1.60**	**1.55**
	Emissions per PLN 1 million of assets (average per year)					
Assets (average per year)	152,813	198,575	213,186	233,399	254,195	279,042
Scope 1	34	16	18	16	15	13
Scope 2 – market-based	43	31	24	19	14	12
Scope 2 – location-based	184	114	102	83	61	48
Scope 3 – market-based	43	57,616	52,190	45,515	101,886	96,292
Scope 3 – location-based	43	57,616	52,209	45,530	101,899	96,301
Total – market-based	**120**	**57,664**	**52,231**	**45,550**	**101,916**	**96,317**
Total – location-based	**261**	**57,746**	**52,329**	**45,630**	**101,975**	**96,362**
	Emissions per FTE (annual average)					
FTE (annual average)	7,943	8,601	8,372	8,401	8,117	7,783
Scope 1	657	375	452	452	484	462
Scope 2 – market-based	823	724	599	527	430	435
Scope 2 – location-based	3,547	2,623	2,591	2,314	1,895	1,728
Scope 3 – market-based	822	1,330,222	1,329,017	1,264,505	3,190,765	3,452,375
Scope 3 – location-based	822	1,330,222	1,329,499	1,264,937	3,191,177	3,452,688
Total – market-based	**2,302**	**1,331,321**	**1,330,069**	**1,265,484**	**3,191,680**	**3,453,272**
Total – location-based	**5,026**	**1,333,220**	**1,332,542**	**1,267,704**	**3,193,556**	**3,454,878**

**For net revenue, we used the value of consolidated net revenue determined in accordance with ESRS 2 as the sum of: interest income, fee and commission income, result on financial instruments measured at fair value through profit or loss and foreign exchange result, result on the sale of debt securities measured at amortised cost, result on the sale of debt securities measured at fair value through other comprehensive income, dividend income, result on hedge accounting and result on other core operating activities. Data for 2019–2023 are not comparable with data for 2024–2025 for Scope 3 and Total due to differences in the calculation scope — data for 2021–2025 include financed emissions from Scopes 1 and 2 for Categories 13 and 15.*

Disclosure on stranded greenhouse gas emissions

Because most of our emissions originate from financial activities, there is a potential risk related to stranded greenhouse gas emissions arising from our client portfolio and from the collateral we hold. Due to the shorter average maturity of loans within the corporate portfolio, the issue of stranded emissions does not arise, as we ultimately have the option to discontinue cooperation with clients who do not meet decarbonisation targets.

In the case of long-term mortgage loans, the issue of stranded greenhouse gas emissions may emerge. Therefore, we actively work with our clients to encourage them to modernise their homes and we offer renovation loans to support this. Our mortgage advisors are trained to discuss potential renovations with clients that can help reduce the scale of this challenge.

Development of methodology and 2024 recalculation update

In 2025, we continued to develop our methodology for estimating Scope 3 emissions in Categories 13 and 15. The updates introduced include both clarifying calculation rules and streamlining the data used and their sources. To ensure consistency of approach and improve comparability of results over time, we recalculated the emissions reported for 2024. In 2025, for the first time, we also report financed emissions in Scope 3 - we determine them for exposures to general-purpose financing, project financing and machinery leasing.

General Corporate Loans, Project Finance, and Leased Assets - machinery & equipment

We began applying PCAF sector emission intensity factors, instead of the previously used indicators based on GUS data, as the basis for calculations for these exposure classes. This change aligns the calculation approach with the market standard and improves data comparability over time. The estimated emissions cover Scopes 1, 2 and 3.

For Leased Assets – Vehicles, the methodology has not changed. The estimated emissions cover Scopes 1 and 2.

Sovereign debt

We clarified the method for determining the attribution factor, basing it on the ratio of the portfolio value to gross domestic product adjusted for purchasing power parity and converted into PLN using the international dollar exchange rate. We standardised the sources of national emissions data and discontinued the adjustment for net emissions exports, retaining UNFCCC data as the highest-quality source according to PCAF. In line with PCAF recommendations, the estimated emissions cover Scope 1.

Commercial Real Estate

We standardised the rules for using the data necessary for calculations and implemented a mechanism enabling the estimation of energy demand in cases of missing information, based on the building's function, its floor area and year of construction. We clearly defined the method for determining property values and foreign-exchange conversion rules, and we reviewed the commercial real estate portfolio to ensure proper identification of income-producing assets. In line with PCAF recommendations, the estimated emissions cover Scopes 1 and 2.

Mortgages

We clarified the rules for using data from energy performance certificates, including quality criteria and exclusion cases. We also updated reference values for energy demand by year of construction and streamlined the procedures to follow in the event of missing or ambiguous data, to ensure consistent and comparable emissions estimates. In line with PCAF recommendations, the estimated emissions cover Scopes 1 and 2.

Quantitative information on the CO_2e emissions update for the year 2024

kg CO_2e	Data before recalculation	Data after recalculation	Change rate
Scope 1	3,932	3,932	0%
Scope 2 – market-based	3,494	3,494	0%
Scope 2 – location-based	15,379	15,379	0%
Scope 3 – market-based	9,934,323	25,898,939	161%
Scope 3 – location-based	9,937,665	25,902,281	161%
Category 13	1,740,409	2,010,886	16%
Category 15	8,192,059	23,886,198	192%
Total – market-based	**9,941,749**	**25,906,365**	**161%**
Total – location-based	**9,956,977**	**25,921,592**	**160%**

Biodiversity and ecosystems (E4)

Biodiversity is the variety of and interaction between all living organisms which work together in ecosystems. Biodiversity is important not only for the balance of the ecosystems themselves, but also because of the ecosystem services that are essential for the proper functioning of the economy and society.

As a financial institution, we can have an impact on biodiversity through the appropriate management of the risk of biodiversity loss in the area of credit risk, the credit policies adopted, education and client engagement as well as involvement in biodiversity-related initiatives.

Biodiversity in the 2025 double materiality assessment

As part of our double materiality assessment, we analysed biodiversity and ecosystem issues (ESRS E4) in relation to impacts, risks and opportunities, for each of our value chain segments and for our own operations. According to the results of the analysis, the biodiversity topic was assessed as not material.

As a result of the double materiality assessment (DMA) carried out previously – in 2024 – the topic of biodiversity was considered material. Accordingly, we have carried out a number of actions and deepened our knowledge in this area during the reported period, 2025. We have therefore decided to include information on ongoing actions in this year's Sustainability statement.

The change in the DMA score for the biodiversity topic does not mean that we are no longer addressing the issue – we continue to see the loss of biodiversity as one of the important environmental risks. This topic remains embedded in key credit processes, and we monitor the development of regulations, methodologies and standards in this area so that we adapt our activities accordingly.

We have provided more information on the process of identifying and assessing impacts, risks and opportunities, including for biodiversity, here.

Our approach to managing impacts on biodiversity

Policies

E4-2, MDR-P

Our main ambition is to set our clients on the path of contributing to halting and reversing biodiversity loss.

Our approach to biodiversity and ecosystems is set out in two key documents: the *Sustainability Policy of the ING Bank Śląski S.A. Group* and the *ING Bank Śląski S.A. ESG Risk Management Policy*

Document name	Related relevant sustainability issues	Related internal documents
ING Bank Śląski S.A. ESG Risk Management Policy	• E1 Climate • E4 Biodiversity	• *ESG Manual for Business Banking Clients* • *ESG Manual for Wholesale Banking Clients*

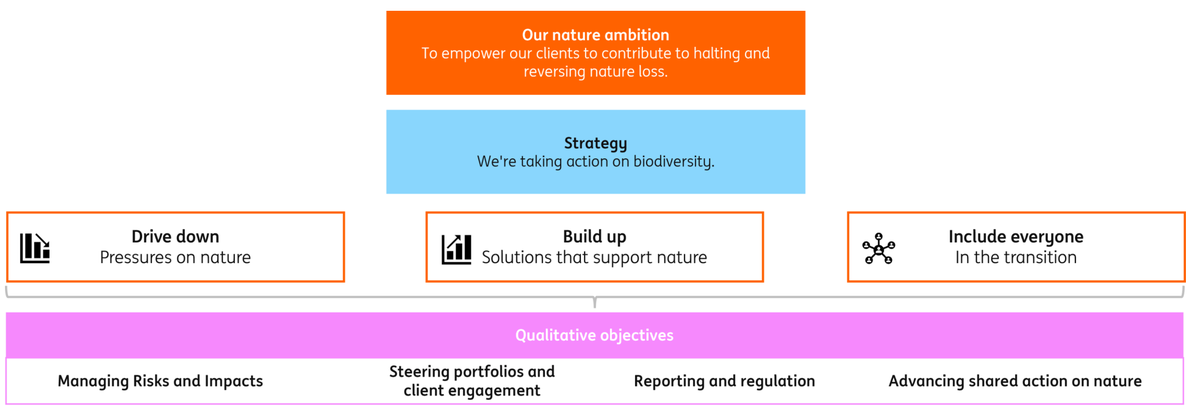
The *Sustainability Policy* defines the main areas of action for nature and biodiversity and confirms that we are pursuing actions in line with the hierarchy of impact reduction recommended by the Science Based Targets Network (SBTN) and the Taskforce on Nature-related Financial Disclosure (TNDF). More information on the Sustainability Policy can be found here.

The *ESG Risk Management Policy* and related manuals describe mechanisms to mitigate biodiversity risks, including the identification of activities excluded from funding, such as those that may have a material adverse impact on protected areas (UNESCO, Ramsar, IUCN) or associated with illegal logging or deforestation of forests of special natural value. Oversight is carried out through the ESG Council, which approves the strategy and monitors its implementation, and the ESG Risk Committee responsible for the methodology for assessing climate and environmental risks, including biodiversity loss.

Objectives and actions

E4-3, E4-4

We identify qualitative objectives for managing biodiversity loss in our 2025-2027 strategy, which we describe here. Our ambitions, strategy and qualitative objectives are presented in the diagram below:



Impact and risk management

Regardless of the current results of the double materiality assessment, we consider the loss of biodiversity as one of the important environmental risks, especially in the long term. We regularly assess risks related to impacts on, and dependencies on, biodiversity and ecosystems across our loan portfolios. More information on managing ESG risks can be found here.

Managing our portfolio and working with clients

At the client/transaction level, we manage biodiversity impacts and risks using the exclusions and restrictions indicated in the ESG Risk Management Policy and ESG guidelines. Among other things, we have included rules not to fund projects that may directly negatively impact certain high-value ecosystems and certain economic activities that are incompatible with our approach to biodiversity. ING is a signatory to the Equator Principles (EP). In accordance with internal regulations, major investment projects that are subject to the Equator Principles and do not comply with it are not funded by us.

In the Wholesale Banking segment, we use an ESG risk assessment tool that includes an assessment of biodiversity risk and is applied in the credit process. If a material impact or dependency in the area of biodiversity is identified in the sectoral approach – a more in-depth assessment is required, including the client's presentation of mitigation actions to reduce the negative impact/risk.

A training course for Advisors of the Business Banking division was held in 2025, attended by 330 people, as well as an open webinar for clients. Biodiversity was also one of the topics discussed at the round tables for the agricultural industry, which were attended by 46 companies. On the website en.esg.ing.pl we have published the guide "*Biodiversity and Business – The ABC for companies*".

Reporting and regulatory compliance

Deforestation and other forms of ecosystem conversion are one of the main direct drivers of biodiversity loss. Although we do not fall within the scope of the EU Deforestation Regulation (EUDR), we have implemented a specific policy for forestry and plantations within both ESG risk manuals, which covers clients who grow, harvest, process, genetically modify plantation crops or trade in timber or products derived from plantation crops and, among other things, defines guidelines for verification of the origin of timber.

Joint action for ecosystems and promotion of biodiversity

As part of the promotion of biodiversity in the organisation, an open training session was held for employees entitled "*Biodiversity and Business*", attended by 450 employees, as well as a dedicated workshop for representatives of the ESG Programme, ESG Risk and the Bank Supervisory Board.

In 2025, we continued to work on wetland ecosystems. Since the beginning of 2024, we have already paid out four donations totalling PLN 2.8 million, including:

- 2024: PLN 2.0 million to the WWF Poland Foundation in the form of two donations for the "Rakutowskie swamps" project,
- 2024: PLN 250,000 to UNEP/GRID-Warszawa for the Upper Biebrza River Wetland Ecosystems project,
- 2025: PLN 580,000 to UNEP/GRID-Warszawa for the project Space for Nature – Protection of Forest and Non-Forest Wetland Ecosystems in the Upper Biebrza River Area, the Biebrza National Park and its buffer zone.

In 2025, we carried out two off-site employee volunteering activities in the Rakutowskie swamps and the Upper Biebrza River Wetlands, with a total of more than 40 participants. In addition, we produced a popular science educational film on biodiversity and the environmental role of wetlands along the Biebrza River. More information on this topic can be found here (in Polish).

We recognise that this kind of action is the next step in the mitigation hierarchy and as a financial institution we should take action at portfolio level first. Therefore, we see our involvement in this project not as a compensatory measure, but as a pilot initiative and a source of inspiration for our clients. Our involvement in the project was widely communicated, including at events and conferences attended by clients of the Wholesale Banking and Business Banking divisions.

The commitment to nature conservation and restoration also promotes dialogue with NGOs and the scientific community, which is crucial for the development of methodologies and tools.

EU Taxonomy

What is Taxonomy?

Taxonomy is the common name of a legal act of the European Union – Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment – that establishes harmonised EU-wide principles for sustainable investment. The legislation is designed to increase the level of environmental protection by re-directing capital from environmentally damaging investments to greener alternatives.

The Taxonomy does not define which activities are "good" and which are "bad", but only describes in detail investments that are environmentally sustainable. It is intended as a tool to support investors and entrepreneurs to make informed investment decisions towards measures that will contribute to achieving climate neutrality in the European Union by 2050.

The Taxonomy does not prohibit investment in activities that do not meet its criteria, but gives additional preference to environmentally sustainable solutions. The implementation of regulations defining what investments are environmentally sustainable will also make it possible to identify pseudo-environmental activities – concerning the unjustified claim by some entities that their activities are environmentally friendly, when there are no grounds for this – this phenomenon is called greenwashing.

On 30 December 2021, the EU Commission Delegated Regulation (2021/2178) to Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment (later updated in 2022, 2023 and 2025) entered into force. It imposes an obligation on a number of European entities, including the banking sector and consequently ING Bank Śląski, to report both quantitative and qualitative information on environmentally sustainable business activities.

Our business strategy and the Taxonomy

One of our strategic priorities in the ESG area is to support clients in their environmental transition. The direction of this transition is set by the environmental objectives of the EU Taxonomy:

1. climate change mitigation (CCM),
2. climate change adaptation (CCA),
3. sustainable use and protection of water and marine resources (WTR),
4. the transition to a circular economy (CE),
5. pollution prevention and control (PPC),
6. protecting and restoring biodiversity and ecosystems (BIO).

In developing our sustainable finance product offering, we focus on the objectives of the EU Taxonomy, which are material to our clients' business model. We tailor the financing terms to the client's stage of transition, making them contingent on achieving the objectives of the ESG strategy or supporting the financing of the assets necessary to implement the strategy. At the same time, we subject ESG factors to detailed analysis as part of the lending process to ensure their sustainability. Read more about our way of working, our priorities and our sustainability objectives here.

Minimum Safeguards

Minimum Safeguards are one of the criteria of the EU Taxonomy — Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment — used to determine whether a given activity is environmentally sustainable. As defined, it is a set of procedures used by an undertaking to ensure compliance with:

- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereafter: OECD Guidelines, 2023 edition), and
- UN Guiding Principles on Business and Human Rights (hereinafter: the UN Guiding Principles), including the principles and rights set out in the core conventions identified in the ILO Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Bill of Human Rights.

The criterion of compliance with minimum safeguards applies to the entire activity of the undertaking concerned. Meeting the prerequisites for minimum safeguards enables the reporting of portfolio exposures in terms of sustainable financing.

In 2023, we conducted a self-assessment for the first time and demonstrated the compliance of the ING Bank Śląski S.A. Group's activities with the rationale of the Taxonomy minimum safeguards. The scope and conduct of the analysis is presented in the Management Board Report on Operations of the ING Bank Śląski S.A. Group 2023.

In 2024, we renewed and expanded the analysis – the analysis took place in a self-assessment format by completing a comprehensive questionnaire and analysing regulations and internal processes. This process additionally involved the Group's largest subsidiaries in an in-depth manner: ING Bank Hipoteczny, ING Commercial Finance and ING Lease Polska. The scope and outcome of the analysis was also reviewed with external legal support. The results of the analysis confirmed the absence of identified gaps, and the scope of the analysis is presented in the Management Board Report on Operations of the ING Bank Śląski S.A. Group for 2024.

The results of the 2025 analysis confirm that ING Bank Śląski Group's operations are conducted in accordance with the requirements of the minimum safeguards. The analysis was based on past practice and covered both the bank and the subsidiaries of the ING Bank Śląski Group. Key stages of verification:

1. The operation of due diligence procedures and processes as referred to in the OECD Guidelines and the UN Guiding Principles.
2. Fulfilment of the principles and rights indicated in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
3. Confirmation of no judicially found violations without implemented corrective actions in the following business areas: disclosure, human rights, employment and employee relations, environment, anti-corruption, consumer interests, science, technology and innovation, competition, and taxation.
4. Confirmation that no recommendations have been issued by the OECD National Contact Point (NCP) in relation to the conducted activities under the OECD Guidelines during the last 12 months, and that no inquiries have been received from the Business and Human Rights Resource Centre.

In December 2025, we carried out a periodic annual review of the ING Bank Śląski Group's Human Rights Declaration and updated it, inter alia, to include information on requirements arising from the *European Accessibility Act* and the Polish Accessibility Act, in accordance with the *Act of 26 April 2024 on ensuring compliance with accessibility requirements for certain products and services by economic operators.*

If a breach or risk of a human rights violation is identified, stakeholders (internal and external) can contact us through the whistleblowing channels. External stakeholders of the entire ING Bank Śląski Group can report irregularities via an external reporting channel, also available in English. In relation to internal stakeholders, the handling and response to reports is carried out within the framework of the internal ING Bank Śląski S.A. *Whistleblower Policy* and the *Anti-Discrimination and Anti-Harassment Policy*, the *Procedure Regulating How to Act in the event of a Suspicion of Undesirable Phenomena*, and the *Procedure for Handling Objections to the Bank's Conduct*. More information on the whistleblowing mechanism can be found here and our environmental, community and corporate governance policies are available on the website.

Meeting the prerequisites for minimum safeguards is an ongoing process that requires a constant process of monitoring and reporting on actions taken. In order to best understand the expectations of our stakeholders, we maintain an active dialogue with them (e.g. through regular dialogue sessions or roundtables), as well as by engaging in various partnerships with social organisations and NGOs. We regularly survey the opinions and evaluations of internal stakeholders, i.e. employees, inter alia, through the periodically conducted Organisational Health Index (OHI) survey. The interests of employees and their rights are represented by the employees' organisations – the employees' council and the trade unions.

In order to take action based on market best practice and independent expert opinion, we proactively participate in external initiatives. In 2025, ING representatives co-ordinated the work of the Minimum Safeguards Working Group of the *Sustainable Investment Forum* Poland (POLSIF). In January, at the bank's headquarters in Warsaw, we organised a workshop with representatives of the largest financial institutions in Poland, with the aim of discussing cases of assessing minimum safeguards for financed investments. ING experts were also invited to work together on the financial supplement to the Guide for Undertakings on the Application of EU Taxonomy Minimum Safeguards issued in 2025 by the Ministry of Development and Technology.

Our reporting obligations

Our quantitative reporting for the ING Bank Śląski Group for 2025 includes an assessment of the eligibility (Taxonomy-eligible) and alignment (Taxonomy-aligned) of exposures against all six environmental objectives of the EU Taxonomy. We prepared the disclosures using the new definition of the Green Asset Ratio (GAR) and the new reporting templates introduced by *Regulation 2026/73/EU*, which aims to simplify the taxonomic disclosures.

According to the current reporting templates, in the next reporting year credit institutions will additionally be required to show also the portion of assets that have not been assessed for eligibility or compliance with the Taxonomy. Such a situation may arise if clients preparing 2025 sustainability statements take the opportunity to omit the assessment of activities below the materiality threshold of 10%. In addition, credit institutions will be required to disclose key performance indicators relating to fee and commission income and the trading portfolio starting from 2028.

From exposures to economic sectors described in the Taxonomy, those classified as Taxonomy-eligible will be further distinguished to identify those that are Taxonomy-aligned. In order for an asset to be considered "green", i.e. Taxonomy-aligned, it must holistically meet the technical eligibility criteria for significant contribution and the "do no significant harm" (DNSH) principle. In addition, in the case of exposures to entities other than households, they should also ensure that their activities are carried out in accordance with "Minimum Safeguards".

To fulfil all these reporting obligations, we relied on the following in preparing the disclosures:

- data and information made public by our corporate clients in their non-financial reports for 2023 and 2024; we obtained most of this data through the ESG database developed and made available by BIK [Credit Information Bureau],
- actual data from energy performance certificates for buildings obtained from the Central Register of Energy Performance of Buildings,
- data related to the characteristics of the object of financing obtained in the course of the lending process for exposures to households and to corporate clients that have a "*known use of proceeds*" formula, i.e. the purpose for which the funds are to be used is known.

Our disclosures as a credit institution are based on prudential consolidation. They are prepared in several ways:

- total financial assets at the end of the year by type of client and financial instrument,
- credit financial guarantees provided to entities subject to the *Corporate Sustainability Reporting Directive (CSRD)*,

- exposures to non-financial undertakings subject to the *Corporate Sustainability Reporting Directive (CSRD)* at year-end by sector of activity,
- financial assets granted during the reporting year by type of client and financial instrument.

In addition, each of these snapshots is presented in two approaches, based on revenue (turnover KPIs) and based on capital expenditure (capex KPIs).

If we do not have publicly available or accurate key performance indicators of our counterparties, we use the latest available data disclosed by them in previous years. However, when we do not have such data either, we treat the exposure as non-eligible. We then assign a value of "zero" in the numerator of the relevant indicator, which means that we do not carry out any further analysis in this respect.

It is worth noting that the Taxonomy reporting framework does not yet constitute a closed catalogue, and the currently applicable regulations leave considerable room for interpretation, while market practice is still evolving.

Mandatory Taxonomy disclosures

Financing of financial and non-financial entities

With respect to our corporate segment exposures, as a first step we identified those clients who are subject — either directly or indirectly through their ultimate parent — to the obligation of non-financial reporting (within sustainability statements) in accordance with Directive 2022/2464/EU, as only these clients determine what proportion of their revenues (turnover), costs (operating expenditure) and capital expenditure (capex) is associated with activities described in the Taxonomy (both Taxonomy-eligible and Taxonomy-aligned).

In a further step, we split the on-balance-sheet debt exposures to these identified clients into those under a targeted funding formula ("*known use of proceeds*") and those under a general funding formula ("*unknown use of proceeds*").

For exposures under the general-purpose financing model ("unknown use of proceeds"), we recognised as Taxonomy-eligible and Taxonomy-aligned the gross carrying amount multiplied by the relevant KPI (key performance indicator) reported by the respective client or its parent undertaking in its 2023 and 2024 report.

We would like to note that in Taxonomy disclosures of undertakings for 2024, the breakdown of KPIs between Taxonomy-eligible and Taxonomy-aligned exposures by individual environmental objectives was not always applied (similarly to disclosures for 2023). Therefore, in our quantitative disclosures, we may have a situation where the sum of the values complying with individual environmental objectives is less than the total value complying with all environmental objectives.

Due to our cautious and conservative approach in recognising exposures to non-financial undertakings granted under the special purpose financing formula, we have not recognised Taxonomy-aligned assets from this, pending the formation of market practice in terms of documentation.

Household financing

With regard to our exposures to households, we analysed a portfolio of mortgage-backed loans and a portfolio of cash loans that were taken out to buy a car or to renovate a building/apartment.

Retail loans secured by residential real estates

For mortgage loans, in assessing their eligibility, based on the data we had, we selected only those loans aimed at the purchase or construction of real estate (activity 7.7 'Acquisition and ownership of buildings' indicated in Annex I of the updated Delegated Regulation 2021/2139).

For Taxonomy-eligible loans, in the next step we assessed which loans make a significant contribution to climate change mitigation on the basis of primary energy (EP) demand based on data from building energy performance certificates. For loans granted for residential properties built by the end of 2020, we have assumed a threshold of 15% of the most efficient buildings in the country based on estimates of the Ministry of Development and Technology of December 2025, i.e. for single-family houses 73.20 kWh/m^2 for 2025 reporting (83.91 kWh/m for 2024 reporting and 76.59 kWh/m^2 for earlier years) and for multi-family buildings 83.18 kWh/m^2 for 2025 reporting (81.86 kWh/m^2 for 2024 reporting and 76.59 kWh/m^2 for earlier years). For loans granted for residential real estate built after 2020, we have assumed the level of the building standard for nearly zero-emission buildings adjusted downwards by 10%, i.e. 63 kWh/m^2 for single-family houses and 58.5 kWh/m^2 for multi-family buildings.

For loans that contribute substantially to climate change mitigation, the next step of the analysis was to verify alignment with the Do No Significant Harm principle according to the technical screening criteria for this activity, i.e. to check whether the financed property is vulnerable to physical risk (acute or chronic) based on the precise geographical location of the property address. Only exposures secured by properties not exposed to high physical risk were recognised as Taxonomy-aligned exposures.

Retail cash loans

In the case of cash loans for the purchase of a car (activity 6.5 indicated in appendix I to the updated Delegated Regulation 2021/2139) or the renovation of a dwelling activity 7.3, 7.5 or 7.6 indicated in appendix I to the updated Delegated Regulation 2021/2139), their eligibility is assessed on the basis of the proof provided to us by the client (e.g. an invoice confirming the purchase), which amounts to at least 70% of the amount of the financing granted (and only this part is recognised as Taxonomy-eligible). Due to our cautious and conservative approach in selecting financial assets as Taxonomy-aligned, we have not recognised "green" exposures from this, pending the formation of market practice in terms of documentation.

Financing of local authorities

As our business model is not based on financing public housing and the financing we provide to local authorities is not in the form of specialised lending, we have not taxonomically verified our exposure to local authorities.

Green Asset Ratio (GAR)

Commission Delegated Regulation (EU) 2026/73 simplifying taxonomic disclosures introduced a new definition of the denominator of the GAR (green asset ratio) allowing for 100%. The table below shows the impact of this change on our key indicators for 2024.

Effect of changing the denominator definition on the Green Asset Ratio (GAR) for 2024

	Stock		Flow	
	Previous definition*	New definition**	Previous definition*	New definition**
Total gross assets (PLN million)	264,362		59,981	
Denominator of GAR (PLN million)	207,396	103,372	50,946	22,021
Green Asset Ratio (GAR) – KPI Turnover (%)	2.1%	4.2%	1.8%	4.3%
Green Asset Ratio (GAR) – KPI Capex (%)	2.5%	5.1%	2.7%	6.3%
GAR Coverage	78.5%	39.1%	84.9%	36.7%

**The GAR denominator according to the previous definition is equal to assets in gross carrying amount after excluding: exposures to sovereigns, supranational issuers, central banks and the trading portfolio*
***The GAR denominator under the new definition is equal to the assets in gross carrying amount to be assessed against the Taxonomy*

As a result of the revision, as at 2025 yearend we have recognised PLN 73.2 billion of Taxonomy-eligible assets by KPI turnover and PLN 75.6 billion by KPI capex, up by 19% and 19% y/y. From this pool, as environmentally sustainable, we have extracted PLN 8.2 billion of assets by KPI turnover and PLN 9.5 billion by KPI capex, which translates into 87% and 81% y/y growth respectively. This growth is responsible for:

- with respect to retail mortgage loans:
  - a significantly improved energy performance profile of newly originated mortgage loans in 2025,
  - a greater portfolio coverage with energy efficiency certificates,
  - meeting the eligibility criteria as at 2025 yearend by a portion of mortgage loans that did not meet them in 2024 (mainly loans granted in 2024 for which a mortgage entry in favour of the bank had not yet been established), which enabled their verification for taxonomy alignment,
  - aligning the approach with market practice in terms of compliance for construction loans;
- with respect to undertakings:
  - a significant improvement in Taxonomy ratios among clients with significant exposures, as well as new material financings provided to clients required to prepare sustainability statements,
  - streamlining the process of succession of reporting obligation status from the parent to subsidiaries, which expanded the pool of entities included in the calculation of exposures.

Our Green Asset Ratio (GAR) determined using the new denominator definition at the end of 2025 was 7.2% by KPI turnover and 8.3% by KPI capex.

Summary of the GAR KPI stock based on the new denominator definition

PLN million	2023*		2024*		2025		Change y/y	
	KPI turnover	KPI capex	KPI turnover	KPI capex	KPI turnover	KPI capex	KPI turnover	KPI capex
Taxonomy-eligible assets, including	49,035	49,764	61,465	63,496	73,153	75,619	19%	19%
retail mortgage loans	41,918	41,918	45,144	45,144	53,654	53,654	19%	19%
towards non-financial undertakings	703	1,535	4,113	5,860	6,044	7,851	47%	34%
towards financial undertakings	6,415	6,311	12,207	12,492	13,454	14,113	10%	13%
Taxonomy-aligned assets, including	1,282	1,348	4,385	5,227	8,205	9,456	87%	81%
retail mortgage loans	1,103	1,103	2,088	2,088	5,770	5,770	176%	176%
towards non-financial undertakings	179	244	530	1,131	443	1,250	-16%	11%
towards financial undertakings	-	1	1,767	2,008	1,991	2,436	13%	21%
Green Asset Ratio GAR	**1.53%**	**1.61%**	**4.24%**	**5.06%**	**7.21%**	**8.31%**	**+2,97p.p.**	**+3,25p.p.**

**Historical data has been recalculated in line with the new definition of the denominator of the Green Asset Ratio (GAR).*

Over 99% of our environmentally sustainable assets relate to the climate change mitigation objective, with retail mortgage loans representing the dominant category.

Summary of the GAR KPI by objective based on the new denominator definition

Objectives	2023*		2024*		2025		Change y/y	
	KPI turnover	KPI capex	KPI turnover	KPI capex	KPI turnover	KPI capex	KPI turnover	KPI capex
CCM	1.53%	1.56%	4.10%	4.89%	7.17%	8.29%	+3,07p.p.	+3,40p.p.
CCA	0.00%	0.03%	0.10%	0.07%	0.00%	0.01%	-0,10p.p.	-0,06p.p.
WTR	0.00%	0.00%	0.02%	0.03%	0.01%	0.01%	-0,01p.p.	-0,02p.p.
CE	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	+0,02p.p.	-
PPC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-	-
BIO	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-	-
Total	**1.53%**	**1.61%**	**4.24%**	**5.06%**	**7.21%**	**8.31%**	**+2,97p.p.**	**+3,25p.p.**

**Historical data has been recalculated in accordance with the new definition of the denominator of the Green Asset Ratio (GAR).*

The quantitative information required of credit institutions by appendix VI of the updated Regulation 2021/2178 can be found here.

We are aware of the challenges associated with the availability and quality of data to assess environmentally sustainable activities. Access to data and possible further EU regulatory adjustments in this area will have an impact on our business strategy and lending decisions, including the setting of quantitative targets. As at the reporting date, we had not defined quantitative targets in the form of Green Asset Ratio (GAR) and/or Banking Book Taxonomy Alignment Ratio (BTAR) indicators with respect to future investments in environmentally sustainable activities.

Trading portfolio

ING Bank Śląski's trading portfolio as at 2025 yearend was in line with the product mandate and consisted of interest rate derivatives, FX derivatives, FX spot and Polish and Czech government bonds. The portfolio of IRS transactions hedging loans that have been granted to finance sustainable support investments is growing successively. The portfolio characteristics did not differ significantly from the average risk exposure during the year.

Financing related to nuclear energy and natural gas

Among the entities identified as being subject to non-financial reporting obligations, we selected those non-financial clients whose principal business activity is classified under a Polish Classification of Activities (PKD) code describing activities related to nuclear energy or natural gas under the Taxonomy. In the next step, we selected, those companies that disclosed in their 2023 and 2024 reports that they have activities that qualify for those related to nuclear energy and natural gas, and then among these clients we identified companies whose activities are Taxonomy-aligned.

Taxonomy figures

The tables below present exposures at gross carrying amount in the banking book of the ING Bank Śląski S.A. Group, in line with prudential consolidation, as of 31 December 2025.

2025 - Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation					
Main KPI	Total exposure to Taxonomy-aligned activities (currency)		KPI		% coverage (over total assets)
	Turnover-based	CapEx-based	Turnover-based	CapEx-based	
Green asset ratio (GAR) stock	8,205	9,456	7.21%	8.31%	39.77%
Additional KPIs	Total exposure to Taxonomy-aligned activities (currency)		KPI		% coverage (over total assets)
	Turnover-based	CapEx-based	Turnover-based	CapEx-based	
Green asset ratio (GAR) flow	1,942	2,400	7.16%	8.85%	40.97%
Trading book*					
Financial guarantees stock	0.22	0.43	25.64%	50.88%	
Financial guarantees flow	-	-	-	-	
Assets under management**					
Fees and commissions income*					

** Not reported for 2025 (not mandatory); ** Article 7(2) and (3) and Section 1.1.2 of appendix V of the act delegated to Article 8 of the EUT; *** Article 7(1) and Section 1.2.4 of appendix V of the act delegated to Article 8 of the EUT;*

Turnover KPI

2025 - 1. Assets (stock) for the calculation of GAR (TURNOVER) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
1	**GAR - Covered assets in both numerator and denominator**	**113,813**	**73,153**	**8,205**	**8,162**	**5**	**14**	**23**	**-**	**-**	**5,770**	**37**	**633**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**113,813**	**73,153**	**8,205**	**8,162**	**5**	**14**	**23**	**-**	**-**	**5,770**	**37**	**633**
3	**Financial undertakings**	**31,244**	**13,454**	**1,991**	**1,989**	**2**	**-**	**-**	**-**	**-**	**-**	**30**	**307**
4	Loans and advances	28,421	12,225	1,872	1,870	2	-	-	-	-	-	23	260
5	Debt securities, including UoP	2,823	1,229	119	119	-	-	-	-	-	-	7	47
6	Equity instruments	-	-	-	-	-	-	-	-	-			-
7	**Non-financial undertakings**	**14,559**	**6,044**	**443**	**403**	**3**	**14**	**23**	**-**	**-**	**-**	**7**	**326**
8	Loans and advances	14,539	6,038	442	403	3	14	23	-	-	-	7	326
9	Debt securities, including UoP	20	6	1	1	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-			-
11	**Households**	**68,011**	**53,655**	**5,770**	**5,770**	**-**		**-**			**5,770**	**-**	**-**
12	of which loans collateralised by residential immovable property	68,009	53,654	5,770	5,770	-		-			5,770	-	-
13	of which building renovation loans	1	1	-	-	-		-			-	-	-
14	of which motor vehicle loans	-	-	-	-						-	-	-
15	**Local government financing**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
16	Housing financing	-	-	-	-	-		-			-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**-**	**-**	**-**	**-**	**-**		**-**			**-**	**-**	**-**
19	**Exposures included on voluntary basis**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**

2025 - 1. Assets (stock) for the calculation of GAR (TURNOVER) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
20	**Total GAR assets**	**113,813**	**73,153**	**8,205**	**8,162**	**5**	**14**	**23**	**-**	**-**	**5,770**	**37**	**633**
21	**Assets not covered for GAR calculation**	172,387											
22	**Central governments and Supranational issuers**	55,268											
23	**Central banks exposure**	6,352											
24	**Trading book**	2,332											
25	**Undertakings and entities not subject to CSRD**	81,317											
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	61,644											
27	Loans and advances	61,292											
28	of which loans collateralised by commercial immovable property	27,476											
29	of which building renovation loans	-											
30	Debt securities	33											
31	Equity instruments	319											
32	Non-EU country counterparties not subject to CSRD disclosure obligations	251											
33	Loans and advances	240											
34	Debt securities	-											
35	Equity instruments	11											
36	**Derivatives**	**73**											
37	**On demand interbank loans**	**172**											
38	**Cash and cash-related assets**	**865**											
39	**Other categories of assets (e.g. Goodwill, commodities etc.)**	**26,009**											
40	**Total assets**	**286,201**											
41	**Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations and local governments**	**0.8**	**0.4**	**0.2**	**0.2**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**0.2**
42	**Financial guarantees**	**0.8**	**0.4**	**0.2**	**0.2**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**0.2**
43	**Assets under management**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
44	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-
45	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 1. Assets (flow) for the calculation of GAR (TURNOVER) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
1	**GAR - Covered assets in both numerator and denominator**	**27,109**	**14,177**	**1,942**	**1,938**	**-**	**3**	**-**	**-**	**-**	**1,410**	**6**	**311**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**27,109**	**14,177**	**1,942**	**1,938**	**-**	**3**	**-**	**-**	**-**	**1,410**	**6**	**311**
3	**Financial undertakings**	**4,132**	**2,131**	**343**	**342**	**-**	**-**	**-**	**-**	**-**	**-**	**2**	**159**
4	Loans and advances	4,132	2,131	343	342	-	-	-	-	-	-	2	159
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-			-
7	**Non-financial undertakings**	**6,213**	**2,739**	**190**	**186**	**-**	**3**	**-**	**-**	**-**	**-**	**4**	**151**
8	Loans and advances	6,213	2,739	190	186	-	3	-	-	-	-	4	151
9	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-			-
11	**Households**	**16,764**	**9,308**	**1,410**	**1,410**	**-**		**-**			**1,410**	**-**	**-**
12	of which loans collateralised by residential immovable property	16,764	9,308	1,410	1,410	-		-			1,410	-	-
13	of which building renovation loans	1	-	-	-	-		-			-	-	-
14	of which motor vehicle loans	-	-	-	-						-	-	-
15	**Local government financing**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
16	Housing financing	-	-	-	-	-		-			-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**-**	**-**	**-**	**-**	**-**		**-**			**-**	**-**	**-**
19	**Exposures included on voluntary basis**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**

2025 - 1. Assets (flow) for the calculation of GAR (TURNOVER) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
20	**Total GAR assets**	**27,109**	**14,177**	**1,942**	**1,938**	**-**	**3**	**-**	**-**	**-**	**1,410**	**6**	**311**
21	**Assets not covered for GAR calculation**	39,059											
22	**Central governments and Supranational issuers**	9,687											
23	**Central banks exposure**	100											
24	**Trading book**	595											
25	**Undertakings and entities not subject to CSRD**	19,048											
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	16,830											
27	Loans and advances	16,769											
28	of which loans collateralised by commercial immovable property	7,193											
29	of which building renovation loans	-											
30	Debt securities	-											
31	Equity instruments	61											
32	Non-EU country counterparties not subject to CSRD disclosure obligations	200											
33	Loans and advances	198											
34	Debt securities	-											
35	Equity instruments	2											
36	**Derivatives**	**12**											
37	**On demand interbank loans**	**73**											
38	**Cash and cash-related assets**	**86**											
39	**Other categories of assets (e.g. Goodwill, commodities etc.)**	**9,458**											
40	**Total assets**	**66,168**											
41	**Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations and local governments**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
42	**Financial guarantees**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
43	**Assets under management**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
44	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-
45	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 2. GAR sector information (Turnover) (PLN million)

	Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives					
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*
Breakdown by sector - NACE 4 digits level									
7711 - Renting and leasing of cars and light motor vehicles	2,595	2,074	200	200	-	-	-	-	-
2015 - Manufacture of fertilisers and nitrogen compounds	1,233	181	8	8	-	-	-	-	-
4711 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	1,210	138	-	-	-	-	-	-	-
6120 - Wireless telecommunications activities	996	123	28	26	2	-	-	-	-
3511 - Production of electricity	972	945	-	-	-	-	-	-	-
6820 - Renting and operating of own or leased real estate	740	737	-	-	-	-	-	-	-
6110 - Wired telecommunications activities	593	350	-	-	-	-	-	-	-
6209 - Other information technology and computer service activities	396	16	-	-	-	-	-	-	-
4920 - Freight rail transport	234	230	-	-	-	-	-	-	-
4619 - Agents involved in the sale of a variety of goods	221	2	-	-	-	-	-	-	-
Nuclear activities	972	-	-						
Fossil gas activities	972	-	-						

The table above presents only taxonomy relevant sectors according to NACE codes, where the gross carrying amount has non-zero values after rounding to the nearest million PLN.

2025 - 3. GAR KPI stock (TURNOVER) (PLN million)

	% (compared to corresponding total covered assets in the denominator)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*				
1	**GAR - Covered assets in both numerator and denominator**	**64.27%**	**7.21%**	**7.17%**	**0.00%**	**0.01%**	**0.02%**	**0.00%**	**0.00%**	**5.07%**	**0.03%**	**0.56%**	**11.22%**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**64.27%**	**7.21%**	**7.17%**	**0.00%**	**0.01%**	**0.02%**	**0.00%**	**0.00%**	**5.07%**	**0.03%**	**0.56%**	**11.22%**
3	**Financial undertakings**	**43.06%**	**6.37%**	**6.37%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.10%**	**0.98%**	**14.80%**
4	Loans and advances	43.01%	6.59%	6.58%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08%	0.92%	15.32%
5	Debt securities, including UoP	43.52%	4.21%	4.21%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.26%	1.67%	9.68%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	**Non-financial undertakings**	**41.51%**	**3.04%**	**2.77%**	**0.02%**	**0.09%**	**0.16%**	**0.00%**	**0.00%**	**0.00%**	**0.05%**	**2.24%**	**7.33%**
8	Loans and advances	41.53%	3.04%	2.77%	0.02%	0.09%	0.16%	0.00%	0.00%	0.00%	0.05%	2.24%	7.33%
9	Debt securities, including UoP	29.31%	3.64%	3.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.09%	0.23%	12.42%
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
11	**Households**	**78.89%**	**8.48%**	**8.48%**	**0.00%**		**0.00%**			**8.48%**	**0.00%**	**0.00%**	**10.75%**
12	of which loans collateralised by residential immovable property	78.89%	8.48%	8.48%	0.00%		0.00%			8.48%	0.00%	0.00%	10.75%
13	of which building renovation loans	70.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
14	of which motor vehicle loans	70.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%
15	**Local government financing**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**0.00%**	**0.00%**	**0.00%**	**0.00%**		**0.00%**			**0.00%**	**0.00%**	**0.00%**	**0.00%**
19	**Exposures included on voluntary basis**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
20	**Total GAR assets**	**64.27%**	**7.21%**	**7.17%**	**0.00%**	**0.01%**	**0.02%**	**0.00%**	**0.00%**	**5.07%**	**0.03%**	**0.56%**	**11.22%**

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 4. GAR KPI flow (TURNOVER) (PLN million)

	% (compared to corresponding total covered assets in the denominator)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*				
1	**GAR - Covered assets in both numerator and denominator**	**52.30%**	**7.16%**	**7.15%**	**0.00%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.20%**	**0.02%**	**1.15%**	**13.70%**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**52.30%**	**7.16%**	**7.15%**	**0.00%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.20%**	**0.02%**	**1.15%**	**13.70%**
3	**Financial undertakings**	**51.56%**	**8.29%**	**8.28%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.05%**	**3.85%**	**16.08%**
4	Loans and advances	51.56%	8.29%	8.28%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	3.85%	16.08%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	**Non-financial undertakings**	**44.08%**	**3.06%**	**3.00%**	**0.00%**	**0.05%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.07%**	**2.44%**	**6.94%**
8	Loans and advances	44.08%	3.06%	3.00%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.07%	2.44%	6.94%
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
11	**Households**	**55.52%**	**8.41%**	**8.41%**	**0.00%**		**0.00%**			**8.41%**	**0.00%**	**0.00%**	**15.14%**
12	of which loans collateralised by residential immovable property	55.52%	8.41%	8.41%	0.00%		0.00%			8.41%	0.00%	0.00%	15.15%
13	of which building renovation loans	70.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
14	of which motor vehicle loans	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%
15	**Local government financing**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**0.00%**	**0.00%**	**0.00%**	**0.00%**		**0.00%**			**0.00%**	**0.00%**	**0.00%**	**0.00%**
19	**Exposures included on voluntary basis**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
20	**Total GAR assets**	**52.30%**	**7.16%**	**7.15%**	**0.00%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.20%**	**0.02%**	**1.15%**	**13.70%**

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 5. KPI off-balance sheet exposures (TURNOVER)

	% (compared to corresponding total off-balance sheet assets)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
		51.48%	**25.64%**	**25.64%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**1.04%**	**19.17%**
1	Financial guarantees (FinGuar KPI)	51.48%	25.64%	25.64%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.04%	19.17%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 5. KPI new off-balance sheet exposures (TURNOVER)

	% (compared to corresponding total off-balance sheet assets)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
		0.00%	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

Capex KPI

2025 - 1. Assets (stock) for the calculation of GAR (CAPEX) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
1	**GAR - Covered assets in both numerator and denominator**	**113,813**	**75,619**	**9,456**	**9,434**	**6**	**12**	**-**	**-**	**-**	**5,770**	**55**	**1,489**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**113,813**	**75,619**	**9,456**	**9,434**	**6**	**12**	**-**	**-**	**-**	**5,770**	**55**	**1,489**
3	**Financial undertakings**	**31,244**	**14,113**	**2,436**	**2,433**	**3**	**-**	**-**	**-**	**-**	**-**	**36**	**646**
4	Loans and advances	28,421	12,826	2,189	2,186	3	-	-	-	-	-	26	480
5	Debt securities, including UoP	2,823	1,287	247	247	-	-	-	-	-	-	10	166
6	Equity instruments	-	-	-	-	-	-	-	-	-			-
7	**Non-financial undertakings**	**14,559**	**7,851**	**1,250**	**1,231**	**4**	**12**	**-**	**-**	**-**	**-**	**19**	**844**
8	Loans and advances	14,539	7,845	1,249	1,230	4	12	-	-	-	-	18	844
9	Debt securities, including UoP	20	6	1	1	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-			-
11	**Households**	**68,011**	**53,655**	**5,770**	**5,770**	**-**		**-**			**5,770**	**-**	**-**
12	of which loans collateralised by residential immovable property	68,009	53,654	5,770	5,770	-		-			5,770	-	-
13	of which building renovation loans	1	1	-	-	-		-			-	-	-
14	of which motor vehicle loans	-	-	-	-						-	-	-
15	**Local government financing**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
16	Housing financing	-	-	-	-	-		-			-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**-**	**-**	**-**	**-**	**-**		**-**			**-**	**-**	**-**
19	**Exposures included on voluntary basis**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**

2025 - 1. Assets (stock) for the calculation of GAR (CAPEX) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
20	**Total GAR assets**	**113,813**	**75,619**	**9,456**	**9,434**	**6**	**12**	**-**	**-**	**-**	**5,770**	**55**	**1,489**
21	**Assets not covered for GAR calculation**	172,387											
22	**Central governments and Supranational issuers**	55,268											
23	**Central banks exposure**	6,352											
24	**Trading book**	2,332											
25	**Undertakings and entities not subject to CSRD**	81,317											
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	61,644											
27	Loans and advances	61,292											
28	of which loans collateralised by commercial immovable property	27,476											
29	of which building renovation loans	-											
30	Debt securities	33											
31	Equity instruments	319											
32	Non-EU country counterparties not subject to CSRD disclosure obligations	251											
33	Loans and advances	240											
34	Debt securities	-											
35	Equity instruments	11											
36	**Derivatives**	**73**											
37	**On demand interbank loans**	**172**											
38	**Cash and cash-related assets**	**865**											
39	**Other categories of assets (e.g. Goodwill, commodities etc.)**	**26,009**											
40	**Total assets**	**286,201**											
41	**Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations and local governments**	**0.8**	**0.5**	**0.4**	**0.4**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**0.1**
42	**Financial guarantees**	**0.8**	**0.5**	**0.4**	**0.4**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**0.1**
43	**Assets under management**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
44	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-
45	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 1. Assets (flow) for the calculation of GAR (CAPEX) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
1	**GAR - Covered assets in both numerator and denominator**	**27,109**	**15,087**	**2,400**	**2,396**	**1**	**3**	**-**	**-**	**-**	**1,410**	**8**	**694**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**27,109**	**15,087**	**2,400**	**2,396**	**1**	**3**	**-**	**-**	**-**	**1,410**	**8**	**694**
3	**Financial undertakings**	**4,132**	**2,229**	**509**	**509**	**-**	**-**	**-**	**-**	**-**	**-**	**3**	**285**
4	Loans and advances	4,132	2,229	509	509	-	-	-	-	-	-	3	285
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-			-
7	**Non-financial undertakings**	**6,213**	**3,550**	**482**	**478**	**-**	**3**	**-**	**-**	**-**	**-**	**6**	**409**
8	Loans and advances	6,213	3,550	482	478	-	3	-	-	-	-	6	409
9	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-			-
11	**Households**	**16,764**	**9,308**	**1,410**	**1,410**	**-**		**-**			**1,410**	**-**	**-**
12	of which loans collateralised by residential immovable property	16,764	9,308	1,410	1,410	-		-			1,410	-	-
13	of which building renovation loans	1	-	-	-	-		-			-	-	-
14	of which motor vehicle loans	-	-	-	-						-	-	-
15	**Local government financing**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
16	Housing financing	-	-	-	-	-		-			-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**-**	**-**	**-**	**-**	**-**		**-**			**-**	**-**	**-**
19	**Exposures included on voluntary basis**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**

2025 - 1. Assets (flow) for the calculation of GAR (CAPEX) (PLN million, multi-page table)

		Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
					CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
20	**Total GAR assets**	**27,109**	**15,087**	**2,400**	**2,396**	**1**	**3**	**-**	**-**	**-**	**1,410**	**8**	**694**
21	**Assets not covered for GAR calculation**	39,059											
22	**Central governments and Supranational issuers**	9,687											
23	**Central banks exposure**	100											
24	**Trading book**	595											
25	**Undertakings and entities not subject to CSRD**	19,048											
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	16,830											
27	Loans and advances	16,769											
28	of which loans collateralised by commercial immovable property	7,193											
29	of which building renovation loans	-											
30	Debt securities	-											
31	Equity instruments	61											
32	Non-EU country counterparties not subject to CSRD disclosure obligations	200											
33	Loans and advances	198											
34	Debt securities	-											
35	Equity instruments	2											
36	**Derivatives**	**12**											
37	**On demand interbank loans**	**73**											
38	**Cash and cash-related assets**	**86**											
39	**Other categories of assets (e.g. Goodwill, commodities etc.)**	**9,458**											
40	**Total assets**	**66,168**											
41	**Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations and local governments**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
42	**Financial guarantees**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
43	**Assets under management**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
44	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-
45	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 2. GAR sector information (Capex) (PLN million)

	Total gross carrying amount	of which Taxonomy-eligible	of which Taxonomy-aligned	Breakdown per environmental objectives					
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*
Breakdown by sector - NACE 4 digits level									
7711 - Renting and leasing of cars and light motor vehicles	2,595	2,212	600	600	-	-	-	-	-
2015 - Manufacture of fertilisers and nitrogen compounds	1,233	447	6	5	-	-	-	-	-
4711 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	1,210	717	21	21	-	-	-	-	-
6120 - Wireless telecommunications activities	996	281	189	188	-	-	-	-	-
3511 - Production of electricity	972	945	-	-	-	-	-	-	-
6820 - Renting and operating of own or leased real estate	740	738	-	-	-	-	-	-	-
6110 - Wired telecommunications activities	593	350	-	-	-	-	-	-	-
6209 - Other information technology and computer service activities	396	93	58	58	-	-	-	-	-
4920 - Freight rail transport	234	230	-	-	-	-	-	-	-
4619 - Agents involved in the sale of a variety of goods	221	77	-	-	-	-	-	-	-
Nuclear activities	972	-	-						
Fossil gas activities	972	-	-						

The table above presents only taxonomy relevant sectors according to NACE codes, where the gross carrying amount has non-zero values after rounding to the nearest million PLN.

2025 - 3. GAR KPI stock (CAPEX) (PLN million)

	% (compared to corresponding total covered assets in the denominator)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*				
1	**GAR - Covered assets in both numerator and denominator**	**66.44%**	**8.31%**	**8.29%**	**0.01%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.07%**	**0.05%**	**1.31%**	**12.50%**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**66.44%**	**8.31%**	**8.29%**	**0.01%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.07%**	**0.05%**	**1.31%**	**12.50%**
3	**Financial undertakings**	**45.17%**	**7.80%**	**7.79%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.12%**	**2.07%**	**17.26%**
4	Loans and advances	45.13%	7.70%	7.69%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.09%	1.69%	17.07%
5	Debt securities, including UoP	45.58%	8.75%	8.75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.35%	5.87%	19.20%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	**Non-financial undertakings**	**53.93%**	**8.59%**	**8.45%**	**0.03%**	**0.08%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.13%**	**5.80%**	**15.92%**
8	Loans and advances	53.96%	8.59%	8.46%	0.03%	0.08%	0.00%	0.00%	0.00%	0.00%	0.13%	5.80%	15.92%
9	Debt securities, including UoP	29.88%	4.38%	4.37%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27%	0.41%	14.66%
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
11	**Households**	**78.89%**	**8.48%**	**8.48%**	**0.00%**		**0.00%**			**8.48%**	**0.00%**	**0.00%**	**10.75%**
12	of which loans collateralised by residential immovable property	78.89%	8.48%	8.48%	0.00%		0.00%			8.48%	0.00%	0.00%	10.75%
13	of which building renovation loans	70.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
14	of which motor vehicle loans	70.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%
15	**Local government financing**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**0.00%**	**0.00%**	**0.00%**	**0.00%**		**0.00%**			**0.00%**	**0.00%**	**0.00%**	**0.00%**
19	**Exposures included on voluntary basis**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
20	**Total GAR assets**	**66.44%**	**8.31%**	**8.29%**	**0.01%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.07%**	**0.05%**	**1.31%**	**12.50%**

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 4. GAR KPI flow (CAPEX) (PLN million)													
% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*				
1	**GAR - Covered assets in both numerator and denominator**	**55.65%**	**8.85%**	**8.84%**	**0.00%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.20%**	**0.03%**	**2.56%**	**15.91%**
2	**Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation**	**55.65%**	**8.85%**	**8.84%**	**0.00%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.20%**	**0.03%**	**2.56%**	**15.91%**
3	**Financial undertakings**	**53.94%**	**12.31%**	**12.31%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.06%**	**6.89%**	**22.83%**
4	Loans and advances	53.94%	12.31%	12.31%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	6.89%	22.83%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
7	**Non-financial undertakings**	**57.14%**	**7.75%**	**7.69%**	**0.01%**	**0.04%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.09%**	**6.59%**	**13.57%**
8	Loans and advances	57.14%	7.75%	7.69%	0.01%	0.04%	0.00%	0.00%	0.00%	0.00%	0.09%	6.59%	13.57%
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
11	**Households**	**55.52%**	**8.41%**	**8.41%**	**0.00%**		**0.00%**			**8.41%**	**0.00%**	**0.00%**	**15.14%**
12	of which loans collateralised by residential immovable property	55.52%	8.41%	8.41%	0.00%		0.00%			8.41%	0.00%	0.00%	15.15%
13	of which building renovation loans	70.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
14	of which motor vehicle loans	0.00%	0.00%	0.00%						0.00%	0.00%	0.00%	0.00%
15	**Local government financing**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
16	Housing financing	0.00%	0.00%	0.00%	0.00%		0.00%			0.00%	0.00%	0.00%	0.00%
17	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	**Collateral obtained by taking possession: residential and commercial immovable properties**	**0.00%**	**0.00%**	**0.00%**	**0.00%**		**0.00%**			**0.00%**	**0.00%**	**0.00%**	**0.00%**
19	**Exposures included on voluntary basis**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
20	**Total GAR assets**	**55.65%**	**8.85%**	**8.84%**	**0.00%**	**0.01%**	**0.00%**	**0.00%**	**0.00%**	**5.20%**	**0.03%**	**2.56%**	**15.91%**

2025 - 5. KPI off-balance sheet exposures (CAPEX)

% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
		58.83%	**50.88%**	**50.88%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.15%**	**12.26%**
1	Financial guarantees (FinGuar KPI)	58.83%	50.88%	50.88%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	12.26%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

2025 - 5. KPI new off-balance sheet exposures (CAPEX)

% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objectives						of which KUoP	of which transitional	of which enabling
				CCM*	CCA*	WTR*	CE*	PPC*	BIO*			
		0.00%	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**	**0.00%**
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

** Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and marine resources (WTR); Circular economy (CE); Pollution (PPC); Biodiversity and Ecosystems (BIO)*

Social information (S)

Due to the important role they play in the economy and society, financial institutions can have a considerable impact on social issues. We recognise this particularly in relation to our customers and employees. By taking care of our staff and actively working with our clients, we try to create value that goes beyond financial metrics. We recognise this particularly in relation to our customers and employees. By caring for our people and actively engaging with our customers, we aim to create value beyond financial metrics. We believe that financially healthy people contribute to a healthy economy and drive social progress, and that responsible stewardship of human resources contributes to the success of the entire organisation.

In this section, we present information on ING's important sustainability issues that relate to the social area:

- **S1 Own workforce:**
  - Working conditions,
  - Equal treatment and opportunities for all;
- **S4 Consumers and End-users:**
  - Information-related impacts for consumers and/or end-users
  - Social inclusion of consumers and/or end-users.

Own workforce (S1)

SBM-3

By “workforce” we mean our employees, i.e. those employed under a contract of employment. This group also includes those who are not employed under an employment contract but carry out tasks for ING under other forms of contracts and those employed by temporary employment agencies. Employees employed under employment contracts make up over 93% of our workforce.

At the 2025 yearend the ING Bank Śląski Group employed 7,693 people. They are mainly experts in the field of finance, but also specialists in other fields, such as IT or modern technology. Women account for 62% of the total workforce. Compared to the end of last year, the number of employees in the Group decreased by 308, a decrease of 3.8%. ING Bank Śląski alone employed 7,256 people as at 2025 yearend, 297 fewer than year before.

Information on personnel costs is presented here.

Material topics	IRO type
Secure employment	⊕ ⊖
Work-life balance	⊖
Training and skills development	⊕
Diversity	⊕ ⚠
Gender equality and equal pay for work of equal value	⊖ ⚠
Employment and inclusion of persons with disabilities	⚠
Measures against violence and harassment in the workplace	⊖ ⚠

⊕ Actual positive impact
⊖ Actual negative impact
⊕ Potential positive impact
⊖ Potential negative impact
Opportunity
⚠ Risk

Full description of material impacts, opportunities and risks can be found here

S1-7

The range of tasks and projects we carry out means that we also use other forms of cooperation, such as B2B contracts, Body Leasing arrangements or temporary work. These solutions are mainly used in the areas of operations and IT, as well as in cooperation with external consultants of various specialisations

- **B2B** – cooperation with sole traders conducting single-person business activity. The terms of cooperation, including remuneration, place and time of work, are agreed with the contractor in each case. This form is primarily used to fill in missing competences in the organisation or to carry out specialised, temporary tasks.
- **Civil law contracts** – forms of cooperation regulated by the Civil Code, including, inter alia, mandate contracts, work contracts and internships. We mainly use them when we need additional competences or support for specific, specialised tasks of a periodic nature.

- **Body Leasing** – refers to a form of cooperation based an agreement between the contracting entity and a service provider. This agreement does not involve the provision of employees, but the delivery of specific services by a third-party company. We use this form of cooperation primarily when we require competencies that are not available within the organisation.
- **Temporary agency workers** perform tasks of a temporary nature for a single user employer, for a period not exceeding 18 months within a consecutive 36-month period. This form of employment makes it possible to fill staff shortages for tasks that do not require specialised knowledge and to respond flexibly to changes in processes. It is particularly useful in situations of increased, short-term demand for labour, such as seasonal projects.

Our employees in numbers

S1-6

Number of employees

	2021	2022	2023	2024	2025
Total Bank	**8,179**	**7,925**	**7,906**	**7,553**	**7,256**
Headquarters in Katowice	3,750	3,612	3,660	3,744	3,724
Headquarters in Warsaw	882	994	1,228	1,254	1,275
Branches	3,547	3,319	3,018	2,555	2,257
Total Subsidiaries	**446**	**438**	**473**	**448**	**437**
ING Lease (Polska) Sp. z o.o.	246	237	240	218	209
ING Commercial Finance Polska S.A.	116	114	113	109	104
ING Bank Hipoteczny S.A.	38	36	36	32	32
ING Usługi dla Biznesu Sp. z o.o.	43	37	36	33	33
Nowe Usługi S.A.	3	3	3	3	3
SAIO Spółka Akcyjna	-	11	14	22	24
Paymento Financial S.A.	-	-	31	31	32
ING Bank Śląski Capital Group	**8,625**	**8,363**	**8,379**	**8,001**	**7,693**

The systematic decrease in the workforce is due to the restructuring programme adopted for the period 2024-2026, about which we write more here.

Full-Time Equivalent (FTE) Headcount

	2021	2022	2023	2024	2025
Total Bank	8,143	7,895	7,874	7,505	7,215
Total Subsidiaries	432	427	459	442	431
ING Bank Śląski Capital Group	**8,575**	**8,322**	**8,333**	**7,947**	**7,646**

S1-7

Number of other persons working for the organisation

	2022	2023	2024	2025
B2B	178	216	276	268
Civil law contracts	446	378	219	264
Body Leasing	139	109	110	1
Temporary agency workers	44	56	45	39
Total	**807**	**759**	**650**	**572**

The reduction in Body Lease collaborations in 2025 relative to previous years is due to a change in approach to the services performed by Body Leasing arrangements and outsourcing them outside the organisation (outsourcing).

Number of employees broken down by gender and full-time equivalent contract of employment

	2021	2022	2023	2024	2025
Woman	**5,568**	**5,354**	**5,274**	**4,971**	**4,742**
Full-time	5,468	5,275	5,193	4,884	4,663
Part-time	100	79	81	87	79
Man	**3,057**	**3,009**	**3,105**	**3,030**	**2,951**
Full-time	3,007	2,965	3,053	2,968	2,892
Part-time	50	44	52	62	59
Total	**8,625**	**8,363**	**8,379**	**8,001**	**7,693**
Full-time	8,475	8,240	8,246	7,852	7,555
Part-time	150	123	133	149	138

Number of employees broken down by gender and duration of employment contract

	2021	2022	2023	2024	2025
Woman	**5,568**	**5,354**	**5,274**	**4,971**	**4,742**
Indefinite period	5,161	5,107	5,112	4,830	4,599
Fixed term	407	247	162	141	143
Man	**3,057**	**3,009**	**3,105**	**3,030**	**2,951**
Indefinite period	2,796	2,856	2,994	2,926	2,849
Fixed term	261	153	111	104	102
Total	**8,625**	**8,363**	**8,379**	**8,001**	**7,693**
Indefinite period	7,957	7,963	8,106	7,756	7,448
Fixed term	668	400	273	245	245

Methodological note:

1 *We provide all data on the number of our employees and collaborators with ING as at the last day of the reported period in headcount.*
2 *According to the definition of an employee, there are no cases of persons employed on a contract of employment who would not have guaranteed working hours.*
3 *The gender categories "Other" and "Not reported" are not included in the tables, as there were no reports in these categories from employees.*

Number of newly hired employees by gender

	2021	2022	2023	2024	2025
Women	429	340	242	156	151
Men	492	342	296	178	140
Total	**921**	**682**	**538**	**334**	**291**

Number of employees who left during the reporting year

	2021	2022	2023	2024	2025
Women	**464**	**575**	**444**	**477**	**416**
Voluntary leaves	245	278	217	220	179
Involuntary leaves	219	297	227	257	237
Men	**305**	**376**	**248**	**252**	**218**
Voluntary leaves	234	256	165	131	114
Involuntary leaves	71	120	83	121	104
Total – total leaves	**769**	**951**	**692**	**729**	**634**
Voluntary leaves	479	534	382	351	293
Involuntary leaves	290	417	310	378	341

Employee turnover rate

	2021	2022	2023	2024	2025
Women	**8.3%**	**10.7%**	**8.4%**	**9.6%**	**8.8%**
Voluntary leaves	4.4%	5.1%	4.0%	4.3%	3.7%
Involuntary leaves	3.9%	5.5%	4.2%	5.0%	4.9%
Men	**10.0%**	**12.5%**	**8.0%**	**8.3%**	**7.4%**
Voluntary leaves	7.7%	8.5%	5.4%	4.3%	3.8%
Involuntary leaves	2.3%	4.0%	2.7%	3.9%	3.5%
Total leaves	**8.9%**	**11.2%**	**8.2%**	**8.9%**	**8.1%**
Voluntary leaves	5.5%	6.3%	4.5%	4.3%	3.7%
Involuntary leaves	3.4%	4.9%	3.7%	4.6%	4.3%

Methodological note: Voluntary departures take into account departures at the initiative of the employee, including retirements, involuntary departures result from contract termination at the initiative of ING and due to the death of the employee. Employee turnover rate excludes turnover between entities within the ING Group. The turnover rate is the number of employee departures in a given year divided by the average number of employees in the same period.

S1-9

Number of employees broken down by employment level and age group and gender

	2021			2022			2023			2024			2025		
	Women	Men	Total	Women	Men	Total	Women	Men	Total	Women	Men	Total	Women	Men	Total
Senior management	62	130	192	65	138	203	64	144	208	71	137	208	86	146	232
30-50 years	35	85	120	34	91	125	32	89	121	35	82	117	38	84	122
Over 50 years	27	45	72	31	47	78	32	55	87	36	55	91	48	62	110
Management	291	245	536	293	247	540	298	255	553	274	257	531	268	240	508
Under 30 years	2	7	9	1	6	7	3	4	7	1	3	4		1	1
30-50 years	220	191	411	214	185	399	203	188	391	186	185	371	172	175	347
Over 50 years	69	47	116	78	56	134	92	63	155	87	69	156	96	64	160
Other employees	5,215	2,682	7,897	4,996	2,624	7,620	4,912	2,706	7,618	4,626	2,636	7,262	4,388	2,565	6,953
Under 30 years	748	574	1,322	614	480	1,094	569	470	1,039	466	407	873	409	334	743
30-50 years	3,631	1,744	5,375	3,470	1,763	5,233	3,364	1,808	5,172	3,138	1,774	4,912	2,922	1,742	4,664
Over 50 years	836	364	1,200	912	381	1,293	979	428	1,407	1,022	455	1,477	1,057	489	1,546
Total	**5,568**	**3,057**	**8,625**	**5,354**	**3,009**	**8,363**	**5,274**	**3,105**	**8,379**	**4,971**	**3,030**	**8,001**	**4,742**	**2,951**	**7,693**
Under 30 years	750	581	1,331	615	486	1,101	572	474	1,046	467	410	877	409	335	744
30-50 years	3,886	2,020	5,906	3,718	2,039	5,757	3,599	2,085	5,684	3,359	2,041	5,400	3,132	2,001	5,133
Over 50 years	932	456	1,388	1,021	484	1,505	1,103	546	1,649	1,145	579	1,724	1,201	615	1,816

Methodological note:

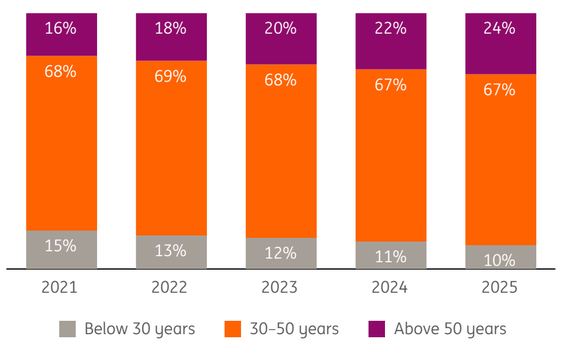
1 Senior managers are considered to be those employed in positions of grade 19 and above (out of 21 grades) and acting as supervisors for at least one employee.

2 Employees classified below grade 19 and who are supervisors for at least 1 member of staff are considered to be managers.

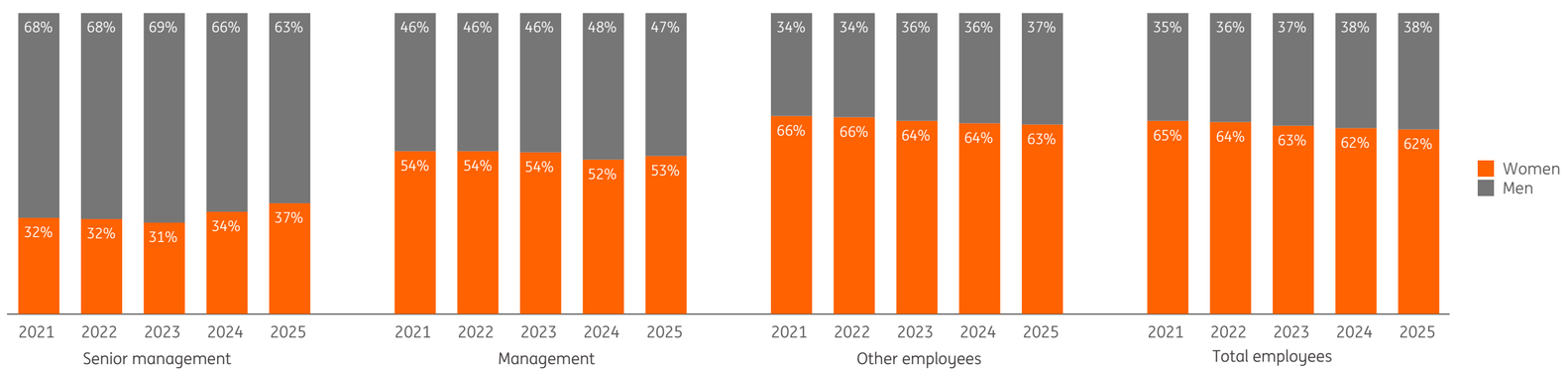
3 The Bank Management Board is included in Senior Management.

4

Employee structure by age



Employee structure by employment category



Employee relationship management

S1-2

Employees are our most valuable asset. We therefore place great importance on maintaining high-quality dialogue with both employees and social partners, using a variety of communication channels. The Center of Expertise HR is responsible for employee dialogue and regularly conducts employee opinion surveys. These surveys help us better understand employees' perspectives, including in areas related to our strategy, working conditions and their expectations towards the organisation.

Channels of communication with employees

We communicate with employees through several channels. Information flows both unidirectionally (informative or educational emails, newsletters, news on the intranet) and bidirectionally. The latter are very often self-service tools such as posts on the Viva Engage community to share knowledge, thoughts and initiate actions from below, or an events calendar to help manage training and conferences. Chat rooms and survey applications are used to collect opinions.

Our employees work from multiple locations, both from offices and from home, so digital channels predominate in communication:

- **Newsletters** – the most popular form of communication alongside emails. A well-being newsletter (12 issues) and a BRAVO weekly summary (20 issues from July 2025) are sent to all employees, replacing the CEO's newsletter Let's stay in touch (10 issues). In turn, a package of communications is directed to subscribers or selected groups – daily to employees of the Retail Clients Division, weekly newsletter of the Business Clients Division, newsletter of the recruitment team (3 issues).
- **Intranet ING Today** – its page views exceeded 4 million on an annual basis. The home page with news generates the most clicks. We publish around 250 news items per month. The most-read news item had more than 14,800 views. The HR pages and events calendar are among the most popular.
- **Viva Engage** – the most popular of the around 500 social channels in 2025 are: @Goodly Informed, @Active ING, @Universum MB (CEO's blog), @Just Simply, or the @Volunteer ING community run jointly with the ING for Children Foundation. Also frequently visited are the employee network communities – @Diverse, @Women of ING, @Gen Z, @Rainbow Lions Poland Bank and, due to the implementation of new tools, the @Microsoft 365 community.
- **Chats** – a tool that allows people to ask questions anonymously. In 2025 there were 2 chats with Management Board members, 5 thematic chats including HR, IT, fraud prevention. They gather from several hundred to several thousand participants. The chat with the CEO was the most popular (attended by nearly 2,800 employees, around 600 questions were asked).
- **eBaśka** - 3 issues of the electronic magazine and one paper edition in a magazine format.
- **OHI survey** – employee engagement is crucial for achieving our shared goals, so we regularly ask them about what most influences their work and what they need to find satisfaction in it. We conduct the full Organisational Health Index (OHI) survey every two years, while every six months we conduct the OHI Pulse – a shorter version of the survey that asks about selected, most relevant aspects of an organisation's performance.

In terms of direct communication, it is worth noting the following:

- **Organisational Culture Ambassadors** – in their areas they support organisational culture building and employee engagement. They help to communicate and work with OHI results so that they translate into concrete actions. With AKO, the organisation can more effectively understand the needs of employees and implement changes to improve their experience.
- **Employee Networks** are 4 thriving initiatives (Diverse, Women of ING, Gen Z, Rainbow Lions Poland Bank), which this year initiated, among other things, a series of events under the slogan September as the month of empathy and a total of a dozen meetings (including the SHEspresso and Gen Z Talks series) with informal leaders, directors and the Bank Management Board.
- **A series of meetings between the bank's new CEO and employees** – since taking up his new role in May, the CEO has met personally with employees at branches and headquarters. During 2025, he visited regional offices in Łódź, Gdańsk, Kraków, Warsaw, Bielsko-Biała, Wrocław, Lublin, Katowice and Poznań, meeting with a total of over 1,000 employees. Another 20 meetings were held with key support units of the bank and companies of the capital group.
- **Strategic meetings** – in November at the Spodek in Katowice, the Bank Management Board announced a new long-term strategy ING – In the Beat of Life. The event was attended by 6,200 employees. On the other hand, during Sustainability Week, which was held under the slogan Inspire yourself to take action 11 events took place, gathering an average of around 400 people each. In total, more than 1,600 people attended the event..

Relations with the social partners

Employee Council

We apply a policy of actively engaging employees and their representatives in dialogue on employment-related matters, ensuring that they have a real influence on decisions that affect them. The Works Council has been operating at the Bank since 2006 and, since 2010, has been elected by employees in free and direct elections. Its composition is broader than required by the Polish Act on Informing and Consulting Employees. The Council operates on the basis of an agreement concluded with the employer, which sets out the schedule of its work, the principles for interactions with the employer's representatives, and the rules governing mutual communication, consultations and the collection of opinions. Once a quarter, the Employee Council holds a meeting with the

President of the Management Board to discuss ongoing projects, planned changes and the financial performance of the institution in the context of personnel policy. The Council also holds ad hoc meetings with senior executives from the various business lines to discuss details of ongoing projects, planned changes in the divisions. During the meetings, council representatives report to the employer on matters referred to the council directly from employees. These matters relate to ongoing work, proposed changes and improvements.

Company trade union organisation

Independently of the Employee Council, the bank also has a company Trade Union Organisation. The dialogue with the trade union touches on issues related to statutory obligations to consult and agree on both collective labour law and individual employee matters.

Together with the trade union organisation, we have decided not to conclude a collective agreement, while it is a standard of our relationship to agree annually on the principles of the increase shares to be launched and the package of additional benefits for employees leaving the bank as a result of restructuring processes (cash severance). Any negotiations we have with trade union representatives or agreements with the Employee Council are carried out on behalf of all our employees.

An important aspect of the social dialogue is the participation of 3 representatives of the bank in the structures of the ING Group European Employee Council. As part of this cooperation, our representatives are able to present internationally on issues related to the functioning of the organisation in Poland and exchange experiences with other countries.

The costs related to trade union activities in 2025 amounted to PLN 627 thousand, compared to PLN 604 thousand in 2024

Percentage of employees who are members of a trade union organisation active in the bank					
	2021	2022	2023	2024	2025
Percentage of employees who are members of a trade union organisation active in the bank	5.4%	5.5%	6.0%	6.9%	7.0%
Percentage of employees represented by the Employee Council and a trade union organisation operating at the Bank	100%	100%	100%	100%	100%

Whistleblowing channels for reporting breaches and concerns available to employees

We maintain an open and transparent dialogue with employees, providing formal channels for raising concerns, needs, and potential violations. All employees have access to mechanisms for reporting concerns, in the form of the Whistleblower app and the ability to report irregularities via a dedicated email box or by name to the Centre of Expertise – Compliance, which is the internal organisational unit authorised to receive reports, including the Whistleblower Reporting Officer. These mechanisms allow for the reporting of cases related to discrimination, bullying, workplace safety and other potential violations of employee rights. We ensure that our employees are aware of and trust the established channels for reporting breaches. More information on whistleblowing channels and training on applicable ethics rules can be found here.

Trusted Person

As an employer, ING attaches great importance to fostering the right attitudes in various work situations. One of the organisation's needs is to provide systematic support to individuals navigating difficult, often conflict-related situations that affect their workplace experience and performance. Since 2024, the role of a trusted person has been in place at ING. The purpose of the trusted person role is to provide support to employees in workplace conflict situations, ensuring that all employees feel they are treated with dignity and respect, while not tolerating any forms of inappropriate conduct within the employment relationship.

Trusted Persons have completed a certification training programme preparing them to perform this role, as well as to act as internal mediators. In total, the organisation has 17 trustee members who have supported around 60 employees since the role began.

We know how employees rate us

S1-5, MDR-T

Engaged employees are the foundation of our organisation, so we regularly ask them about the factors that most influence their work and what they need to achieve full satisfaction. We invite employees to participate in regular and anonymous surveys such as OHI, OHI Pulse, as well as thematic surveys covering Diversity & Inclusion, Wellbeing, the Hybrid Work Model and Risk Culture.

The Organisational Health Index (OHI) survey measures an organisation's ability to adapt and innovate for long-term success. The study focuses on key organisational skills and capabilities related to issues such as leadership, innovation and education. As part of this survey, we also look at how our relationships with clients and the outside world are going. Employees also have the opportunity to add comments in response to open questions. "What are the best aspects of working at ING?" and "What could be improved at ING?".

The survey and methodology are provided by the renowned McKinsey & Company, which significantly contributes to the reliability of the result. With a sample of more than 600 different organisations worldwide and a total surveyed population of more than 2.5 million corporate employees, the study provides meaningful references to a general benchmark outside ING.

In 2025, two OHI Pulse surveys took place in May and October. Survey attendance is increasing year on year. In the May survey, we achieved a record turnout of 89%. In October, 88% of employees participated in the survey.

The questions in the survey allow us to monitor priority indicators such as strategy clarity, role clarity, organisational discipline, data-driven decision-making, talent development and client centricity. Compared to the benchmark, i.e. other organisations in the FinTech sector, the performance of the ING Bank Śląski Group's priorities: "Clarity of strategy", "Client centricity" and "Operational discipline", and have been in the top decile, i.e. that our score is higher than 90% of the surveyed organisations globally; while the score for the priority "Clarity of role" remains in the top quartile, i.e. that our score is higher than 75% of the surveyed organisations.

We also examine employee satisfaction, commitment, as well as aspects of their work experience such as work-life balance, workload, relationship with their manager and sense of belonging:

- Commitment to work, i.e. response to the question "Does work give me a sense of personal satisfaction?" in the October 2025 OHI survey, 80% of respondents agree with this statement, compared to 79% in 2024.
- Engagement in the organisation, understood as the response to the question "I would most likely recommend ING as a good employer" – in the OHI survey from October 2025, 84% of respondents agree with this statement; this indicator has not changed compared to the previous year.
- We measure the sense of belonging from 2023 with the Inclusion Index, which consists of five questions. In 2025, the index remains unchanged from 2024, at a high level of 86%.
- Employee well-being is a new indicator that we measured in the May edition of the survey. The well-being Index consists of six questions, and this year it was 82%.

In addition, we study the employee Net Promoter Score (NPS) by asking the question "How likely would you be to recommend to family, colleagues and friends to become an ING client"? The NPS score is calculated in accordance with the generally accepted methodology and in the October 2025 OHI Pulse survey we recorded an increase in the value of this indicator by 5 points (to 53) compared to the October 2024 score.

In addition to answering the questionnaire, our staff also left precise indications of what they need in the form of comments on the open questions. Both surveys received over 8,000 comments.

The opinions of our employees are the foundation of our actions

After each OHI survey, the results and comments are thoroughly analysed and based on these, plans are made on how to improve our organisation – how to strengthen our strengths and develop areas that need improvement. The survey also helps us not to lose momentum, to have an ongoing dialogue and to respond quickly to employee feedback.

Working conditions

Secure employment

At ING, we provide our employees with stable employment conditions. Over 93% of our total workforce consists of employees on permanent contracts, of which 97% have indefinite-term contracts. The average length of employment is 14.0 years, and the turnover rate remains below the industry average (i.e. 8.1% in 2025 and 8.9% in 2024). Alternative forms of employment are regulated in the *Bylaw – Alternative Forms of Cooperation at ING Bank Śląski S.A.* and result from periodic demand for support work or one-off activities, variability in demand for work related to process restructuring or project implementation, seasonal/periodic fluctuations in demand for work or the operation of mobile networks and banking representatives. The use of forms of employment other than the employment contract should be limited in time and must not build a long-term relationship with co-workers.

Policies

S1-1, MDR-P

The most important internal documents regarding the shaping of working conditions and remuneration in the ING Bank Śląski S.A. Group include:

Document name	Related relevant sustainability issues
ING Bank Śląski S.A. Labour Bylaw	• Working conditions – secure employment • Work-life balance, working hours
ING Bank Śląski Group Remuneration Policy	• Working conditions – secure employment • Gender equality and equal pay for work of equal value
ING Bank Śląski S.A. Employee Remuneration Bylaw	• Working conditions – secure employment • Gender equality and equal pay for work of equal value
ING Bank Śląski S.A. Employee Evaluation Bylaw (Step up)	• Gender equality and equal pay for work of equal value • Training and skills development

The above bylaws apply to all employees and are set in close cooperation with the social side, which makes suggestions to the employer in the course of analysing the changes, reflecting the needs of our employees. Taking care of the consistency of regulations across the ING Bank Śląski S.A. Group, once the bylaw has been updated at the bank level, the changes are implemented in the regulations in force in the subsidiaries and approved by the management boards of the individual companies. The exception is the *ING Bank Śląski S.A. Group Remuneration Policy*, which is a document common to all companies. The policy is enacted by the Bank Supervisory Board and subsequently adopted by the supervisory boards of group entities. The Centre of Expertise HR is the owner of the policies and the entity responsible for updating them. All documents are available to employees on the intranet.

In the table below, we provide a summary of the applicable regulations by key Group companies:

ING Bank Śląski S.A.	ING Bank Hipoteczny S.A.	ING Lease sp. z o.o.	ING Commercial Finance S.A.
ING Bank Śląski S.A. Labour Bylaw	*ING Bank Hipoteczny S.A. Labour Bylaw*	*ING Lease (Polska) Sp. z o.o. Labour Bylaw*	*ING Commercial Finance Polska S.A. Labour Bylaw*
ING Bank Śląski S.A. Employee Remuneration Bylaw	*ING Bank Hipoteczny S.A. Remuneration Policy*	*ING Lease (Polska) Spółka z.o.o. Employee Remuneration Bylaw*	*ING Commercial Finance Polska S.A. Employee Remuneration Bylaw*
ING Bank Śląski S.A. Employee Evaluation Bylaw (Step up)	*ING Bank Hipoteczny S.A. Employee Evaluation Bylaw (Step up)*	*ING Lease (Polska) Sp. z o.o Employee Evaluation Bylaw*	*ING Commercial Finance Polska S.A. Employee Evaluation Bylaw (Step Up)*

ING Bank Śląski S.A. Labour Bylaw

The ING Bank Śląski S.A. Labour Bylaw establishes the organisation and order of the work process and the related rights and obligations of the employer and employees, including the principles of remote working. At the same time, the bylaw addresses issues arising from the *International Labour Organisation Conventions* by setting minimum requirements regarding, for example, working time and annual leave, human and workers' rights, freedom of association and protection of trade union rights, abolition of discrimination in employment, insurance against accidents at work and occupational diseases, and occupational health and safety. Implementing the guidelines of the *International Labour Organisation Convention*, ING declares the non-use of forced or compulsory labour in all its forms. At the same time, we confirm that we do not employ children or young workers, and that the condition of employment of an employee is that he or she has full legal capacity. Regulatory provisions are reflected in practice. Thus, we declare that its personnel policy confirms that the organisation addresses the issues of human trafficking, forced or compulsory labour and child labour in a clearly negative way.

In the bylaw, we emphasise that ING employees have the right to freedom of association, including the right to form and join trade unions. ING guarantees the established organisations the right to draw up their own statutes and bylaws, freely elect their representatives, appoint their Management Board, activities and set their agenda. At the same time, the employer bears the costs of the entities established under the *Trade Union Act* and *the Act on Informing and Consulting Employees*.

Remuneration regulations

The ING Bank Śląski S.A. Group Remuneration Policy sets out the key assumptions for shaping the remuneration policy used to attract and retain employees by ensuring market-competitive remuneration levels and defines the remuneration components. The Policy:

- supports the implementation of the business strategy and the short, medium and long-term interests of the organisation and its clients,
- supports sound and effective risk management to maintain and protect the bank's secure capital base and does not encourage excessive risk taking beyond the risk appetite approved by the Supervisory Board of ING Bank Śląski S.A.,
- is gender-neutral, which means not creating conditions for undue preference for either gender in terms of employment, career development, promotions and the award and payment of remuneration.
- determines the level of remuneration of the members of the Management Board in relation to the remuneration of other employees,
- identifies the elements that make up the annual review of the remuneration system and the remuneration-related indicators monitored.

The Policy is a document adopted by the Supervisory Board of ING Bank Śląski S.A., and then implemented within the internal regulations of the group's companies. This approach guarantees uniformity across all group entities. It is mandatory that the policy is reviewed annually and updated as required by changes in the regulatory or market environment.

The regulation that formulates the remuneration principles is the *ING Bank Śląski S.A. Employee Remuneration Bylaw* and its appendices. The Remuneration Bylaw sets out the rules for the remuneration of employees employed by ING and the granting of work-related fringe benefits. An appendix to the regulations is the *ING Bank Śląski S.A. Employee Evaluation Bylaw (Step Up)*, which define the rules for setting tasks, assessing them and granting bonuses to employees. For more on remuneration principles, see the chapter Equal pay.

Actions

Social protection

S1-11

All employees of the ING Bank Śląski Group are covered by social protection in accordance with Polish law, i.e. protection against loss of income in the event of illness, accident at work, loss of job, disability, birth of a child or retirement.

An important element of employee support is also the benefits package resulting from the Company Social Benefits Fund. The companies within the group have a common social policy which ensures consistency in the approach to the benefits offered. As part of the benefits, a package is provided to cover the employee's family members, including Christmas benefit, holiday benefit. To support employees who find themselves in difficult life circumstances, we allow every employee to apply for a hardship allowance. Assistance is available to employees and their family members who need the most support, such as those facing serious illnesses (e.g., cancer) and employees with the lowest incomes (e.g., single parents, parents of children with disabilities).

Regulatory aspects and details of the offer are published on the intranet pages and widely communicated in the form of emails addressed directly to employees from members of the Bank's Management Board encouraging the use of the tools available.

Benefits offered to employees

Alongside other forms of reward and recognition, we offer employees an extensive catalogue of benefits and perks to enhance the attractiveness of the workplace. The selection of benefits and fringe benefits offered to employees is based on trend analyses and the voices of employees regarding their expectations.

The benefits offering is built around four pillars: Health, Energy, Activity and Finance, which define a holistic approach to the package offered to employees to complement fixed and variable remuneration. The measures taken reflect the specific provisions of the *ING Bank Śląski S.A. Group Remuneration Policy* and the labour bylaw in force in the bank and its subsidiaries.

Health

In the health pillar, we focus on measures to support the physical and mental well-being of our employees. We provide access to preventive health care, specialist consultations and educational programmes to help build informed and health-promoting habits on a daily basis.

- **Medical care** – employees have access to a competitive medical care offer, including a comprehensive package together with dental and reimbursement for both themselves and family members. In July 2025, employees had the option to join hospital insurance or purchase optional orthopaedic coverage add-ons.

To support the health of our employees, we offer a range of preventive measures. The wide range on offer makes it possible to significantly reduce the risk of contracting serious diseases or detecting them too late:

- **Preventive health check-ups** as part of standard medical care packages, benefiting a total of 1,865 people in 2025.
- **The Oncology Prevention Programme** is a comprehensive screening package dedicated to employees to promote preventive screening. In 2025, around 530 people had preventive screening for breast and gastrointestinal diseases.
- **"We Study Genes at ING"** – as part of the programme, we offer a subsidy for genetic testing. In 2025, in addition to genetic testing to assess cancer risk, employees had the option of choosing a second programme- diseases of old age, such as Alzheimer's disease.
- **Vaccination reimbursement** – as part of our activities to support prevention, our employees are able to benefit from the following reimbursements for vaccinations: against TBE, HPV, hepatitis A, hepatitis A+B, typhoid, pneumococcus, tetanus, diphtheria, whooping cough, covid, influenza, cholera, yellow fever, rabies.

In addition to health care and prevention activities, we undertake a number of activities and initiatives to raise awareness of health care and healthy habits. In 2025, these included meetings and consultations as part of initiatives such as Health Week and Well-being Days. Prevention campaigns were also organised for employees in the offices, during which they had the opportunity to be examined with a dermatoscope for skin diseases.

Energy

The energy pillar includes benefits to support our employees in taking care of their work-life balance, mental health and adequate regeneration.

- **Additional days off** – we offer our employees additional days off over and above employment legislation, including additional maternity and paternity leave, an additional day off for the family, a package of additional days off for employees who have a close family member with a recognised disability.
- **Sabbatical** – the opportunity to enjoy a free extended break.
- **Mindgram platform** – a platform for psychological support and personal development. In addition to the pre-packaged webinars, it gives employees the opportunity to meet individually with specialists: a psychologist, a psychodietician, a coach or even a financial or legal adviser. Employees have unlimited access to workshops and development sessions, and can also invite a loved one to take advantage of this form of support.
- **Orange helpline** – in the interest of the mental well-being of employees and those close to them, an anonymous helpline operated by certified psychologists provided the opportunity to talk about well-being, concerns or problems. All ING employees, together with their immediate family members who are in the same household with the employee, can benefit from the support.
- **New well-being platform** – in 2025, we launched a pilot of a new well-being platform offering employees access to mental health professionals and webinars and podcasts to support mental resilience.
- **Energy Days** were held throughout the week in October. Employees benefited from various forms of meetings with mental health specialists or meetings with psychologists and therapists. There was also the opportunity to be tested with a stress barometer and to take part in mindfulness sessions with VR goggles.

Activity

As part of the activity pillar, we take measures to support the physical activity of our employees. We organise tournaments, runs and marches, often combined with charity events. Key 2025 initiatives include:

- **Active ING** – the ActiveCharity challenge in the sports app and an additional six competition challenges, for people who like walking, running and cycling – in the spring edition, and for those who prefer swimming, gym or walking – in the autumn edition. Our employees raised PLN 20,000 for the ING for Children Foundation. A total of 827 people attended the event. Nearly 2,000 employees registered on the Active ING platform.

- **"Run Warsaw"** – we have been taking part in the "Run Warsaw" event since 2013. The Orange Team is made up of employees and their accompanying persons and families. Every year we run and march for the ING for Children Foundation. In 2025, we broke the enrolment record. More than 8,300 people attended the event, and more than PLN 170,000 was donated to the foundation. Traditionally, after the run and march we met for a family picnic.
- **Sports tournaments** – we organise sports tournaments every year. The 2025 included a football tournament, a table tennis tournament and a beach volleyball tournament. More than 350 employees participated in the tournaments.
- **Mocodajnia** – is a place in Katowice at Chorzowska 50, which, depending on your needs, is a meeting room, a creative workshop space or an exercise room. Equipment and activities are tailored to the needs reported by our staff. We pay particular attention to classes aimed at preventing back disorders that result from prolonged sitting while working at a computer, reducing stress levels and muscle tension resulting from the pace of work and the number of tasks we face on a daily basis, acupressure mats help to combat back pain and have a relaxing effect. In 2025, in response to the needs of our employees, we continued regular dance classes, Tai-chi, yoga and dance classes for the children of our employees at Mocodajnia. We have also launched yoga classes in Warsaw, at the Floor Hub in our headquarters at 2 Puławska Street. We have also introduced online classes in Tibetan healing yoga. In addition, the possibility of taking online classes has been created.
- **Sports budget** – the main purpose of the sports budget is to support the sporting passions of our employees, promoting a healthy lifestyle and physical activity.
- **Activity Days** – in June, we organised Activity Days, during which we invited employees to participate in sporting activities and attend yoga sessions or meetings with a personal trainer. During the Activity Days, many topics were covered, such as how to take care of ourselves when we are short of time.

Finance

The finance pillar includes initiatives to strengthen the financial security of our employees. We offer solutions to support household budget management, savings programmes and benefits to help you plan for a stable financial future.

- **Cafeteria programme** – in operation at the bank since 2017. The cafeteria is available to all employees and the number of scored points depends on the salary level. Employees can choose from a wide range of products in the online system, such as cinema or theatre tickets, weekend or holiday leisure, they can also make purchases from the available shops and are not limited to leisure, sports and cultural and educational offers only. An important element of the Cafeteria Programme is the possibility of transferring the unused points at the end of the year to the ING for Children Foundation, which allows for supporting the statutory goals of the Foundation and more effective use of the pool of points that the employee received during the year. The cafeteria offer is under constant development, and employees can report themselves to potential vendors whose products they would like to see in the system. Employees have access to a mobile app for the cafeteria programme, which further increases the flexibility of using this benefit. In December 2025, employees already had the opportunity to order a free sports card, which will be operational from January 2026.
- **The Employee Pension Programme (PPE)** is a solution thanks to which we enable employees to collectively and voluntarily accumulate additional funds for retirement. The programme is intended for all employees employed for a period of at least 3 months. All that is required is a declaration of participation. For employees who join the scheme, we finance a base contribution of 3.5% of salary, which is invested in selected investment funds. The programme also allows for systematic investment of additional own funds. The account balance can be viewed via the internet application. Due to the favourable principles of the existing Employee Pension Programme, a decision was made not to launch the Employee Capital Plans programme. In 2025, 86% of employees were using PPE.
- **Group life insurance** – employees are offered the opportunity to take out group insurance with two insurance companies. The real benefit is the possibility for employees to take advantage of the employer-sponsored insurance option, which not only includes life insurance but also protects employees against serious illness. Employees are still able to take advantage of other insurance options under the self-funded offer from both Nationale Nederlanden and PZU. In April 2025, the offer was refreshed with the possibility to buy additional bricks.
- **Periodic campaigns** – the aim of our actions is to educate employees on financial matters and promote their financial well-being by passing on useful knowledge. The launch of activities in this area was preceded by a survey of employees' opinions, which confirmed their interest in such activities. Responding to their needs, we focus on areas such as:
  - promoting knowledge about saving programmes for future retirement,
  - support in the field of personal taxes in the form of conferences, chats and brochures prepared by external experts
  - providing knowledge and support on the market situation in Poland, the psychology of finance or the household budget.
  - financial education for children.

Summary of benefits usage in 2025

Pillar	Action	Number of employees	Percentage
Health	Preventive health programs	3,014	39%
	Health-care meetings and consultations	3,540	46%
Energy	Mindgram platform	3,574	46%
Activity	"Biegnij Warszawo" and "Maszeruję kibicuję"	employees: 2,890, employees with families app. 8,300	38%
	Sports tournaments (tennis, volleyball, football)	349	5%
Finance	Employee Pension Program	6,640	86%
	Employer-sponsored insurance	5,833	76%

Methodological note: The benefit utilisation rate was calculated by comparing data on employees' use of a given benefit with the headcount as at year-end..

Our actions in offsetting the negative impact associated with the restructuring plan

S1-4, MDR-A

In December 2023, the Management Board of the Bank announced a restructuring plan involving a planned reduction of approximately 1,450 positions over the period 2024–2026. We place great importance on the way necessary changes are implemented and on minimising their negative impact on our employees..

First and foremost, we ensured financial protection for employees whose employment contracts are terminated as part of the restructuring processes by providing an additional severance package. The amount of the severance payment depends on the employee's length of service within the ING Group and its legal predecessors. The additional severance is granted independently of the benefits provided under the Polish Act on Specific Rules for Terminating Employment Relationships for Reasons Not Attributable to Employees. The level of the additional severance payments was subject to negotiations with the company trade union and was ultimately approved in an agreement concluded with the employee representatives. The agreement was signed in December 2023 for a period of three years.

The process of implementing the restructuring plan is based on close monitoring of contractual arrangements, including voluntary departures at the initiative of the employees themselves. In the case of voluntary departures, HR units always review the business needs to fill the vacancy created by the employee's departure. Voluntary departures and close monitoring of redundancies make it possible to achieve the effect of a reduction in the workforce without having to launch a collective redundancy procedure.

SBM-3.48-b

In connection with the restructuring plan, the Bank Management Board decided to create a restructuring provision for 2024-2026, which increased the bank's operating expenses by PLN 86.1 million in 2023. The level of utilisation of the provision set aside for this purpose is closely monitored in the form of monthly reports presented to the Bank Management Board. The report contains figures showing the level of employment in relation to the level of the restructuring provision set aside for this purpose.

Work-life balance

At ING, we promote a holistic approach to work-life balance. We take actions to reduce work-related stress and pressure, and also support the implementation of healthy habits that prevent feelings of exhaustion and burnout. We organise a number of actions to support employees through, inter alia, the fringe benefits on offer, as well as implementing real practices to encourage employees to take advantage of additional days off and opportunities for flexible working arrangements.

Actions

S1-4, MDR-A

Actions supporting work-life balance offered as part of benefits (Energy Pillar) are described earlier in this chapter.

We focus on initiatives that support proper work organisation and teamwork. We also build awareness of how important it is for our productivity to take breaks at work and maintain good relationships with colleagues, especially in a hybrid working environment.

Working hours

At ING, we are committed to a flexible approach to working hours. The framework for this flexibility is set out in the labour bylaw.

In units where this is possible, the employees themselves decide on the starting time, assuming that the applicable standards are observed. The labour bylaw indicates the timeframes for starting and finishing hours.

Our working model allows for remote working in hybrid mode. This means being able to work from the office as well as from home. The pattern of remote working is determined by the direct supervisor and indicates the days of in-office and out-of-office work. In order to meet the needs of employees, we allow personal leave during working hours. Such exits shall be reported to the immediate supervisor.

In building employees' work-life balance habits, we encourage employees to take overtime in the form of days off. Additionally, employees who work during the night, on Saturdays, Sundays, and public holidays – in accordance with the current work schedule – are offered an additional day off with pay.

Parents at work

At ING, we take care to adapt our working conditions to meet the needs of our female employees at different stages of their lives. In 2025, together with the Women of ING employee network, we implemented a comprehensive offer to support people before, during and after long-term absences. We conducted more than 150 interviews, which allowed us to fully perceive their needs. We want to make sure that, in the event of a return or in preparation for a long absence, all the information needed is just a click away.

The dedicated tab in ING Today contains checklists for people before, during, and after a long absence. Not only do the materials help to better prepare for an absence or return, but they also contain key information about the entire offer available to returnees. We have also introduced a special tab in the HR system that allows you to leave a private email address. This allows us to easily communicate with the absent person and they with us. To date, more than 2,500 employees have used this option. We have additionally prepared leave guides for fathers, mothers and employees with disabilities. We have also ensured that our labour bylaw support a flexible work system, which is a practical solution to challenges, for example, for young parents returning to professional activity. Other solutions already implemented include a mentoring programme and the abolition of the paperwork for feeding breaks, which now do not have to be registered. Since its implementation, nearly 30 people use the offer each month. We are working to implement further improvements that will make people more comfortable returning to work and minimise the uncertainty that already exists.

In addition, as part of the Women of ING employee network activities, we invited parents to webinars with experts. We talked about topics close to parents:

- To be an adult who hears the inner child – to be a parent who understands and supports their child?
- The Power of Words – how to talk about people with disabilities, what words to use when talking (including to children) about people with disabilities?
- How to avoid falling into the trap of stereotypes – what stereotypes commonly affect children from adults and how they translate into self-esteem, self-worth and the choices they make.
- Dad is not a second mum.

Holidays and additional days off for parents

As part of efforts to support parents in balancing professional work with parenthood, for the past 4 years we have been offering employees additional benefits beyond the statutory limits:

- **10 days of additional maternity leave** – every mother raising a child up to 2 years old can take 10 additional days of maternity leave, retaining the right to remuneration.
- **5 additional days of paternity leave** – every father raising a child up to 2 years old can take 5 additional days of paternity leave, retaining the right to remuneration. The condition is that the basic paternity leave must be used first.
- **2 days or 16 hours of childcare** – we have extended the entitlement to use 2 days or 16 hours of paid childcare: parents of children up to 18 years old can take advantage of this option (compared to the statutory age of children up to 14 years old), regardless of whether the other parent has used this option.
- **Day off for the family** – every ING employee is entitled to take an extra day off for the family. Free time can also be used in hours, and the employee decides how to use it.

S1-15

Parental-related leave entitlements

	2024	2025
Employees entitled to parental leave*	**100%**	**100%**
Women	100%	100%
Men	100%	100%
including:		
Employees who took parental leave guaranteed by the provisions of the Labour Code	**50%**	**49%**
Women	53%	51%
Men	45%	45%
Employees who took family leave resulting from additional provisions of the Labour Regulations	**93%**	**94%**
Women	95%	95%
Men	90%	91%

Methodological note:
**calculated collectively for all parental leave guaranteed by law and additional leave resulting from the provisions of the Work Regulations*

Equal treatment and equal opportunities for all

Our Approach to Diversity, Inclusion, and Belonging

S1-4

At ING, we are pursuing our strategy by actively supporting initiatives that build a diverse and inclusive work environment. We design solutions to develop ourselves as a responsible employer and a reliable partner for our clients. We strive to make ING an equal opportunity bank.

In 2025, we adopted the *Sustainability Policy of the ING Bank Śląski Group S.A.*, in which Principle 12 addresses the area of diversity, inclusion and belonging:

"*We respect diversity and counter all forms of discrimination, violence and harassment. We support gender equality, equal pay for work of equal value and strive for balanced representation of women and men at all levels of the organisation. We take into account the needs of neurodiverse people and people with disabilities, creating a working environment that is open to all*".

We want inclusion and a sense of belonging to be permanently embedded in our organisational culture and visible in our daily activities. This is why we develop inclusive habits based on the Orange Code, which guides our decisions. These principles apply to all employees and are reflected in the Labour Bylaw.

When creating initiatives, we rely on sound research and verified sources. In this way, we reinforce an inclusive working environment. We treat activities in the area of Diversity, Inclusion & Belonging like any other strategic priority. We focus our attention on four pillars:

1. We support people in turning good intentions into practical habits.
2. We are analysing our processes in terms of inclusion.
3. We provide individuals in leadership roles with the space for education and action.
4. We treat tasks related to DIB like any other strategic priority.

The four pillars of our approach to diversity, inclusion and belonging

We care about gender balance

S1-4, MDR-A, S1-5, MDR-T

In 2023, we set a target that by 2025 at least 30% of senior management positions would be held by women. By December 2025, we had achieved 48%.

Together with the ING Women employee network, we are strengthening the visibility of women in the organisation and expanding the development opportunities available to all talents.

MDR-M

Gender equality management indicators				
KPIs	Definition	2023	2024	2025
Percentage of women in senior management	Including the Management Board and senior management – percentage of women who hold a position in the hierarchy up to the second level from the CEO among all employees in such positions	48%	47%	48%
Percentage of women in total management	Percentage of women in managerial positions (including management, senior management and lower management) among all employees in such positions	31%	34%	37%
Percentage of women in middle management	Percentage of women who hold a managerial position below the second level from the CEO, among all employees in such positions	54%	52%	53%
Percentage of women in non-managerial positions	Percentage of women in non-managerial positions among all employees in such positions	64%	64%	63%
Percentage of women in total staff	Percentage of women in the organisation relative to all employees	63%	62%	62%
Percentage of female promotions	Percentage of women who were promoted to a higher position compared to the number of total promotions that took place in a given year	68%	66%	59%
Percentage of women in IT	Percentage of women in engineering and programming roles relative to all people employed in such roles	25%	24%	24%
Percentage of new female employees	Percentage of female new hires to total new hires for the year	45%	47%	52%
Percentage of women leaves	Percentage of women leaves in relation to total number of leaving employees in the year	64%	65%	66%

Methodological note:

1 *Senior management is considered to be those employed in positions from grade 19 inclusive (out of 21 grading categories) and simultaneously being supervisors for at least one employee.*
2 *The management staff is considered to be employees classified below the grade 19 of classification and who are supervisors of at least one employee.*
3 *The Bank Management Board is included in Senior Management.*

Actions

S1-4, MDR-A

We ensure that all our actions contribute to a better understanding of our Diversity, Inclusion, and Belonging Strategy and reinforce inclusive habits. We adjust our range of activities each year, which we direct to both employees and those in leadership positions:

- we organise numerous workshops and webinars related to promoting an inclusive culture and creating a diverse, inclusive and safe workplace,
- we support the activities of employee networks,
- we are co-founding a sectoral women's network,
- we conduct research that allows us to become a more inclusive employer (Inclusion Index),
- we offer programs for leaders that enhance their skills in conducting difficult conversations about providing feedback, minimizing unconscious biases, and inclusive leadership,
- we organise events related to diversity and inclusion culture,
- we provide mentoring, Skills Sharing – which is our version of reverse mentoring, coaching and career counselling,
- we are discussing diversity on the forum,
- we run a leadership program for young women,
- we support individuals before, during, and after long absences, regardless of the reason,
- we are conducting evaluations of our HR processes to minimise unconscious biases,
- we reward those most committed to creating an inclusive workplace by holding an internal competition Inclusivity Ambassador Prize.

The biggest educational events in the area of diversity, inclusion, and belonging in 2025 were:

- As part of Diversity Days, we organised an interactive exhibition that provided a better understanding of what neurodiversity is and opened up discussions on how the working environment can support different cognitive, sensory and social needs. More than 500 people visited the exhibition and more than a thousand got involved in the other activities we organised as part of the event. Both online and on-site, at the other locations we invited all female and male employees to participate in: among others, an internal competition: "Place for my mindset – what supports me at home and what supports me in the office?" or webinar: "How to design a space that supports your efficiency and at the same time cares for your comfort".

- Representatives from our employee networks led a series of meetings with internal and external experts as part of the initiatives: Gen Z Talks and SHEspresso. These are initiatives that are close to workers' needs. The meetings are very popular, with over 3,000 people benefiting throughout the year.
- The Women of ING employee network conference 2025 was held under the theme "We join forces, support development". The event was put together by members of the Women of ING network and the Women in Tech community. Participants at the event had the opportunity to hear about the importance of mentoring in professional development.

We include neurodiverse individuals and people with disabilities

In 2025, we will continue the global strategy initiated in 2024 for the inclusion of people with disabilities and neurodiverse individuals, which clearly defines our goal – we want to create a work environment where neurodiverse individuals, people with disabilities, and those indirectly affected by disabilities can achieve their full potential. Our actions will focus on four areas:

1. Conscious and supportive leadership.
2. Talent acquisition and retention.
3. Accessibility.
4. Reporting.

In 2025, we continued our educational activities on the topics of neurodiversity and disability. In addition to an interactive exhibition promoting solutions to support neurodiverse people, we have developed a new module in leadership training on unconscious beliefs related to disability and neuroatypicality. Another year of cooperation with the Atypika Foundation is also behind us. This year, we jointly produced the webinar "Neurodiversity from a biological perspective". In December, we invited our employees to a meeting with the captain of the Polish national amputee football team, Przemysław Świercz, and to a joint training session in this discipline.

From 2019, we provide a package of support for people with disabilities and their families. It includes fixed monthly allowances financed from the Company Social Benefits Fund for employees with a moderate or severe degree of disability, as well as for those raising children with a disability certificate. We also support employees who care for relatives with moderate or severe disabilities. In these situations, we offer an additional two days off for the care of a spouse or partner, parents, in-laws or grandparents. Those caring for a child with a disability certificate can take an additional five days off. We also take into account the needs of employees with a declared mild disability. We provide them with an additional three days off with pay.

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S1-12

Employees with disabilities*

	2021	2022	2023	2024	2025
Women	131	147	158	155	145
Men	51	55	57	56	64
Total	**182**	**202**	**215**	**211**	**209**
Percentage of employees	2.1%	2.4%	2.6%	2.6%	2.7%

**in accordance with the definition contained in the Charter of Rights of Persons with Disabilities (Act of 1 August 1997)*

We build awareness and strengthen inclusive habits

We focus on developing inclusive habits among all employees, with a particular focus on those in leadership positions. We address different dimensions of diversity, such as gender, age, disability or diversity based on the place of work. We see change as a shared responsibility, which is why we strengthen the awareness and commitment of leaders and actively support employee networks and grassroots initiatives implemented by teams.

Our employees also have access to development programmes dedicated to diversity and inclusion on a training platform. We offer webinars and short educational formats that address inclusive behaviour, language and recognising unconscious beliefs. In 2025, we ran a workshop for people in leadership positions on reducing unconscious beliefs in managerial decisions.

At ING, there are four thriving employee networks:

- *Diverse* individuals engaged in areas related to disability, neurodiversity, and cultural diversity, with over 600 followers on internal social media,
- *Rainbow Lions*, who focus their activities around the LGBTQA+ community, and their community is followed by over 300 people,

- *Women of ING* work towards supporting gender balance at ING through activities related to parenting, building self-confidence, and development. The employee network on internal social media is followed by over a thousand people,
- *Gen Z* is a network that brings together people from Generation Z and all those who want to strengthen intergenerational cooperation. This employee network has more than 600 followers.

Each of our employee networks can count on the support of a dedicated sponsor, whose role is filled by a Board Member, and we talk regularly about diversity and our impact on building an inclusive culture:

- In January 2025, for the first time, we honoured the six people most committed to promoting diversity and strengthening inclusive habits;
- In March 2025 we celebrated the second employee network conference Women of ING;
- June was a month full of diverse initiatives for us. Together with ING Hubs, we hosted two employee networking offsites. We had the opportunity to learn more about the perspective of Generation Z together with the Gen Z network and representatives of this generation from other ING countries, and to exchange experiences with people working in local Rainbow Lions networks in different ING countries;
- proudly, together with the *Rainbow Lions* network, we also celebrated Pride Month, which included Rainbow Meetings, a formula reminiscent of a living library, as well as a webinar that introduced us to the history of the LGBTQA+ movement in Poland. We also invited all individuals interested in the idea of the Equality March to march together in Warsaw and Katowice;
- in 2025, we continued our reverse mentoring formula – a total of 50 intergenerational couples have already taken part in *Skills SharING*;
- in December 2025, we celebrated *Days of Sensitivity to Disability,* as part of which we organised a meeting and training with Przemysław Świercz, captain of the Polish national amputee football team.

On the training platform, we provide our employees with development programmes dedicated to diversity and inclusion. It features a series of webinars and microlearning on different aspects of diversity, inclusive behaviour and language, and identifying unconscious beliefs.

Engagement in external initiatives

As of 2019, we are a signatory of the *Diversity Charter* – a voluntary initiative bringing together employers from business, NGOs, public administration, local government and academia. It is our commitment to supporting diversity and building an inclusive workplace.

ING Bank Śląski is also a member of the *Polish Bank Association's Diversity & Inclusion Committee*, which started in October 2022. The Committee focuses, inter alia, on strengthening diversity and equal opportunities, increasing the representation of women on boards, supervisory boards and in management positions, promoting women's competence and experience in the financial sector and supporting the implementation of European regulations and standards. Strengthening women's financial awareness and independence also remains an important area of action. More than 20 banks and financial institutions operating on the Polish market participate in the initiative. Bożena Graczyk – Vice-President of the Bank Management Board is a member of the *Committee for Diversity and Inclusion within the Polish Bank Association*. For more than a year now, the *Women's Interbank Network* has also been operating at the committee.

In 2025, we launched the "*Guide to Good Practices for Equal Opportunities, Inclusion, and Social Responsibility in the Banking Sector*", which we prepared in collaboration with the Polish Bank Association and colleagues from other companies in the banking sector. The guide is not only a source of knowledge and inspiration, but also a document that sets standards for the entire market. The guide can be downloaded here.

Diversity awards

In 2025, we are once again on the *Diversity in Check,* which identifies the employers most advanced in diversity management in Poland. In the 5th edition, we remained on the list of distinguished companies with a score of more than 80%. The initiative brings together stakeholders drawing strength from the various dimensions of diversity, allows for an assessment of a company's level of maturity in diversity management and inclusive organisational culture and also provides a summary of activities in this area.

Our global submission to the Workplace Pride benchmark has once again received the highest possible level: "Advocate". It was a great achievement for the entire ING and a reflection of individual and collective efforts in 24 countries, as well as proof that inclusion is at the heart of our identity.

Equal pay

S1-1, MDR-P

The remuneration system is open and transparent, and its principles are communicated to all employees. The primary document defining the principles of remuneration is the *ING Bank Śląski S.A. Group Remuneration Policy.* This policy specifies the key assumptions for shaping the remuneration policy used to attract and retain employees by ensuring a market-competitive level of remuneration and defines the components of remuneration. It is gender-neutral, which means not creating conditions for undue preference for either gender in terms of employment, career development, promotions and the award and payment of remuneration.

The assumptions of the remuneration package are further clarified in the *ING Bank Śląski S.A. Employee Remuneration Bylaw*. The principles for bonuses, on the other hand, are set out in the *ING Bank Śląski S.A. Employee Evaluation Bylaw (Step Up*), which describes the rules for assigning tasks, evaluating employees, and awarding bonuses.

The total remuneration is divided into a fixed and a variable part.

Fixed remuneration

An employee's fixed remuneration consists of the following elements:

- basic salary,
- supplementary benefits granted on the basis of generally applicable laws and the bank's internal regulations,
- fringe benefits that form part of the bank's overall policy, i.e.:
  - medical care,
  - occupational pension scheme,
  - life insurance,
  - company cars,
  - remote working / office allowance,
  - benefits granted to employees under the Cafeteria Scheme Bylaw.

Variable remuneration

Variable remuneration is all forms of remuneration and other benefits provided in return for performance. It is determined on the basis of an assessment of sustainable and risk-adjusted performance taking into account quantitative and qualitative criteria. Variable remuneration includes an annual bonus and financial rewards.

Equal pay indicators

MDR-T, S1-4

We continuously monitor the ratio of women's to men's salaries. The analysis of the pay gap is based on a comparison of the average remuneration of men and women across the bank as a whole and across the group.

The full picture of gender pay disparity is, however, more complex, as it is influenced by many factors such as the employment structure of women and men, as well as the value and type of work they perform. We therefore monitor the wage gap using two indicators:

- unadjusted wage gap,
- adjusted wage gap.

Indicator calculation methodology

- **Unadjusted Gender Pay Gap** – ING Bank Śląski S.A. calculates the unadjusted gender pay gap indicator in accordance with the methodology resulting from the Guidelines of the European Banking Authority. The calculation is based on determining the ratio of the difference between the average hourly wage of men and women to the average hourly wage of men. The analysis includes all persons employed at ING as at the end of 2025 under an employment contract, excluding employees with long-term absences (at least 3 months as at 2025 yearend) and those employed only in the last 3 months of 2025. Other assumptions used in the calculation include the conversion of full-time salaries for part-time employees and the annualisation of salaries for employees included in the analysis. The variable remuneration included in the calculation represents the remuneration awarded for 2025. The unadjusted rate in 2025 decreased by 1 p.p. to 29%.
- **Adjusted pay gap** – the main factor influencing the level of the pay gap at ING Bank Śląski S.A. is the employment structure as well as the value and type of work performed. So far, the adjusted pay gap has been calculated by the bank in relation to groups of employees employed within the same grading categories. The bank determines the level of the adjusted pay gap based on an analysis comparing the average salaries of women and men employed in homogeneous groups of positions performing the same work or work of the same value, in accordance with the bank's remuneration policy, weighted by the number of employees in these positions. Job groups with a female or male representation of less than three employees were excluded from the calculation. The other assumptions used in the calculation are the same as for the unadjusted gap. The adjusted ratio in 2024 was 3.1% and in 2.3%.2025

We are taking steps to ensure that the gender pay gap is reduced over time.

S1-16

Unadjusted pay gap indicator calculated according to the methodology of the EBA Guidelines			
		2024	2025
Ratio of the difference between average male and female pay to average male pay	ING Bank Śląski Group	30%	29%

Gender pay gap by employment category		
Category	2024	2025
Senior management	-9%	-3%
Management	11%	11%
Other employees	26%	26%

Methodological note:

1 *The data for 2024 has been recalculated in accordance with the latest (September 2025) recommendation of the Polish Bank Association (ZBP).*
2 *Senior management is considered to be those employed in positions from grade 19 inclusive (out of 21 grading categories) and simultaneously being supervisors for at least one employee.*
3 *The management staff is considered to be employees classified below the grade 19 of classification and who are supervisors of at least one employee.*
4 *The Bank Management Board is included in Senior Management*

Additionally, apart from the gender pay gap indicator, since 2022 we have been continuing an in-depth analysis in the area of equal pay for equal work, which shows the pay gap indicator for the same positions, job categories and competencies. This way, we identify individuals who statistically earn less or more for a given profile, also in

comparison to the opposite gender. The results of the analyses are one of the key elements considered by managers when making decisions about salary increases.

We are implementing a range of diversity and inclusion initiatives aimed at equalising opportunities for women and men, as well as building awareness among managers and employees regarding ING's non-discriminatory policy towards any gender. One of the annual goals of the Management Board in recent years has been to ensure an appropriate balance of women and men in the succession plans for senior management positions.

Review of the remuneration package

To ensure competitive remuneration levels, we review remuneration levels twice a year. The subject of the analysis is market data – independent salary reports and economic information. Based on the above data, the Management Board makes a decision regarding the rules of the pay raise campaign for the given year. The Remuneration and Nomination Committee and the Supervisory Board receive information about the adopted principles of salary increases. The analysis of employee salaries by gender is combined with the presentation of the gender pay equality index for the past year, along with information on actions taken to eliminate any potential inequalities in this area.

Based on comparative analyses, in 2025 we conducted a salary increase action that covered all employees in April. The raises consisted of an automatic part and a discretionary part, which was decided by the manager. The main thrust of the increase action included an increase in the minimum wage to PLN 6,000 gross (full-time) per month, an increase of PLN 500 over the minimum in force before the change. We have also introduced a new basic salary table in which we have increased the minimum salary amounts in grades 11 to 15. In view of the planned implementation of European requirements regarding the right to equal pay for men and women for equal work or work of equal value, we conducted an extensive outreach campaign based on more than 120 meetings with Management Board Members and heads of business units in the second half of 2025, where we presented specific analyses and challenges regarding the pay gap in their subordinate structures.

Differentiation

During the recruitment process, as well as when making decisions regarding promotions, candidates' salaries are consulted with the respective HR Business Partners. This practice is intended to counteract unjustified pay gaps. At the same time, the bank has a simplified management structure with an expert path, the purpose of which is to increase employee development opportunities. This allows for the systematic promotion of employees and an increase in the level of remuneration.

Linking employee remuneration to the minimum wage

We offer our employees stable employment contracts in line with the arm's length principle. The object of the analyses is to relate the level of remuneration offered to the market and to examine the relationship to the statutory minimum wage level. We present below the remuneration of employees at the lowest level – in relation to the minimum wage and in relation to the average in the banking sector.

Ratio of pay of lowest-level employees broken down by gender to minimum wage

	2021	2022	2023	2024	2025
Woman	159%	169%	156%	128%	129%
Man	154%	166%	156%	128%	129%

Comparison of salaries of entry-level employees to the market*

	2021	2022	2023	2024	2025
Bank / Market	120%	116%	113%	106%	111%

**Basic salary compared to the banking sector; market benchmark data is provided by Korn Ferry Hay Group.*

Ratio of Management Board remuneration to employee remuneration

Beyond the area of pay equality between women and men, an important element is to prevent disparities between the remuneration of Management Board members and the average remuneration of our employees. Therefore, this area is governed by two policies: *The Remuneration Policy for Supervisory Board and Management Board Members of ING Bank Śląski S.A.* and *the ING Bank Śląski S.A. Group Remuneration Policy.*

In accordance with the provisions of the regulations cited above, the average annual gross total remuneration of the Management Board Members does not exceed 40 times the average gross total remuneration of the other employees on an annual basis. This relationship is reviewed annually as part of the pay policy review. The average monthly gross base salary per employee amounted to PLN 14.2 thousand in 2025, compared with PLN 12.8 thousand in 2024.

Information on the ratio of directors' remuneration to the average remuneration of employees					
	Limit	2022	2023	2024	2025
Ratio of multiples of average gross basic salary (monthly)	40	12	12	11	10
Ratio of multiples of average gross total remuneration (annual)	40	27	22	21	19

S1-16

Index of total annual remuneration				
	2022	2023	2024	2025
Ratio of annual total remuneration for the highest paid person in the organisation to the median annual total remuneration for all employees (excluding the highest paid person)	40.6	36.7	36.0	30.9
Ratio of the percentage increase in total annual remuneration for the top earner in the organisation to the median percentage increase in total annual remuneration for all employees (excluding the top earner)	79%	15%	87%	-1%

Ensuring a work environment free of discrimination and bullying

S1-1, MDR-P

At ING, we condemn all forms of discrimination, bullying and harassment. We work together to create an inclusive workplace. Our commitment to creating a work environment free from discrimination based on gender, race, skin colour, religion, political views, national or social origin is included, inter alia, in the labour bylaw, our *Declaration of the ING Bank Śląski S.A. Group on Respect for Human Rights* (link) and in the ING Global Code of Conduct, which we write about here.

Policies

As an expression of our commitment to counteracting undesirable phenomena in the workplace, such as discrimination or bullying, we have implemented separate regulations in this regard:

Document name	Related material sustainability matters	Related internal regulations
Anti-Discrimination and Anti-Harassment Policy	Measures against violence and harassment in the workplace	*Procedure for Handling Suspected Adverse Incidents*

The above documents were approved by the President of the Management Board and the HR Director is responsible for their implementation and application in the bank.

Actions

S1-3, S1-4, MDR-A

All employees starting work at ING complete the mandatory training Work free of bullying and discrimination. The training aims, on one hand, to acquaint new employees with the existence of the organisation's Anti-Discrimination and Anti-Harassment Policy and the Procedure Governing How to Act in the Event of Suspected Undesirable Phenomena, and on the other hand, to familiarise employees with the topic of recognising undesirable phenomena such as mobbing, harassment, and discrimination, as well as to indicate the procedure to follow in case of irregularities and the mode of reporting them. We monitor the level of training delivery every year – in 2025 all new employees (100%) have completed the training programme.

Each of us, anonymously or by name, may report irregularities related to material breaches of labour standards, internal regulations, as well as ethical standards in the bank's business practices. We can achieve this through channels such as: *The Whistleblower* ("*Gwizdek*"), which we describe in more detail here and the Bullying-Discrimination dedicated email box.

Each report to the Mobbing-Discrimination mailbox is considered in accordance with the *Procedure for Handling Suspected Adverse Incidents*. After the conclusion of the investigative proceedings, in the event of circumstances outlined in the report, the team investigating the matter provides recommendations regarding corrective actions.

The report sent to the Mobbing-Discrimination mailbox goes to the representatives of the HR area.

S1-17

Number of reports in the Mobbing/Discrimination category				
	2024		2025	
	Number of reports	Number of confirmed cases	Number of reports	Number of confirmed cases
Reports to the Mobbing-Discrimination email box	3	1	1	0
"Whistleblower" reports	2	0	10	5

The procedure for handling reports and corrective actions in the case of reports deemed justified are described in the chapter on breach reporting mechanisms here.

Training and skills development

The development of employee competence is a key element of our strategy. Investing in the knowledge and skills of teams is not only a way to improve the quality of services provided, but also the foundation for building an organisation that is strong, innovative and resilient to market changes. In a dynamic world, we focus on providing access to state-of-the-art training programmes, mentoring initiatives and extensive development opportunities in a variety of areas. Our approach is based on practical activities that foster the building of reflection and conscious improvement of competence. In this way, we support employees in achieving ambitious career goals, which directly translates into increased value delivered to our clients.

Training - interchangeably: **development activity** - we define as any activity aimed at acquiring or changing competences (knowledge, skills, attitudes) in a specific subject area. Training can be in on-site form: organised internally or externally (outside the bank) or online in the form of e-learning, webinar, online workshops, online lectures, massive open online course (MOOC), learning materials and other forms of development support. Training can be provided by in-house trainers within the bank, other employees of the Bank and its subsidiaries or by trainers representing training and consultancy companies.

Policies

S1-1, MDR-P

Document name	Related material sustainability matters	Related internal regulations
ING Bank Śląski S.A. Employee Evaluation Bylaw (Step Up)	• Training and skills development	• *Procedure for Development Activities in the ING Bank Śląski S.A. Group* • *Procedure for Improving Professional Qualifications at ING Bank Śląski S.A.*

In the past year, we have updated the Procedure for Development Activities in the ING Group. We have taken into account the latest guidelines from the external regulator. A key element of the update is the implementation of a new mandatory training matrix, which includes a breakdown of training: legally required, indirectly required by law and not required by law, but which supports competence development. In addition, we have clarified deadlines for completing individual training courses and updated the target groups, which enables development activities to be better aligned with the needs of the organisation and the applicable regulations.

Actions

Directions and objectives of our activities in the area of training and development

S1-4, S1-5, MDR-T, MDR-A

In 2025, our focus was on creating opportunities to grow and cultivate a culture of continuous learning. The aim was to support the building of core competences, high performance and empowerment in adapting to technological change. In addition to consistently delivering on the promise of the highest quality client experience and implementing continuous improvements, sustainability remains an important element of our strategy. This direction requires equipping employees with the knowledge, skills and abilities to meet the long-term goals of the organisation.

Leaders are essential in the implementation of the strategy. From there, we focused on the quality of leadership and the development of practical skills. In 2025, we expanded the scope of our talent review to include further groups of leaders. As a result, we offered modular development programmes tailored to their needs. We developed skills such as effective communication, inclusive behaviour, strengthening individual and team mental resilience or leading organisational change.

One of the priority areas is the implementation of artificial intelligence (AI). In August, we made Microsoft Copilot available to all employees. To enable it to reach its full potential, we have organised a series of webinars, a conference, workshops and courses on prompting, as well as the mandatory AI Act training. We build a basic understanding of artificial intelligence in employees, support the adoption of AI in daily work, and offer advanced courses for those at the highest level of knowledge.

In an effort to improve the user experience, we implemented a new platform in 2025 that makes it easier for employees to complete training activities. The app supports development through personalised and engaging learning experiences. It allows progress to be tracked, recommends content tailored to the role and facilitates knowledge sharing within the organisation. On the platform, employees carry out both mandatory and optional training.

Individual development plans

In 2025, we continued the practice of creating Individual Development Plans (IPRs), which are mandatory for all leaders. These plans form the basis for both employee career paths and succession plans.

Leaders encourage their teams to define their own career paths and support their implementation over three time horizons:

1. short-term – development within the current position,
2. medium-term - preparing for the next career step through upskilling
3. long term – career planning within the organisation or changing direction through reskilling.

In 2025, the number of people who have registered their development plans with the system is 1,450 (a decrease of 6.8% compared to 2024). Employees have the opportunity to benefit from the support of in-house career

counsellors, who help with the diagnosis of career aptitudes, the choice of direction and the first steps of career planning.

10-20-70 method

Once development goals have been identified, employees plan pathways to achieve them according to the 10-20-70 method, which remains the cornerstone of effective learning at ING:

- **10%** is formal learning: courses, workshops, literature, internal and external webinars, access to digital platforms.
- **20%** is knowledge and experience gained through feedback from supervisor, colleagues and while working with a mentor, coach.
- **70%** competence is developed through practice, day-to-day performance, experimentation, challenge, and active engagement in the workplace.

Coaching is aimed at people who have knowledge and skills but, for various reasons, are not using them to their full potential and need support in overcoming blockages or looking at their challenge with an experienced coach. In 2025, individual work with certified coaches both internal and external – benefited 20 employees.

Mentoring remains one of the key development tools at ING, where those with more experience share it with others in one-to-one meetings. We offer employees various forms of this programme, from which almost 200 people benefited in 2025:

- Internal mentoring programme – in 2025 we changed the approach by implementing the programme in two tracks: leadership and expert. The programme is supported by the Mentiway app, which supports the process from recruitment, through to the delivery of effective meetings between people in the mentor role and mentees, and the testing of the quality and effectiveness of the process. Participants in the programme were prepared for their participation through workshops and webinars.
- Skills Sharing – an intergenerational knowledge exchange between experienced leaders and representatives of Generation Z.
- External mentoring programme in collaboration with the Business Women Leaders Foundation. It is designed for people who need to gain an outsider's perspective on their objectives.
- Career counselling is becoming an increasingly popular option for people consciously shaping their career path. Certified advisors support employees in making career decisions, designing individual development plans and exploring career opportunities at ING. In 2025, 105 people benefited from career counselling.

Internships

- The developmental internship #zarazwracam [Be right back] is carried out in a different organisational unit and lasts for a maximum of three months. During an internship, the employee takes on new tasks in a different environment, pursues predefined objectives, acquires new knowledge, develops skills and verifies his or her professional aptitude.
- The developmental internship #nazadanie [assignment-based] is a short-term stay in another team aimed at acquiring new skills. The dimension of the engagement is agreed individually between the trainee and the leaders of the two teams. The internship can be carried out in flexible cycles – both in terms of days and hours.

Development platforms and applications

In March, we launched a new learning platform within the organisation, ***ING University,*** which replaced two existing tools – My Learning and ING Learning Centre. This solution collects training processes, programmes and events in one place, makes them easily searchable and facilitates the monitoring of mandatory training, among other things.

One of the greatest strengths of the new platform is its integration with ***Udemy Business***, which gives employees access to more than 15,000 courses in fields ranging from technology to management to personal development. This opens the door to global knowledge and industry best practice. In 2025, 1,243 courses were used by 685 users.

Another of the education tools made available to employees is the ***eTutor*** app. It offers courses in English, German, Spanish, Italian and Polish for foreigners. 2,800 employees benefited from language development in the 2025 application.

We also support our employees in acquiring knowledge through reading. We provide the ***Legimi*** app with thousands of ebooks and audiobooks to enhance business knowledge as well as those related to interests. In 2025, 3,000 employees used the app. They read a total of almost 13.5 million pages across the available ebooks and audiobooks.

Initiatives and educational programmes implemented in 2025

- **AI education** – we have implemented a programme for employees to improve skills related to artificial intelligence. Based on *UNESCO's AI competency framework*, we have prepared a three-stage competency development programme. We developed an AI knowledge levelling test, which was completed 2,400 times. At the Understand level, there is learning of basic assumptions, changing beliefs, knowledge of functions, goals, problem-solving capabilities, as well as cyber security and artificial intelligence risks. The Apply level is characterised by knowledge of AI applications, prompting and collaborating on improvements with AI. At the Create level, employees learn how to develop business-responsive artificial intelligence models, effectively managing AI projects in the organisation. After completing the test, employees receive a recommendation on proposed development activities adapted to their level.

Employees were able to benefit from different types of learning – from short e-learning, online workshops, to longer forms such as conferences, in-house learning programmes or flexible forms of CampusAI courses, AI Managers or 10xDevs delivered with external partners.

The most popular conference was ***Growing because I want*** to under the theme #festivalAI. It was used by almost 2,000 employees online and on-site in Katowice over four days. At the Open Day, we hosted, among others, Prof Andrzej Dragan, received practical guidance on how to use Copilot effectively, and attended a panel discussion featuring ING experts and leaders. On the second day designed for those in leadership roles power speech led by Bartosz Pucek, we heard examples of AI applications at ING, and invited leaders from other organisations to hear about the use of AI in the market. The next two days of the conference consisted of online workshops on prompting, building a career path with AI, as well as creative thinking and problem solving using technology, which were led for us by experts from Campus AI and Booster of Innovation.

- ***30under30*** – a development initiative that supports future female banking leaders to achieve their career goals and gain a market advantage. The programme included workshops on public speaking and business pitching, inspirational panel discussions, a Gallup poll, elements of service design, working on a solution to a business problem. The second edition of the programme was completed by 19 female employees from the Risk Division, the Finance Division and the Technology Division.
- ***Tech Learning Day*** – 20 people on stage, a packed auditorium in Katowice and over 400 participants online! Organised by the CIO Division, the conference placed a strong emphasis on inspiring new challenges in technology education. An important part of the meeting was also a conversation about how to learn in this day and age and use new technological developments wisely.
- ***Cyber Security Month*** – every November, the Cyber Security and IT Risk Expert Centre organises Cyber Security Month for employees. It is a series of educational and entertaining events aimed at raising employee awareness which also increases the safety of our organisation.

In 2025, we organised five lectures:

- Review of current/most interesting cyber attacks on users in Poland conducted for around 70 people on-site and 483 people remotely,
- Everyday cyber security – passwords, attacks and everyday pitfalls – 88 online participants,
- Trends and fashions 2025 – 94 participants online,
- Next stop – Black Mirror. Of the dark side of artificial intelligence – 99 participants online,
- Can a computer kill? – 15 in-person participants, 142 online participants.

In addition, educational programmes are run across business lines to support the development of key business skills and strengthen the organisation's ability to achieve its strategic objectives.

We develop leaders – because the strength of our teams depends on them

Strong leadership skills are the foundation of well-being and performance at ING. We equip leaders with practical skills. We develop both those who manage teams and those who lead informally or are preparing for a leadership role.

Leaders lead by example because what they do is more important than what they say. This is why our global and local offerings are modular and offer choice. The development pathway at ING Today is a signpost in the Individual Development Plan, and leaders decide for themselves which elements best support their needs.

Key activities in 2025:

- ***Authentic leadership*** – we support the people who lead our bank in a world full of complexity and digitalisation. We help build the self-awareness, relationships and skills needed to lead people through change and influence the direction of the organisation. We focus on learning through experience and collaboration. We use new technologies like group VR simulations. We connect leaders with people outside the organisation.
- ***Make a difference in leadership*** – we support in the development of key competences for the future of leaders who lead teams or individuals. The programme prepares you to manage change, build mental resilience, communicate simply and effectively and execute your business strategy. We create a space to work with feedback and develop the skills of the future.
- ***AI managers*** – we support leaders to consciously and effectively implement AI in the organisation. The programme focuses on practical applications in a leadership role. The course includes live online classes and access to recordings. It is a space to gain the competences of the future and increase your impact within the organisation.
- ***Leadership Fundamentals and ING Leadership Experience*** – flagship global programmes for new and experienced leaders. Interactive sessions, certified facilitators, experienced coaches, theory and practice in real-life situations.
- ***Workshops on inclusive leadership and unconscious attitude***s – we teach what inclusive leadership is, how to build psychological safety, manage beliefs and micro-behaviours. We analyse unconscious biases and ways to counteract them. This is a time to share experiences and develop strategies that leaders will implement at work.
- ***Change management and VR simulations*** – in a world of constant change, we support you in successfully leading teams through transformation. The VR simulation is a practical training that develops key skills: communicating change clearly, understanding emotions, dealing with resistance and having supportive conversations.

- ***Mentoring, coaching and career counselling programmes*** – we provide the space for informed career development and planning. These are unique formats where people connect face to face. We connect mentors and mentees within the organisation and, through our collaboration with the *Business Women Leaders Foundation*, also outside ING. We offer coaching sessions – with internal and external coaches – and advice on designing individual career paths.

Metrics

MDR-M, S1-13

Due to the wide range of development opportunities, we measure various aspects of their use, including hours spent on the ING University platform, the number of mentoring sessions, indicators such as the number of people at bank-wide events, and their feedback in quality surveys. Measuring the effectiveness of an action depends on its form. We also gather the voice of employees in the annual OHI survey. This gives us a broad picture of how the development offer meets the needs of people working at ING. We ask, among other things, whether employees feel they have the appropriate competencies to implement ING's strategy, whether they receive the training and development they need to perform their jobs effectively, and to what extent ING offers clear career paths for all employees.

Development at ING in numbers

Quantitative information on development activities	2021	2022	2023	2024	2025
Number of development activities per employee	25	24	40	37	22
Number of hours of development activities per employee	29.0	32.2	36.0	32.0	27.0
Percentage of employees who participated in at least one development activity	98%	99%	98%	98%	100%

Quantitative information on development activities	2024	2025
Development budget per person (PLN)		
Women	2,619	2,601
Men	1,969	1,854
Total	**2,374**	**2,315**
Average number of hours of development activities per employee		
Women	33	27
Men	31	27
Total	**32**	**27**
Average number of hours of development activities per employee – grade level		
Senior management	24	23
Managerial staff	33	35
Other employees	32	27

Methodological note:

1. *The training budget is allocated to the implementation of development initiatives and programmes, as well as to the purchase of tools and educational platforms. The costs of individual activities, as well as licence fees for the use of platforms, are calculated per active platform user or participant in a given training course.*
2. *Senior management is considered to be those employed in positions from grade 19 inclusive (out of 21 grading categories) and simultaneously being supervisors for at least one employee.*
3. *Employees classified below grade 19 and who are supervisors for at least 1 member of staff are considered to be managers.*
4. *The Bank Management Board is included in the senior management.*

Employee Evaluation (Step up)

We base employee appraisal on the Step Up model, which combines performance appraisal with behavioural assessment and supports the implementation of the bank's strategy by developing competencies, strengthening the organisational culture and building employee engagement. The model sets annual targets in two independent areas: Results of Work and Orange Behaviours.

A key part of this process is the annual and semi-annual interviews. These are formal meetings between the employee and the supervisor, during which:

- the performance of the tasks is summarised,
- the extent to which objectives have been met is assessed,
- areas for development are identified,
- priorities and an action plan for the coming year are set.

Two-way feedback, including both the employee's and supervisor's perspectives, is an important element of the interviews.

Talks are held twice a year – after half a year to assess the achievement of objectives and identify areas for development, and a summary of the whole year finally accounting for tasks. The outcome of the annual interview translates directly into the level of the annual bonus. The rules for the settlement of bonuses can be found in *the Employee Evaluation Bylaw (Step up).*

Percentage of employees who took part in the Step Up* annual appraisal process

	2021	2022	2023	2024	2025
Women	**94%**	**94%**	**95%**	**96%**	**96%**
Senior management	100%	100%	100%	99%	100%
Management	100%	99%	97%	98%	99%
Other employees	93%	93%	95%	95%	95%
Men	**99%**	**99%**	**100%**	**97%**	**97%**
Senior management	100%	100%	99%	99%	99%
Management	100%	100%	99%	99%	99%
Other employees	99%	99%	100%	96%	96%
Total	**96%**	**96%**	**97%**	**96%**	**96%**

Methodological note:
**Only long-term absentees were not involved in the Step Up process.*
1. *Senior management is considered to be those employed in positions from grade 19 inclusive (out of 21 grading categories) and simultaneously being supervisors for at least one employee.*
2. *Employees classified below grade 19 and who are supervisors for at least 1 member of staff are considered to be managers.*
3. *The Bank Management Board is included in Senior Management.*

Consumers and end-users (S4)

Our clients

We are a universal bank which, together with other group companies, serves both retail clients and businesses. We define our clients as corporate clients and individual clients.

At the end of December 2025, the number of clients was 5.3 million (up by 155 thousands y/y) and was divided into the following business segments:

- 4.70 million retail clients (up by 133 thousands y/y), of which 2.37 million are primary clients for whom we are the bank of first choice,
- 594 thousands corporate clients (up by 21.6 thousands y/y).

More about our clients can be found here.

In this chapter, in line with the results of the double materiality assessment and the analysis of the ESRS definition of "Consumer and End-User", we focus on information relating to material sustainability issues related to our **individual** and **private banking** clients served within ING Bank Śląski's retail banking segment (hereafter: "clients").

Material topic	IRO type
Access to (quality) information Responsible marketing practices	⊖ ⚠
Access to products and services Non-discrimination	⊖
Privacy and data protection	⊖ ⚠

⊕ Actual positive impact
⊖ Actual negative impact
⊕ Potential positive impact
⊖ Potential negative impact
Opportunity
⚠ Risk

Full description of material impacts, opportunities and risks can be found here.

Our mission is to support and inspire people to be one step ahead in life and business. We are one of the largest banks in Poland providing services and products to retail clients. Our clients are an extremely diverse group in terms of age, location and other socio-demographic characteristics. Most are Polish nationals, but we also serve clients from other countries.

We want to inspire and support our clients to make the right life decisions and look after their financial health. We achieve this mission through the procedures in place, but above all through dedicated employees who are sensitive to the diverse needs of clients.

Link to business strategy

SBM-3, S4-4

In November 2025, we published our new ING business strategy. In the beat of life, extending to 2035. The strategy is guided by a vision that is based on three key values within the ING Group: Most loved, Most impactful, Most valued. We are committed to our clients to create unparalleled experiences and to be an assistant in wealth management and good financial decisions. More information on our strategy can be found here.

We invest in technological development, improve the accessibility of services and adapt our solutions to the changing needs of our clients. We are committed to simple language and clear communication. The client and their needs remain at the heart of our business model.

We support entrepreneurship and help manage finances. We want to be a bank that provides its clients with practical solutions that they need and enjoy using, and to which they have safe and equal access. We want people to be able to achieve their goals with our support. Access to quality information and social inclusion are important to strengthen the financial health of clients and to strive for full accessibility of products and services. Through extensive financial education activities aimed at our clients, we want to strengthen their ability to make responsible financial decisions with an understanding of their consequences.

In the ESG goals set for 2025-2027, we focus our actions relating to our retail clients on strengthening entrepreneurship and levelling the playing field for clients. These are consistent with the identified material areas of our potential impacts, opportunities and risks described here.

We also continue to support clients in their environmental transformation through:

- financing and the offer of sustainability-related products and services (e.g. a loan for an energy-efficient home),
- building awareness and knowledge about sustainability and the environmental impact of financial decisions.

More information on sustainability is set out in our strategy here. We provide a more detailed overview of how we implement our objectives and integrate them into daily interactions with our retail clients in the following sections of this chapter.

Engaging with retail clients

S4-2, S4-4

Our clients are one of our most important stakeholder groups. In accordance with the *ING Bank Śląski S.A. Organisational Bylaw* – which defines the operating principles and areas of responsibility – two business divisions supervised by Board Members are responsible for the retail client segment:

- Retail Clients division,
- Private Banking and Investment Clients division.

Additionally, the COO – Retail Client Operations division has units responsible for operational support, including the process of handling complaints and enquiries. Clients are a key resource for us – their feedback helps us see both strengths and areas for improvement.

We learn about what is important to our clients from the ongoing analysis of their needs, coming to us through all channels of client contact with the bank. We analyse in detail the findings of our research with clients. We are systematically increasing the number of surveys on key client journeys, and we are implementing more and more surveys in Moje ING so that clients can evaluate our processes right after the activity, on the spot. We research and analyse key indicators and key drivers of the customer experience along their path.

Understanding how clients use our products, services and applications helps us design solutions that address the needs of specific client groups. More information on designing products and services with the best possible user experience in mind can be found here. We write about our work on accessibility of products and services here.

The primary channel of communication with our clients is the Internet, with a strongly growing role for mobile banking. Far-reaching digitalisation requires not only changes in how we function as a company, but also responsibility for our clients, their data and their security. We therefore strive to support our clients and offer them solutions that are secure, intuitive and user-friendly. More information on technological transformation can be found here.

The Moje ING mobile app is the main channel for our clients to interact with the bank. In 2025, we have seen a significant increase in the number of its active users. It is already used by more than 3.1 million clients (compared to 2.9 as at 2024 yearend). We care about the performance and reliability of our systems. Moje ING's accessibility as at 2025 yearend was 99.97% (99.95% the year before). For children aged 6 and over, we have made the Moje ING app available in an age-appropriate version with a limited range of functions. More information on Moje ING can be found here. Remote contact for our clients is supported by a 24/7 helpline, state-of-the-art chat, contact forms and social media.

We also serve our clients through a network of meeting places. These are places where our clients can ask for advice and have a chat. As at 2025 yearend, we had 150 meeting places (175 the year before) and 55 cash service

points (unchanged from 2024). We are consistently in the process of modernising our bank outlets, which involves changing equipment and décor and introducing new functional solutions. As at 2025 yearend, the bank also had 64 ING Express outlets located in major shopping centres across Poland (56 in 2024). More information on our service in meeting places can be found here.

We actively cooperate with community organisations and NGOs. The dialogue we have with them is an important source of knowledge about our clients' needs, especially those who may be at risk of exclusion, for example due to health or age. We write about our partnerships and cooperation with the environment here.

We have presented information on the channels, forms and frequency of communication in the chapter Relations with our Staheholders.

One of the ways we assess the effectiveness and quality of our client relationships is through the *Net Promoter Score (NPS*), which measures whether clients would recommend ING to others. For us, this is not just a number – it is a strategic barometer of satisfaction, loyalty and the trust our clients have in us. By analysing the NPS, we can verify the effectiveness of the actions taken, the experiences designed and the processes described in the following chapter.

Customer experience remains at the heart of our strategy. Thanks to a rigorous methodology and market benchmarks, we know exactly how our clients perceive us and where we stand in comparison to other financial institutions. At the same time, we do not limit ourselves to the indicator alone – we analyse in depth the voice of the client, comments and feedback coming in from multiple sources.

In 2025 we have seen an increase in NPS among retail clients. The annual average value reached 32 points, compared to 31 points in 2024. This result allowed us to maintain our position as the leader in the rankings and maintain a 16-point lead over the market average and a ten-point lead over the next bank. The data comes from the independently syndicated NPS relational benchmark survey (Bermuda project), conducted by research agency Minds & Roses. The survey was conducted using the CATI method and covers a representative group of Polish bank clients aged 15 and over. More information on the NPS can be found here.

Whistleblowing channels for reporting concerns and complaints available to retail clients

One of the key elements of client communication is complaints management. Our *Client Centricity Policy* sets out the minimum requirements for complaints procedures, including the need to be transparent in the complaints process and to keep clients informed about the progress of ING's complaints handling. Complaints must be evaluated regularly and root cause analyses must be carried out to reduce the risk of harm to the client.

A complaint is defined as any expression of dissatisfaction by a client with an activity, product or service offered by ING Bank Śląski S.A., addressed to the bank in any form, in which the client expects a remedy, a refund or other form of compensation.

To ensure the highest quality of service, we have identified units responsible for handling each type of complaint. We make sure that the employees in these units are specialised and we have clear responsibilities. We act on the basis of the law and our internal regulations, including the *Complaints Management Policy at ING Bank Śląski S.A.* and prepared procedures.

We have also made available a whistleblowing channel for all external stakeholders who would like to raise a concern about the conduct of a bank or an entity of its group.

Complaints process

We accept complaints from any person, including those who are not our clients. We provide multiple channels for submitting complaints, including internet and mobile banking (a self-registration form and chat), by telephone, in writing, and at meeting places. The channel for submitting complaints established by a third party is the e-Delivery channel, which stems from the *Electronic Delivery Act of 18 November 2020* and is operated by Poczta Polska. The other channels are provided by us as a bank and refer to the provisions of the *Act of 5 August 2015 on the Handling of Complaints by Financial Market Entities, the Financial Ombudsman and the Financial Education Fund.*

Clients are informed about the possibility of filing a complaint via our websites (in the contact section and/or on specific product pages, in frequently asked questions and in the search engine when searching for "complaints") and via the terms and conditions, which are provided to the client together with the individual products. In addition, the Contact Centre/branch/chat agent can provide further information on the complaints processes when a client contacts ING and would like to make a complaint.

We recognise that a situation where a client decides to make a complaint is not comfortable for them, so we ensure that the process is simple, intuitive and tailored to the needs of clients.

We provide clients with a complaint submission form in Moje ING. In addition to complaints, clients may also independently register an instruction or submit additional documents in support of their request. We are constantly developing our system by extending the form's functionalities and improving its operation. The complex but intuitive categorisation of request topics, 24/7 access and fast system operation, significantly speeds up the process of registering a request and forwarding it to the relevant analyst. Clients can check the status of their request at any time in Moje ING. With this solution, access to this information is constant and independent of the accessibility of specialists on the chat, helpline or meeting place. In 2025, 48% of complaints were registered by clients through the form (+17 p.p. compared to the previous year).

We monitor client satisfaction with the complaints process. We analyse every stage – from the moment the client approaches us with a problem to the moment they receive a response from us. The elements of this complex process are an important source of information, and detailed analyses provide us with clues on how to improve it and make it work ever more efficiently.

We also look at the reasons for the complaints made – this is a valuable source of information for us about the level of our service and the products we offer to clients.

Our aim is to handle requests as quickly as possible. Many of these (71.1% in 2025) were handled within 48 hours of being reported (+5 p.p. compared to the previous year). We have also improved the average complaint handling time (calculated in calendar days) – from 5.3 days in 2024 to 4.7 days in 2025.

In the complaints that we handle positively, we do so in accordance with our clients' expectations. We refund their account, provide them with additional explanations, correct data or optimise processes to avoid similar situations in the future.

Our policies for retail clients

S4-1, MDR-P

Consumer and end-user policies support the implementation of the strategy by setting out principles and standards of conduct in key areas of client relations. These standards are firmly embedded in operational processes and internal regulations and their application enables the identified impacts and risks to be effectively managed. The key documents describing our approach to individual clients and their link to sustainability issues are set out in the table below.

Relevant policies are also in place in material entities of the ING Bank Śląski S.A. Group, all of which are approved by the Management Board (of the bank or its subsidiaries, respectively). Employees have ongoing access to policies and client guidelines through resources available on the intranet and during dedicated training sessions.

We have provided additional information, including the extent of the practical application of each policy, later in this chapter.

Document name	Related material sustainability topics	Related internal regulations
Client Centricity Policy (hereinafter: the "CCP Policy")	• Access to (high quality) information • Responsible marketing practices • Social inclusion of consumers or end-users • Ensuring accessibility of products and services	• *Manual on the Prevention of Greenwashing* • *Manual on Markets and Investor Protection* • *Insurance Distribution Manual* • *Greenwashing Risk Management Manual* • *Manual on Ensuring Accessibility of ING Bank Śląski S.A. Products and Services.* • *Guidelines on Client Orientation in Relation to Physical Risk and Transformation in Mortgage Products* • *Policy - Standard for the Implementation, Modification, Review and Liquidation of Products for Bank clients (PARP)*
Complaints Management Policy at ING Bank Śląski S.A.	• Access to (high quality) information • Responsible marketing practices • Social inclusion of consumers or end-users	• *Procedure for Handling Registered Complaints*
ING Bank Śląski S.A. Personal Data Protection Policy	• Impact of information on consumers or end-users – Privacy	• *Guidelines on the Protection of Personal Data* • *Personal Data Breach Reporting Procedure* • *Banking Secrecy Policy* • *Manual – Mandatory Guidelines to the Personal Data Protection Policy: Training and Awareness-Raising* • *Policy – Rules on Record Retention and Deletion*

Marketing communication

S4-1, MDR-P, S4-4, MDR-A

Client Centricity Policy (hereinafter: the CCP Policy)

The *CCP Policy* applies to all business divisions of ING Bank Śląski S.A. and the scope of protection is tailored to the specific client segment. The Centre of Expertise – Compliance is the owner of the document.

The *CCP Policy* helps to prevent the risk of unfair treatment of the client. It is based on the *Golden Rules of Customer Service*, which have been expanded to create requirements that are designed to help protect (potential) clients and prevent negative impacts resulting from, inter alia, mis-selling. We implement the provisions of the policy by offering products and services that are suitable for clients throughout the lifecycle of the relationship with them, at a fair price that takes into account market realities, costs and risks. We ensure this by implementing and monitoring appropriate controls and processes, such as incorporating all elements of client focus (including social inclusion and prevention of greenwashing) into the development of new and changes to existing products. The *CCP Policy* requires that all information provided to the client about products and services is communicated in a clear and not misleading manner and that services are delivered by employees who are professionals with appropriate knowledge and experience. In all these actions, we consider ESG risks and the impact on our products and services.

The *CCP Policy* is closely linked to several other ING policies, in particular the *Policy – Standard for the Implementation, Modification, Review and Liquidation of Products for Bank Clients (PARP*). The *PARP Policy* sets out the requirements for the approval and review of financial products, while the CCP Policy sets out the standards for client orientation to be adhered to when developing, offering, recommending and/or selling financial products, as well as ING's further interaction with clients. When developing products, we aim to add value for clients and ensure that the information provided is reliable and that our products and services are understandable and accessible to all clients, including those with lower levels of digital skills or with disabilities. In line with the *CCP Policy*, we want to create and sell products that contribute to the interests and objectives of clients and society.

In line with the *CCP Policy*, our priority in communicating with clients is to ensure that the message is fully transparent and accurate. Information provided to the client about products and services should be clear and not misleading. All marketing materials must comply with the rules contained in the *Marketing Materials Review Manual*:

1. The message in our advertising materials must be tailored to the target audience, their competence and financial knowledge.
2. The content provided shall be accurate, not questionable or misleading.
3. Where possible, materials should refer recipients to a website or other place where they can read full and comprehensive information about the product or service.
4. Our marketing activities must comply with the law and good morals. Specifically:

- *the Act on Combating Unfair Competition of 16 April 1993,*
- *the Act on Counteracting Unfair Market Practices of 23 August 2007,*
- *the Act on Personal Data Protection,*
- *the Act on Competition and Consumer Protection of 16 February 2007,*
- *the Consumer Credit Act of 12 May 2011,*
- *Banking law,*
- *the Act on Trading in Financial Instruments,*
- *Regulation on the Mode and Conditions of Operations of Investment Firms, Banks referred to in Article 70(2) of the Act on Trading in Financial Instruments and Custodian Banks,*
- *the Act on Mortgage Credit and on Supervision over Mortgage Credit Intermediaries and Agents of 23 March 2017,*
- the Position of the Polish Financial Supervision Authority (PFSA) and basis resulting from: Article 83c(2) and (3) of the *Act on Trading in Financial Instruments Act of 29 July 2005,*
- The PFSA's rules on advertising of banking services.

In addition, our actions are guided by the guidelines and recommendations contained in:

- *the Code of Ethics in Advertising developed by the Association of Marketing Communication SAR.*
- The Polish Bank Association's 2015 Good Practice Standards for Consumer Credit Advertising,
- An introduction to the greenwashing issue of the Polish Bank Association 2024,
- Greenwashing Monitoring and Supervision – Final Report EBA/REP/2024/09" of 04.06.2024 – EBA recommendations,
- Children Rights' Charter in Business (an initiative of the Forum for Responsible Business),

All advertising content prepared by ING is subject to review by participants in the process, including the Legal Department and the Centre of Expertise – Compliance in accordance with the Marketing Materials Review Manual.

PARP Process

At ING, there is a process for introducing, modifying, reviewing, and discontinuing products intended for clients, known as the PARP - Product Approval and Review Process. It ensures appropriate oversight and risk-management frameworks in the development of new products and the modification of existing ones, including products offered to consumers.

This process is governed by the *Policy – Standard for the Implementation, Modification, Review and Liquidation of Products for Bank Clients (PARP)* and the *Instruction – Standard for controls and organization of the process for introducing, modifying, reviewing, and discontinuing products intended for clients of ING Bank Śląski S.A.* Any change to the *PARP Policy* must be submitted for approval to the Management Board and the Supervisory Board. These regulations describe:

- the roles and responsibilities of individual units participating in the process (including second line of defense units, e.g., compliance, operational risk), the procedure for processing product changes and the decision-making mode;

The stages of executing a product change include:

- initiation of the change,
- review and decision,
- execution of the decision,
- legislation/implementation.

All new products and changes are assessed in the PARP process within a standardized approach that ensures compliance with the law, consistency, high quality, and value for clients and for ING. At the same time, the requirements and course of the process ensure that the scope of risk assessment for a product includes the application of Polish legislation, European Union legislation, and other legal provisions (e.g., FATCA/CRS, BFG, GDPR, MiFID II, ESG-related regulations and sanctions).

When implementing a product initiative, units managing the product and developing product regulations must follow the following principles:

- products should be consistent with the bank's strategy, and their structure should be transparent and easy to understand for the target client group,
- financial and non-financial risks related to the implementation of the product initiative must not exceed the established acceptable level of risk,
- product initiatives implemented within PARP are consistent with applicable law and internal regulations,
- the target client group for products/services is clearly identified and defined based on commercial criteria and risk assessment, as well as (if applicable) in terms of sustainability preferences,
- information on the product, target client groups, functionalities, pricing, sustainability aspects, pilots, risks, and exclusions is clearly communicated and is understandable for clients,
- the bank does not exploit gaps in the law to circumvent financial reporting regulations or avoid tax burdens, whether for the bank or the client - the bank's products do not support clients in potential tax evasion,
- the bank does not use clauses considered prohibited (abusive) in regulations and agreements concluded with clients,
- information is provided to clients in a reliable, transparent, and exhaustive manner and presents all essential product features, in particular the conditions for using the product and the associated costs and potential financial risks for the client,
- the bank subjects the products offered to periodic reviews.

The implementation of a new product or significant changes is carried out after the mandatory issuance of a decision by the appropriate permanent product committee appointed by the Management Board:

- Retail Products Committee,
- Corporate Products and Financial Markets Comittee.

The decision of the product committee is published in the form of an order issued by the President of the Management Board.

Plain language

We widely promote the idea of plain language, share our knowledge and our experiences and have been simplifying our communication for more than ten years. Complicated terminology and intricate content can be a barrier for many people. As part of the "Po prostu" project ("Simply"), the plain language standard at ING, we have set ourselves the goal of making the language of banking more accessible to all clients. From a small project, we have grown to a standard across the organisation and have learned to write our communications more simply.

In 2025, we continued to simplify our communications:

- In Q2, we made Prostomat 2.0, a new version of the simplification tool, available to all employees. With AI, the tool better diagnoses and suggests how to simplify difficult sentences.
- We have also developed a certification programme: 133 people have been trained, 104 have been certified simply and 18 have passed the examination at the University of Wrocław. We also joined the Polish Bank Association agreement and organised the 7th edition of the plain language conference – once again bringing together experts from different companies and institutions in a joint dialogue.

Counteracting greenwashing

We define greenwashing as the intentional or unintentional provision of false, incomplete, incomplete or inaccurate information that may mislead clients and other stakeholders about the level of sustainability (in terms of E, S and G) of the products and services provided, the operation, the strategy and the stated objectives of the organisation. This is part of the generally accepted principle that information must be "fair, clear, not misleading and accessible".

This principle is not limited to written information. It also applies to the use of visuals that may present too one-sided a picture. Greenwashing is not only about environmental aspects. All the issues covered by an organisation's ESG commitments: environmental, social and corporate governance are potentially vulnerable to allegations of greenwashing. Timely and systematic identification of greenwashing risks is an important measure to reduce reputational, litigation and financial risks. This is why it is so important to understand what risks may arise from greenwashing.

Products and counteracting greenwashing

In the area of countering greenwashing during the design and implementation of new products, the *Client Centricity Policy* is put into practice through the following manuals, guidelines, and procedures

- *Manual – Guidelines for Preventing Greenwashing* – on the pitfalls of greenwashing that must be taken into account when designing new products,
- *Greenwashing Risk Management Manual* – on control processes and the processing of greenwashing complaints,
- *ESG (Sustainability) Product and Exposure Qualification Manual* – transparent classification of financial products and instruments based on market standards, Taxonomy (deposits and loans) and SFDR (financial instruments),
- *ESG (sustainability) qualification procedure for credit products.*

The new product development process takes into account specific guidelines for ESG-related products. Any newly designed product in this category shall be qualified in accordance with the *ESG (Sustainability) Product and Exposure Qualification Manual*, which defines the following asset categories (e.g. loans, credits):

- Tier 1 – aligned with the EU Taxonomy,
- Tier 2 – sustainable/social/green depending on the subject of the financing,
- Tier 3 and Tier 4 – supporting ESG e.g. SLL (Sustainability Linked Loans) financing.

In the case of liabilities (accounts, bonds), the qualification depends on the asset being financed. In the case of financial instruments (investment funds), the basis for the classification is the provisions of Articles 8 and 9 of the SFDR.

Based on the outcome of the classification, an anti-greenwashing analysis is carried out, the principles of which are set out in the *Manual – Guidelines for Preventing Greenwashing.* Recommendations for product communication are already made at the stage of this analysis, which significantly mitigates the risk of unfair treatment of the client in the context of greenwashing.

Communication and counteracting greenwashing

We are aware that the prevention of greenwashing should start long before the communication is developed. In the previous paragraphs, we have described a number of regulations that protect us from communicating activities whose subject matter may bear the hallmarks of greenwashing. At the same time, we know that even products and initiatives that comply with the EU Taxonomy and other ESG regulations can be written about in redundant ways. At ING, we place importance on transparent and data-driven communication of ESG-related initiatives. The principles of such communication are detailed in the following documents:

- *Manual – Guidelines for Preventing Greenwashing,*
- *Assessment of ESG Communications* (hereafter: OK_ESG) – a practical guide, based on examples from the 2020-2024 message analysis.

Transparency statement

The *OK_ESG* material also describes the obligations relating to the *Transparency statement* that we apply to communications about our sustainability-related actions, in particular climate action. We want clients and stakeholders to be aware that transforming the economy is a long and complex process. The transparency statement speaks to the broader context of our actions, not just the selected initiative we are communicating at the time. We are committed to ensuring that the recipient has the full picture and does not gain a misconception about the level of sustainability of our actions based on a single message. We place them, for example, under environmental posts on the bank's social media channels. The content of the *Transparency Statement* is as follows:

Society is transitioning to a low-emission economy. Our clients are making this transition, and so are we at ING. We fund many sustainable activities, but still more of those that are not. Check how we are doing – go to esg.ing.pl

Anti-Greenwashing Experts

Within the Centre of Expertise ESG Innovations unit, there are experts dedicated to preventing greenwashing. Their role is to support business units, cooperate with the Compliance Centre of Expertise in developing and implementing regulations, and deliver training activities.

Training activities 2025

Since 2023, we have made a webinar on greenwashing available to employees as part of the "*ESG for professionals*" programme, which 409 people completed in 2025 (compared to 806 people in 2024).

In addition, the topic of greenwashing is part of the core educational programme "*ESG and sustainability*", which has been completed by more than 77% of employees of the ING Bank Śląski S.A. Group since 2023 (+3 p.p. compared to 2024). In addition, a training course for key individuals involved in product processes and communications was held

in 2025, which involved more than 270 people (more than 350 people participated in the 2024 training series). Training activities were also extended to both ING foundations.

Metrics

MDR-M

In the area of countering greenwashing, the objectives set relate to the implementation of the requirements of the *CCP Policy*, according to which all information (including marketing material) about ING's financial products that we provide to (potential) clients must be reliable, clear and not misleading. Constant monitoring is being carried out to reduce or eliminate greenwashing practices. We use the following metrics to measure the effectiveness of these activities:

- % of higher-risk products per client segment;
- number of risks registered in relation to greenwashing;
- number of greenwashing incidents;
- number of complaints containing a greenwashing component.

No material events have been identified in 2025 that could generate an increased level of greenwashing risk.

Accessibility of products and services

S4-4, MDR-A

We want to be a bank that is accessible to everyone. We are successively introducing improvements and solutions to ensure equal access to our products and services for all clients, regardless of their living situation, economic status, health status or individual needs. In this area, we undertake a number of activities aimed at satisfying our clients and strive to meet regulatory requirements through continuous monitoring of regulations and trends; In June 2025, we implemented the requirements under the *European Accessibility Act* and the *Polish Accessibility Act* in accordance with the *Act of 26 April 2024 on Ensuring that Certain Products and Services by Business Entities Meet Accessibility Requirements*. We are successively taking care to improve accessibility for clients with special needs, especially in areas:

- digital accessibility,
- accessibility of documents and regulations,
- communication accessibility,
- accessibility of facilities and helplines,
- accessibility of ATMs and cash deposit machines.

All the facilities implemented in 2025 are described on a dedicated page - Barrier-free bank - information on accessibility.

We strive to ensure that products and services are accessible to all client groups

We educate, support and raise awareness among our employees about customer groups at risk of exclusion, including people with disabilities and special needs. In their daily work, specialists use materials containing guidance on serving senior customers as well as people with disabilities – mobility, visual, hearing or other.

Since 2015, we have continued to maintain the "MIGAM" ["I know sign language"] sign language interpreter access service in all our outlets and on the bank's helpline. It allows deaf people to easily and quickly access the bank's services via their mobile phones. The vast majority of our outlets are equipped with induction loops, a reading app for the visually impaired, magnifying glasses and signing frames. Clients can enter our facilities with an assistance dog. Our search engine allows you to check the availability of facilities at individual establishments.

We implement solutions that comply with international digital accessibility standards for use by visually impaired people in accordance with *Web Content Accessibility Guidelines 2.1 (WCAG 2.1):*

1. We are customising the Moje ING mobile app, the Moje ING online banking system and the bank's website.
2. We adapt non-marketing communications to take into account the needs of people with such impairments.
3. We are adapting the regulations to comply with the requirements of the *Act on Ensuring Accessibility for Persons with Special Needs*. We make them available in formats that allow them to be read by software supporting people with special needs. We take care to provide adequate text contrast, clear fonts and simple language so that our clients can make full use of the documents. At the client's request, we can provide policies in Polish Sign Language, in audio format, in enlarged versions with large print, as well as in Braille.

We are also cooperating with the *Widzialni* Foundation in this area. In January 2025, we joined the *Business Accessibility Forum*.

We are actively involved in sectoral projects and initiatives aimed at dialogue with the social side and continuous improvement in accessibility. Remote contact of our clients is supported by a helpline, chat, contact form. Availability times are presented on the website under Help and Contact.

We also focus our actions on the management of equipment, taking care of its accessibility, security, functionality, adaptation to current requirements and client needs.

Bearing in mind the accessibility requirements for products and services, we aim to make ATM / POS machines suitable for use by people with special needs. In 2025, all ATMs with the ING logo will enable the use of a voice guide. In addition, we have expanded this functionality in 2025 to include BLIK transactions and Euro withdrawals. For visually impaired people, this is an important facility. In addition to the audio system, blind and partially sighted

clients are also assisted during the transaction by stickers with Braille messages. They indicate the key elements, making it easier to use the ATM. In locations where this was possible, we adjusted the height of the ATMs to accommodate people who use a wheelchair. Information about ATM facilities is available in the search engine on our website.

Solutions available at our outlets	Meeting places		Customer service points		ING Expresses	
	2024	2025	2024	2025	2024	2025
Number of outlets	**175**	**150**	**55**	**55**	**56**	**64**
Sign language service	100%	100%	100%	100%	-	-
Wheelchair accessible space	-	87%	-	93%	-	-
Wheelchair accessible space with assistance	-	11%	-	7%	-	-
Access without architectural barriers	98%	99%	100%	100%	100%	100%
Induction loop	53%	100%	91%	100%	-	-
Possibility to enter with an assistance dog	100%	100%	100%	100%	100%	100%
Facilities for the blind and visually impaired	-	100%	-	100%	-	100%

Methodological note: The accessibility solutions were developed and implemented in 2025. The information presented has been prepared in accordance with the requirements of the law that came into force in June 2025. As a result, at the end of 2024 we did not have comparable data or indicators, as they were not required or monitored to the extent applicable today. In ING Express points operating in open spaces (such as shopping malls), certain facilities are not applied due to the need to ensure safety and the confidentiality of conversations with clients

Solutions available at ATMs/deposit machines with the ING logo		
	2024	2025
Wheelchair access (no architectural barriers, adapted height of device)*	138	208
Sound system – possibility to use a voice guide by connecting headphones	520	850

**criterion determined on the basis of consultation with the Integration Foundation (an ATM is adjusted if its highest control is up to a height of maximum 120 cm).*

We have supplemented the search engine for our outlets and ATMs/deposits available on our website in January 2025 with additional filters to check which facilities for the disabled we have at each outlet.

Accessibility of knowledge and financial education

S4-4, MDR-A

An important activity to support the accessibility and financial health of clients is financial education, which we have been addressing to a wide audience for many years. The implementation of these actions flows from the need to share the expertise we have as a financial institution. We feel a responsibility to strengthen the financial health of our clients and target a wide range of educational content, designed for a diverse audience. Financial education activities are also one of the main areas of activity of one of our corporate foundations, the ING for Children Foundation. More information on the Foundation can be found here.

Responsible business in customer service

We are continuing with activities that put the client at the centre of our processes. We support clients by educating and assisting them in the use of the Moje ING app, offering banking products and services, as well as additional functionalities such as the Trusted Profile, paying for parking or purchasing public transport tickets. Education begins at the relationship establishment stage – prioritising the process of opening a selfie account with a facility that engages and empowers the client, giving them a sense of control and convenience. In addition, we make it possible to confirm identity using the mObywatel app, which reduces paperwork time and enhances the user experience.

On the screens in the outlets, we provide step-by-step tutorials on how to complete a transfer, change data or set limits for transfers and BLIK. We continuously analyse the activities that cause the most difficulties for clients and update the materials to be as helpful as possible.

Our specialists at the venues actively support clients in setting up the Moje ING app, completing their first transactions and selecting banking products. We focus on the client's independence – showing them how to use the app's functions in practice so that they can operate without barriers in the future.

We make sure that our service standards are accessible and friendly to every client, while supporting the comfort of professionals. We have introduced guidelines for serving mature clients and people with disabilities, which make it easier to tailor the process to individual needs and eliminate communication barriers.

In addition, we have provided guidance on inclusive language to make every interaction understandable, empathetic and professional. This provides professionals with clear tools and standards that simplify the service, increase confidence in the conversation and allow them to draw on the expertise of specialists. Ongoing support is also provided by your Virtual Assistant in the Moje ING app, available at a convenient time and place to answer questions and help you use the app safely.

Security is a key part of our conversations – we educate clients on how to protect their data and transactions, and provide solutions such as behavioural verification and CyberRescue. This builds awareness and trust, and makes clients feel confident in the digital world.

We are constantly working to ensure that the quality of mortgage customer service is of the highest standard. We organise workshops for our professionals, using modern technology such as VR goggles to practice the standard of customer service. Working to develop the competence of our specialists, translates into high satisfaction ratings. Among other things, this is the reason why we came 1st in the "*Institution of the Year*" ranking in the best mortgage service category. For us, this proves that investing in development and innovation really pays off – above all for our clients.

Promoting financial security attitudes and solutions for the future

We are continuing to promote offering solutions to support clients in building their financial health. In as part of the bank's ESG strategy, we responsibly offer IKE and IKZE pension products and carry out educational activities that help clients to consciously plan for the future.

During the year, we prepared and targeted clients with four special offers to promote pension products. The vast majority of people took advantage of these during face-to-face conversations with our pension experts, highlighting the role of specialist advice in making long-term decisions.

In order to also reach out to the younger client group, we have established cooperation with ING Express partners. As a result, we have increased interest in the topic of financial security for retirement. Clients can make appointments for consultations with experts both at the bank's outlets and during video meetings.

At the same time, we are developing the availability of knowledge and intensifying investment education activities. Our aim is to support clients in understanding the principles of long-term saving and investing so that they can make informed decisions about their financial future.

Availability of knowledge and client education in the area of investing

In pursuit of our mission to provide our clients with access to knowledge and education, we focus on explaining the principles of the financial market, commenting on the current market situation, introducing the specifics of the product offering and building awareness of how to take care of the financial future.

We have made available to clients in Moje ING the next level of sophistication "Investing Science with ING"- educational materials dedicated to those with more experience and investment knowledge. With this solution, the client will find tailored content to his or her interests and needs at the time. Our experts at the Investment Competence Centre prepare monthly market commentaries for clients, available on ing.pl. Clients find summaries of key market developments.

With financial education and the future of our customers in mind, we have implemented pension calculators for IKE and IKZE on the website and Moje ING..

In 2025, we continued our programme of regular online meetings with our clients. We held webinars where experts from the bank and our partners from investment fund companies shared their market knowledge in the area of investments.

Educational activity aimed at children and teenagers in the ING City on the Roblox

"*ING City*" is an educational game on the Roblox platform, with which ING was the first in Poland to appear in 2022. It is a virtual world where children and young people (7-17 years old) learn how to navigate safely online and the basics of responsible financial management – through fun and practical tasks. Players earn points for, among other things, cleaning the city, walking the dogs, washing windows and cars or helping out at a restaurant, while learning about cyber security: creating strong passwords, recognising unsafe sites, protecting data and keeping passwords safe.

ING Bank Śląski is aware of the risks that children may encounter online; therefore, the ING City game on the Roblox gaming platform is provided free of charge. Its aim is to stimulate interest in the topic of cyber security in young people in their natural environment and to support parents in educating them about it.

By the end of 2025, the game had engaged more than 1.4 million players (compared to 1 million at the end of 2024), while reaching more than 4.2 million visits (2.6 million at the end of 2024). Players have completed more than 690 thousands lessons in the Cyber Security Academy (300 thousands by the end of 2024) lessons in the Cyber Security Academy and more than 460 thousands online security quizzes (150 thousands by the end of 2024).

Economic Education at Your Fingertips

In 2025, we launched a nationwide educational programme "Economic Education at Your Fingertips", aimed at supporting the development of financial, economic and social competencies among primary school children. The programme was born out of the conviction that the ability to make decisions, plan and understand the basics of economics is the foundation of the competences of the future. The initiative includes a complete set of engaging educational materials for students in grades 1-3 and 4-8:

- Content for younger students was developed by the ING for Children Foundation.
- The scenarios for grades 4-8 were created by employees from ING's CFO Division together with the Foundation.
- All materials were created in collaboration with external experts.

The materials cover topics such as the history of money, earning, saving, spending, sharing, planning and developing future competences. Each module is enriched with activities to help consolidate knowledge through action. Content is available free of charge on the programme website here. Alongside the education programme, a grant programme has been launched in which teachers, together with their students, can carry out their own economic projects inspired by the "Economic Education at Your Fingertips" materials. Public primary schools nationwide are invited to participate, and the 10 schools with the most innovative ideas will receive a grant of PLN 6 000 to implement the project.

Education in a modern form – Myths and Credits

We want mortgage knowledge to be accessible to everyone – including younger audiences. That is why we created the video series "*Myths and Credits*" in TikTok format. In 10 short episodes, we dispel popular myths and explain the most important issues in simple terms. The videos are very popular – they already have more than 8.5 million views.

Our aim is not only to educate, but also to inspire informed decisions, including in the area of energy efficiency by encouraging clients to contact our specialists, who are there to support our clients on a daily basis.

Security of our clients' data and protection of privacy

Policies

S4-1, MDR-P

We are committed to ensuring that the rights to privacy and protection of personal data, as set out in *the Charter of Fundamental Rights of the European Union, the European Convention on Human Rights, the Data Protection Regulation (GDPR)* and the case law of the European Court of Justice, are taken into account when processing personal data.

We have regulated this area in our *Personal Data Protection Policy*, which reflects the requirements under the law and sets out our obligations in this respect. The following are responsible for ensuring compliance and implementation of the provisions of the policy: at the level of the bank's Board Member, the Data Protection Executive and the Data Protection Officer.

The principles relating to the processing of personal data included in the policy include:

- its confidentiality, data minimisation and processing for a specific purpose,
- transparency and information requirements for natural persons with regard to the processing and their rights,
- ensuring that the storage of personal data is limited,
- carrying out a data protection impact assessment of the effects of the processing on the rights and freedoms of natural persons,
- carrying out an impact assessment of data transfers outside the European Economic Area to countries not providing adequate protection.

The requirements of the policy set the standards for the protection of personal data that our employees follow to ensure compliance with the law and to meet the expectations of clients, suppliers, business partners and employees.

Banking secrecy also protects client privacy and is a pillar of trust in the client's relationship with the bank, and the bank's secrecy is designed to protect clients from unauthorised access to their financial data and to prevent fraud and financial abuse.

We make every effort to ensure that the protection of banking secrecy as set out in the *Banking Law* is taken into account in all processes, whether carried out by the Bank or by third parties acting on behalf of the Bank.

The bank has a *Banking Secrecy Policy* that organises the requirements of the rules on the protection of information covered by banking secrecy. One document identifies responsibilities to mitigate the risk of disclosure of banking secrecy by, inter alia, raising employee awareness, protecting banking secrecy information from loss and unauthorised disclosure, properly identifying, classifying and safeguarding such information, and ensuring that banking secrecy information is used/disclosed when there is a proper basis for doing so.

We make all internal policies and procedures available to our employees in an internal document database. We have prepared basic information in this regard for our clients on our website: Personal data protection | ING Bank Śląski.

Actions

S4-4, MDR-A

We are constantly working on solutions to protect clients and their finances from security breaches. We secure the IT environment, classify the data collected in specific applications and determine the relevance of this data. Depending on the level of data materiality, technical and organisational security measures are implemented, as well as appropriate contractual provisions with suppliers.

The actions we take an ongoing basis are aimed at mitigating the privacy risks of the individuals whose data we process on the one hand, and improving the services we provide on the other.

Potential material data protection impacts are identified and addressed in relevant risk assessments:

- data protection impact assessment – carried out in relation to the processing activities and allowing them to be analysed in depth in accordance with the applicable data protection rules and principles,
- legitimate interest assessment (so-called "balancing test") – carried out to assess whether the bank can rely on a legitimate interest as a legal basis for certain personal data processing activities,
- data transfer impact assessment – carried out when personal data are transferred to a country outside the European Economic Area.

All the aforementioned assessments lead to the identification of risks to the natural person and the introduction of measures to mitigate these risks, which are implemented directly in the business process or IT resource. This enables the continuous identification, management and mitigation of relevant data protection risks, as these assessments are an integral part of defining new business processes or making changes to existing ones. In addition, data protection issues are assessed and documented as part of the Policy for the Implementation, Modification, Review and Disposal of Products for Bank Clients. In addition, in 2025 we implemented Policy – Rules on Record Retention and Deletion, which supplements the above regulations with consistent information lifecycle principles – from storage and archiving to timely and secure disposal – with a particular focus on the principle of a limited retention period for personal data.

The Data Protection Officer shall be involved at every stage of the identification and assessment of the risk of violation of the rights and freedoms of the persons whose data the bank processes.

In addition, we analyse all client submissions in order to improve our products, processes, policies, procedures and communications and to involve relevant risk parties and internal stakeholders.

Within the Polish Bank Association, we are working with other banks to develop consistent solutions related to personal data protection.

Key actions taken in 2025 included:

- An analysis of the changes resulting from the *Digital Omnibus Regulation* and its impact on banks,
- Preparation of recommendations for the copying of identity cards,
- Consultation on the initiative of the Personal Data Protection Office (UODO) reducing the scope of data available in the Central Registration and Information on Business (CEIDG),
- changes in data processing in relations between Biuro Informacji Kredytowej S.A. – banks.

Data security and privacy education

We take care to inform clients transparently and completely about how their personal data is processed. We want clients to understand how we process their data, what rights they have and how they can exercise those rights. In doing so, we protect clients from the threat of losing control of their data.

At the same time, we continue to carry out awareness-raising activities targeted at employees. Cyber security is an important part of a bank's operations, as well as building a competitive advantage based on knowledge and modern technology. Social engineering, malware, ransomware, phishing are just some of the threats we need to be aware of. ING has security systems in place, but the actions of cyber criminals are becoming increasingly sophisticated, so all employees must remain vigilant. More information on cyber security can be found here.

In 2025, we conducted the following awareness-raising campaigns targeting employees:

- e-learning courses related to cyber security. Topics covered included how to protect yourself and your organisation from threats, e.g. how to recognise suspicious emails, text messages and websites, the latest deepfake threats in cybercrime and methods of manipulation,
- Cyber Security Month, during which ING experts and invited guests held a series of workshops and lectures,
- a dedicated internal "Join the Safe" community for employees, addressing security topics, describing examples of fraud and presenting new technological solutions.

We systematically monitor the degree of training delivery. Employees are obliged to process personal data in accordance with the authorisation given to them based on their job position. We build employee awareness of the applicable data processing rules through periodic communication to all employees and workshops on the protection of legally protected information.

Raising client awareness and teaching them about safe online behaviour is also an important activity. To 2025 this end, we have produced a range of educational materials available at:

- website www.ing.pl under the Security tab,
- on the login screen and in e-banking,
- on social media.

In addition, when a new type of fraud is identified, we inform clients by sending them a so-called PUSH. A dedicated group of specialists analyses fraud cases and decides whether security measures are necessary, informing clients of the new threat.

A security tool called CyberRescue has also been made available for our bank's clients. One of the functionalities of this tool is a special helpline where advice can be sought on, inter alia, the situation:

- when someone intercepts a client's email inbox or social network account,
- when a client receives an email with a suspicious link or attachment.

The bank has also developed products and solutions for underage clients, such as the ING City educational game on the Roblox platform. More information can be found here.

Cases of client privacy breaches and personal data leaks

S4-4, MDR-A

In the event of a personal data protection breach, we take the necessary containment and mitigation measures as quickly as possible after such an incident is identified. An appropriate analysis of the likelihood of the risk of a breach of the data subject's rights and freedoms is carried out and, if necessary, we report the breach to the supervisory authorities in accordance with regulatory requirements.

If required, we inform the data subjects indicating the possible consequences of the personal data breach and a description of the measures applied or proposed to remedy the breach and minimise its possible negative effects. We carry out an analysis of the process in which the breach occurred and implement additional security measures to prevent similar events in the future.

Data protection breach statistics

In 2025, we recorded 312 data protection breaches (compared to 186 in 2024), of which 160 breaches required notification to the Personal Data Protection Office (UODO), compared to 75 cases requiring notification in 2024. In the required cases – where violations of the rights and freedoms of natural persons were assessed at a high level – the affected persons were informed about the incidents, indicating the potential negative consequences of the violation and possible actions to minimise the negative consequences of the incidents.

The breaches that occurred were due, inter alia, to the loss of documentation by the postal or courier service operator and mistakes made by employees in the course of their duties (e.g. an email sent to the wrong addressee, an attachment with third-party details was mistakenly added in a message to a client, paper documents were mistakenly issued).

Where the client's complaint is justified, we take action to grant the client's request. In 2025, the bank found 19 substantiated complaints from clients regarding breaches of privacy.

In terms of the decisions taken by the Personal Data Protection Office (UODO), in 2025 the bank disagreed with two decisions and challenged them before the Provincial Administrative Court, additionally challenging one decision in 2024. Four cases are currently pending before the Provincial Administrative Court and one case is pending before the Supreme Administrative Court (NSA) at the bank's request.

SBM-3.48-b

In July 2025, the President of the Polish Data Protection Authority (UODO) imposed a fine of PLN 18 million on the bank in relation to the practice of scanning identity cards between April 2019 and September 2020. The bank created a provision for the amount of the fine and recognized it as an operating cost for 2025 (Note No. 8 in the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Capital Group for 2025). The bank appealed the decision by exercising its right to file a complaint with the Provincial Administrative Court in Warsaw. The bank fully cooperated with the President of UODO at every stage of the proceedings. The bank collected scans of identity documents only in situations where it was necessary to fulfil obligations arising from the Anti-Money Laundering and Counter-Terrorist Financing Act. The scans were obtained solely for this purpose.

Metrics

S4-5, MDR-T, MDR-M

No measurable targets have been set in the area of data security and privacy protection, but continuous performance monitoring is carried out using performance and risk indicators. These are monitored at a monthly frequency to allow for trend analysis.

The effectiveness of the implementation of actions is measured by:

- Timeliness of data protection impact assessments – as at 2025 yearend, the indicator was 100% (compared to 97% in 2024),
- the number of data processors on behalf of the bank that have been audited in the last three years – as at 2025 yearend, there was no entity that had not been audited (as in 2024).
- completeness of the implementation of the so-called "balancing tests: when basing the processing of personal data on the controller's legitimate interest – as at 2025 yearend, all the necessary balancing tests had been implemented (as in 2024).

Risk indicators in the area of personal data have been established for the following elements:

- timeliness of data subjects' rights requests – as at 2025 yearend, 100% of requests were completed within the regulatory deadline (similar to 2024),
- percentage of data protection breaches timely reported to the Data Protection Authority – as at 2025 yearend, all breaches for which the analysis showed a need to notify the Authority were timely reported (as in 2024),
- the number of entities processing personal data on behalf of a bank outside the European Economic Area to which data was transferred without the required impact assessment for the transfer of that data – as at 2025 yearend was 0 (unchanged from 2024),
- Percentage of bank employees trained in the area of data protection – 99.1% as at 2025 yearend (compared to 98.9% in 2024).

In addition to the measures described, we test and evaluate the controls defined in the area of data protection once a year.

Governance information (G)

Our corporate culture drives the way we do business and impacts all our stakeholders. We are guided by the ING's Orange Code, which sets our values and behaviours and ensures we work with integrity, transparency, high standards of business ethics, and with a strong focus on regulatory compliance.

In this chapter, we present information on sustainability issues material for ING that relate to the area of corporate governance:

- **G1 Business conduct:**
  - Corporate culture
  - Protection of whistle-blowers
  - Corruption and bribery

Business conduct (G1)

Business conduct refers to the way we do business. It includes issues such as business ethics and corporate culture, including anti-corruption and anti-bribery, and whistleblowing mechanisms and protection of whistleblowers.

Responsible business conduct is the cornerstone of our business and a key element in building trust with ING. Under the ESRS G1 topic, in line with the results of the double materiality assessment, we focus on issues related to business ethics, corporate culture, anti-corruption and anti-bribery, and the functioning of whistleblower reporting and protection mechanisms.

Material ropic	IRO type
Corporate culture	⊕ ⚠
Corruption and bribery	⚠
Protection of whistle-blowers	⚠

In this chapter, we outline how we manage the material issues covered by ESRS G1 – in particular, a description of the policies in place, the control processes and the steps taken to ensure regulatory compliance and maintain high ethical standards.

The internal guidelines and procedures that make up the internal control system enable us to identify and assess actual and potential risks in a timely manner, and allow us to respond to existing and potential risks in the short and medium term. However, the long-term outlook faces considerable uncertainty due to the changing regulatory environment and limited ability to forecast macroeconomic and social developments.

⊕ Actual positive impact
⊖ Actual negative impact
⊕ Potential positive impact
⊖ Potential negative impact
Opportunity
⚠ Risk

Full description of material impacts, opportunities and risks can be found here

Our ethics and compliance policies

G1-1, MDR-P

Key policies relating to material topics:

Document name	Related material sustainability topics	Related internal regulations
Bylaw – Principles of Professional Ethics for Employees of the ING Bank Śląski S.A. Group	• Corporate culture	• *Labour By-law* • *Anti-Discrimination and Anti-Harassment Policy* • *Conflict of Interest Management Policy* • *Client Centricity Policy* • *Conflict of Interest Policy* • *Market Abuse Policy* • *Competition Policy* • *Personal Data Protection Policy* • *FEC Policies*
Anti-Corruption Policy of the ING Bank Śląski S.A. Group	• Corruption and bribery	• *Conflict of Interest Policy* • *FEC Policies* • *Procurement Policy*
ING Bank Śląski S.A. Whistleblower Policy	• Corporate culture • Protection of whistle-blowers • Corruption and bribery	• *Procedure for Handling with Whistleblower Reports* • *Manual – Control Standard for the ING Bank Śląski S.A. Whistleblower Policy* • *Procedure for Carrying out Checks for Potential Retaliation against Whistleblowers*

In the table below, we provide a summary of the applicable regulations by key Group companies:

ING Bank Śląski	ING Bank Hipoteczny	ING Lease	ING Commercial Finance
Bylaw – Principles of Professional Ethics for Employees of the ING Bank Śląski S.A. Group			
Anti-Corruption Policy of the ING Bank Śląski S.A. Group			
ING Bank Śląski S.A. Whistleblower Policy	*ING Bank Hipoteczny S.A. Whistleblower Policy*	*Whistleblower Policy at ING Lease (Polska) Sp. z o.o. and Subsidiaries*	*ING Commercial Finance Polska S.A. Whistleblower Policy*

Our corporate culture

Our actions have an impact on many stakeholders: clients, employees, shareholders, vendors and the entire social environment. Each of these stakeholders expects us to act in an ethical manner. At ING, we all have a responsibility to act ethically and in line with our values. We cannot ignore, tolerate or excuse behaviour that is not in line with our principles, as this would negatively affect the trust in our bank from the public and from the employees who take care of its development every day.

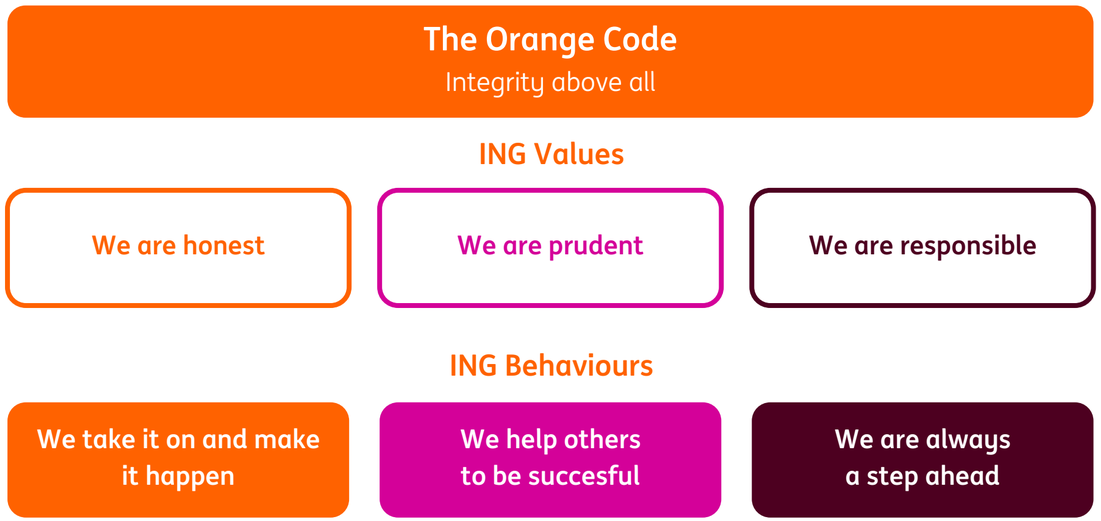
Our organisational culture is based on the Orange Code – a statement of who we are, with the overarching principle of "ethics and integrity first". The *Bylaw – Principles of Professional Ethics for Employees of the ING Bank Śląski S.A. Group* combines the ING Global Code of Conduct (referring to the Orange Code and ING's main policies and guidelines) and the requirements indicated by the Financial Supervisory Commission, the EBA and the Code of Banking Ethics. The Orange Code indicates general values and behaviours, while individual policies and other ING regulations describe more specific guidelines.

The Orange Code

The Orange Code describes what we can expect from each other. It is a set of standards that we collectively value, that we strive to live up to and invite others to judge us on. It was created within ING Group N.V in 2014 and is an important part of creating a consistent culture across ING.

The Orange Code consists of values and behaviours to support our actions on a daily basis.

ING's values are our promise to the world. ING's Orange Behaviours are the commitments we – as colleagues – make to each other and the standards by which our actions can be assessed. They are also an important part of our annual assessment system. In addition, employees are encouraged to share feedback with each other based on the "Stop, Start, Continue" model as a way of expressing appreciation, supporting growth and change, reinforcing behaviours that build effectiveness and helping others succeed.



Bylaw – Principles of ethics

The *Bylaw – Principles of Professional Ethics for Employees of the ING Bank Śląski S.A. Group* is a document introduced by the Bank Management Board and approved by the Supervisory Board and applies to entities in the ING Bank Śląski Capital Group, i.e. the bank and its subsidiaries and their employees. The bylaw is owned by the Centre of Expertise – Compliance unit, which is responsible for its implementation, promotion and evaluation of its application by employees. The document is available on the intranet for all employees.

The core content of the applicable ethical principles is described in the section of this policy entitled the ING Global Code of Conduct. Based on the values and behaviours from the Orange Code, we have highlighted 10 principles of behaviour we expect from all employees. These principles are designed to prevent and protect us from making unethical and/or illegal decisions in the course of our day-to-day business. The bylaw was updated in October 2025.

10 principles of conduct listed in the ING Global Code of Conduct:

1 Putting sustainability at the heart We place sustainability at the forefront and continuously work to advance our ambitions in relation to climate change, the environment, human rights and an inclusive society	2 Customer centricity We protect customer rights and interests
3 Unfair competition and Market abuse We help safeguard fair competition and fair markets	4 Know your customer We protect ING from being misused facilitate financial economic crimes tax offences.
5 A safe environment We create and maintain a safe, , and inclusive working environment.	6 Speaking up We speak up and report suspected actual criminal conduct, unethical, or other misconduct by within ING.
7 Innovation, technology data We protect personal data and use data technology for the benefit and of our stakeholders.	8 Beware of what you share We treat all information with care and responsibly
9 Conflicts of interest We identify potential conflicts interest and take action.	10 Anti-bribery & corruption We apply a zero-tolerance approach bribery and corruption.

The bank's representatives and intermediaries are required to familiarise themselves with the ING Global Code of Conduct.

The bank also requires ethical behaviour from its vendors – this is set out in the ING Bank Śląski S.A. Code of Conduct for Vendors made available to vendors on a dedicated website (in Polish)

Actions

MDR-A

We ensure that our employees are familiar with ethical principles and apply them in their work. We regularly remind our employees of the values that guide our organisation and the Orange Code.

As part of the onboarding process, each new employee is required to familiarise themselves with ING's principles of professional ethics and to sign a declaration confirming their understanding thereof, as well as to complete the e-learning training on the ING Global Code of Conduct. All employees regularly complete e-learning training on the applicable ethical principles and sign annual declarations confirming their awareness of, and compliance with, these principles. By the end of 2025, 94% of our employees completed a training module on the ING Global Code of Conduct completed with a statement of compliance.

In addition, new employees complete a series of e-learning courses on specific policies that are an extension of the ING Global Code of Conduct (e.g. in the areas of conflict of interest, whistleblowing, anti-corruption, KYC, etc.). When these policies are updated, all employees (or those to whom the specific policy applies) complete training on the policy or refresher training.

We are a member of the Polish Bank Association, and one of our employees serves as a member of the Bank Ethics Committee. We endeavour to take an active part in shaping and promoting ethical principles by, among other things, participating in surveys and competitions, such as the annual survey of the Bank Ethics Committee, and taking part in competitions organised by Puls Biznesu for an ethical company (we have won the title of Ethical Company every year for many years, and the title of Super Ethical Company from 2020 to 2024), where we have to demonstrate the bank's regulations and actions that foster ethical behaviour.

Risk Culture

We also shape our organisational culture by building a mature risk culture. It consists of, among other things:

- Building employees' knowledge and awareness of applicable regulations and internal policies, as well as of risk identification and management, through training courses, workshops and webinars provided both for all employees and tailored to the nature of individual roles.
- Leading by example from senior management (so-called Tone from the Top) through communications and discussions on risks during meetings with employees.
- Decision-making according to the Orange Code – a developed methodology used to make balanced decisions in situations where an ethical dilemma arises (e.g. as part of product or model changes). It is based on four steps, under which we ensure the balancing of the rights and interests of various stakeholders and, where necessary, the adoption of preventive measures in relation to potential adverse consequences of decisions.
- A defined risk appetite and regular monitoring of its compliance in our bank's various risk areas.
- An appropriate remuneration system for employees as defined, inter alia, in the Remuneration Policy and Staff Appraisal Principles, which sets out an incentive system based not only on financial but also on non-financial criteria.
- By building a risk culture, we want each of our employees, regardless of their position, to be aware of the risks they may face in their work and know how to deal with them.

As part of the Risk Culture Programme, we have organised a competition – Risk Heroes – for the fourth time in 2025, which rewards employees who have had a special impact in the last year on shaping the risk culture and keeping our bank and our clients safe.

Monitoring of actions

MDR-T

Both ethical actions and risk culture are analysed and evaluated in our bank. We monitor the risk culture as part of ING Group's methodology, which assesses the maturity level of the risk culture. We carry out analyses along four dimensions: risk awareness, risk assessment, escalation and feedback, and leadership. We use a variety of data sources for monitoring, such as annual employee surveys, expert assessment, quantitative indicators. We analyse changes in individual areas on an annual basis.

The Bank Management Board annually assesses employees' compliance with ethical principles within the framework of an adopted methodology based on quantitative and qualitative criteria. The results of the assessment form the basis for analysing whether any corrective action or updating of the rules to the changing situation within the bank and its environment is required.

Results of the OHI survey on organisational culture

Ethical culture is a key element of ING's organisational culture. Once every six months, our employees have the opportunity to share their perspective in the OHI survey, which explores various aspects of organisational health. Questions on ethical culture are included in the OHI area "Work environment", which we survey every 2 years. Our score in the latest survey (November 2024) was 83% and we are in the top quartile, meaning that we are rated higher than 75% of other organisations.

Percentage of employees who agree with the following statements	
ING's culture positively influences the way people behave	82%
People want to work here because of the culture and working environment	83%
Leaders act in a manner consistent with ING values	87%
Leaders show concern for staff welfare	79%
Leaders encourage honesty, transparency and honest, open dialogue	86%
ING responds in a timely manner to employee misconduct and/or inappropriate behaviour	89%

Counteraction of corruption

We conduct our business with integrity, prudence and responsibility, with the aim of ensuring compliance with applicable laws and regulations, and apply a zero-tolerance approach to bribery and corruption in all our relationships. We treat this issue as one of the priority issues in our relations with clients, business partners and public officials.

Policies

G1-1, MDR-P, G1-3

Our bank has a set of anti-corruption regulations that all employees are required to follow. These regulations are owned by the Centre of Expertise – Compliance, with the key document being the *Anti-Corruption Policy of the ING Bank Śląski S.A. Group*, adopted by resolution of the Bank Management Board. This policy sets out the key corruption risks and the responsibilities and control objectives necessary to ensure that these risks are appropriately identified, assessed, managed and monitored. The latest version of the *Anti-Corruption Policy* has been in force since 1 July 2025 and, like the previous version, is compliant with applicable national and international laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

Breaches of laws and regulations as well as of the anti-corruption policy may result in legal risks, reputational risks for our bank and ING Group, corporate liability for the bank, and individual liability for employees who contributed to the breach. Members of senior management may also be held accountable.

The provisions of the policy clarify two further regulations: *Policy – Manual on Business Activities Vulnerable to FEC Risks*, also adopted by resolution of the Bank Management Board, and a separate manual on compliance with the aforementioned regulations, implemented by order of the President of the Bank Management Board. They cover, inter alia, forms of corruption, the obligations of employees and third parties cooperating with the Bank, as well as the rules for accepting and offering benefits (both material and non-material) in relations with clients, third parties and public officials, in particular with regard to:

- gifts or entertainment offers,
- cash or cash equivalents (giving or receiving benefits in this form is prohibited),
- trip or accommodation funding,
- the risk of corruption in connection with the recruitment of employees, including in the form of internships or apprenticeships,
- corruption risks in relations with the bank's third parties, e.g. in connection with charitable donations, partnerships or sponsorship agreements.

When dealing with third parties, e.g. in connection with the conclusion of sponsorship/social partnership agreements or charitable donations, our bank manages the risk of corruption by carrying out due diligence procedures and ensuring appropriate contractual provisions. The ING Bank Śląski S.A. Anti-Corruption Declaration, appended to the policy, may also be used for this purpose. In addition, the policy principles are published on the bank's website.

The policy provides for the prohibition of political donations, e.g. to political parties or campaigners in connection with running for political office.

Actions

G1-GOV-1, G1-1, G1-3, G1-4, MDR-T

Internal control in the area of anti-corruption

We have a Key Risk Indicator (KRI) to monitor zero tolerance for corruption by employees or third parties on a monthly basis. Reporting is based on data relating to incidents recorded in the Risk Navigator tool. KRI is reported at meetings of the KYC Committee and the Non-Financial Risk Committee (NFRC).

As part of our bank's internal control system, elements of the anti-corruption process are subject to:

- on-going verification, in particular of reports entered in the Register of Benefits,
- checks on the completeness and correctness of the Register of Benefits, carried out quarterly or monthly, depending on the specific purpose of the check,
- key control tests.

Given ING's zero-tolerance approach to corruption, senior management has a particular responsibility to promote a culture in light of which corruption is not and will never be accepted. In this way, the Bank's commitment to conducting its business with integrity, prudence and responsibility is put into practice.

Incidents in the area of anti-corruption are dealt with in accordance with the *Non-financial Risk Incident Management Manual*, which describes the principles for managing non-financial risk incidents in the ING Bank Śląski S.A. Group, including the incident reporting process. A key role here is played by the operational coordinators of the incident, whose job is to support the unit where the incident occurred in terms of corrective actions and reducing the risk of the incident recurring in the future. The procedure ensures that the team investigating the incident is independent of those involved. In the case of incidents in the area of corruption, these are the compliance employees. The incident management process is owned by the Operational Risk Management Department. In addition, mitigating actions are recommended in cases of lesser gravity, in the context of the handling of reports concerning the acceptance or giving of benefits.

In line with the Bank's Procurement Policy, a "Know Your Supplier" qualification process is in place. Its objective is to mitigate the risk of engaging with vendors involved in undesirable criminal, financial and economic activities – including those indicative of bribery and corruption – as well as with vendors whose financial, social or environmental standing is uncertain. Consequently, this process reduces the risk of ING Bank Śląski's reputation as a trustworthy institution by confirming that ING operates in compliance with the law, regulations and only works with vendors that follow the same rules. Each vendor is obliged to comply with the ING Bank Śląski S.A. Code of Conduct for Suppliers.(in Polish).

Training

G1-GOV-1, G1-1, G1-3, G1-4

Mandatory anti-corruption training is designed to ensure that all employees understand the corruption risks ING faces and the risks they may face and how ING manages these risks. The aim of the training is to enable participants to understand:

- the nature of the benefit and the forms in which it can occur,
- the role and responsibilities of an employee in combating corruption,
- the way ING mitigates the corruption risks it faces.

General anti-corruption training is part of the Financial Crime and Fundamentals e-learning. At ING Bank Śląski, it was implemented in the 1st quarter of 2024. All new employees of our bank are compulsorily enrolled in the training.

In 2024, we implemented an approach whereby employees in positions with increased exposure to the risk of corruption (so-called high-risk roles) should complete additional, specialised e-learning. To this end, we have implemented the Manual on the Identification of High-Risk Roles in the Context of Anti-Corruption at ING Bank Śląski S.A. Identified employees were enrolled in dedicated e-learning (excluding employees who did the 2024 training). The e-learning covered the following topics:

- regulatory requirements against corruption,
- internal framework for corruption risk management,
- ING's approach to accepting/giving gifts and entertainment offers, including the obligation to register them,
- corruption risks related to public officials.
- corruption risks associated with the employment of employees.
- corruption risks arising from cooperation with third parties.

Completion of both training courses (both general and for high-risk roles) is monitored.

Members of the Bank Management Board are addressed in both training courses and also receive – like all employees – periodic (twice a year) awareness communication.

Awareness communication in 2025 was dedicated to issues such as the obligation to complete the Register of Benefits, gifts prohibited under the anti-corruption policy, potential liability of employees for actions in breach of the policy, whistleblowing obligations. In addition, a separate communication regarding the survey and dedicated training was addressed to individuals identified as holding high-risk roles.

Anti-corruption and bribery training carried out in a given year	Basic training		Additional training for functions at risk	
	2024	2025	2024	2025
Percentage of employees who completed training	93.8%	92.6%	84.0%	68.3%
Number of employees enrolled in training	725	918	413	1,640
Number of employees who completed training	680	850	347	1,120
Frequency of training	Every 2 years		Every 2 years	

In 2025 no incidents of corruption or bribery, convictions or fines related to breaches of anti-corruption and anti-bribery regulations were recorded

Mechanism of reporting breaches

G1-1

Employees and other persons authorised by law can report suspected breaches through the established whistleblower channels:

- electronic whistleblower channel – the Whistleblower channel,
- traditional mail.

We have implemented internal regulations to protect whistleblowers and other persons designated by law from retaliation to the extent required by regulatory requirements, in particular by the Act of 14 June 2024 on the protection of whistleblowers implementing Directive (EU) 2019/1937. Reports can be named or anonymous, in either case we are committed to confidentiality and discretion and to protecting whistleblowers from retaliation. As a rule, each report is received by the President of the Management Board, who decides on the investigative action and accepts the outcome. Our internal regulations also regulate how to deal with a report concerning a Management Board member. Such reports are accepted by the Supervisory Board. Employees can also ask questions and clarify doubts about the applicable conduct rules by contacting the Centre of Expertise – Compliance via a dedicated email address.

In accordance with our internal regulations, we assign a category to the reports we receive, according to the table below. In 2025, 48 reports qualifying for consideration under the procedure set out in the ING Bank Śląski S.A. Whistleblower Policy, concerning, among others, discrimination, employee conflicts or breaches of the bank's internal regulations, were submitted. Following the analysis and explanatory proceedings, irregularities were confirmed in 20 cases and corrective actions were applied, such as:

- improving internal processes and regulations,
- the development of supervisors' competence in areas that need strengthening,
- disciplinary actions and reminders of rules of conduct,
- extensive communication campaigns to raise awareness among employees.

Information on reported breaches is communicated quarterly to the Bank Management Board and the Supervisory Board.

S1-17

In the table below, we present data on the number of reports eligible for consideration under the procedure set out in the ING Bank Śląski S.A. Whistleblower Policy.

Entry category	2024	2025
Discrimination	2	1
Financial and economic crime, anti-money laundering	1	2
Fraud/Theft	4	2
Breach of confidentiality and privacy of client/employee related data	1	3
Violation of any external laws or regulations or violation of any ING policy	12	2
Unfair treatment of the client	1	-
Bullying	1	1
Sexual harassment	1	1
Employee conflict	4	7
Work environment	4	18
Harassment	4	10
Pressure at work/unrealistic goals	1	1
Other undesirable behaviour	4	-
Total	**40**	**48**

In 2025 there were no fines, penalties or compensation related to notifications in any of the above categories during the reporting period.

The whistleblowing system is subject to a periodic assessment by the Supervisory Board as to its adequacy and effectiveness. In 2025 the system was assessed as effective.

We ensure that our employees are aware of and trust the established channels for reporting breaches. Every new employee receives mandatory training on ING Global Code of Conduct, as well as mandatory periodic training on the reporting of breaches of ethical principles and standards (repeated every three years). Those involved in the whistleblower clarification process participate in training and meetings on Whistleblowing at the ING Group level. An awareness campaign was conducted in Q3 2025 to remind bank employees of the topics of whistleblowing and whistleblowers and their importance to the organisation and society. A reminder was also given on how to report breaches at the bank.

Notwithstanding the above, the bank has also provided a whistleblower channel for all external stakeholders who would like to raise a concern about the conduct of the bank or an entity of its group.

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Our integrated report

We are pleased to present the Management Board Report on Operations of the ING Bank Śląski S.A Group for 2025, which – in line with our long-standing practice – takes the form of an integrated report. We published our first integrated report for 2016, and its format allows our stakeholders to receive a coherent and comprehensive view of our operations, results, and key non-financial aspects in a single document.

This report meets the formal requirements of the *Regulation of the Minister of Finance of 6 June 2025 on current and periodic information provided by issuers of securities and on the conditions under which information required by legal regulations of a third country may be recognised as equivalent.*

In 2024, we presented our first Sustainability Statement, prepared in accordance with the requirements of the *CSRD and the European Sustainability Reporting Standards (ESRS)*. The 2025 report includes this statement for the second time, presenting progress in implementing regulatory requirements, the development of our reporting processes and the further integration of ESG issues into our business.

The report covers the period from 1 January to 31 December 2025, unless otherwise indicated. Both financial and non-financial data pertain to the ING Bank Śląski S.A. Capital Group (and selected financial data of ING Bank Śląski S.A.). Significant changes in the structure of the ING Bank Śląski S.A. Group in the reporting period are described here.

The report covers the activities of the ING Bank Śląski S.A. Group and the effects of these activities. In the report we have included relevant information on the strategy, management, performance and prospects of our bank. We presented it taking into account the economic, social and environmental context. We also present our understanding of business responsibility and the impact we have on the environment – now and in the future. We believe that our integrated report explains how the non-financial aspects of our business affect our ability to create and sustain value (limiting their erosion wherever possible) in the short, medium and long term.

We issue the report on an annual basis. The previous report for 2024 was published in March 2025.

The report was independently externally validated for:

- compliance of qualitative and quantitative disclosures under the Corporate Sustainability Reporting Directive and the European Sustainability Reporting Standards,
- compliance of qualitative and quantitative taxonomic disclosures resulting from Regulation 2021/2178, as amended,
- compliance of qualitative and quantitative disclosures under Regulation 2019/2088 and Delegated Regulation 2022/1288 in relation to the PAI Core Indicators (SFDR disclosure) with the requirements of these Regulations.

The attestation service was performed by Forvis Mazars Audyt Spółka z ograniczoną odpowiedzialnością.

The attestation service report has been published on ESPI as part of the annual report package and is available on the investor relations website.

Who was involved in the drafting of the report

Work on the report was coordinated by a team comprising representatives from the areas of sustainable development and ESG, investor relations and financial reporting. However, the report is the result of the engagement of our entire organisation.

These included primarily:

- employees at all levels who participated in the preparatory work and prepared the data for the report, as well as participating in the audit process,
- representatives of our key stakeholder groups who took part in the materiality study.

The contribution of all the people and institutions allowed us to prepare the Management Board Report on Operations of the ING Bank Śląski S.A. Group in 2025.

Please direct any questions relating to this report to:

Contact details	
First name and surname	Iza Rokicka
Position	Director of the Investors Relations, ESG Reporting and Market Research Bureau
Division	CFO Division
E-mail address	iza.rokicka@ing.pl

The Disclosure Requirements complied with in our sustainability statements

IRO-2

ESRS	General disclosures	Place in the report	Remarks
ESRS 2			
BP-1	General basis for the preparation of sustainability statements	General information: Preparation of Sustainability Statement	
BP-2	Disclosure in relation to special circumstances	General information: Preparation of Sustainability Statement	
GOV-1	The role of administrative, management and supervisory bodies	General information: Sustainability governance	
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	General information: Sustainability governance	
GOV-3	Integration of sustainability-related performance in incentive schemes	ING Bank Śląski S.A. Management Board statement on the application of corporate governance principles Linking remunerations to sustainability maters	Incorporation by reference
GOV-4	Statement on due diligence	General information: Due diligence processes regarding the sustainability matters	
GOV-5	Risk management and internal controls over sustainability reporting	General information: Preparation of Sustainability Statement	
SBM-1	Strategy, business model and value chain	ING Bank Śląski: The scale of our activity ING Bank Śląski: Business segments ING Bank Śląski: Business model and value creation General information: Our value chain General information: Sustainability in our business strategy	Incorporation by reference
SBM-2	Interests and views of stakeholders	General information: Stakeholder engagement in the double materiality assessment process General information: Relationships with our stakeholders	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	General information: Results of the materiality assessment General information: Sustainability in our business strategy	
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General information: Sustainability impacts, risks and opportunities assessment process	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	The Disclosure Requirements complied with in its sustainability statements	

ESRS	General disclosures	Place in the report	Remarks
ESRS E1	**Climate change**		
GOV-3	Integration of sustainability-related performance in incentive schemes	ING Bank Śląski S.A. Management Board statement on the application of corporate governance principles Linking remunerations to sustainability maters	Incorporation by reference
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	General information: The assessment of sustainability impacts, risks and opportunities General information: Sustainability in our business strategy Climate change: Financial implications and resilience of the business model	
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General information: The assessment of sustainability impacts, risks and opportunities Climate change: Transition risks	
E1-1	Transition plan for climate change mitigation	Climate change: Our transition plan	
E1-2	Policies related to climate change mitigation and adaptation	Climate change: Policies for managing climate-related impacts, risks and opportunities	
E1-3	Actions and resources in relation to climate change policy	Climate change: ESG policy implementation actions	
E1-4	Targets related to climate change mitigation and adaptation	Climate change: Overview of objectives within transition plans	
E1-5	Energy consumption and mix	Not reported	Based on the results of the materiality assessment, the topic is not material for own operations
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Climate change: GHG emissions	Based on the results of the materiality assessment, the topic is not material for own operations (GHG emissions Scope 1 and 2)
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Not reported	ING does not have carbon credits
E1-8	Internal carbon pricing	Not reported	ING does not apply internal carbon pricing
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Climate change: Financial impacts and resilience of the business model	A transition period has been applied in line with ESRS 1
ESRS E4	**Bioróżnorodność i ekosystemy**		
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	General information: Sustainability impacts, risks and opportunities assessment process	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
IRO-1	Description of the processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	General information: Sustainability impacts, risks and opportunities assessment process	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Not reported	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
E4-2	Policies related to biodiversity and ecosystems	Biodiversity and ecosystems: Politics	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.

ESRS	General disclosures	Place in the report	Remarks
E4-3	Actions and resources related to biodiversity and ecosystems	Biodiversity and ecosystems: Objectives and actions	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
E4-4	Targets related to biodiversity and ecosystems	Not reported	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
E4-5	Impact metrics related to biodiversity and ecosystems change	Not reported	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Not reported	Based on the results of the materiality assessment, the topic is not material. Reported voluntarily. The explanation is provided here.
ESRS S1	**Own workforce**		
SBM-2	Interests and opinions of stakeholders	General information: Stakeholder engagement in the double materiality assessment process General information: Relationships with our stakeholders	
SBM-3	Significant impacts, risks and opportunities and their interrelation with the strategy and the business model	General information: Sustainability in our business strategy	
S1-1	Policies related to own resources	Own workforce: Secure employment - Policies Own workforce: Equal pay - Policies Own workforce: Training and skills development - Policies	
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Own workforce: Employee relationship management	
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Own workforce: Whistleblowing channels for reporting breaches and concerns available to employees	
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Own workforce: Secure employment Own workforce: Work-life balance Own workforce: Equal treatment and opportunities for all Own workforce: Training and skills development Own workforce: Ensuring a work environment free of discrimination and harassment	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	General information: Sustainability in our business strategy Own workforce: Our approach to Diversity, Inclusion and Belonging	
S1-6	Characteristics of the undertaking's employees	Own workforce: Our employees in numbers	
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Own workforce: Our employees in numbers	
S1-8	Collective bargaining coverage and social dialogue	Not reported	Relations with social partners are part of the dialogue with employees, and in this context it is an material issue.

ESRS	General disclosures	Place in the report	Remarks
S1-9	Diversity measures	Own workforce: Our employees in numbers	
S1-10	Adequate wages	Not reported	Adequate pay is an important element of employment conditions/job security.
S1-11	Social protection	Own workforce: Secure employment	
S1-12	People with disabilities	Own workforce: Our approach to Diversity, Inclusion and Belonging	
S1-13	Training and skills development metrics	Own workforce: Development at ING in figures	
S1-14	Health and safety metrics	Not reported	Based on the results of the materiality assessment, the topic is not material.
S1-15	Work-life balance measures	Own workforce: Parents at work	
S1-16	Compensation metrics (pay gap and total compensation)	Own workforce: Equal pay	
S1-17	Incidents, complaints and severe human rights impacts	Own workforce: Ensuring a work environment free of discrimination and harassment General information : Respect for Human rights	
ESRS S4	**Consumers and end-users**		
SBM-2	Interests and views of stakeholders	General information: Stakeholder engagement in the double materiality assessment process General information: Relationships with our stakeholders	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business mode	General information: Material impacts, risks and opportunities General information: Sustainability in our business strategy	
S4-1	Policies related to consumers and end-users	Consumers and end-users: Our policies for retail clients	
S4-2	Processes for engaging with consumers and end-users about impacts	Consumers and end-users: Engaging with retail clients	
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Consumers and end-users: Complaints process	
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end- users, and effectiveness of those actions	Consumers and end-users: Engaging with retail clients Consumers and end-users: Marketing communication Consumers and end-users: Accessibility of products and services Consumers and end-users: Security of our clients' data and protection of privacy	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	General information: Material impacts, risks and opportunities General information: Sustainability in our business strategy	Measurable, result-oriented and timely targets have not been established. Our ESG targets take into account identified significant impacts, opportunities and risks in the area of customers and end-users,

ESRS	General disclosures	Place in the report	Remarks
ESRS G1	**Business Conduct**		
GOV-1	The role of the administrative, supervisory and management bodies	General information: Sustainability governance	
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General information: Sustainability impacts, risks and opportunities assessment process	
G1-1	Corporate culture and business conduct policies and corporate culture	Business conduct: Our ethics and compliance policies Business conduct: Mechanism of reporting breaches	
G1-2	Management of relationships with suppliers	Not reported	Based on the results of the materiality assessment, the topic is not material. The supplier verification process – KYS – is described in the section on anti-corruption and bribing.
G1-3	Prevention and detection of corruption and bribery	Business conduct: Counteraction of corruption	
G1-4	Confirmed incidents of corruption or bribery	Business conduct: Counteraction of corruption	
G1-5	Political influence and lobbying activities	Not reported	Based on the results of the materiality assessment, the topic is not material. ING Bank Śląski does not finance political activities and does not carry out lobbying activities.
G1-6	Payment practices	Not reported	Based on the results of the materiality assessment, the topic is not material.

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Disclosure requirement and related datapoint	Reference to the SFDR	Pillar 3 reference	Benchmark Regulation reference	European Climate Law reference	Sustainability Statement
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13, Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		ING Bank Śląski S.A. Management Board statement on the application of corporate governance principles: Diversity policy for supervisory and management bodies
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Statement of compliance with corporate governance principles: Composition of the Supervisory Board Composition of the Management Board
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10, Table #3 of Annex 1				General informations: Sustainability due diligence processes
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4, Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453	Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9, Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14, Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818,		Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Climate change: Our transition plan
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		Climate change: Our transition plan
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4, Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Climate change: Our transition plan
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5, Table #1 and Indicator n. 5 Table #2 of Annex 1				Not material
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5, Table #1 of Annex 1				Not material

Disclosure requirement and related datapoint	Reference to the SFDR	Pillar 3 reference	Benchmark Regulation reference	European Climate Law reference	Sustainability Statement
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6, Table #1 of Annex 1				Not material
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1, and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Climate change: GHG emissions
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3, Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Climate change: GHG emissions
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Not reported, transition period applied
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Not reported, transition period applied
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not reported, transition period applied
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8, Table #1 of Annex 1 Indicator number 2, Table #2 of Annex 1 Indicator number 1, Table #2 of Annex 1 Indicator number 3, Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7, Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8, Table 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12, Table #2 of Annex 1				Not material

Disclosure requirement and related datapoint	Reference to the SFDR	Pillar 3 reference	Benchmark Regulation reference	European Climate Law reference	Sustainability Statement
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2, Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1, Table #2 of Annex 1				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7, Table #1 of Annex 1				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10, Table #2 of Annex 1				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14, Table #2 of Annex 1				Not material
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11, Table #2 of Annex 1				Biodiversity and ecosystems: Policies
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12, Table #2 of Annex 1				Biodiversity and ecosystems: Policies
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15, Table #2 of Annex 1				Biodiversity and ecosystems: Policies
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13, Table #2 of Annex 1				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9. Table #1 of Annex 1				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				General informations: Respect for human rights Own workforce: Working conditions
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				General informations: Respect for human rights Own workforce: Working conditions
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9, Table #3 and Indicator number 11 Table #1 of Annex I				General informations: Respect for human rights Own workforce: Working conditions
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		General informations: Respect for human rights Own workforce: Working conditions
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				General informations: Respect for human rights Own workforce: Working conditions
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Not material
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				Own workforce: Whistleblowing channels for reporting breaches and concerns available to employees Business conduct: Mechanism of reporting breaches

Disclosure requirement and related datapoint	Reference to the SFDR	Pillar 3 reference	Benchmark Regulation reference	European Climate Law reference	Sustainability Statement
ESRS S1-14 Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Not material
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Own workforce: Equal pay
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Own workforce: Equal pay
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Own workforce: Ensuring a work environment free of discrimination and harassment
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10, Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		General informations: Respect for human rights
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12, and n. 13 Table #3 of Annex I				Not material
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9, Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11, and n. 4 Table #3 of Annex 1				Not material
ESRS S2-1Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10, Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14, Table #3 of Annex 1				Not material
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9, Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10, Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14, Table #3 of Annex 1				Not material

Disclosure requirement and related datapoint	Reference to the SFDR	Pillar 3 reference	Benchmark Regulation reference	European Climate Law reference	Sustainability Statement
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9, Table #3 and Indicator number 11, Table #1 of Annex 1				General informations: Respect for human rights Consumers and end-users: Our policies for retail clients
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10, Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		General informations: Respect for human rights Consumers and end-users: Our policies for retail clients
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14, Table #3 of Annex 1				General informations: Respect for human rights Consumers and end-users: Our policies for retail clients
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15, Table #3 of Annex 1				Business conduct: Counteraction of corruption
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6, Table #3 of Annex 1				Business conduct: Mechanism of reporting breaches
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17, Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Business conduct: Counteraction of corruption
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16, Table #3 of Annex 1				Business conduct: Counteraction of corruption

TCFD table

Disclosure area		Description	Place in the report
Governance	Disclosure A	Describe the board's oversight of climate-related risks and opportunities.	General information: Sustainability governance
	Disclosure B	Describe management's role in assessing and managing climate-related risks and opportunities.	General information: Sustainability governance
Strategy	Disclosure A	Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	General information:Results of the materiality assessment General information: Sustainability in our business strategy Climate change:Identified impacts, risks and opportunities
	Disclosure B	Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	Climate change: Financial impacts and resilience of the business model
	Disclosure C	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Climate change: Financial impacts and resilience of the business model
Risk Management	Disclosure A	Describe the organization's processes for identifying and assessing climate-related risks.	General information:Sustainability impacts, risks and opportunities assessment process Climate change:Identified impacts, risks and opportunities
	Disclosure B	Describe the organization's processes for managing climate-related risks.	Bank and client safety: ESG Risk Climate change: Policies for managing climate-related impacts, risks and opportunities Climate change: Actions related to the implementation of the ESG Risk Management Policy Climate change: Our transition plan
	Disclosure C	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Bank and client safety: ESG Risk
Metrics and Targets	Disclosure A	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	General information:Sustainability impacts, risks and opportunities assessment process Bank and client safety: ESG Risk
	Disclosure B	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	Climate change: GHG emissions
	Disclosure C	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	General information: Sustainability in our business strategy Climate change: Our transition plan

ESG risk figures

The tables below show the exposures at gross carrying amount in the banking book of the ING Bank Śląski S.A. Group, according to prudential consolidation as at 31 December 2025. We do not accept security interests in real estate, which is why no such information is included in the tables.

Template 1: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity (PLN million, multi-page table)

	Sector	Gross carrying amount					Accumulated impairment			Financed greenhouse gas (GHG) emissions Scope 1, 2, 3			Maturity date – gross carrying amount (years)				
			Including exposures to corporates excluded from EU Paris-aligned**	including environmentally sustainable (CCM)	of which stage 2	of which stage 3*		of which stage 2	of which stage 3*	Scope 1, 2, 3 (in tons of CO_2 equivalent)	of which scope 3	percentage of gross carrying amount calculated on the basis of individual company reports	<= 5 years	> 5 years <= 10 years	> 10 years <= 20 years	> 20 years	Weighted average maturity
1	**Exposures towards sectors that highly contribute to climate change**	**64,255**	**593**	**125**	**9,206**	**4,506**	**2,272**	**251**	**1,956**	**16,765,426**	**9,904,825**	**12.7%**	**52,390**	**10,883**	**720**	**263**	**2.91**
2	A - Agriculture, forestry and fishing	1,509	-	-	241	81	53	4	47	768,951	200,120	8.5%	1,147	351	10	-	3.28
3	B - Mining and quarrying	989	-	6	27	4	2	1	1	278,585	34,654	1.5%	977	11	-	-	0.87
4	B.05 - Mining of coal and lignite	1	-	-	-	-	-	-	-	1,622	362	-%	1	-	-	-	0.96
5	B.06 - Extraction of crude petroleum and natural gas	-	-	-	-	-	-	-	-	-	-	-%	-	-	-	-	-
6	B.07 - Mining of metal ores	726	-	6	-	-	-	-	-	33	9	-%	726	-	-	-	0.28
7	B.08 - Other mining and quarrying	252	-	-	27	4	2	1	1	254,746	29,532	5.7%	240	11	-	-	2.57
8	B.09 - Mining support service activities	10	-	-	-	-	-	-	-	22,183	4,751	-%	10	-	-	-	1.02
9	C - Manufacturing	22,301	20	79	3,634	2,400	1,086	117	946	6,758,038	4,392,888	11.3%	18,110	4,191	-	-	2.69
10	C.10 - Manufacture of food products	3,447	-	-	374	139	103	14	84	1,932,630	1,600,742	14.9%	2,550	897	-	-	3.32
11	C.11 - Manufacture of beverages	541	-	-	82	9	5	1	4	145,396	87,418	25.0%	499	42	-	-	1.88
12	C.12 - Manufacture of tobacco products	-	-	-	-	-	-	-	-	-	-	-%	-	-	-	-	-
13	C.13 - Manufacture of textiles	156	-	-	49	12	8	1	6	36,347	21,643	35.5%	127	29	-	-	3.44
14	C.14 - Manufacture of wearing apparel	-	-	-	-	-	-	-	-	75	-	-%	-	-	-	-	0.01
15	C.15 - Manufacture of leather and related products	30	-	-	6	-	1	-	-	5,171	3,054	19.0%	26	4	-	-	2.86
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	1,256	-	-	258	92	75	9	65	217,864	105,183	5.5%	1,021	235	-	-	2.78
17	C.17 - Manufacture of pulp, paper and paperboard	1,050	-	4	199	23	17	2	13	214,345	158,329	9.3%	768	283	-	-	3.26
18	C.18 - Printing and service activities related to printing	580	-	-	84	13	16	6	10	84,254	49,183	10.0%	392	188	-	-	3.83
19	C.19 - Manufacture of coke oven products	19	1	-	-	-	-	-	-	12,586	6,184	1.6%	19	-	-	-	1.31
20	C.20 - Production of chemicals	2,191	18	8	38	1,291	471	1	470	355,090	163,220	1.2%	2,063	129	-	-	1.44
21	C.21 - Manufacture of pharmaceutical preparations	599	-	-	48	-	1	-	-	149,273	53,043	5.3%	579	20	-	-	3.03
22	C.22 - Manufacture of rubber products	2,493	-	-	414	118	43	9	32	740,963	489,685	10.3%	1,983	511	-	-	2.84
23	C.23 - Manufacture of other non-metallic mineral products	893	-	24	150	82	36	3	32	417,659	139,445	6.4%	778	115	-	-	2.45
24	C.24 - Manufacture of basic metals	919	-	2	337	50	57	30	26	600,230	268,143	30.4%	685	235	-	-	2.54
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	2,975	-	2	777	196	86	13	69	711,483	585,747	10.4%	2,291	685	-	-	2.92
26	C.26 - Manufacture of computer, electronic and optical products	388	-	17	49	4	5	2	3	59,860	48,219	9.1%	337	52	-	-	1.99
27	C.27 - Manufacture of electrical equipment	551	-	-	153	44	22	4	18	151,111	115,644	4.4%	444	107	-	-	2.63
28	C.28 - Manufacture of machinery and equipment n.e.c.	711	-	-	168	153	47	8	39	123,575	102,843	17.6%	580	131	-	-	2.52
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	358	-	2	80	10	6	2	3	86,641	70,577	35.8%	293	65	-	-	2.29
30	C.30 - Manufacture of other transport equipment	312	-	-	52	67	26	2	24	40,324	22,595	38.6%	202	110	-	-	2.56
31	C.31 - Manufacture of furniture	639	-	-	160	48	35	8	27	86,527	52,368	10.9%	448	191	-	-	3.28
32	C.32 - Other manufacturing	2,158	-	20	153	44	26	4	20	581,777	245,803	4.9%	2,007	151	-	-	2.15
33	C.33 - Repair and installation of machinery and equipment	31	-	-	2	5	2	-	2	4,859	3,820	44.8%	20	11	-	-	3.69

Template 1: Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity (PLN million, multi-page table)

	Sector	Gross carrying amount					Accumulated impairment			Financed greenhouse gas (GHG) emissions Scope 1, 2, 3			Maturity date – gross carrying amount (years)				
			Including exposures to corporates excluded from EU Paris-aligned**	including environmentally sustainable (CCM)	of which stage 2	of which stage 3*		of which stage 2	of which stage 3*	Scope 1, 2, 3 (in tons of CO_2 equivalent)	of which scope 3	percentage of gross carrying amount calculated on the basis of individual company reports	<= 5 years	> 5 years <= 10 years	> 10 years <= 20 years	> 20 years	Weighted average maturity
34	D - Electricity, gas, steam and air conditioning supply	3,209	33	-	265	31	23	11	10	273,843	163,775	65.6%	1,229	1,014	703	263	8.49
35	D35.1 - Electric power generation, transmission and distribution	2,899	7	-	265	13	15	11	2	207,781	163,520	72.6%	960	989	687	263	8.98
36	D35.11 - Production of electricity	2,773	7	-	260	13	15	11	2	200,659	157,865	75.8%	839	984	687	263	9.22
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	2	1	-	-	2	-	-	-	325	250	1.0%	2	-	-	-	2.63
38	D35.3 - Steam and air conditioning supply	308	26	-	-	16	8	-	8	65,737	5	0.2%	266	26	16	-	3.99
39	E - Water supply; sewerage, waste management and remediation activities	781	-	-	86	45	31	2	28	217,673	127,775	5.8%	585	195	-	-	3.54
40	F - Construction	3,332	-	11	698	291	210	21	183	793,520	591,493	20.1%	2,997	334	1	-	2.37
41	F.41 - Construction of buildings	1,206	-	5	276	98	77	7	68	245,660	195,330	22.4%	1,136	69	1	-	2.14
42	F.42 - Civil engineering	882	-	6	151	57	40	3	36	207,617	146,997	16.6%	834	48	-	-	2.00
43	F.43 - Specialised construction activities	1,244	-	-	271	136	93	11	79	340,243	249,165	20.6%	1,027	217	-	-	2.86
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	16,431	535	5	2,094	715	478	58	398	6,941,327	4,015,440	10.0%	14,163	2,263	5	-	2.11
45	H - Transportation and storage	5,659	4	24	824	459	152	22	124	534,777	290,978	10.5%	4,713	946	-	-	3.06
46	H.49 - Land transport and transport via pipelines	4,333	4	-	692	396	123	19	99	257,835	144,232	10.6%	3,657	676	-	-	3.09
47	H.50 - Water transport	13	-	-	-	-	-	-	-	32,364	1,761	4.3%	13	-	-	-	1.23
48	H.51 - Air transport	13	-	-	-	-	-	-	-	697	469	1.1%	13	-	-	-	1.07
49	H.52 - Warehousing and support activities for transportation	1,159	-	-	130	59	27	3	23	231,862	140,842	11.2%	891	268	-	-	3.16
50	H.53 - Postal and courier activities	141	-	24	1	4	2	-	2	12,018	3,673	2.7%	139	2	-	-	1.69
51	I - Accommodation and food service activities	905	-	-	50	41	27	3	23	90,312	68,444	16.3%	582	323	-	-	4.39
52	L - Real estate activities	9,141	-	-	1,288	439	210	11	195	108,401	19,258	2.6%	7,886	1,254	-	-	2.98
53	**Exposures towards sectors other than those that highly contribute to climate change**	**12,199**	**-**	**278**	**1,001**	**337**	**226**	**22**	**190**				**10,517**	**1,481**	**201**	**-**	**2.70**
54	K - Financial and insurance activities	937	-	29	4	-	1	-	-				728	100	109	-	2.94
55	Exposures to other sectors (NACE codes J, M - U)	11,262	-	249	996	337	225	22	190				9,789	1,381	92	-	2.67
56	**Total**	**76,454**	**593**	**403**	**10,207**	**4,843**	**2,498**	**273**	**2,146**	**16,765,426**	**9,904,825**	**12.7%**	**62,906**	**12,364**	**921**	**263**	**2.87**

**Stage 3 - non-performing exposures; **In accordance with Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU climate transition benchmarks and EU benchmarks adapted to the Paris Agreement – Recital 6: sectors listed in Sections A-H and L of appendix I to Regulation (EC) No 1893/2006.*

In the table above, we provide a summary of the gross carrying amount of credit exposures to non-financial companies operating in sectors that highly contribute to climate change.

We have also listed exposures to entities excluded from the EU Paris Aligned Benchmarks (PABs), in line with Article 12(1)(d) to (g) and Article 12(2) of Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020, which supplements Regulation (EU) 2016/1011 of the European Parliament and the Council concerning the minimum standards for EU Climate Transformation Benchmarks and EU Paris Aligned Benchmarks. The bank group's exposure to entities excluded from the PAB as at 2025 yearend is PLN 593 million.

In the case of Article 12(1), we selected exposures based on:

- an internal list of clients whose activities are related to thermal coal or energy production; and
- selection by codes of the Polish Classification of Activities – for activities related to the exploration, extraction, distribution or refining of oil or gas fuels.

With regard to Article 12(2), we have not made such a verification due to lack of data.

In the table above, we have also included the financed GHG emissions (category 13 and 15), which we have estimated based on the GHG Protocol records and the PCAF standard, using a variety of internal and external databases. Emissions for each asset class have been calculated both based on real data provided by clients and data from energy efficiency certificates, as well as using a range of indicators to estimate emissions. The data in the table is consistent with the data presented here in terms of the exposures contained therein.

Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral (PLN million)

		Gross carrying amount														
			Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
			0 <= 100	> 100 <= 200	> 200 <= 300	> 300 <= 400	> 400 <= 500	> 500	A	B	C	D	E	F	G		of which level of energy efficiency estimated (EP score in kWh/m² of collateral)
1	**Total EU area**	**99,750**	**48,814**	**31,014**	**8,600**	**3,512**	**1,073**	**640**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**60,885**	**90.0%**
2	Of which Loans collateralised by commercial immovable property	30,184	4,424	12,553	4,233	1,717	964	494	-	-	-	-	-	-	-	19,117	69.7%
3	Of which Loans collateralised by residential immovable property	69,565	44,390	18,461	4,367	1,795	109	147	-	-	-	-	-	-	-	41,768	99.3%
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-%
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	54,788	26,952	18,117	6,309	2,656	396	358	-	-	-	-	-	-	-	54,788	100.0%

The table above shows the value of loans secured by commercial and residential immovable property, together with information on the energy efficiency level of the collateral as measured by energy consumption in kWh/m².

The disclosure for commercial immovable property has been prepared based on the information we have from the energy performance certificates of the buildings or, in their absence, using an internal methodology to estimate primary energy (EP) ratios, which are primarily sensitive to the type of property and the year of construction. For residential immovable property, we first used information from building energy performance certificates and, when these were not available, we applied our own methodology based on the year of construction of the building and the corresponding technical and construction regulations. This means that for immovable property for which we have estimated energy efficiency, we do not take into account any thermal modernisations that may have occurred after the year of construction, as we do not possess this information. The energy efficiency of our portfolio improves year on year, particularly due to the significant new acquisition of mortgage loans for retail clients in 2025, as part of our offering of eco-mortgages and mortgage loans for energy-efficient homes. In addition, we are constantly working on the quality and completeness of the data in our systems ((particularly address-related data) to allow better attribution of the building's primary energy demand (EP) ratio from the Central Register of Energy Performance Certificates, where information is constantly increasing. In addition, the amount of EP data obtained from clients in the credit process is increasing.

We do not publish information by energy efficiency class of buildings, as there are no such legal regulations in Poland.

In the column with the total gross carrying amount, we report the sum of loans collateralised by immovable properties, including those that are not subject to an energy efficiency assessment (e.g. land). This approach ensures that we are aligned with the table showing exposures subject to physical risk (Template 5).

Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk (PLN million)

The whole portfolio		Gross carrying amount								Accumulated impairment		
		Exposures sensitive to impact from climate change physical events										
		division by maturity classes (years)					exposures sensitive only to the impact of climate change events	of which stage 2	of which stage 3*		of which stage 2	of which stage 3*
		<= 5	> 5 <= 10	> 10 <= 20	> 20	Average weighted maturity						
1	A - Agriculture, forestry and fishing	24	2	-	-	2.55	**27**	4	-	-	-	-
2	B - Mining and quarrying	70	-	-	-	0.70	**70**	5	3	-	-	-
3	C - Manufacturing	648	102	-	-	2.14	**750**	55	99	38	1	36
4	D - Electricity, gas, steam and air conditioning supply	215	292	472	263	8.52	**1,242**	122	2	6	5	1
5	E - Water supply; sewerage, waste management and remediation activities	8	-	-	-	2.23	**8**	1	-	-	-	-
6	F - Construction	181	4	1	-	1.93	**186**	75	17	12	2	10
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	162	50	-	-	1.54	**212**	6	7	2	-	2
8	H - Transportation and storage	193	26	-	-	2.89	**219**	24	19	2	-	1
9	L - Real estate activities	1	-	-	-	3.75	**1**	-	-	-	-	-
10	Loans collateralised by residential immovable property	10	26	117	281	20.84	**433**	10	1	1	-	1
11	Loans collateralised by commercial immovable property	191	74	15	8	3.71	**288**	46	51	22	2	20
12	Repossessed collaterals	-	-	-	-	-	**-**	-	-	-	-	-
13	Other relevant sectors	140	17	7	-	0.40	**164**	10	1	-	-	-
		1,509	**989**	**22,301**	**3,209**	**781**	**3,332**	**16,431**	**5,659**	**9,141**	**69,565**	**30,184**	**-**	**13,104**

** Stage 3 - non-performing exposures.*

In the table above, we show the exposures subject to the impact of physical hazards. These are presented by:

- sectors of economic activity, and
- the type of immovable property that constitutes the collateral.

In the remaining columns of the sector rows, exposures sensitive to risk are presented excluding loans secured by real estate, as those have been shown in the corresponding rows.

Total gross carrying amount in the sector rows is the entire exposure of the ING Bank Śląski S.A. Group to non-financial entities operating in the specified sectors. The remaining columns in the sector rows present exposures sensitive to physical risk excluding loans secured by immovable property, as those is shown in the corresponding rows. We have not included in the table any consideration of the fact that the immovable property is insured against physical risk. However, we would like to inform you that for retail mortgage loans there is a flood policy requirement (for policy renewals and for new sales).

We indicate the physical risk at a given address with the help of an internal physical risk assessment model. We identify risk for exposures collateralised by immovable property according to the address of the collateral real estate. Physical risk-sensitive exposure on the portfolio collateralised by immovable property amounted to PLN 721 million as at 2025 yearend. The main physical risk to which our collateral portfolio is exposed is flooding.

For unsecured exposures, the identification of physical risk sensitivity in Business Banking area is carried out based on address of the place of business activity and the sector's sensitivity to a given physical hazard (primarily flood risk and water scarcity have been identified), while in the Wholesale Banking area, we apply a fully sector-based approach – taking into account the sector's sensitivity to a given physical hazard as well as the estimated financial impact. The exposure to non-financial entities sensitive to physical risk in unsecured portfolio amounted to PLN 2,879 million as at 2025 yearend.

For the purpose of identifying exposures to the 20 most carbon-intensive companies in the world, we relied on a compilation published by CDP, i.e. the CDP Carbon Majors Launch Report 2024. As at 2025 yearend – just like at the end of 2024 – we did not have any direct involvement in any of these 20 companies nor any involvement through loan agreements with entities related to them.

PAI indicators according to SFDR

SFDR* (Sustainable Finance Disclosure Regulation) indicators of ING Bank Śląski Group as an investee.

Table 1 – Statement of the main adverse effects of investment decisions on sustainability factors

Sustainability Factor Adverse Impact Index			Unit of measure	2024	2025
Climate and other environmental indicators					
Greenhouse gas emissions	1	Greenhouse gas emissions	Scope 1 greenhouse gas emissions [tonnes CO_2e]	3,933	3,599
			Scope 2 greenhouse gas emissions [tonnes CO_2e]	3,494 – *market-based* / 15,379 - *location-based*	3,384 – *market-based* / 13,446 - *location-based*
			Scope 3 greenhouse gas emissions [tonnes CO_2e]	25,898,939 – *market-based* / 25,902,282 - *location-based*	26,869,639 – *market-based* / 26,872,073 - *location-based*
			Total greenhouse gas emissions [tonnes CO_2e]	25,906,365 – *market-based* / 25,921,592 - *location-based*	26,876,623 – *market-based* / 26,889,119 - *location-based*
	2	Carbon footprint	Total greenhouse gas emissions [tonnes CO_2e]	25,906,365 – *market-based* / 25,921,592 - *location-based*	26,876,623 – *market-based* / 26,889,119 - *location-based*
	3	Greenhouse gas intensity	CO_2e emissions from Scope 1-3 per PLN 1 million of the revenue of the ING Bank Śląski Group	0.00160 – *marked-based* / 0.00160 – *location-based*	0.00155 – *marked-based* / 0.00155 – *location-based*
	4	Exposure from fossil fuel companies		The ING Bank Śląski Group is not active in the fossil fuel sector.	
	5	Share of energy consumed and produced from non-renewable sources	Share of non-renewable energy sources consumed and produced in relation to renewable energy resources, expressed as a percentage of total energy resources	1,66% (for 98,34% of the remaining energy, the bank holds guarantees of origin or green certificates).	2,37% (for 97,63% of the remaining electricity, the bank holds guarantees of origin or green certificates).
	6	Energy intensity per sector with significant climate impact	Energy consumption expressed in GWh	The ING Bank Śląski Group is not active in sectors with a significant climate impact.	
Biodiversity	7	Actions adversely affecting biodiversity sensitive areas	Companies with facilities operating in or near biodiversity-sensitive areas where their operations have an adverse impact on such areas	The ING Bank Śląski Group does not operate in or near biodiversity-sensitive areas.	
Water	8	Emissions to water	Tonnes of emissions to water – indicator expressed as a weighted average	The ING Bank Śląski Group does not generate emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and of the Council (6) and direct emissions of nitrates, phosphates and pesticides.	
Waste	9	Hazardous waste and radioactive waste indicator	Tonnes of hazardous waste and radioactive waste – indicator expressed as weighted average	No hazardous or radioactive waste generated in 2024.	No hazardous or radioactive waste generated in 2024.

Table 1 – Statement of the main adverse effects of investment decisions on sustainability factors

Sustainability Factor Adverse Impact Index			Unit of measure	2024	2025
Indicators on social and labour issues, human rights issues and anti-corruption and anti-bribery issues					
Social and labour issues	10	Breaches of the Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Companies		The ING Bank Śląski Group monitors compliance with the Global Compact and the OECD Guidelines for Multinational Companies. A description of the actions taken is available in the section concerning the EU Taxonomy Minimum Safeguards.	
				In 2024, there has been one final judgment in the area of labour law finding a violation in an employment inequality case – concerning grading tables. The corrective action was implemented even before the legal conclusion of the proceedings. In the area of taxation, there is a final judgment on the audit of STIR reports (from 2020). The deficiencies identified during the audit took place in 2018, i.e. the initial period of implementation of the STIR responsibilities, the causes of these deficiencies had already been addressed before the audit itself, as confirmed by the results of the audit and internal control.	In the area of taxation, there was a final judgment on the audit of the STIR reports (of 2020) in January 2025, which was disclosed in the 2024 report. In the area of disclosure of information and/or consumer interests, in July 2025 there was a ruling by the Supreme Administrative Court on an individual complaint to UODO concerning the failure to delete a credit query in BIK. Based on this, a high-risk recommendation was defined and corrective actions planned.
	11	Lack of processes and controls to oversee compliance with the Global Compact and the OECD Guidelines for Multinational Companies		ING Bank Śląski Group 2024 conducted an in-depth analysis of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight core conventions identified in the Declaration of the International Labour Organisation. The result of the analysis was to confirm the processes and ensure that the guidelines were followed in the internal regulations.	The ING Bank Śląski Group, as in 2024, conducted an in-depth analysis of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration. The result of the analysis was to confirm the processes and rationale for adhering to the guidelines in the internal regulations. More information on this topic can be found here.
	12	Average unadjusted gender pay gap		31% – the ratio of the difference between the average salary of men and women to the average salary of men according to the EBA methodology (unadjusted ratio).	29% – the ratio of the difference between the average male and female pay to the average male pay according to the EBA methodology (unadjusted ratio).
	13	Gender diversity of board members – average ratio of women to men on company boards, expressed as a percentage of all board members		50% in ING Banku Śląskim.	50% in ING Banku Śląskim.
	14	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)		The ING Bank Śląski Group does not finance entities involved in the production or sale of controversial weapons.	
Indicators applicable to investments in government bonds and bonds issued at supranational level					
Environmental issues	15	Greenhouse gas intensity for countries with bonds invested in	Not Applicable.		

Table 1 – Statement of the main adverse effects of investment decisions on sustainability factors					
Sustainability Factor Adverse Impact Index			Unit of measure	2024	2025
Social issues	16	Number of countries with bonds invested in and affected by social violations	Not Applicable.		
Indicators applicable to real estate investments					
Fossil fuels	17	Fossil fuel exposure in relation to real estate	Not Applicable.		
Energy efficiency	18	Exposure from energy inefficient real estates	Not Applicable.		

**Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on disclosure of information related to sustainable development in the financial services sector.*

Table 2 – Additional climate and other environmental indicators

Adverse effect on sustainability		Adverse effect on sustainability factors (qualitative or quantitative data)	Unit of measure	2024	2025
Climate and other environmental indicators					
Securities	1	Inorganic pollutant emissions	Tonnes of inorganic pollutant equivalent per million euros invested rate expressed as a weighted average	Due to the specific nature of its operations, the ING Bank Śląski Group does not measure non-organic emissions.	
	2	Air pollutant emissions	Tonnes of air pollutant equivalent for every EUR 1 million invested, rate expressed as a weighted average	Due to the specific nature of its operations, the ING Bank Śląski Group does not measure emissions of air pollutants.	
	3	Emissions of ozone-depleting substances	Tonnes of ozone-depleting substance equivalent per EUR 1 million invested, rate expressed as weighted average	Due to the nature of its operations, the ING Bank Śląski Group does not measure emissions of ozone-depleting substances.	
	4	Lack of implementation of carbon reduction initiatives	Failure to implement carbon reduction initiatives to comply with the Paris Agreement targets	You can read about initiatives to reduce financed emissions here.	
Energy performance	5	Breakdown of energy consumption by type of non-renewable energy sources	Share of energy from non-renewable sources, by individual non-renewable energy source	Scope 1: 26% petrol 5% natural gas Scope 2: 21% district heating 1% district cooling	Scope 1: 28% petrol 4% natural gas Scope 2: 21% district heating 1% district cooling

Table 2 – Additional climate and other environmental indicators

Adverse effect on sustainability		Adverse effect on sustainability factors (qualitative or quantitative data)	Unit of measure	2024	2025
Water, waste and materials – emissions	6	Water reuse and recycling	Average volume of water used (in cubic metres) per EUR 1 million of revenue	Water consumption in 2024- 43,170 m^3. 0.2% of the water was recycled (grey water in Ruda Śląska + rainwater at the bank's head office at Sokolska street in Katowice).	Water consumption in 2025- 41,756 m^3. 0.3% of the water was recycled (grey water in Ruda Śląska + rainwater at the bank's head office at Sokolska street in Katowice).
			Weighted average percentage of water recycled and reused		
	7	Lack of a water management policy	Lack of a water management policy	The ING Bank Śląski Group does not have a policy regarding water management.	
	8	Exposure from areas of significant water scarcity	Having facilities located in areas of significant water scarcity and lack of a water management policy	We have no such facilities.	
	9	Production of chemicals	Carrying out activities covered by Chapter 20.2 of Annex I to Regulation (EC) No 1893/2006	Not applicable.	
	10	Land degradation, desertification, soil sealing	Carrying out activities that lead to land degradation, desertification or soil sealing	Not applicable.	
	11	Lack of sustainable agricultural practices/practices for sustainable land management	Lack of sustainable agricultural practices or strategies/ practices or strategies for sustainable land management	Not applicable.	
	12	Failure to apply sustainable practices to the seas and oceans	Lack of application of sustainable practices or strategies in the field of seas and oceans	Not applicable.	
	13	Rate of non-recycled waste	Tonnes of non-recycled waste per €1 million invested, rate expressed as a weighted average	We have no information on what proportion of municipal waste is sent for recycling.	
	14	Natural species and protected areas	Impact on endangered species	ING Bank Śląski Group does not perform own operations that affect endangered species included in the Red List of Threatened Species published by the International Union for Conservation of Nature (IUCN). The ING Bank Śląski S.A. Capital Group does not have a separate biodiversity protection policy, but our approach to biodiversity is described in Principle No. 24 in the *Sustainable Development Policy of the ING Bank Śląski S.A. Capital Group (only in Polish).*	
			Failure to have a biodiversity conservation policy covering operational sites owned, leased or managed in or adjacent to a protected area or an area of high biodiversity outside protected areas		
	15	Deforestation	Failure to have a deforestation prevention policy	The ING Bank Śląski Capital Group does not have a separate deforestation prevention policy, but our approach (policy) regarding the issue of deforestation is described in our internal instructions: *ESG Instructions for Wholesale Banking Clients - ESG Risk Assessment* and in the *Environmental, Social and Corporate Governance Risk Instructions (ESG Instructions for Business Clients).*	
Green securities	16	Share of securities not issued under Union legislation on environmentally sustainable bonds	Participation in investments of securities not issued under the Union legislation on environmentally sustainable bonds	No such papers are available.	
Indicators applicable to investments in government bonds and bonds issued at supranational level					
Green securities	17	Share of bonds not issued under Union legislation on environmentally sustainable bonds	Not Applicable.		

Table 2 – Additional climate and other environmental indicators

Adverse effect on sustainability		Adverse effect on sustainability factors (qualitative or quantitative data)	Unit of measure	2024	2025
Indicators applicable to real estate investments					
Greenhouse gas emissions	18	GHG emissions (Emissions include owned and leased real estate, does not include financed emissions)	Scope 1 greenhouse gas emissions generated by real estate [tonnes CO_2e]	843	543
			Scope 2 greenhouse gas emissions generated by real estate [tonnes CO_2e]	3,494 – *market-based* / 15,379 - *location-based*	3,384 – *market-based* / 13,446 - *location-based*
			Scope 3 greenhouse gas emissions generated by real estate [tonnnes CO_2e]	34 – *market-based* / *location-based*	29 – *market-based* / *location-based*
			Total greenhouse gas emissions generated by real estate [tonnes CO_2e]	4,371 – *marked-based* / 16,256 - *location-based*	3,957 – *marked-based* / 14,019 - *location-based*
Energy Consumption	19	Energy intensity	Energy consumption expressed in GWh for owned real estate per square metre	0.000180 GWh/m2 (indicator calculated based on CREEM path for office space)	0.000179 GWh/m^2 (indicator calculated based on CREEM path for office space)
Waste	20	Waste generation from operations	Share of real estate not equipped with waste sorting facilities and not covered by a waste recovery or recycling contract	Due to the specific nature of its business, the ING Bank Śląski Group does not carry out such measurements.	
Resource consumption	21	Raw material consumption for new buildings or major renovations	Share of building materials (excluding recycled or recovered materials or materials of biological origin) in relation to the total weight of building materials used in new buildings and major renovations	Due to the specific nature of its business, the ING Bank Śląski Group does not carry out such measurements.	
Biodiversity	22	Share of artificial land	Share of non-vegetated area (areas with no ground vegetation or vegetation on roofs, terraces and walls) in relation to the total area occupied by all real estate	Due to the specific nature of its business, the ING Bank Śląski Group does not carry out such measurements.	

Table 3 – Additional indicators on social and labour issues, human rights issues and anti-corruption and bribery issues

Adverse effect on sustainability		Adverse effect on sustainability factors (qualitative or quantitative data)	Unit of measure	2024	2025
Indicators on social and labour issues, human rights issues and anti-corruption and anti-bribery issues					
Social and labour issues	1	Investments in companies that do not have an occupational accident prevention policy	Lack of an occupational accident prevention policy	The employer's obligations in the field of health and safety, including ensuring safe working conditions, organising health and safety training and preventing risks, as well as the employee's obligations to comply with health and safety regulations, are included in the Labour Bylaw.	
	2	Accident rate	Accident rate expressed as a weighted average	Accident rate calculated as total number of people injured in accidents/employment × 1000: 1.34.	Accident rate calculated as total number of people injured in accidents/employment × 1000: 2.13.
	3	Number of days lost due to injuries, accidents, fatalities or illnesses	Number of working days lost due to injuries, accidents, fatalities or illnesses, expressed as a weighted average	209 working days.	430 working days.
	4	No supplier code of conduct	Lack of a supplier code of conduct (in the context of hazardous working conditions, precarious employment, child labour and forced labour)	The ING Bank Śląski Group has a Vendor Code of Conduct of ING Bank Śląski S.A., which sets out, inter alia, the respect for human rights, labour rights, the prohibition of forced labour and child labour and much more.	
	5	Lack of a mechanism for dealing with complaints on labour issues	Lack of a mechanism for dealing with complaints on labour issues	The ING Bank Śląski Group has mechanisms in place to handle complaints on employee issues.	
	6	Insufficient protection for whistleblowers	Lack of a whistleblower protection policy	ING Bank Śląski Group has whistleblower protection mechanisms in place as part of its whistleblowing policies.	
	7	Cases of discrimination	Number of cases of discrimination, expressed as a weighted average	1 (number of confirmed cases).	0 (number of confirmed cases).
			Number of cases of discrimination leading to sanctions, expressed as a weighted average		
	8	Excessive remuneration of the chief executive officer	Average ratio of the annual total remuneration of the top earner to the median annual total remuneration of all employees (excluding that top earner)	36,0	30,9
Human rights	9	No policy on respect for human rights	No policy on respect for human rights	The ING Bank Śląski Group has a Declaration: ING Bank Śląski S.A. Group Declaration on Respect for Human Rights. The declaration was adopted in December 2023, with its last review in December 2025.	
	10	No due diligence process	Lack of due diligence to identify, mitigate and eliminate adverse human rights impacts	Based on the conclusions of the analysis of the international human rights guidelines carried out in 2023 and extended in 2024 (see section 11 under Social and labour issues), the operation of processes and the assurance of compliance with the guidelines in internal regulations was confirmed. We are monitoring and successively deepening our due diligence procedures at all levels of the value chain.	

Table 3 – Additional indicators on social and labour issues, human rights issues and anti-corruption and bribery issues

Adverse effect on sustainability		Adverse effect on sustainability factors (qualitative or quantitative data)	Unit of measure	2024	2025
	11	Lack of procedures and measures to prevent trafficking in human beings	Lack of a policy to prevent human trafficking	In accordance with ING Bank Śląski S.A. Group Declaration on Respect for Human Rights, ING advocates the elimination of all forms of forced labour and child labour, both in its operations and in its value chain.	
	12	Activities and suppliers at significant risk of incidents of child labour	Activities and suppliers at significant risk of incidents of child labour	In accordance with the Vendor Code of Conduct of ING Bank Śląski S.A., the bank's suppliers are prohibited by law from employing children under the age of 16. The bank's vendors, in accordance with International Labour Organisation conventions, may only employ children in circumstances that fully protect them from possible exploitation, moral and physical danger, long-term health exposure and in cases that do not constitute an obstacle to education.	
	13	Activities and suppliers at significant risk of incidents of forced labour	Activities and suppliers at significant risk of incidents of forced labour	In accordance with the Vendor Code of Conduct of ING Bank Śląski S.A., the bank's vendors must not in any way benefit from or tolerate forced labour, corporal punishment or other prohibited disciplinary practices. The bank's vendors do not have the right to force or pressure the work.	
	14	Number of identified cases of serious human rights issues and incidents	Number of cases of serious human rights issues and incidents, expressed as a weighted average	No such cases – verification of proceedings and final rulings, as well as the absence of reports to the OECD National Contact Points, as part of the assessment of the EU Taxonomy Minimum Safeguards in the bank's own operations.	Absence of such cases – verification in terms of proceedings, violations and final judgements, as well as lack of notifications to the OECD NCP, as part of the assessment of the EU Taxonomy Minimum Safeguards in own operations.
Tackling corruption and bribery	15	Lack of an anti-corruption and bribery policy	Lack of an anti-corruption and bribery policy in line with the United Nations Convention against Corruption	Throughout the reporting period, the bank had an anti-corruption policy in place: until March 2024 it was the "Anti-Bribery and Corruption Policy" and from April 2024 "ING Bank Śląski S.A.'s anti-corruption policy".	
	16	Cases of insufficient action being taken for breaches of anti-corruption and bribery standards	Failure to take sufficient action in the event of breaches of anti-corruption and bribery procedures and standards	No such cases.	No such cases.
	17	Number of convictions and an amount of fines for violations of anti-corruption and anti-bribery laws	Number of convictions and an amount of fines for violations of anti-corruption and anti-bribery laws	No such cases.	No such cases.
Indicators applicable to investments in government bonds and bonds issued at supranational level					
Social issues	18	Average income inequality score	Distribution of income and income inequality among participants in a given economy	Not applicable.	
	19	Average freedom of expression scores	Score that measures the degree of freedom of action of political and civil society organisations	Not applicable.	
Human rights	20	Average human rights performance	Average human rights performance of the country in which the bond was invested	Not applicable.	
Governance	21	Average corruption score	A measure of the perceived level of corruption in the public sector	Not applicable.	
	22	Tax jurisdictions reluctant to cooperate	Investments in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes	Not applicable.	
	23	Average political stability score	A measure of the likelihood of the current regime being overthrown by force	Not applicable.	
	24	Average rule of law score	Score measured in terms of levels of corruption, lack of respect for fundamental rights and deficiencies in the civil and criminal justice system	Not applicable.	

Legal changes

Changes in the banking sector regulations		
Name	**Effective date**	**Description**
Act of 6 November 2024 on compensatory taxation of component units of international and national groups	01 January 2025	The Act implemented into the Polish legal order the provisions of Council Directive (EU) 2022/2523 of 14 December 2022 on ensuring the global minimum level of taxation of multinational enterprise groups and large domestic groups in the European Union (Journal of Laws of EU L 328 of 22.12.2022, p. 1), also referred to as a top-up tax. The new rules applied to constituent entities of a multinational group or a national group if, in at least two of the four tax years immediately preceding the tax year, they had group revenue (as shown in the group's consolidated accounts) of at least EUR 750 million. The equalisation tax is a new type of taxation (a new tax in the sense of the Tax Ordinance) that aims to ensure that the income of the constituent entities of international and domestic groups is taxed at least at a minimum rate of 15 per cent in each jurisdiction in which they operate. This is in response to the challenges of tax optimisation and shifting profits to low-tax jurisdictions. This law introduced 3 main types of compensatory taxes: • Global Income Inclusion Rule (IIR), a tax levied on the ultimate parent company in a group, which will be liable to pay the relevant compensation tax if its low-taxed subsidiaries in other jurisdictions do not achieve the minimum effective tax rate. • Qualified Domestic Minimum Top-up Tax (QDMTT), unlike IIR, the right to collect this tax stays in the state where the low-taxed component units of the group are located. This tax is designed to ensure that income generated in Poland is taxed at a minimum level, even if the parent company is located in another country. • Undertaxed Payments Rule (UTPR), a tax imposed on group entities located in a jurisdiction when the parent company operates in a country that has not implemented the IIR rules. In such cases, Polish entities will be required to pay a top-up tax. The introduction of the regulation made it necessary for Polish companies that are part of international capital groups to adapt to the new regulations. In the event that the effective tax rate calculated according to the standards of these regulations is less than 15%, companies will be required to pay a national or global top-up tax. Global tax calculations will be based on specific provisions introduced by the Act. Due to differences in the tax systems of countries obliged to implement the global tax principles, tax calculations for the purposes of compensatory taxation will, in principle, be based on data resulting from the accounts (with appropriate adjustments).
Act of 19 November 2024 amending the Act on Agricultural Tax, the Act on Local Taxes and Fees and the Act on Stamp Duty	01 January 2025	The amendment introduced modifications to the real estate tax, inter alia resulting from the Constitutional Court's judgment of 4 July 2023, ref. SK 14/21. The changes in this respect include the introduction of new legal definitions of the terms building, structure, construction work, permanent connection to the ground, and the residential part of a residential building, as well as the introduction of appendix 4 to the Act, which contains categories of objects that are constructions.
Regulation of the Minister of Finance of 16 August 2024 on additional data to be added to the accounts to be submitted under the Corporate Income Tax Act	01 January 2025	As of 1 January 2025, the largest CIT taxpayers, i.e. corporate income taxpayers, have been obliged to keep their accounts exclusively in electronic form and to annually send the JPK_KR_PD and JPK_ST structure (collectively as "JPK-CIT") to the tax authorities. JPK, or the Single Control File, is an electronic document containing a collection of taxpayers' data that contains information on the economic operations of a specific period of the fiscal year. Its purpose is to facilitate the monitoring, analysis and detection of tax irregularities. JPK-CIT is a new way to send ledger data in an xml data schema. With CIT JPK files, their structure will be based on the JPK_KR structure adapted to the specifics of CIT taxpayers.

Changes in the banking sector regulations		
Name	**Effective date**	**Description**
Act of 6 December 2024 amending the Accounting Act, the Act on Statutory Auditors, Audit Firms and Public Supervision and certain other acts	01 January 2025	The law is related to the implementation of the (EU) Directive 2022/2464 (CSRD). The provisions of the Act relate to the imposition of new sustainability reporting obligations, the attestation of such reports by auditors, and the obligations of audit committees in this regard. For large entities (such as a bank), reporting under the new rules for the first time occurred for 2024 (report published in 2025).
Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the minimum capital threshold	09 July 2024 / 01 January 2025	The CRR3 Regulation is part of a package of legislation that implements elements of the Basel III regulatory reforms into EU law. CRR3 introduces changes to the rules on capital requirements in all areas of risk. The changes concern, inter alia, the minimum capital threshold, credit, market and operational risks, as well as ESG risks.
Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 amending Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches and environmental, social and corporate governance risks	11 January 2026 (requires implementation into national law)	CRD6 aims to further harmonise the framework for banking supervision. Changes related to supervision include, inter alia, the grounds for withdrawal of authorisation, the obligations of banks in relation to the acquisition or disposal of a material holding, the transfer of assets and liabilities of material value and mergers and demergers, the involvement of the supervisor in the assessment of the suitability of all members of the management board and the chair of the supervisory board, and the sanctions applied (including the power to impose periodic fines) and other supervisory measures. The directive also includes changes to the risk management and internal control system, including reference to the management of ESG risk, as well as the risk of exposure to cryptocurrency.
Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on operational digital resilience in the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011	17 January 2025	A new regulation (known as DORA) sets out requirements for financial entities in relation to the management of risks associated with the use of information and communication technologies (ICTs), including the reporting of serious ICT-related incidents and the testing of operational digital resilience. DORA also contains provisions on agreements entered into by financial entities with external ICT service providers and rules on the establishment and operation of a framework for the supervision of key external ICT service providers providing services to financial entities.
Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 on laying down harmonised rules on artificial intelligence (Artificial Intelligence Act)	02 February 2025 / 02 August 2026	The new regulations set out the obligations of providers and users of AI-based systems. The extent of the requirements depends on the level of risk represented by the system in question. Among others, systems for credit assessment, as well as employee recruitment and management, were classified as high-risk systems. The regulation also identifies prohibited AI practices.
Act of 4 April 2025 amending the Act – Tax Ordinance and certain other acts	01 May 2025	The Act implemented the CJEU judgment (C-322/22) by amending the Tax Ordinance by establishing a regulation according to which interest on a tax overpayment arising as a result of a decision of the Constitutional Tribunal or a decision of the Court of Justice of the European Union is due from the date on which the overpayment arose until the date on which it is repaid, irrespective of the timing of the application in this regard.
Act of 26 April 2024 on ensuring that economic operators meet the accessibility requirements of certain products and services	28 June 2025	The Act sets out the accessibility requirements for products and services and the related obligations of economic operators. The provisions of the Act apply, inter alia, to products such as payment terminals, ATMs and deposit machines, as well as services such as retail banking. The requirements of the Act relate in particular to the provision of information in a specific, accessible form, websites and mobile apps. With regard to retail banking, in particular, the perceptibility, functionality, comprehensibility and compatibility of consumer identification methods, electronic signatures, security and payment services are to be ensured.

Changes in the banking sector regulations		
Name	**Effective date**	**Description**
Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purpose of money laundering or terrorist financing	10 July 2027	The AML Regulation, together with Regulation 2024/1620 on the establishment of the Anti-Money Laundering and Countering the Financing of Terrorism Authority (AMLA) and Directive 2024/1640, make up the package of new EU legislation related to AML and terrorist financing. Regulations are directly applicable in all EU Member States, the Directive requires implementation into national law. The new rules will replace the existing Directive 2015/849. The AML Regulation contains provisions on: • measures to be applied by obliged entities to prevent money laundering and terrorist financing, • transparency requirements on beneficial ownership for legal entities, trusts created by deed and similar legal arrangements, • measures to limit the misuse of anonymous instruments.
Act of 25 June 2025 amending the Corporate Income Tax Act	07 August 2025	There has been a repeal of Article 27c of the Corporate Income Tax Act, hereinafter: the CIT, which mandated that the obligation to prepare and make public information on the implemented tax strategy for the tax year should be fulfilled by: • tax groups, irrespective of the amount of revenue earned and • taxpayers other than tax capital groups, in which the value of revenue earned in the tax year referred to in Article 27b(1) of that Act exceeded the equivalent of EUR 50 million converted into PLN according to the average EUR exchange rate announced by the National Bank of Poland on the last working day of the calendar year preceding the year in which individual taxpayer data was made public. The repealed provision was effective from 1 January 2022.

Changes in the banking sector regulations		
Name	**Effective date**	**Description**

Act of 5 August 2025 amending the Act on Value Added Tax and the Act on amending the Act on Value Added Tax and certain other acts	02 September 2025 / 01 February 2026	The main objective of the law passed is to amend the regulation of the National e-Invoicing System, hereafter: KSeF. The main objectives of the KSeF as set out in the Act are:
		• making it compulsory for all taxable persons (active and VAT-exempt taxable persons) to issue structured invoices, taking into account the various stages of implementation:
		  • from 1 February 2026 – taxpayers whose total value of sales including the amount of tax did not exceed PLN 200,000 in 2024,
		  • from 1 April 2026 for other taxpayers,
		• exemption from the obligation to issue structured invoices as from 1 April 2026 for taxpayers whose total value of sales, including the amount of tax, documented by invoices issued in a given month is less than or equal to PLN 10,000; the taxpayer loses the right to issue electronic invoices and paper invoices starting from the invoice in which the value referred to above was exceeded,
		• maintaining the possibility of invoicing from cash registers between 1 February 2026 and 31 December 2026,
		• the possibility (voluntary) of issuing structured invoices to consumers,
		• the possibility for taxpayers to use the 'offline24' mode on a voluntary basis,
		• introduction of the possibility of attaching attachments to the e-invoice, provided the intention to issue and send them to KSeF is notified; the attachment is an integral part of the e-invoice,
		• postponement until the end of 2026 of the requirement to provide a KSeF number in payments for e-invoices – those made under the split payment mechanism (MPP) and between active taxpayers,
		• postponement until 1 January 2027 of the application of penalties for failure to issue a structured invoice or breach of the rules on structured invoices. KSeF.
		In addition, the Act introduces a deferment of the deadlines relating to the settlement of VAT on the "unreimbursed deposit" for packaging covered by the deposit scheme – the first settlement of VAT on the difference in the value of the deposit resulting from packaging covered by the deposit scheme placed on the market in 2025 – will take place in the return for February 2026.

Regulation of the Minister of Finance and Economy of 12 October 2025 amending the Regulation on the exclusion of the obligation to collect flat-rate corporate income tax	31 December 2025	Extension to 2026 of the exemption in the application of the pay & refund mechanism in relation to the so-called technical payer in relation to payments of receivables referred to in Article 26(2e) of the CIT Act. An analogous regulation has been issued with regard to the provisions under the Personal Income Tax Act, hereinafter: the PIT Act, i.e. with regard to the payments of dues referred to in Article 41(4d) and (10) of the PIT Act.
Act of 25 June 2025 amending the Personal Income Tax Act and the Corporate Income Tax Act	01 January 2026	The Act introduced changes consisting of: • the repeal of the sanction of the loss of CIT status by tax capital groups (CPGs) when they carry out controlled transactions with non-group related parties on non-market terms, • the introduction of rules for the reimbursement of tax by taxpayers in the event of the revocation of a decision on support or the withdrawal of a permit for entrepreneurs carrying out a new investment in the Polish Investment Zone or entrepreneurs conducting business in special economic zones, • limiting the obligation to file information on the partners of a general partnership in the event of a change in the composition of the partners and their shareholdings in such a partnership.

Changes in the banking sector regulations		
Name	**Effective date**	**Description**
Act of 06 November 2025 amending the Corporate Income Tax Act	01 January 2026	According to the amended wording of Article 6(1)(10a) of the CIT, the place of the fund's registered office will no longer be a criterion for exemption from corporate income tax. Entities based outside the EU and EEA will also benefit. In order to benefit from the exemption, it is necessary to fulfil a number of conditions set out in the modified wording of the provision of Article 6 of the CIT. The corporate income tax exemption will apply to those mutual investment institutions for which there is a legal basis for the competent authority of the Republic of Poland to obtain, through automatic exchange, information on the accounts maintained by these institutions, if the scope of the information provided includes the data specified in the Act of 9 March 2017 on the exchange of tax information with other states. The amendment covers both third-country mutual institutions as well as taxpayers established in a country other than the Republic of Poland operating a pension scheme, with regard to income related to the accumulation of savings for retirement purposes, who meet the conditions set out in the Act.
UsAct of 6 November 2025 amending the Corporate Income Tax Act and the Act on Tax on Certain Financial Institutions	01 January 2026 / 01 January 2027	The Act introduces significant changes to the taxation of the banking sector, i.e. an increase in the current 19% CIT rate. In 2026, the CIT rate for banks is increased to 30%. In turn, 2027 is envisaged to be reduced to 26% and from 2028 the 23% rate will apply. These changes include- domestic banks, cooperative savings and loan associations, branches of foreign banks and credit institutions. The introduction of the new rates is intended to increase the fiscal burden on the sector to finance public expenditure – particularly in the area of security and defence. There are also changes for start-ups with revenues of less than EUR 2 million. The current CIT rate is 9%. This will increase to 20% from 2026 and will be set at 16% from 2027. In addition to the increase in CIT rates for banks, the law also included provisions for a reduction in the tax on certain financial institutions, the so-called bank tax. The tax which is currently 0.0366% of the tax base will be reduced to 0.0329% of the tax base from 1 January 2027, and from 2028 it will be 0.0293% of the tax base. The changes will come into effect on 1 January 2026 and those relating to the tax on certain financial institutions from 1 January 2027.

Glossary

Add-on – Charge on capital requirement determined in accordance with Regulation 575/2013 (CRR).

Agile – This is a new system of working in selected units of the bank taken from the IT industry. It enables a rapid response to changing client and market needs.

AIRB (Advanced Internal Rating-Based) – is an advanced internal rating method used to measure credit risk.

Interest earning assets – assets that generate interest income for the bank; the main part is loans to clients.

ALCO / ALCO Committee – Asset-Liabilities Committee.

BGF (Bank Guarantee Fund) – A deposit guarantee and resolution scheme. The BGF guarantee covers deposits up to the equivalent of EUR 100,000.

BGK (Bank Gospodarstwa Krajowego) – a state-owned development bank. BGK's main task is to support the country's economic development and improve the quality of life of Poles.

BIK (Credit Information Bureau) – an institution that processes information on the timeliness of repayment of financial obligations of natural and legal persons.

SREP (Supervisory Review and Evaluation Process) – One of the supervisory tools of the Polish Financial Supervision Authority. The aim of the BION process is to identify the size and nature of the risk to which the bank is exposed, to assess the quality of the risk management process, to assess the level of capital covering the risk arising from the bank's operations and bank management.

The OSII Buffer (Other Systemically Important Institution Buffer) – is part of the macro-prudential supervision of the banking sector. The buffer is imposed on systemically important banks at both the individual and consolidated level. The buffer takes values between 0% and 2% of the capital requirement.

Collateral buffer – this is part of the macro-prudential supervision of the banking sector. Buffer imposed on all banks; must consist of the highest quality capital (Tier 1) and is 2.5% of the capital requirement (i.e. the maximum value) from 2019.

Compliance – Ensuring that operations comply with regulations, standards or recommendations.

CPI – Consumer Price Index that measures changes in the price level of consumer goods and services. The world's most popular measure of inflation/deflation.

CRR – Regulation (EU) No 575/2013 of the European Parliament and of the Council.

CSR – Corporate Social Responsibility.

CVA (Credit Value Adjustment) – the credit value adjustment resulting from the difference between the risk-free value of the portfolio and the real value of the portfolio, which includes the possibility of counterparty default.

DORA (Digital Operational Resilience Act) – the Financial Sector Digital Operational Resilience Regulation, which sets out a new European framework for effective and comprehensive digital risk management in financial markets.

BRR Directive (Bank Recovery and Resolution Directive) – Directive of the European Parliament and of the Council on the recovery and resolution of credit institutions and investment firms.

EBA – European Banking Authority.

ESG – (Environmental, Social, Government) – an acronym for environmental, social and corporate governance factors respectively.

ESR – Environmental and Social Risk.

Factoring – the purchase by a factoring service provider (factor) of non-overdue receivables of businesses (clients) owed to them by their counterparties for deliveries and services.

Pillar 3 – the formal name of the document is Qualitative and Quantitative Information on Capital Adequacy.

Own funds – Funds comprising Tier 1 capital (comprising, inter alia, share capital, supplementary capital, reserves, retained earnings) and Tier 2 capital (comprising, inter alia – with the approval of the relevant supervision authority – subordinated liabilities).

Guarantee – A bank guarantee is a written commitment of the bank to pay the amount given there to the beneficiary on the terms and conditions stated therein. However, this agreement only has a collateral function, it is not a means to settle a commercial contract.

ICAAP (Internal Capital Adequacy Assessment Process) – this is a model for estimating internal capital.

ILAAP (Internal Liquidity Adequacy Assessment Process) – this is a model for estimating liquidity resources.

IIRC – International Integrated Reporting Council.

PFSA (Polish Financial Supervision Authority) – supervises the banking sector, the capital market, the insurance market, the pension market, the supervision of payment institutions and payment services bureaus, electronic money institutions and the cooperative bank sector.

Cost of funding – annual interest expense / average interest liabilities over 5 consecutive quarters.

Costs of risk – balance of expected loss allowances and provision for legal risk of foreign currency mortgage loans.

Loans and other receivables from clients (gross/net) – unless otherwise indicated, includes all receivables from clients regardless of the valuation model adopted.

LCR – Liquidity Coverage Ratio. Computed as a ratio of high-liquid assets to short-term liabilities. Introduced in stages – minimum value is: 60% in 2014 and 2015, 70% in 2016, 80% in 2017 and 100% from 2018 onwards.

Total Capital Ratio (TCR) – Calculated as the ratio of own funds to assets and off-balance sheet liabilities including risk weights; a ratio calculated in accordance with Basel III regulations.

Leasing – the agreement, whereunder the owner of an assets item (lessor) provides the user (lessee) with the right to use the assets item for a defined period in exchange for payment or a series of payments.
MREL (Minimum Requirement for own funds and Eligible Liabilities) – minimum level of own funds and liabilities subject to write down or conversion. The institution transposed into Polish law under the Act on the Bank Guarantee Fund, Deposit Guarantee Scheme and Resolution of 10 June 2016.
IAS – International Accounting Standards; gradually superseded by the IFRS, i.e. International Financial Reporting Standards.
IFRS – International Financial Reporting Standards and their interpretations approved by the International Accounting Standards Board.
Mystery Shopper – One of the methods used to score the client service satisfaction where service quality is assessed during client sales and service points visits.
Integrated thinking **Integrated thinking**) – An organisation's active consideration of the relationships between its various operational and functional units and capitals – the resources and relationships that the organisation uses or influences in its business activities. Integrated thinking leads to integrated decision-making and actions that take into account the creation, preservation or erosion of value in the short, medium and long term for the organisation, capitals and the external environment.
NPLs (Non-performing loans) – in simple terms, these are "bad loans; this means that clients fail to repay their loans on time or are very likely not to do so in the future. Under IFRS 9, this concept includes Stage 3 receivables and POCIs (purchased or originated credit impaired).
NBP – National Bank of Poland – a central bank which acts as the issue bank, the bank of banks and the central state-owned bank.
NPS (Net Promoter Score) – a method for assessing client loyalty. The client base is divided into three categories: promoters, indifferent clients and detractors. The NPS indicator represents the difference between the share of promoters and detractors in the total client base.
NFRC – Non-Financial Risk Committee
NSFR – Net Stable Funding Ratio. It is computed as the ratio of available stable funding to required stable funding. In accordance with Regulation (EU) No 876/2019 of the European Parliament and of the Council, the minimum level of the indicator is 100% and applies from the end of June 2021.
OHI (Organisational Health Index) – a survey of organisational health.
PACE – An organised process boosting innovations across ING Group. It encourages the rapid launch of new products and services developed by small, independent and interdisciplinary teams.
PD (Probability of Default) – a measure of the likelihood of default.
GDP – Gross Domestic Product – Aggregated market value of goods and services produced by national and foreign factors in a given country and in a given period.
Bank tax – A popular name of the tax on certain financial institutions. A tax of 0.0366% per month (0.44% per annum) is levied on the value of assets at the end of the month after previous deductions.
Coverage of stage 3 loan portfolio by write-downs – NPL coverage ratio. Ratio of impairment allowances on loans and other receivables granted to clients to impaired loans and other receivables granted to clients. Under IFRS 9, it is the ratio of the write-downs of receivables in stage 3 and POCI (purchased or originated credit impaired) to the value of these receivables.
RAS (Risk Appetite Statement) – a document that sets out the maximum amount of risk the group is prepared to accept against a given type of risk.
Credit rating – Evaluation of the ability of a legal entity drawing a loan to repay the debt in full that is to repay interest and principal on the contractual terms and conditions. The entity can be either a company or, for example, the state.
MPC (Monetary Policy Council) – A body of the National Bank of Poland (NBP). Amongst other things, the MPC is responsible for deciding on the level of NBP interest rates.
Retail segment – Simply: natural persons and natural persons running business.
Corporate segment – Simply: natural persons running their own businesses, clients from the medium-sized and large business segments, as well as strategic clients.
SWIFT – Society for Worldwide Interbank Financial Telecommunication. SWIFT mediates international transactions between financial institutions.
Carbon footprint – The total set of GHG emissions caused directly or indirectly by an individual, organisation, event or product.
Tier 1 – Top-quality capital, computed in line with Basel III regulations.
Share of Stage 3 loans and POCI. (Non-Performing Loans Ratio) – simplified, this is the share of "bad" loans in the total gross loan portfolio. Under IFRS 9, this is the share of receivables in stage 3 and POCI (purchased or originated credit impaired) in the total gross receivables portfolio.
United Nations Environment Program Finance Initiative – A global partnership between the United Nations and over 200 representatives of the world financial sector. The agreement aims to promote sustainable financing.
United Nations Global Compact – The largest global initiative gathering business striving after sustainable growth.
VaR (Value at Risk) – this indicator measures the potential loss that is expected not to be exceeded given a certain level of probability.
WCAG – International guidelines on making Web content more accessible. These principles tell you what to do to make the service accessible to everyone, regardless of their fitness level, age, hardware or software they use.
WIBOR (Warsaw Interbank Offered Rate) – It is a reference interest rate of loans on the Polish interbank market.
WIRON 1M Compound Rate – a benchmark index that is determined in accordance with the Rules of WIRON Compound Indices Family. The index is administered by WSE Benchmark SA, based in Warsaw. For more on the

current value and how the WIRON index is developed, see the administrator's website: https://gpwbenchmark.pl

Loans/Deposits (L/D) ratio – Loans and other receivables granted to clients net of liabilities to clients.

Risk cost margin ratio – Net loan loss provisions (pursuant to IFRS 9: allowances for expected credit losses and provisions for legal risk of foreign currency mortgage loans) to the average value of the gross loan portfolio for 5 consecutive quarters.

Interest margin ratio – Annual net interest income / average interest assets for 5 consecutive quarters.

Cost/income ratio (C/I) – Ratio calculated as the ratio of operating expenses (excluding bank tax) to income, including net profit of associates consolidated by the equity method.

Return on assets (ROA) ratio – annual net profit / average assets for 5 consecutive quarters.

Return on equity (ROE) – annual net profit / average capital value over 5 consecutive quarters.

Return on equity (ROE) – MCFH-adjusted return on equity excluding cash flow hedge revaluation reserve – net income / average capital value over 5 consecutive quarters (excluding cash flow hedge revaluation reserve).

Tier 1 capital

Tier 1 capital ratio – Ratio of Tier 1 capital to assets and off-balance sheet liabilities including risk weights; ratio calculated in accordance with Basel III regulations.

Management Board statement

Truthfulness and reliability of the reports presented

To the best knowledge of the Management Board of the Bank, the financial data for 2025 and the comparable data presented in the Annual Financial Statements of ING Bank Śląski S.A. and the Annual Consolidated Financial Statements of the ING Bank Śląski S.A. Group have been prepared in accordance with the applicable accounting principles and reflect in a true, fair and clear manner the asset and financial position of the Bank and the Bank Capital Group and the financial result achieved by the Bank and the Bank Capital Group. The report of the Management Board contained in this document provides an accurate picture of the development and profitability of the activities and situation (including a description of the main types of risk and uncertainty) of the Bank and the Bank's Group in 2025.

In the opinion of the Management Board, this Management Board Report on Operations of the ING Bank Śląski S.A. Group in 2025 has been prepared in accordance with the Integrated Reporting Guidelines (The International <IR> Framework) and in accordance with the requirements of Article 55(2a) of the Accounting Act, and the sustainability reporting of the Bank Group included in the document has been prepared in accordance with the Accounting Act, the ESRS and Article 8 of Regulation 2020/852 and the delegated acts issued pursuant to Article 8(4) of that Regulation.

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

2026-03-03	Michał Bolesławski President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Joanna Erdman Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Marcin Giżycki Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Bożena Graczyk Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Marcin Kościński Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Maciej Ogórkiewicz Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Wojciech Sieńczyk Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature
2026-03-03	Alicja Żyła Vice-President of the Bank Management Board	The original Polish document is signed with a qualified electronic signature