



# Sustainability Policy of the ING Bank Śląski S.A. Group

**ING Bank Śląski S.A.**

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**Table of contents**

Introduction ..... 3

Scope of Application ..... 3

Purpose ..... 3

Thematic Scope ..... 3

Overview ..... 3

Our Fundamental Principles and Commitments (G) ..... 4

Our Social Principles and Commitments (S) ..... 5

    Human rights ..... 5

    Our Employees ..... 5

    Our Clients ..... 6

    Other significant stakeholder groups ..... 7

Our Environmental Principles and Commitments (E) ..... 7

Policy oversight ..... 9

    Annex no. 1 - Related internal documents ..... 10

    Annex no. 2 - Conventions, reports and guidelines that inspired this policy ..... 12

## Introduction

This Policy outlines the approach of ING Bank Śląski S.A. (hereinafter: “ING” or the “Bank”) and the material subsidiaries of the ING Bank Śląski S.A. Group (hereinafter: the “Group” or the “Capital Group”) to sustainability and ESG (Environmental, Social and Governance matters, hereinafter: “ESG”).

## Scope of Application

This Policy applies to the material subsidiaries of the ING Bank Śląski Group, this is: ING Bank Śląski S.A., ING Bank Hipoteczny S.A., ING Lease Sp. z o.o., ING Commercial Finance S.A.

## Purpose

The purpose of this Policy is to support long-term value creation for the Capital Group and its stakeholders by establishing a framework for responsible management of environmental, social and governance impacts. In particular, it aims to:

1. Build a sustainable and resilient business model,
2. Support compliance with regulations in the context of sustainable development,
3. Promote transparency and high standards of stakeholder communication.

## Thematic Scope

This Policy outlines the principles that guide our actions when defining and implementing strategic objectives in the areas of ESG and sustainable development. These principles are defined in relation to key stakeholder groups, including employees, clients, investors and capital markets, non-governmental organisations, the regulatory environment, the natural environment, business partners including suppliers, society, and the broader industry ecosystem. **The principles and commitments set out in this Policy are further elaborated through detailed policies that constitute the Corporate Governance and Sustainability Management System.**

A list of related documents is provided in **Annex 1**. This Policy is based on agreements, guidelines and good practices relating to ESG and sustainable development (see **Annex 2**).

## Overview

At ING, we believe that transforming the economy towards sustainability is essential to ensuring a secure future for current and future generations. This can only be achieved through a collective effort, by adapting both individual and collective behaviours to support an economic model that promotes the well-being of all social groups, job creation, respect for human rights and the protection of natural resources.

## Our Fundamental Principles and Commitments (G)

### Principle 1. Sustainable development is an integral part of our strategy

Within the ING Bank Śląski Capital Group, we treat sustainable development as a key component of our strategy and the way we conduct our business. We integrate sustainability considerations into decision-making processes, risk management and organisational resilience building. We believe that a responsible approach to environmental, social and governance (ESG) matters creates long-term value for our clients, shareholders and society as a whole.

### Principle 2. We identify and assess the materiality of sustainability topics

We systematically analyse which ESG topics are most material to our operations and stakeholders. We assess both the impact of these topics on our financial performance and the impact of our activities on the environment and society. The outcomes of these analyses are incorporated into risk management, the definition of strategic priorities and the setting of objectives.

Our approach is based on data, stakeholder dialogue and recognised standards such as the European Sustainability Reporting Standards (ESRS), the AA1000 Stakeholder Engagement Standard AA1000, and the Integrated Thinking Principles.

### Principle 3. We foster a culture of responsibility and high ethical standards

Our corporate culture shapes how we conduct our business and affects all our stakeholders. The foundation of this culture is the ING Orange Code, which defines our values and behaviours and ensures integrity, transparency and regulatory compliance. We uphold high ethical standards in our relationships with clients, partners and employees.

We regularly communicate and provide training on the principles set out in the Global Code of Conduct and the Orange Code to support a culture of responsible banking.

### Principle 4. We safeguard the security of the Bank, clients and the financial system

We act with due diligence to prevent all forms of misconduct and financial crime. We take measures to prevent money laundering, terrorist financing, tax fraud and cybercrime. We implement modern technological solutions, control procedures and training programmes to protect our clients, the Bank and the stability of the financial system.

### Principle 5. We fulfil our commitments through effective implementation and development of competences

We ensure that our priorities are met by clearly assigning responsibilities, monitoring progress and providing management information. We invest in the skills of our employees at all levels of the organisation, including leadership training, to build a culture of responsibility within the bank. We support collaboration between teams and engage in industry initiatives that reinforce our sustainability efforts.

### Principle 6. We ensure transparency and reliable reporting

We uphold transparency through reporting and disclosures that comply with regulatory requirements and stakeholder expectations. We apply the European Sustainability Reporting

Standards (ESRS) and the International Integrated Reporting Framework (IIRF) to ensure the quality, consistency and comparability of information.

Our aim is to ensure that ESG reports and communications enable stakeholders to understand our goals, progress and impacts, building trust and credibility among clients, partners and society.

## **Our Social Principles and Commitments (S)**

### **Human rights**

#### **Principle 7. We conduct our business with respect for human rights**

We are committed to respecting internationally recognised human rights that apply to our operations. This includes, in particular, the principles and rights set out in the Universal Declaration of Human Rights and in the core conventions referenced in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

#### **Principle 8. We expect respect for human rights from our suppliers, clients and third parties**

We continuously assess human rights impacts across all segments of our value chain — from the supply chain and our own operations, through impacts on employees, to the credit portfolio and potential indirect impacts associated with financing activities.

Our ESG client-level risk assessment and transaction-level risk assessment include social factors. Ensuring compliance with key international human rights regulations is part of the assessment of the EU Taxonomy Minimum Safeguards.

### **Our Employees**

People are a key source of our competitive advantage. Within the ING Bank Śląski Capital Group, we recognise that the organisation's success depends on the engagement, expertise and diversity of our employees. That is why we take conscious actions to remain an attractive employer — to attract talents, support their development and retain them in the organisation. Our approach is guided by the following sustainability principles, which define our standards for the workplace.

#### **Principle 9. We ensure safe and fair working conditions**

We care about the health of employees, safety and stability of employment. We ensure decent pay conditions, transparent work evaluation rules and support work-life balance. We strive to create a working environment that fosters well-being and a sense of security.

#### **Principle 10. We promote diversity, inclusion and equal opportunities**

We value diversity and prevent all forms of discrimination, violence and harassment.

We promote gender equality, equal pay for work of equal value, and strive for balanced representation of women and men at all organisational levels.

We take into account the needs of neurodivergent employees and employees with disabilities, creating an inclusive workplace open to everyone.

### **Principle 11. We invest in competence development and entrepreneurship**

We provide access to training, development programmes and tools that support skills development. We encourage employees to be innovative and entrepreneurial, co-creating the Bank's future in a changing environment.

### **Principle 12. We support social engagement and volunteering**

We encourage employees to engage in social and environmental initiatives that create meaningful impact. We support volunteering and mentoring as ways of sharing knowledge, skills and time — inspiring others and contributing to positive change. Active involvement in social and environmental projects strengthens our culture of responsibility.

## **Our Clients**

Our clients are at the heart of our business. As an institution of public trust, we are committed to ensuring their safety, transparency and the highest quality of service. Our approach is guided by principles that support long-term relationships, responsible use of financial services and protection of customers' interests.

### **Principle 13. We ensure transparency and simplicity in communication**

We provide information about products and services in a clear, fair and non-misleading manner. We ensure that our materials are understandable and accessible to all clients, including those with lower levels of digital proficiency or clients with disabilities.

### **Principle 14. We offer products and services that suit client needs**

We design and deliver products and services that meet the needs of clients throughout the entire lifecycle of the relationship. We ensure fair pricing that reflects market conditions, costs and risks.

### **Principle 15. We protect our clients assets and data**

We apply the highest standards of personal data protection and privacy. We implement effective mechanisms to safeguard funds entrusted to the Bank and to prevent financial abuse and cybercrime.

### **Principle 16. We support financial education and informed decision-making**

We conduct a wide range of educational initiatives targeted at different client groups to enhance financial and digital literacy. We educate clients on risks related to financial crime and support business clients in understanding sustainability-related risks and opportunities. Our aim is to prevent financial exclusion, build financial resilience, strengthen digital competencies and support responsible decision-making that prepares clients for future challenges.

## **Other significant stakeholder groups**

Stakeholder relations are the foundation of our responsibility. As a *public trust institution*, we operate in a transparent, ethical and long-term manner, taking into account the impact of our decisions, in particular on shareholders, business partners, suppliers and local communities. We are guided by principles that support sustainable development and build value for all parties.

### **Shareholders and Investors**

#### **Principle 17. We ensure transparency and reliable reporting**

We provide information in a clear, complete and regulatory-compliant manner. Our financial and non-financial reports reflect the actual impact of the Bank's activities on the economy, society and the environment. We apply recognised ESG reporting standards to ensure the credibility and comparability of data.

### **Suppliers and Business Partners**

#### **Principle 18. We collaborate in a spirit of responsibility**

We expect our partners to adhere to high ethical standards, respect human rights and follow principles of sustainable development. We support them in meeting ESG-related expectations through dialogue, knowledge sharing and joint initiatives. We do not enter into relationships with entities whose activities are inconsistent with our principles.

### **Local Communities**

#### **Principle 19. We build partnerships and support social development**

We engage in initiatives that strengthen social and economic development. We collaborate with non-governmental organisations, academic institutions and local governments to implement projects that generate a positive impact on local communities. We promote employee volunteering and educational activities that support young people and local communities in adapting to future challenges.

### **Regulatory Environment**

#### **Principle 20. We maintain open dialogue and ensure regulatory compliance**

We maintain transparent relationships with supervisory authorities and regulators to ensure compliance with applicable laws and standards. We actively participate in consultations and industry initiatives that support the development of a stable and secure financial system. We share knowledge and best practices to jointly shape regulations that foster sustainable development.

## **Our Environmental Principles and Commitments (E)**

As a financial institution, we have an impact on the environment both through our own economy and through credit and investment decisions. Faced with global challenges such as climate change, biodiversity loss and resource scarcity, we take conscious action to mitigate negative impacts, support our customers' transformation and create sustainable solutions.

### Principle 21. We apply a comprehensive approach to environmental matters

Our environmental activities are based on a double materiality analysis. We take a broad view of environmental issues and strive for comprehensive management of risks and impacts related to climate, nature and biodiversity. We incorporate environmental aspects into our processes and continuously enhance our approach as methodologies evolve and data becomes increasingly accessible.

### Principle 22. We decarbonise our portfolio and own operations

We aim to achieve climate neutrality in our own operations in line with the *ING BSK Group's emission-reduction directions*, and we support our clients in transitioning towards a net-zero economy. We pursue this through actions in the following areas::

- Implementing transition plans for the corporate and retail credit portfolios, including the residential and commercial real estate sectors and power generation,
- Financing sustainable and transition-related projects and investments, including renewable energy and energy efficiency,
- Conducting dialogue and engagement with clients in the most emission-intensive sectors and assessing their transition plans,
- Reducing emissions in our own operations.

### Principle 23. We develop products and services that support sustainable development

The financial sector plays a crucial role in transforming the economy towards greater sustainability. Therefore, we develop products and financial mechanisms that support our clients in achieving environmental goals and enabling their transition.

### Principle 24. We take action to protect nature and biodiversity

We recognise biodiversity loss as one of the key environmental risks. It is an important area of action aimed at supporting our clients in their environmental transformation.

We take action for biodiversity in four main areas:

1. Managing risks and impacts, including exclusion and restriction policies for activities that may cause significant negative impacts (e.g. deforestation, degradation of protected areas, illegal logging),
2. Portfolio management, client dialogue and education on biodiversity in the business context,
3. Reporting and regulation,
4. Biodiversity mainstreaming, including education, involvement in projects related to habitat protection and restoration, rewetting of wetlands and employee volunteering.

Our approach follows the impact mitigation hierarchy – we first focus on reducing portfolio impacts, followed by supporting ecosystem restoration.

### Principle 25. We strengthen cooperation with the scientific community and non-governmental organisations

The scientific community and non-governmental organisations are important stakeholders, substantive partners and contractors for projects related to nature conservation and restoration. This cooperation allows us to operate more effectively and develop our approach

based on the latest scientific achievements. Partnerships are the foundation of our educational activities on environmental issues both within and outside the organisation.

### Principle 26. We support a just transition

At ING, we recognise that the transition towards a sustainable economy must consider both environmental and social aspects. We strive to ensure that our actions support a just transition that leaves no one behind. We take into account the impacts of changes on communities, employees and clients, promoting inclusiveness, equal opportunities and social dialogue. We support initiatives that combine climate goals with improved quality of life and local development.

## Policy oversight

### Policy Owner

This Policy has been developed by the Center of Expertise ESG Innovations. The Owner of the Policy is the Management Board of ING Bank Śląski.

### Interpretation

This Policy is subject to interpretation by the Center of Expertise ESG Innovations.

### Implementation in Subsidiaries

Center of Expertise ESG Innovations is responsible for supporting the Bank's subsidiaries in the implementation of this Policy and for informing them of any changes made to the Policy.

### Entry into Force and Periodic Reviews

This Policy shall enter into force on the date of its approval by the Management Board. The policy will be reviewed annually. The policy is available at: <https://en.ing.pl/company-profile/investor-relations/esg-policies>

## Annex no. 1 - Related internal documents

E:

1. ING BSK Group's ESG strategic priorities for 2025-2027 (document publicly available [here](#))
2. ING BSK's directions for decarbonisation (document publicly available [here](#))
3. ING BSK Group's directions of operations in the field of emission reduction. Part 2 (publicly available [here](#))
4. ESG risk management policy

S:

1. ING BSK Group ESG Priorities for 2025-2027 (document publicly available [here](#))
2. Declaration of the ING Bank Śląski S.A. Capital Group on respect for human rights (document publicly available [here](#))
3. Policy on Maintaining a Workplace Free from Discrimination and Mobbing
4. ING Bank Śląski Work Regulations and the Work Regulations of Subsidiaries
5. Remuneration policy in the ING Bank Śląski S.A. Group
6. Remuneration policy for the members of the Supervisory Board and Management Board of ING Bank Śląski S.A.
7. Policy of variable remuneration components for Identified Staff ING of Bank Śląski
8. Employee Remuneration Regulations of ING Bank Śląski S.A. and remuneration regulations of subsidiaries
9. ING Bank Śląski S.A. Employee Assessment Regulations (Step up)
10. Identified Staff ING Bank Śląski S.A. evaluation regulations.
11. Personal data protection policy
12. Binding Corporate Rules
13. The Code of Conduct for Suppliers of ING Bank Śląski S.A. (publicly available [here](#))
14. Charitable Donation Policy
15. ING Bank Śląski Sponsorship Policy
16. Policy of concluding partnership agreements with social organisations at ING Bank Śląski S.A.
17. Customer orientation policy
18. Information policy - Principles of communication with clients
19. Information policy - Rules for communicating with the capital market and the media

G:

20. ING BSK Group ESG Priorities for 2025-2027 (document publicly available [here](#))
21. Principles of professional ethics of ING Bank Śląski employees
22. Conflict of interest management policy
23. Anti-corruption policy
24. Whistleblowing Policy
25. Anti-money laundering and Counter-Terrorist Financing (AML/CTF) policy
26. Tax policy
27. IT security standards
28. Policy - internal governance principles at ING Bank Śląski
29. Policy - principles of internal governance in the ING Bank Śląski Capital Group

30. Principles of corporate governance for supervised institutions
31. Policy on Appointment, Entry into Duties and Dismissal of Members of the Supervisory Board of ING Bank Śląski S.A.
32. Diversity Policy with respect to Members of the Management Board and Supervisory Board of ING Bank Śląski S.A.
33. Statute of ING Bank Śląski S.A.
34. Management Board Regulations
35. Supervisory Board Regulations
36. Audit Committee Regulations of the Supervisory Board
37. Remuneration and Nominations Committee Regulations of the Supervisory Board
38. Risk Committee Regulations of the Supervisory Board
39. General Meeting Regulations
40. Regulations for Participation in the General Meeting

You can find more about our ESG Policies at: [Our ESG Policies | ING Bank Śląski](#)

## **Annex no. 2 - Conventions, reports and guidelines that inspired this policy**

1. Corporate Sustainability Reporting Directive (CSRD)
2. ESRS – European Sustainability Reporting Standards
3. International Integrated Reporting Framework (IIRF)
4. IPCC – Intergovernmental Panel on Climate Change
5. IPBES - Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services - <https://www.ipbes.net/global-assessment>
6. European Green Deal - The European Green Deal - European Commission
7. Kunming-Montreal Global Biodiversity Framework (GBF) - <https://www.cbd.int/gbf>
8. EU Biodiversity Strategy for 2030
9. EBA Guidelines on the management of ESG risks
10. EBA Guidelines on environmental scenario analysis
11. EU Taxonomy - Regulation - 2020/852 - EN - EUR-Lex
12. TNFD - Taskforce on Nature-related Financial Disclosures
13. LEAP - TNFD Framework
14. SBTN - Science Based Targets for Nature (Initial Guidance for Business)