

Report on the performance of an independent assurance service providing limited assurance

For the Management Board of ING Bank Śląski S.A.

Scope of service

We were engaged by the Management Board of ING Bank Śląski S.A. („Bank”) to perform an independent assurance service providing limited assurance, the subject of which was:

- assessment of the compliance of the GRI indicators, selected by the Bank and listed in Appendix 1 to this Report (hereinafter: “indicators subject to verification”) disclosed in the “Management Board Report on Operations of ING Bank Śląski S.A. Group in 2023” (hereinafter: “Non-Financial Statements”) in accordance with criteria specified in GRI 2021 Standard developed by Global Reporting Initiative (hereinafter: “GRI Standards’ guidelines”)
- assessment of the compliance of the qualitative and quantitative disclosures prepared and presented in the Non-Financial Statements in accordance with Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 (“Regulation 2021/2178”), as amended (“EU Taxonomy Disclosures”) with the requirements of Regulation 2021/2178, as amended.
- assessment of the compliance of the qualitative and quantitative disclosures prepared and presented in the Non-Financial Statements in accordance with the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 (“Regulation 2019/2088”) and Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 (“Regulation 2022/1288”) with regard to basic PAI indicators on the entity level (“SFDR Disclosures”) with the requirements of the Regulation 2019/2088 and Regulation 2022/1288.

The attestation service was carried out in order to fulfill the Bank's policy on external attestation of compliance of selected parts of the Non-Financial Statements with the GRI Standards’ guidelines, in accordance with GRI Standards guideline 2-5, compliance of the EU Taxonomy Disclosures with the requirements of Regulation 2021/2178, as amended and compliance of the SFDR Disclosures with the requirements of Regulation 2019/2088 and Regulation 2022/1288.

Responsibility of the Management Board

The Bank's Management Board is responsible for the preparation and fair presentation of presented in the Non-Financial Statements: indicators subject to verification with the GRI Standards guidelines, EU Taxonomy Disclosures in accordance and with the requirements of Regulation 2021/2178, as amended and SFDR Disclosures with the requirements of Regulation 2019/2088 and Regulation 2022/1288. This responsibility also includes designing, implementing and maintaining an internal control system that enables the preparation and presentation of the indicators subject to verification, EU Taxonomy Disclosures and SFDR disclosures free from material misstatement due to fraud or error.

Responsibility of the attestation service provider

Our task was to carry out an assurance service providing limited assurance and to present a conclusion on the work done.

We performed the service in accordance with the provisions of International Standard on Assurance Engagements 3000 'Assurance Engagements other than an Audit or Review of Historical Financial Information' issued by the International Auditing and Assurance Standards Board (IAASB) and with regard to verification of greenhouse gas emissions disclosures, with provisions of International Standard on Assurance Engagements 3410 "Assurance Engagements on Greenhouse Gas Statements" issued by IAASB. This standards require us to plan and execute procedures in such a way as to obtain limited assurance that the indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures included in the Non-Financial Statements have been presented, in all material respects, in accordance with the GRI Standards' guidelines, Regulation 2021/2178, as amended as well as Regulation 2019/2088 and Regulation 2022/1288, respectively.

The firm applies International Standard on Quality Management 1 "Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagement", which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We comply with the independence and ethics requirements of the Code of Ethics for Professional Accountants issued by the Council of International Ethical Standards for Accountants, which is based on the fundamental principles of integrity, objectivity, professional competence, and due diligence, maintaining the secrecy of information and professional conduct.

Performed procedures

The choice of procedures depends on our judgement and understanding of the subject matter of the service, including our assessment of the risk of material misstatement of the indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures. In conducting our assessment of this risk, we consider the internal control associated with the preparation of the Non-Financial Statements and the presentation of the indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures in order to plan the appropriate procedures, rather than to express an opinion on its effectiveness.

Our procedures also included an assessment of whether the subject matter of the service is appropriate, and the criteria adopted are appropriate to the circumstances.

The scope of procedures performed during a service providing limited assurance is more limited than in a service providing reasonable assurance. Therefore, the level of assurance obtained with a service providing limited assurance is lower than the level of assurance that would have been obtained had a service providing reasonable assurance been carried out.

The procedures performed concerned the indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures presented in the Non-Financial Statements and did not cover the other information presented in the Non-Financial Statements.

Our procedures included, in particular:

- Obtain, through interviews, an understanding of the internal control system enabling the preparation of the Non-Financial Statements and the presentation of the indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures,
- Obtain, through interviews, an understanding of the source data collection methods and assumptions applied to prepare the indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures,
- Verify the completeness of information and assess the adequacy of the content of indicators subject to verification with GRI Standards, EU Taxonomy Disclosures with the requirements of Regulation 2021/2178, as amended and SFDR Disclosures with the requirements of Regulation 2019/2088 and Regulation 2022/1288,
- Reconciliation of information contained in indicators subject to verification, EU Taxonomy Disclosures and SFDR Disclosures with the Bank's internal documentation,
- Reconciliation of GRI 2-1, 2-3, 2-10, 2-11, 2-12 indicators to the Bank's financial statements or management reports approved by the General Meeting of Shareholders for the fiscal year ending December 31, 2022, and to the preliminary financial results for 2023, and/or to the Bank's accounting records,
- Reconciliation of the indicators GRI 2-1, 2-2, 2-3, 2-4, 2-5, 2-6, 2-8, 2-12, 2-13, 2-14, 2-15, 2-16, 2-17, 2-18, 2-20, 2-21, 2-22, 2-23, 2-24, 2-25, 2-26, 2-27, 2-28, 2-29, 2-30, 3-1, 3-2, 3-3, 205-2, 205-3, 308-1, 401-1, 401-2, 403-1, 403-3, 403-5, 403-6, 403-9, 404-1, 404-2, 404-3, 406-1, 413-1, 414-1, 417-1, 417-3, 418-1 to internal documents, reports and other sources of data presented by the Bank,
- Reconciliation, on a selected sample, to the source data provided by the Bank (invoices, extracts from systems) and reconciliation, based on the analytical data received, of the completeness and mathematical correctness of the calculation of indicators of a quantitative nature (i.e. GRI 2-7, 2-9, 202-1, 302-1, 302-4, 303-3, 305-5, 306-3, 401-3, 405-1, 405-2, 305-1, 305-2, 305-3, 305-4),
- Reconciliation to source data provided by the Bank (including, but not limited to, reports on the EU Taxonomy indicators for Bank's counterparties prepared for the banking sector by the Credit Information Bureau or EU Taxonomy indicators collected by the Bank directly from clients' reports, balance sheet data of the Bank and its subsidiaries, and information on credit exposures to given clients) of the mathematical correctness of the calculation of the presented EU Taxonomy Disclosures,
- Verification, on a selected sample, of the correctness of the data and methodological assumptions applied in the calculation of the EU Taxonomy Disclosures (reconciliation to source data in customers' non-financial reports, obtaining and independent analysis of documentation of use-of-proceeds financing),

Conclusion

The basis for expressing our conclusion are the issues described in this Report and our conclusion should therefore be read regarding these issues.

We consider that the evidence we have obtained is sufficient and adequate to constitute the basis for our conclusion.

On the basis of the procedures carried out, nothing came to our attention that causes us to believe that presented in the Non-Financial Statements:

- indicators subject to verification were not presented, in all material respects, in accordance with the GRI Standards' guidelines,
- EU Taxonomy Disclosures were not presented, in all material respects, in accordance with the requirements of Regulation 2021/2178, as amended,
- SFDR Disclosures were not presented, in all material respects, in accordance with the requirements of Regulation 2019/2088 and Regulation 2022/1288.

On behalf of

KPMG Audyt Spółka z ograniczoną odpowiedzialnością sp.k.

Andrzej Gałkowski

Proxy

Signed on the Polish version of the report

Warsaw, 6 March 2024

Appendix 1 – List of indicators subject to verification

GRI Standards indicator	
GRI 2-1	Organizational details
GRI 2-2	Entities included in the organization's sustainability reporting
GRI 2-3	Reporting period, frequency and contact point
GRI 2-4	Restatements of information
GRI 2-5	External assurance
GRI 2-6	Activities, value chain and other business relationships
GRI 2-7	Employees
GRI 2-8	Workers who are not employees
GRI 2-9	Governance structure and composition
GRI 2-10	Nomination and selection of the highest governance body
GRI 2-11	Chair of the highest governance body
GRI 2-12	Role of the highest governance body in overseeing the management of impacts
GRI 2-13	Delegation of responsibility for managing impacts
GRI 2-14	Role of the highest governance body in sustainability reporting
GRI 2-15	Conflicts of interest
GRI 2-16	Communication of critical concerns
GRI 2-17	Collective knowledge of the highest governance body
GRI 2-18	Evaluation of the performance of the highest governance body
GRI 2-19	Remuneration policies
GRI 2-20	Process to determine remuneration
GRI 2-21	Annual total compensation ratio
GRI 2-22	Statement on sustainable development strategy
GRI 2-23	Policy commitments
GRI 2-24	Embedding policy commitments
GRI 2-25	Processes to remediate negative impacts
GRI 2-26	Mechanisms for seeking advice and raising concerns
GRI 2-27	Compliance with laws and regulations
GRI 2-28	Membership associations
GRI 2-29	Approach to stakeholder engagement
GRI 2-30	Collective bargaining agreements
GRI 3-1	Process to determine material topics
GRI 3-2	List of material topics
GRI 3-3	Management of material topics
GRI 202-1	Ratios of standard entry level wage by gender compared to local minimum wage
GRI 205-2	Communication and training about anti-corruption policies and procedures
GRI 205-3	Confirmed incidents of corruption and actions taken
GRI 302-1	Energy consumption within the organization
GRI 302-4	Reduction of energy consumption
GRI 303-3	Water withdrawal
GRI 305-1	Direct (Scope 1) GHG emissions
GRI 305-2	Energy indirect (Scope 2) GHG emissions
GRI 305-3	Other indirect (Scope 3) GHG emissions, excluding category 15
GRI 305-4	GHG emissions intensity
GRI 305-5	Reduction of GHG emissions
GRI 306-3	Waste generated
GRI 308-1	New suppliers that were screened using environmental criteria
GRI 401-1	New employee hires and employee turnover

GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees
GRI 401-3	Parental leave
GRI 403-1	Occupational health and safety management system
GRI 403-3	Occupational health services
GRI 403-5	Worker training on occupational health and safety
GRI 403-6	Promotion of worker health
GRI 403-9	Work-related injuries
GRI 404-1	Average hours of training per year per employee
GRI 404-2	Programs for upgrading employee skills and transition assistance programs
GRI 404-3	Percentage of employees receiving regular performance and career development reviews
GRI 405-1	Diversity of governance bodies and employees
GRI 405-2	Ratio of basic salary and remuneration of women to men
GRI 406-1	Incidents of discrimination and corrective actions taken
GRI 413-1	Operations with local community engagement, impact assessments, and development programs
GRI 414-1	New suppliers that were screened using social criteria
GRI 417-1	Requirements for product and service information and labeling
GRI 417-3	Incidents of non-compliance concerning marketing communications
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data