

The ING Bank Śląski S.A. Group has the following regulations governing the remuneration policy:

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

Since 2017, ING Bank Śląski S.A. Group has been using the Step up Performance Management system, which combines job performance assessment, creation of a solid corporate culture and our ambitions. The Step Up system is tied to the annual bonus for employees, which is determined based on the evaluation of balanced and risk-matching results, considering the quantitative and qualitative criteria.

As part of the Step Up, each employee is assigned goals in the following dimensions:

- 1) **Job** – standard job requirements tied to the job description and everyday employee's duties, they may be financial and non-financial, individual, collective and across the Bank.
- 2) **Orange Behaviours** – a set of behaviors resulting from the Orange Code, using which employees effectively achieve the goals set in the Job dimension.

The annual bonus follows the assessment of all 2 Step Up dimensions (driven by the level of goal accomplishment).

The ING Bank Śląski S.A. Group Remuneration Policy does not provide for any form of remuneration that could be an incentive for employees to favour their own interests or interests of the Bank while at the same time acting to the detriment of clients.

Separate rules of variable remuneration, laid down in the Variable Remuneration Policy for Identified Staff, apply to the group of employees holding managerial positions having material impact on the risk profile of the Bank (including Members of the Management Board). 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 are:

- a) 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, excluding employees responsible for control functions,
- b) financial criteria are not used for employees 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,
- c) 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,
- d) allocation of a part of variable remuneration (at least 50%) in financial instruments.

The remuneration policy of ING Bank Śląski S.A. is based on performance management and it supports delivery of the business strategy and long-term interests of the Bank and its clients. Moreover, it supports proper and effective risk management in order to maintain and protect the sound capital base of the Bank; the Policy does not promote excessive risk taking beyond the risk appetite approved by the Supervisory Board of ING Bank Śląski S.A.

The remuneration policy is consistent with the sustainability strategy adopted for a given period by the Bank. It also supports the corporate social responsibility, the fact which is reflected in the individual



objectives set for staff for a given year. At the same time, the Policy does not support the activities which are not compatible with the sustainable growth.

Following the approval by the General Meeting on 7 April 2022 of a new approach to variable remuneration for Identified Staff based on the allotment of ING Bank Śląski S.A. own shares instead of phantom shares as of 1 July 2022, the implementation of activities in accordance with the approved schedule proceeded. The Polish Financial Supervision Authority issued a decision on 13 March 2022 on authorizing ING Bank Śląski S.A. to repurchase its own shares.

The Bank's Management Board implemented the authorisation granted by the Annual General Meeting. In the period from 12 May 2023 to 15 March 2024 Bank repurchased in three tranches a total of 64,023 own shares with a nominal value of PLN 64,023, representing 0.0492% of the Bank's share capital, for a total amount of PLN 15.5 million. The own shares are transferred to the Programme Participants on the basis of Agreements for the acquisition of the Own Shares of the ING Bank Śląski S.A. in connection with participation in the Incentive Program. The Bank's Management Board publishes detailed information regarding the purchase of Own Shares via current reports.





ING Bank Śląski S.A.

PROGRAMME - PERFORMANCE YEAR	MANAGEMENT BOARD												OTHER IDENTIFIED STAFF											
	Total variable remuneration awarded (PLN million)	CASH			PHANTOM SHARES				OWN SHARES				Total variable remuneration awarded (PLN million)	CASH			PHANTOM SHARES*				OWN SHARES*			
		Awarded (PLN million)	Non-deferred (PLN million)	Deferred (PLN million)	Non-deferred (1 year retention)		Deferred		Non-deferred (1 year retention)		Deferred			Awarded (PLN million)	Non-deferred (PLN million)	Deferred (PLN million)	Non-deferred (1 year retention)		Deferred		Non-deferred (1 year retention)		Deferred	
					Value as at the day of award (PLN million)	No	Value as at the day of award (PLN million)	No	Value as at the day of award (PLN million)	No	Value as at the day of award (PLN million)	No					Value as at the day of award (PLN million)	No	Value as at the day of award (PLN million)	No	Value as at the day of award (PLN million)	No	Value as at the day of award (PLN million)	No
2023	10,84	5,42	2,49	2,93	-	-	-	-	2,49	9 584	2,93	11 253	23,51	11,85	7,20	4,65	-	-	-	-	7,00	26 352	4,65	17 504
2022	8,96	4,48	2,59	1,89	1,26	7 338	0,92	5 347	1,33	7 772	0,97	5 654	19,13	9,54	5,72	3,82	2,83	14 974	1,86	9 918	2,95	17 159	1,95	11 379
2021	9,25	4,63	2,55	2,08	2,55	9 254	2,08	7 530	-	-	-	-	19,77	9,87	5,95	3,92	5,70	20 658	3,74	13 579	-	-	-	-
2020	6,77	3,38	1,95	1,43	1,95	11 338	1,43	8 336	-	-	-	-	16,04	8,01	4,86	3,15	4,88	26 742	3,15	17 480	-	-	-	-
2019	7,68	3,84	2,20	1,64	2,20	10 812	1,64	8 028	-	-	-	-	22,89	11,42	6,91	4,51	6,96	32 339	4,51	21 080	-	-	-	-
2018	5,20	2,60	1,52	1,08	1,52	7 932	1,08	5 643	-	-	-	-	22,83	11,40	6,89	4,50	6,93	35 132	4,50	22 993	-	-	-	-
2017	6,64	3,32	1,91	1,41	1,91	8 806	1,41	6 532	-	-	-	-	22,35	11,16	6,73	4,43	6,76	31 238	4,43	20 453	-	-	-	-

Data on the implementation of the variable remuneration scheme are presented as at May 2, 2024.

*Data on Phantom Shares up to and including the assessment year 2022 include data on the number and value of Phantom Shares for Identified Employees at ING Bank Śląski S.A. and subsidiaries apart from ING Bank Hipoteczny S.A. and the number and value of financial instruments granted to Identified Staff at ING Bank Hipoteczny S.A. Data on Own Shares concerning assessment year 2023 include data on the number and value of Own Shares for Identified Staff at ING Bank Śląski S.A. and subsidiaries apart from ING Bank Hipoteczny S.A. and the number and value of financial instruments granted to Identified Staff at ING Bank Hipoteczny S.A.