

**The report on the evaluation of the payroll policy
at ING Bank Śląski S.A. in 2024**

The remuneration policy at ING Bank Śląski S.A. is evaluated on the basis of §28.3 of the *Principles of Corporate Governance for Supervised Institutions*.

At ING Bank Śląski S.A., the core principles of the remuneration policy have been laid down in the ING Bank Śląski S.A. Group Remuneration Policy which was introduced in 2017. The document lays down the key assumptions for shaping the principles of remuneration so as to attract and retain employees, by ensuring the remuneration that is competitive versus the market. The Policy also defines remuneration components.

The principles of the Policy have been further detailed in the other regulations governing the remuneration policy at ING Bank Śląski S.A.:

- 1) Variable Remuneration Policy for Identified Staff of ING Bank Śląski S.A.,
- 2) ING Bank Śląski S.A. Supervisory Board and Management Board Members Remuneration Policy,
- 3) Executive Remuneration Bylaw for Members of the Management Board of ING Bank Śląski S.A.,
- 4) General Conditions of Remunerating the Employees of ING Bank Śląski S.A. with enclosures:
 - a) General Conditions of ING Bank Śląski S.A. Employee Evaluation (Step Up),
 - b) General Conditions of ING Bank Śląski S.A. Identified Staff Evaluation.

I. RULES OF SHAPING THE REMUNERATION POLICY AT ING BANK ŚLĄSKI S.A.

1. In 2024, the Policy remained unchanged vis-à-vis the previous year. Invariably, the Policy furthered delivery of the business strategy and long-term interests of the Bank and its clients, including the sustainability strategy and corporate social responsibility. The said premise was mirrored in the targets set for employees for a given year.
2. As far as remuneration of members of the Bank governing bodies – that is members of the Supervisory Board and of the Management Board – is concerned, the Bank upheld the policy supporting sustainable growth of the bank, which is understood as actions taken in the areas that are meaningful for the society and for the economy, as well as responsibility for and care of the deliverables of those actions, which is part and parcel of the business strategy. Details of remuneration of ING Bank Śląski S.A. Supervisory Board and Management Board Members can be found in the Report compiled as per Article 90g of the Act on Public Offering and Terms and



Conditions of Introduction of Financial Instruments into the Organised Trading and on Public Companies.

II. REMUNERATION COMPONENTS

1. The approach to remuneration components (divided into fixed and variable ones) did not change in 2024. Fixed remuneration is such a large part of the total remuneration that it allows one to pursue a fully flexible policy of variable remuneration components, including the option of reducing or not granting any variable remuneration at all.
2. Variable remuneration encompasses any and all forms of remuneration and other benefits provided in return for performance.

Variable remuneration encompasses the annual bonus which is set per employee, based on the evaluation of balanced and risk-based performance, considering the quantitative- and qualitative criteria. As part of the variable remuneration, high-performing employees may also be awarded an individual cash reward, the aim of which is to recognize and appreciate their extraordinary achievements at work and high potential.

3. Separate rules of variable remuneration, laid down in the *Variable Remuneration Policy for Identified Staff of ING Bank Śląski S.A.*, apply to the group of employees holding managerial positions that have material impact on the risk profile of the Bank (Identified Staff). The Policy defines the components of variable remuneration that may be awarded to Identified Staff and the principles of that remuneration payout.

The most important ones include:

- 1) financial and non-financial criteria as well as risk-adjusted criteria are used to assess individual performance; non-financial criteria should account for at least 50% of all goals, save for the persons responsible for control functions,
- 2) financial criteria are not used for the persons responsible for control functions. The goals for those persons stem from the functions held by them and they are not tied to the performance of the areas controlled by them,
- 3) a deferral of a part of variable remuneration, which is settled in five instalments during the period of work performance verification, to assess the impact of employee actions on the Bank's long-term results,
- 4) (at least 50% of) variable remuneration is awarded in financial instruments, with own shares (previously phantom stock) being the primary instrument since 1 July 2022,
- 5) with a view to ensuring long-term stability of ING Bank Śląski S.A. and tying further the risk management minimum standards to individual remuneration, since 2019 the Bank has had a *Procedure regarding risk requirements for Identified Staff being Risk Takers*. The Procedure enables the Management Board Member responsible for the risk area (the CRO) to take a decision to apply a risk modifier for variable remuneration. Following the requirements, all Identified Staff members being Risk Takers receive written information providing for the specific risk requirements for a given calendar year. After the end of the year, satisfaction of risk requirements is assessed and the assessment result may reduce the variable remuneration of the employee, should risk requirements not be satisfied.



4. Fringe benefits provided under the Bank's remuneration policy cover a package of benefits and wellbeing activities structured under four pillars: Health, Activity, Energy and Finance.

III. SUPERVISION OVER REMUNERATION POLICY

1. Compliance with the remuneration policy at the Bank is supervised by the following bodies:
 - 1) General Meeting:
 - a) evaluate annually whether or not the remuneration policy established is conducive to the development and safety of the Bank's business,
 - b) pass amendments to the ING Bank Śląski S.A. Supervisory Board and Management Board Members Remuneration Policy,
 - c) provide opinion on the remuneration of the Members of the Management Board and the Supervisory Board.
 - 2) The ING Bank Śląski S.A. Supervisory Board:
 - a) approve the ING Bank Śląski S.A. Group Remuneration Policy and the Variable Remuneration Policy for Identified Staff of ING Bank Śląski S.A.,
 - b) supervise compliance with the aforesaid Policies,
 - c) develop and submit to the General Meeting the report on the evaluation of the remuneration policy at the Bank and the report on the remuneration of Supervisory Board and Management Board Members.
 - 3) ING Bank Śląski S.A. Supervisory Board Remuneration and Nomination Committee – monitor the implementation of the Policy.
 - 4) Control functions actively participate and cooperate in the review of the Bank's remuneration policy to ensure its coherence with the risk management strategy and framework. Control functions also assess correctness of the capital base and fulfilment of conditions necessary for the bonus pool disbursement.
 - 5) The Risk Committee of the Supervisory Board of ING Bank Śląski S.A. have been included in the active supervision of the remuneration policy, monitoring the policy's compliance with the Bank's strategy, values and risk appetite.
2. The Polish Financial Supervision Authority supervise the compliance of the Bank's activity with the regulations concerning the variable remuneration components policy.

IV. REPORT ON THE EVALUATION OF THE REMUNERATION POLICY AT THE BANK IN 2024

1. The remuneration policy at the Bank complies with the Bank's strategy, values and risk appetite as well as it supports the long-term interests of the Bank and its clients. Furthermore, it promotes and supports the process of effective risk management in order to maintain and protect the sound capital base of the Bank. It does not promote excessive risk-taking behaviour that is beyond the risk propensity accepted by the Supervisory Board of the Bank and it is based



on performance management combining individual goals with the long-term business strategy and ensuring sustainable growth.

2. Pay rises

In 2024, ING Bank Śląski S.A. kept its remuneration policy whose aim is to support the strategic goals and systematically mark the pays to the market, considering the economic challenges encountered on the market.

The salaries of ING Bank Śląski S.A. staff were reviewed as part of a standard annual procedure. The Remuneration and Nomination Committee was updated on the level of market salaries vis-à-vis the salaries of the employees of ING Bank Śląski S.A. The update was prepared on the basis of the Hay Group reports. Bearing in mind the results of the payroll review, the Bank Management Board decided to implement a pay rise exercise, starting April 2024.

Pay rises were awarded on a discretionary basis. The total pay rise budget stood at 7.5% of the base salary fund. The core assumptions behind the pay rise exercise were the following:

- 1) increasing the minimum wage up to PLN 5,500 gross (full-time FTEs),
- 2) introducing a new base salary table in which the amounts of minimum salaries were raised in all pay grades.

3. Annual performance bonus

2024 was another year of functioning of the annual Step Up goals settlement system, which combines job performance assessment, creation of a solid corporate culture and our ambitions. Performance evaluation directly translates into payout of bonuses to employees. In keeping with the General Terms and Conditions of ING Bank Śląski S.A. Employee Evaluation (Step Up), the Bank Management Board determined, in consultation with the Supervisory Board, the variable remuneration pool for employees. In February 2024, the full bonus (without the adjustment by correction factors) was paid out to Bank employees from the specific provision.

4. Identified Staff annual bonus

In March 2024, the bonus for Identified Staff was settled in accordance with the *Variable Remuneration Policy for Identified Staff of ING Bank Śląski S.A.*:

- 1) variable remuneration for 2023 was set and the non-deferred portion of the bonus was awarded,
- 2) following positive verification of the assessment with consideration of ex-post risk and capital test, the Bank awarded the relevant portions of deferred variable remuneration for 2019, 2020 and 2021.

The base terms and conditions of variable remuneration disbursement were satisfied. The Remuneration and Nomination Committee gave positive advice and, in consequence, the non-deferred 2023 bonus portion and the deferred bonus portions for 2019, 2020 and 2021 were paid out to the Identified Staff. An analogical adjustment multiplier was not applied to the variable remuneration of Identified Staff.



No bonus shall be due should the employment contract be terminated under Article 52 of the Polish 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 verification of assessment of bonus tasks execution, taking ex post risk into account.

5. Incentive Programme for Identified Staff

The incentive programme based on the Bank's own shares was adopted by Resolution No. 29 of the Bank's Ordinary General Meeting of 7 April 2022 at the bank and at companies belonging to the bank group and subject to consolidation, save for ING Bank Hipoteczny S.A.

Own shares are awarded free of charge as an element of variable remuneration for 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).

Programme functioning is preconditioned by acquisition of an adequate number of own shares from the market. According to the Programme assumptions, the Ordinary General Meeting of the Bank authorised the Bank Management Board to acquire own shares under the terms and conditions described below:

- the own shares will be paid in full,
- the own shares will be acquired solely in order to execute the Incentive Programme,
- the maximum number of the acquired own shares shall not exceed 800,000 (in words: eight hundred thousand) shares, or 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 shall the total nominal value of the acquired own shares, own shares acquired earlier by the bank and its subsidiaries included, which have not been sold or redeemed, exceed 0.6% of the bank's share capital,
- the total amount that may be allocated for the acquisition of own shares, the costs of their acquisition included, shall not exceed PLN 200 million (in words: two hundred million) and in no case shall exceed the amount of the reserve capital established for this purpose,
- the own shares will be acquired through the agency of an investment firm selected for this purpose,
- the unit acquisition price per one own share shall be no less than PLN 50 (in words: fifty zloty) and no more than PLN 500 (in words: five hundred zloty). The price per one own share shall be determined taking into account Article 5 of the MAR Regulation and the Technical Standards.

Should – for whatever reasons – the share acquisition process from the market prove unfeasible or impossible without taking excessive effort or within the predefined timelines, then for the needs of further performance of Bank's obligations under the Programme, the Bank Management Board – upon the consent of the Supervisory Board – can take a decision to replace own shares with another financial instrument whose value is shaped by the value of Bank shares or to otherwise perform Bank obligations under the Programme.



The rights to phantom stock allotted before the commencement date of the new programme will be exercised in the manner applicable to date. Notably, the deferred portions of remuneration awarded in phantom stock will not be converted into own shares.

As a result of the transactions carried out as part of the buyback of own shares in tranches:

	Tranche 1	Tranche 2	Tranche 3	Tranche 4
Total number of shares repurchased	24,931	22,800	16,292	25,000
Share buyback timeline	12.05.2023 – 03.07.2023	05.12.2023 – 29.12.2023	13.03.2024 – 05.04.2024	04.12.2024 – 31.12.2024
Total value of repurchased shares	PLN 4,201,796	PLN 6,110,408.00	PLN 5,190,328.50	PLN 6,271,279.00
Share of the repurchased shares in share capital	0.01916%	0.01752%	0.01252%	0.01922%

Own shares were transferred to the individual brokerage accounts of the Management Board Members and Identified Staff in the following numbers:

Bank Management Board	Identified Staff
9,584 own shares	26,352 own shares

No bonus shall be due should the employment contract be terminated under Article 52 of the Polish 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 verification of assessment of bonus tasks execution, taking ex post risk into account.

The rights to phantom stock allotted before the commencement date of the new programme will be exercised in the manner applicable to date. In particular, the deferred parts of the remuneration granted in phantom stock will not be convertible into treasury stock.

6. Hybrid working model

As of March 2022, we have permanently introduced a hybrid working model at the Bank, which involves alternating the performance of work tasks from the office and from home. In 2023, we changed our approach to payment of the adaptation allowance by introducing two allowances instead:

- 1) allowance for remote work – compensating for the costs of remote work, and
- 2) office allowance – supporting commuting employees.



In December 2024, by analogy to the previous year, we paid our employees the said allowances in the gross amount of PLN 1,800. This represented an increase of PLN 300 compared to 2023. All eligible employees were paid the same allowance amount, regardless of their working time. All employees hired on the employment contract basis as at 31 December 2024 received the allowance. The following persons were not eligible for the payment: persons on maternity leaves, parental leaves, childcare leaves and unpaid leaves (including sabbaticals) as well as persons with whom we closed cooperation. Persons returning from long-term absence and employed in 2025 will receive the allowance on a pro rata basis, calculated from the month of their return to work or from the hiring month. Eligible persons will be verified and the allowance will be paid after the end of a given quarter.

7. Fringe benefits

In addition to other forms of rewarding and recognising employees, we offer them an extensive catalogue of fringe benefits that increase the attractiveness of the workplace. We select the fringe benefits offered to employees based on trend analyses and employee feedback regarding their expectations of fringe benefits.

The offer of fringe benefits has been structured into four pillars (Health, Energy, Activity and Finance), which define the holistic approach to the benefit package supplementing fixed and variable remuneration which is offered to employees.

With a view to making the offer more transparent and improving the knowledge of its availability among the staff, in 2024 we continued sending employees a monthly Wellbeing Newsletter in which we communicate details of the offer, present events planned for the following month and inform employees of the sites where they can find information of use and interest from the benefits area. Information about benefits and planned events are grouped under defined pillars of our wellbeing strategy.

1) Health

Our goal under the Health pillar is:

- to ensure that every employee has access to top quality medical services (along with the package of dental services and refunding programme offer), both for themselves as well as their family members.

We offer a range of preventive measures to support the health of our employees. The wide range of services significantly reduces the risk of serious illnesses or late detection of such health conditions:

- Preventive health check-ups as part of standard packages of medical care, of which a total of 1,551 people benefited in 2024.
- The Cancer Prevention Programme is a comprehensive package of tests dedicated to employees, to support employees and to promote prevention. In 2024 alone, around 400 people underwent preventive tests for breast and gastrointestinal diseases.
- 'We test genes at ING' - as part of the programme, we offer financial support for genetic testing. This year, in addition to genetic testing to assess the risk of cancer, employees



had the opportunity to choose a second programme for age-related illnesses, such as Alzheimer's disease.

- Other preventive measures include flu and HPV vaccinations, massages, consultations with specialists (dieticians, back pain prevention).

In addition to healthcare and preventive measures, we also organise a range of activities and initiatives to raise awareness of health and healthy habits. In 2024, these included meetings and consultations as part of the initiatives 'Dietary Wednesdays', 'Health Week' and 'Wellbeing Day'. In total, around 3,569 participants from network units and the head office took part in the meetings.

In 2024, we also continued the surprise campaigns for employees of the head office and the network. This year, for the first time, we undertook to organise 3 large campaigns for the entire sales network in Poland. This was a huge logistical challenge and required a lot of work from us. The feedback after each surprise campaign was very positive, which motivated us to plan even more surprises.

2) Energy

Our goal under the Energy pillar is to ensure psychological support for our employees. Our flagship products are extra days off (for special occasions, for holiday, voluntary activity or to care for their next of kin), the offer for staff children, psychological care and support in difficult everyday situations.

The package of benefits provides for extra days off due to child birth or wedding and their number is higher than the statutory limits (higher than the number of days off provided under the applicable laws). A unique product in the range of days off is the Family Day Off, which employees can use in full or hourly depending on their needs.

We also support parents in that we offer:

- an extra paid maternity leave of 10 days,
- an extra paid paternity leave of 5 days,
- the ability to take advantage of 2 days to care for a child up to 18 years of age.

We dedicate a separate package of extra days off to deal with life situations related to disability; those extra days off include:

- 5 extra vacation days for parents who have a child with a certificate of disability,
- 2 extra days off for employees who take care of family members with disability, and
- 3 extra days off for employees who have a certificate of mild disability.

The extra days off to which staff members are entitled include:

- as many as 5 days per calendar year as a reward,
- a day off for employees who work on a shift basis (that is at night time, on Sundays and statutory holidays),
- a sabbatical leave which is an extended period of time away from work to rest or study, and
- an extra day off to celebrate a jubilee.



In 2024, we kept being focused on mental health. As part of those actions, we undertook the following activities:

- Mental Health Platform – it provided the employees with the ability to talk to a therapist, a coach, as well as a financial advisor or a legal advisor. There is a total of approximately 3,000 participants of the Platform. In addition, employees can take part in thematic podcasts, webinars and recordings. Within the Platform, employees have unlimited access to workshops and development sessions. There are live meetings which are also accessible to individuals who were unable to take part in the live meetings. The workshop topics are selected as needed and they are changed on a regular basis. The employees can also invite their loved ones to take advantage of such a form of help. The World Mental Health Day which is celebrated in October is another occasion where we enable our employees to take advantage of 50 extra hours for psychotherapy within the Platform.
- we continued the operation of the Orange Help-Line – it is a dedicated anonymous helpline which is served by certified psychologists who offered the employees the ability to discuss their well-being, their fears or problems. All ING employees and their loved ones can take advantage of the support. In 2024, an additional helpline was set up for flood victims when it was needed.

In 2024, we also organised special events dedicated to the children of our employees:

- Children’s Day in our office buildings in Katowice and Warsaw – children of our employees from all across Poland were able to take part in multiple workshops, events and competitions. Each visitor also received a gift on the occasion.
- Santa Claus Day – in December, all parents received an extra PLN 50 per each child in their Cafeteria account.

In addition, we organised the following events for employees:

- Wellbeing Day

On 10 September, we celebrated World Wellness Day. On that date, we reminded employees that every day, even through small actions, it is possible to take care of physical health, emotional harmony and good relationships with others. The Bank credited Cafeteria accounts of employees with extra 50 points which teams could spend to arrange some special time, by ordering lunch together or going to cinema together for example.

- Energy Days

A week-long event called Energy Days was held in October. Employees had the opportunity to meet with mental health specialists, including in mindfulness sessions and meetings with psychologists and therapists.

3) Activity

Our goal as part of the Activity Pillar is to encourage employees to take up physical activity. Our flagship products include:

- “Aktywni ING” (Active ING) – a charity challenge in a sports app ‘Aktywni-Charytatywni’ and three additional competition challenges for people who like to walk, run and cycle.



Our employees raised over 20,000 for the ING for Children Foundation. More than 500 people took part in the event. Nearly 1,700 employees are registered on the Aktywni ING platform.

- Biegnij Warszawo (Run Warsaw) - We have been taking part in Biegnij Warszawo since 2013. The Orange Team consists of employees, their companions and families. Every year, we run and march for the ING for Children Foundation. In 2024, we broke the record for registrations. Over 6,000 people took part in the event and we donated over 160,000 to the Foundation. As usual, we met for a family picnic after the run and walk.
- Aktywna Przerwa (Active Break) - as part of the prevention of spinal conditions, we launched a programme called 'Active Break' in October 2020. We recorded 75 exercise videos that can be used as many times as needed at any time. In 2024, employees continued to exercise using the recorded videos. Since October 2020, they have exercised for almost 1,106 hours and played the videos 25,296 times.
- Sports tournaments - We organise sports tournaments every year. In 2024 we held: Football Tournament, Table Tennis Tournament and Beach Volleyball Tournament. The football tournament was for charity. The winning teams donated cheques in the amount of PLN 10,000 to three charities: Amp Futbol, Nadzieja na Mundial [Hope for the World Cup] and the Avalon Foundation.
- Mocodajnia - is a place in Katowice at 50 Chorzowska Street, which, depending on what is needed, serves as a meeting room, a creative workshop space or a gym. Equipment and activities are tailored to the needs reported by our employees. 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 combat back pain and have a relaxing effect.
- In 2024, in response to employee voices, we introduced regular dance, Tai-chi and yoga classes at Mocodajnia. We also started dance classes for our employees' children there. Moreover, we launched yoga classes in Warsaw, in the Floor Hub at our headquarters in 2 Puławska Street. We also introduced online classes in Tibetan healing yoga. Lu Jong Yoga is a set of 21 exercises for everyone regardless of age and fitness, combining form, movement and breath.
- Duplicate bridge - the main aim of the sports budget is to support the sporting passions of our employees, promoting a healthy lifestyle and physical activity. More than 1,500 people have benefited from the sports budget to date.
- Porusz czerwiec (Move June) - in June we invited you to join the Move June campaign. Yoga classes, a cycling photo competition, bike discounts and much more awaited our colleagues.
- Ćwiczymy Pod Chmurką (We exercise outdoor) - in July and August, in various parks in Katowice, Warsaw and Chorzów, our employees could exercise with instructors outdoor. The idea behind the meetings was to promote healthy and active leisure in the open air. The introduction of slow jogging training was a novelty. It was and is very popular among our employees.



4) Finances

Financial security and financial education of our employees are the goals of our activities under the Finance Pillar. Our flagship products under that Pillar include:

- Employee Pension Programme – as part of the programme, the Bank enables employees to accumulate extra funds for their pension, and the Bank finances the basic contribution,
- Group life insurance with two insurance companies. The ability to use the employer-sponsored insurance plan is a real benefit for the employees,
- The Cafeteria plan which has operated at the Bank since 2017. Employees have access to sport cards and a flexible benefit offer. The Cafeteria is accessible to all employees, and the number of points depends on their salary level. The Cafeteria plan was subject to a thorough review in 2023 which allowed us to determine new rules of the plan functioning, effective as of 2024. The tool we have offered to the employees is more flexible, and gives them access to all benefits and services without any limits that had previously applied due to the fact that the benefit was tied with the in-house social benefits funds. At the same time, we implemented a rule, whereby the points were awarded based on the salary grade.

In 2024, we implemented a number of educational activities and offered employees support in the form of financial allowances. As part of these actions:

- we educated employees on financial matters and supported their financial well-being by providing them with useful knowledge. Before we launched those activities, we had held a poll among the employees which confirmed that they were interested in such activities. In response to their needs, we focus on the following areas:
 - promoting knowledge of pension schemes to save for their future pension,
 - providing assistance with personal taxes in the form of conferences, chats and brochures prepared by third-party experts,
 - providing them with knowledge and support in regard to the market situation in Poland, finance psychology or household budget,
 - financial education for children.

8. Gender pay equity

The Remuneration Policy of ING Bank Śląski S.A. Group is gender neutral, which means that it does not create conditions for any gender to be favoured in an unjustified manner with regard to terms and conditions of remuneration.

The pay gap indicator is calculated by comparing the average pay of women and men across the Bank. However, the full picture of the gender pay gap is more complex, as it is influenced by many factors, such as the employment structure, value and type of work performed by women and men. Therefore, the remuneration analysis is divided into two components: the unadjusted pay gap, calculated in accordance with the methodology resulting from the European Banking Authority Guidelines, and the adjusted pay gap, calculated based on the methodology developed by the banking sector in the open forum of the Polish Bank Association (ZBP) in 2025.



The adjusted pay gap provides additional contextual information to help interpret an organisation's individual situation.

- Unadjusted wage gap** - ING Bank Śląski S.A. calculates the unadjusted wage gap ratio in accordance with the methodology resulting from the European Banking Authority Guidelines. The calculation is based on the difference between the average salary of men and women to the average salary of men. The analysis covers all persons employed at the Bank as at 31.12.2024 on the basis of a contract of employment, excluding employees with a long-term absence (at least 3 months as at 31.12.2024) and those employed in the last 3 months of 2024. Other assumptions adopted for the calculation include the conversion of salaries into full-time equivalents for part-time employees and the annualisation of salaries of employees covered with the analysis. The variable remuneration included in the calculation represents the remuneration awarded for 2024. The unadjusted rate in 2024 was 31%.
- Adjusted wage gap** - the main factor impacting the level of the wage gap at ING Bank Śląski S.A. is the employment structure in each pay grade. In order to determine the level of the adjusted wage gap more precisely, the Bank has carried out a detailed analysis comparing the salaries of people employed within homogeneous groups of employees performing the same work or work of the same value. The calculation is based on the average remuneration of men and women employed within homogeneous groups of employees in accordance with the Bank's remuneration policy, weighted by the employment structure of these groups. Groups of employees represented by only one of the genders and those whose size does not reflect the importance of the level of average remuneration (representation of each gender: less than 3 employees) were excluded from the calculation. The adjusted ratio in 2024 was 3%.

The reduction of the wage gap from 32% in 2023 to 31% in 2024 was mainly achieved thanks to the measures taken by the Bank to include wage equality-related indicators in the process of salary increases in 2024.

We are taking steps to ensure that the gender pay gap is reduced over time. In terms of individual staff groups and grades, the pay gap is as shown in the table below.

2024	
Unadjusted gap	31%
Adjusted gap	3%

In addition to the gender pay gap index, since 2022 we have continued our in-depth analysis in equal pay for equal work, which shows the pay mismatch index for the same jobs, grades, competences. In this way, we identify people who earn statistically more or less for a given profile, also relative to the opposite sex. The results of the analyses are one of the key elements taken into account by managers when making decisions on salary increases.

We are implementing a number of diversity and inclusion initiatives aimed at equalising opportunities for women and men and building awareness among managers and employees of our bank's non-discriminatory gender policy. One of the annual objectives of the Management Board in recent years has been to ensure an appropriate gender balance in succession plans for senior managers.



9. Review and update of regulations

As part of the review of the remuneration-related regulations, amendments were proposed to:

- 1) the Remuneration Policy in the ING Bank Śląski S.A. Group, which resulted from:
 - clarification of the Policy provisions in accordance with Article 5 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR'),
 - aligning the provisions relating to elements of fixed remuneration with current reporting and communication practice in a way that explicitly indicates the range of benefits offered by the employer in the 4 pillars, namely Health, Finance, Energy and Activity,
 - adding to the provisions of Chapter 4 on the review of the remuneration policy the provisions relating to reporting obligations - the change is due to an internal audit observation on the implementation of the obligations arising from the Guidelines EBA/GL/2022/06 and EBA/GL/2022/08.
- 2) The Variable Compensation Policy for Identified Staff of ING Bank Śląski S.A., which resulted from:
 - implementation of the audit recommendation issued after the variable remuneration audit by the Internal Audit Department - the change relates to the compliance of the Policy's provisions with the operating practice of assessing the level of achievement of annual targets by those responsible for control functions reporting directly to the Bank Management Board.

10. Meetings of the Remuneration and Nomination Committee

In 2024, the Remuneration and Nomination Committee of ING Bank Śląski S.A. held 10 regular meetings and 1 by way of circulation.

11. Inspections and audits

Between 5 August 2024 and 30 August 2024, the Internal Audit Department carried out an audit of the process of remunerating identified staff at ING Bank Śląski S.A. The purpose of the audit assignment was to evaluate the design and operating effectiveness of the key internal controls relating to the process of remunerating the identified staff at the Bank as well as the Remuneration Policy at ING Bank Śląski S.A.

The audit findings confirmed that the process of determining and payment of the remuneration to Bank employees (including identified staff members at the Bank) had been regulated by internal remuneration policies which are updated, supervised and monitored on a regular basis by the Supervisory Board who are supported by the Remuneration Committee.

The audit recommended the need to implement a change in the regulations whereby a separate proposal will be presented to the Risk Committee of the Bank Supervisory Board to verify whether elements of the remuneration system take into account risk, capital and liquidity.

The recommendation has been implemented by introducing a provision in the Regulations of the Risk Committee of the Supervisory Board of ING Bank Śląski S.A. ensuring the



implementation of the requirement by the Risk Committee of the Supervisory Board in accordance with Article 61 of the EBA/GL/2021/04 Guidelines. In practice, the change will be implemented in the form of the presentation of proposals relating to monitoring of the correctness at the Risk Committee meetings.

The Supervisory Board are of the view that in 2024 the Bank respected the principles of its remuneration policy.

