

Our business strategy

Mission

We support and inspire people to be one step ahead in life and in business

Pillars of our organisation

Key priorities



Orange Code

Our values remain the compass in our daily work

Orange Code - Our Behaviour



You take the initiative and act effectively

You take responsibility for completing tasks, for promises made, for the consequences of your actions.

You delegate to motivate others, maintain momentum and make an impact.

You benefit from help and feedback. Your colleagues will help you succeed if you let them.

You take the floor to acknowledge a job well done and to respond courageously to poor performance.



You help others succeed

You collaborate, prioritise relevant goals over own interests.

You listen by giving time and attention to others regardless of their position, experience or views.

You encourage people from outside your area to work with you.

You trust the intentions and knowledge of others.



You are always one step ahead

You question established methods, unnecessary complexity, but only when you yourself propose a solution.

You make changes, quickly adapting to circumstances whenever the situation calls for a new approach.

You create and simplify: if something doesn't work, you propose new solutions. If something works, you work to make it work even better.

You are brave, you are open about your mistakes - you admit them and learn from them.

- Inspire others to grow, change and improve.
- Treat others as you would like to be treated.
- Express your appreciation frequently.
- Be clear with others about what you intend to achieve.
- Encourage others to make comments they can be challenging but this is not the same as criticism.

- Look for solutions that are best for ING not just for you or your team.
- Be open and actively share information and knowledge.
- Take time for others.
- Celebrate successes with the whole team.
- Create new opportunities for others.
- Dare to have a different opinion while respecting the ideas, thoughts and feelings of others.

- Always think of the customer first.
- Be an example to others.
- Assess the situation carefully and then take swift action.
- Always be curious about new things try to learn something new every week.
- Emulate best practice adapting ideas is welcome as long as you do not claim authorship.
- Look for solutions, not problems.
- Be optimistic.

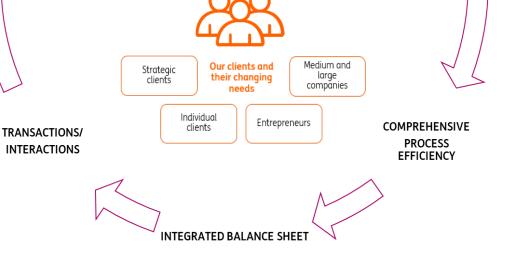
Integrated business model - continuous improvement

INTERACTIONS

The stability of our business model is based on the dynamics of adaptation to change and commercial growth. It operates in line with the concept of a diversified universal bank with segments integrated by values - including a culture of risk and support for sustainability - and a common balance sheet.

DEVELOPMENT AND Customer growth in all **BRAND OUALITY** segments Increase in the number of • The strength of the teams *primary* customers Pride in one's workplace Brand attributes Self-study Brand strength Our products both banking and non-banking Commitment Attracting talent We help you make financial We provide fast payments decisions and transactions **SALES** PEOPLE AND TEAMS We offer easy We offer sustainable saving and borrowing products Diversification of assets by type and Medium and Our clients and

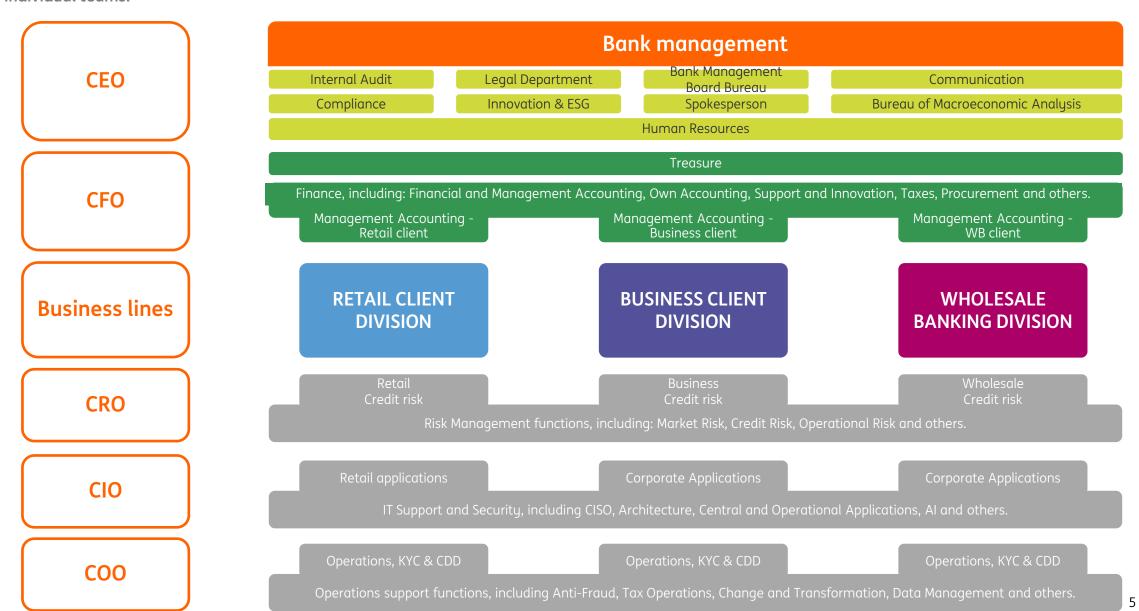
- segment
- Integrated risk management model, including ESG
- Optimised balance sheet based on customer balances
- Stability of deposits
- Optimisation of economic and regulatory capital
- High cost effectiveness
- Stable and reproducible ROE



- Increasing number of interactions/transactions
 - Preferred distribution channels
 - Self-service
 - X-buy
- Products that are easy to understand and have a low risk profile for customers

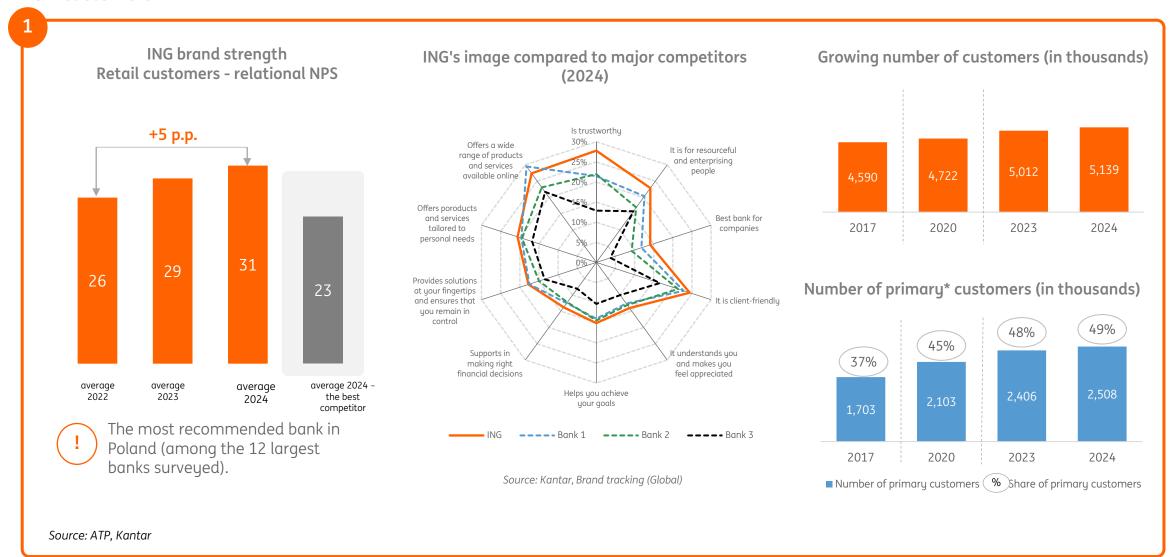
Bank's organisational chart - process optimisation (E2E) aligned with segments

Stable organisation built around business segments, flexible and adaptable to the pace of change. A network of units with strong interactions between individual teams.



A strong brand attracts customers

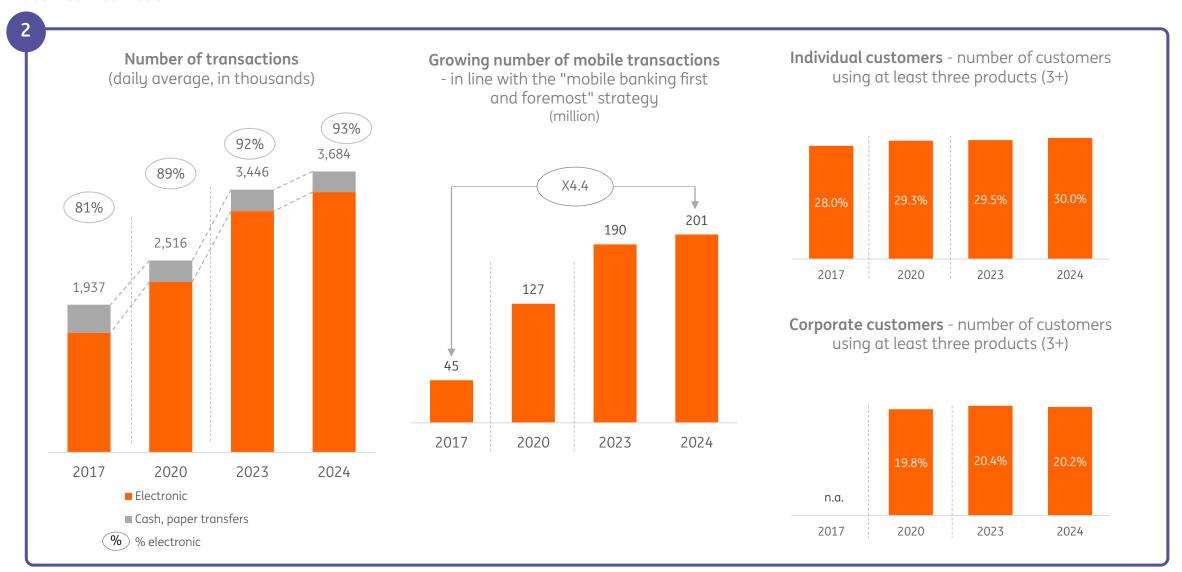
ING's brand image and strength continues to improve due to its focus on customer needs. The strength of the brand is appealing to new customers.



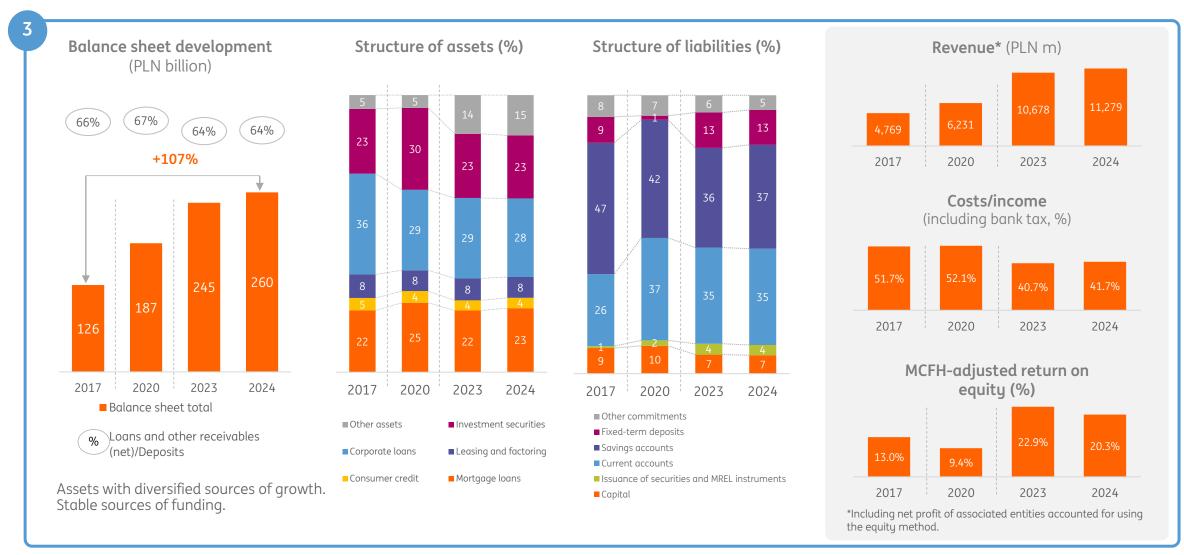
^{*}Primary customer - a customer who has an account with a salary/social security contributions or taxes transfer plus another active product.

Interactions, transactions, preferred distribution channels, x-buy

We listen to customer feedback and are constantly developing our offer, adapting it to changing needs and new trends. Moving from a traditional model to a self-service model.



Diversified balance sheet, stable deposit base, growing efficiency A liability structure with a high proportion of funds deposited in current and savings accounts together with well-diversified assets ensures a high rate of return.



People and Teams

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Entrepreneurial employees - employees seeking new solutions, striving for continuous improvement, change and learning, coping with life, able to make decisions based on facts.

Citizen employees - employees who share responsibility for the communities in which we operate, who give up their own time for things that are important to communities and the country, who are committed to the planet, communities and the economy, who are open to diversity and inclusion; integration of people with disabilities.

Happy employees - a holistic realisation of the need for development - employees who are developing, motivated, prepared for and desire change, employees with high levels of resilience.

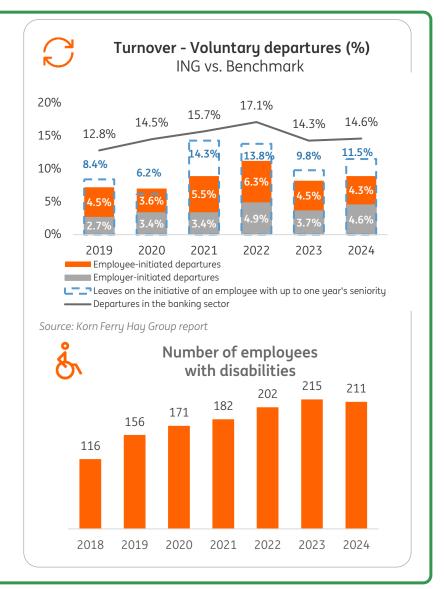
Teamwork and mutual cooperation - an organisation that relies on the creation of team solutions within a narrative management structure, constant change of organisational solutions to ensure the effectiveness of collective self-organisation.

Incentive scheme/remuneration strategy - aligned to market challenges, set with market benchmarking, based on individual tasks and team assignments; in case of identified staff, the incentive scheme/remuneration strategy is in place and is supported by delayed pay.

Attracting talent - consistently developing internship and apprenticeship opportunities, working with local educational communities to attract young talent, supporting employees in their development to enable them to show their unique talents.







Customer activity and digitalisation

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Digitalisation and innovation

- A deep and proactive understanding of customer needs in order to offer innovative, modern, intelligent, digital and integrated technology solutions.
- Focusing on creating products with mobile in mind, integrating with real-time APIs, eliminating manual operations and offering banking services through the many 360° channels available.
- Ensuring that the bank offers innovative products and technologies to customers by creating a partner ecosystem, a PoC factory and a start-up accelerator.

Retail banking

- Continue to grow the number of 'primary' customers and maintain CX leadership status -NPS Challenge #1.
- Increased **electronic interactions** -> increased sales potential in preferred channels.
- Increasing the level of customer self-service -> value-added services.
- Maintaining the status of an outstanding brand and leader of the empowerment score.

Corporate banking

- Maintaining a high level of **customer satisfaction**.
- Maintaining a high level of **customer acquisition**: entrepreneurs, SMEs and large corporates:
 - Continued growth in active and 'primary' customers; strengthening remote channels.
 - OneOnboarding a consistent start-up process for all customers. Increasing the number of products used by customers.
- Continuous development of a range of green products, including loans.
- Expanding the product range to include debt financial instruments.
- Universe 2030 programme automation of complex product processes to achieve full STP and 100% self-service.
- #BestBankForBusiness developing the best product offer for customers, transforming our sales and service model to direct channels, a fully scalable bank based on self-service and digital sales. Further development of ING Business/Mobile and creation of a winning app.
- Development of non-bank services (imoje e-commerce payment gateway, Aleo, ING Accounting, Financial Health Platform - Firmove.pl).

Objective	2021	2022	2023	2024	2024P
Strengthening cooperation with customers					
Number of 'primary' retail customers (million)	2.0	2.1	2.2	2.3	~2.3
Number of corporate 'primary' customers (thousands)	193	205	213	224	~215
Digitalisation					
Share of Primary Mobile customers (%)	82	84.5	86.2	88.9	95
Retail sale personalisation (%)	40	41	43	41	> 45
Mobile sales per 1,000 active customers,	216	202	205	247	~250
Migration of entrepreneurs from My ING to ING Business			\checkmark	\checkmark	V
Customer satisfaction					
Retail customers NPS	29	26	29	31	~29
Entrepreneurs NPS*	45	42	42	42	~42
SME NPS*	- 45	42	39	46	~42
Large companies NPS*	_ 73	49	52	44	~49
NPS strategic customers	69	81	90	85	~69
Innovations					
Overview of IT and PoC partners	50	70	82	112	150

^{*}From 2022 according to NPS Global methodology, previously IPSOS. Target for 2024 aligned with leading methodology.

Operational efficiency, AI and data management



Efficiency initiatives

- Focus on efficiency 'from branches to meeting points'.
- Reducing the volume and cost of cash transactions.
- End-to-end process automation (E2E).
- Review of subsidiary processes to reveal potential synergies with the bank.

Intelligent automation

- Intelligent automation using artificial intelligence (AI), machine learning and cognitive robotics.
- Development of a 'low code' platform to create a consistent interface for operational processes.
- Steady increase in STP (straight-through-processing) levels in all relevant areas.
- Data-driven organisation through the development of advanced analytics competencies.

Data management and use

- Effective management and use of data.
- Attention to data quality, ethical use of data and data protection legislation.
- Keeping the data warehouse up to date as the main data repository.
- Increasing the dissemination of available data tools.

Operational excellence in technology

- Continue efforts to simplify the operational management of technology to reduce time-tomarket by rationalising platforms, tools, suppliers and external services.
- Simplifying all technical processes with a focus on automation and improving the user experience - reducing bureaucracy and the cognitive load on our staff.
- Work across all organisational divisions of the bank to further improve the Build- vs Run-the-bank ratio (cost of building the bank to the cost of running it). Continue to work on the integration of technology platforms through the use of API/Service architecture.

Objective	2021	2022	2023	2024	2024P
Number of meeting points (branches)	257	228	205	175	200
Number of cash points	65	55	55	55	50**
ING DIGI Index* (33 key customer journeys)	72.2%	79.6%	83.4%	87.2%	86.4%
Number of clients / 1 FTE Operations Division	2,700	2,800	2,900	3,115	3,100
General and administrative expenses / Average commercial balances***	100	109/ 95****	104	105	90 (-10 vs. 2021)
Diversity of technology platforms	40%	40%	40%	40%	20%
KPI - reducing the cognitive load of IT technology	30%	30%	30%	30%	20%
Build- vs Run-the-bank indicator	55/45	55/45	55/45	60/40	60/40

^{*} The ING DIGI Index, an indicator of digitalisation, is the percentage of customer journeys that are handled without any manual intervention. The DIGI Index includes a selection of 33 customer journeys common to ING Group.

^{**} During 2024, the assumptions have been updated with a target of 55 cash points.

^{***} Commercial balances - the sum of loans and other receivables from and payables to customers.

^{**** 95} p.b.-excluding the contribution to the commercial bank protection scheme fund (SOBK).

Stability, availability and security of systems



Stability and availability

- Continue to redesign all banking applications to make them event-independent.
- Delivering the NextGen Core Banking platform with significant architecture enhancements to ensure the platform is resilient, stable and flexible to provide customers with a largescale, anytime, anywhere banking experience.
- Applying *cloud-first, multi-cloud* and native approaches to the bank's applications, platforms and services.
- Being the engine of our hybrid model by migrating all our on-premises services to a virtual desktop infrastructure.
- Continuous validation of our technology ecosystem to invest in new, state-of-the-art, market-leading technologies and downsizing of old and legacy systems.

Security and risk management

- Further strengthening our cyber security practices and risk management with a focus on preventive controls and control automation.
- Fully adopting an automated asset discovery system and its ownership in relation to the evolving structure of the organisation and its needs.
- Continue to apply *at-least* principles and separation of duties, as well as simplified IAM and authentication services to maintain overall bank security.

Objective	2021	2022	2023	2024	2024P
My ING availability (%)	99.93	99.98	99.95	99.94	99.94
ING Business availability (%)	99.92	99.86	99.91	99.89	99.94
Percentage of applications migrated to the cloud (%)	0	6	27	31	50
Number of employees using VDI (%)	14	18	24	34	80
Control automation (%)	20	35	65	73	90
Automatic detection controls (%)	70	95	98	99	100

Motivation and commitment. Strong teams.



Engaged employees through continuous improvement of working conditions, employment stability and creating a space for employees to express themselves on issues that are important to them.

- Creating a diverse and personalised benefits offer tailored to the needs of generationally diverse teams.
- Employee Networks as a sounding board for initiatives that support increasing employee satisfaction with the workplace.
- Regular employee and candidate experience survey as a mechanism to initiate process change.

Talent Acquisition through a consistent corporate image, high quality corporate culture, built development opportunities and implemented programmes related to Diversity & Inclusion.

- Continue to work with organisational culture ambassadors to maintain high employee identification with the company.
- · Maintaining the high quality of apprenticeship programmes.
- Equal opportunities programmes for women and men in the workplace.

Strengthened teams working in new working models and maintained high levels of identification with the company. Key competencies built, including the ability to lead others with a focus on creating an organisation where employees feel encouraged to take initiative.

- Leadership development activities to support the building of multi-generational and distributed teams, among others inclusive leadership.
- Strengthen leaders' ability to identify critical skills and support staff to develop and support change.

Built in mechanisms to support self-development in areas of critical competence, including ESG-related areas.

- Implementation of a programme to support internal mobility.
- Upskilling in areas of core competence.
- Implement the role of Career Advisor/Trusted Person.
- · Unconscious bias workshop.

Implementing employee wellbeing activities - an inclusive and barrier-free organisation.

- Disseminating knowledge on mental health.
- Further development of the vaccination programme.
- · Awareness-raising activities on health and physical activity.

Objective	2021	2022	2023	2024	2024P
Building a strategy for an effective hybrid working model		V	V	V	V
Increase in the number of people taking advantage of preventive examinations	1,100	1,700	2,100	2,400	1,500
Increase in the number of people using the Active ING platform	e 600	1,250	1,450	1,500	1,000
OHI - organisational health outcome	85	84	84**	84	~85
eNPS - Employee Net Promoter Score	57	53	48	48	~60
Improving collaboration efficiency - e.g. decrease in multitasking, reduction in meeting time, time for deep work (work smart index)*	13	13	9	7	≤5
Percentage of internal recruitment for management positions	65%	65%	77%	77%	80%
Completion of all mandatory training	\checkmark	\checkmark	\checkmark	\checkmark	V
Increase in the number of learning activition beyond the mandatory training category, delivered on the My Learning platform		61%	61%	58%	60%
Recruitment time ('time to hire'; in days)	56	50	41	37	45

^{*}Work smart index: the work smart scope compares the experience of the average employee with the basic working conditions in high-performance remote or hybrid teams. The index shows how many areas that describe how a company operates fall within and outside the scope. ** Score for 2022, the survey is conducted every other year.

Compliance with regulatory requirements



Top priority for regulatory requirements

- Top priority for all regulatory requirements in business operations and IT development.
- Maintain high discipline in closing recommendations in a timely manner, including recommendations from FIUs (Financial Intelligence Units), PFSA and IAD.
- Non-financial risks within the RAS limit (2.4).

Maintaining a healthy organisation

- Maintaining 'healthy' client acquisition and ending relationships with problem-generating clients.
- Collaboration between all involved entities for efficient, intelligent automation that will enable sustainable compliance, embedded in applications and processes.
- High standard maintained in terms of market conduct, personal data protection and bank secrecy.
- Maintain compliance and increase efficiency in the area of data protection.

AML and resilience

- Meeting compliance targets with local and global regulations and standards allows the bank to remain safe, stable and resilient to threats and risks, both internal and external.
- Action to reduce fraud in electronic banking:
 - Increasing customer awareness of fraud in digital channels,
 - Cooperation with other banks in the fight against fraud.
- Working with other banks on AML processes to strengthen transaction monitoring.
- Continuous improvement of processes and raising awareness of KYC and AML within the organisation.
- Increase in STP levels with further optimisation across all KYC processes and further use of artificial intelligence.

Objective	2021	2022	2023	2024	2024P
Level of non-financial risk	2.5	2.2	2.1	1.6	<2.4
Level of compliance risk	3.0	2.5	2.2	1.8	<2.4
Outstanding recommendations issued by regulatory authorities	0	0	0	0	0
Outstanding critical recommendations	0	0	0	0	0
Percentage of outstanding recommendations of high priority	0	0	0	0	<5%
CDD quality level (%):					
New customers Current customers	< 95	>97	>95 >92	>99 >99	min.98*
Timely implementation of all audit recommendations (both internal and external)	abla		\checkmark	V	V

^{*}In the course of 2024, the assumptions were updated with a target of min 95 for new customers and min 92 for existing customers.

ESG and Sustainability

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E - Environment

- Strive for a sustainable self-management.
- Digitisation of processes taking into account their environmental impact.
- Taking climate factors into account in business decisions.
- Development of a product offer to support the sustainability of customers.
- Funding of projects to support environmental transformation.
- Supporting clients in their environmental transformation.
- Supporting innovation for the climate (Grant Programme for start-ups and young scientists) and local environmental action.

S - Entrepreneurship and equal opportunities

- Continuing to create a working environment where we take care of employee wellbeing (health, energy, activity and finances).
- Supporting employees to be entrepreneurial.
- Nurturing diversity and inclusion among bank staff.
- Supporting clients to manage their finances and educating them on how to be entrepreneurial.
- Supporting the technological and digital transformation of business customers.
- Facilitating access to banking for groups at risk of exclusion.
- Supporting local community activities.

G - Ethics and regulatory compliance

- Building ESG awareness and culture among employees, developing ESG competences.
- Integrating ESG into the bank's organisational structures, processes, product development, risk management, purchasing policy and corporate governance.
- Adapting to regulation risk, finance, compliance and client portfolio.
- Building awareness and understanding of ESG business and regulatory issues among clients.
- Keeping customers safe.
- Sharing best practice and knowledge through industry collaboration and with our stakeholders. Developing joint solutions.

⁵Turnusy Uśmiechu [Smile Camps] Programme was discontinued from March 2022 as the building of the Foundation was made available for 20 children from the Children's Home from Ukraine. In June 2024, by a decision of the Ukrainian authorities, the children returned to the country and the Management Board of ING Bank Śląski and the Board of the ING for Children Foundation decided to close the centre in Wisła and thus end the Smile Camps Programme.

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Objective	2021	2022	2023	2024	2024P
CO ₂ reduction within scope I and II (market-based approach) relative to the base year (2019)	-19.6%	-25.1%	-30.0%	-37%	Climate neutrality within scope I and II by 2030 ¹
Financing of RES and green projects in the corporate area - PLN 4.5 billion (total 2015-2023)	PLN 1.7 billion RES + PLN 4.3 billion green (PLN 6 billion in total)	PLN 3.3 billion RES + PLN 5.9 billion green (total PLN 9.2 billion)	PLN 4.1 billion RES + PLN 9.1 billion green (total PLN 13.2 billion)	PLN 0.5 billion RES	PLN 5 billion RES financing (total in 2024- 2030) ²
Organise 6 editions of the Grant Programme and allocate PLN 6 million (in total between 2022 and 2024)	The programme was launched in 2022	2 editions PLN 2 million	2 editions PLN 2 million	6 editions PLN 6 million (total for the period 2022-2024)	6 editions PLN 6 million (total for the period 2022- 2024)
Gender pay gap	1%	4%	5%	6% ³	1%
Adaptation of the My ING online banking system and mobile application, as well as the bank's website to WCAG 2.1 guidelines	39.6% of components	50.6% of the components	61% components	95% components ⁴	100% components
Volunteer actions, as part of the Good Idea programme and the Smile Camps in Wisła organised by the ING Foundation for Children (total for the period 2022-2024)	65 campaigns 12 camps	28 campaigns 1 camp ³	97 campaigns 1 camp³	193 campaigns 1 camp ⁵ (total for the period 2022-2024)	150 campaigns 40 camps ³ (cumulative target for 2022- 2024)
Setting an ESG-related target as part of annual objectives for managers and employees	The target was approved in 03.2022	Target endorsed after completion of annual target setting process for 2022	100% of managers reporting directly to Board members had an ESG objective	100% of managers (leaders) 97% of employees	100% of managers 50% employees
Level of customer satisfaction of educational activities carried out	Target approved in 03.2022	Satisfaction survey to begin in 2023	4.7/5	4.5/5	4/5
Organisation of national conferences in cooperation with NGOs and industry organisations (total 2022- 2024)	The target was approved in 03.2022	3	4	10 (total for the period 2022-2024)	10 (total for the period 2022- 2024)

¹ In market-based terms.

² In accordance with the document "ING BSK's decarbonisation action " <u>link</u>

³ According to the methodology jointly developed by the banking sector at the forum of the Polish Banks Association (ZBP), which refers to groups of employees working within the same pay grades. From 2025 onwards, the Bank will calculate an adjusted gap, which refers to homogeneous groups of employees, i.e. people doing the same work or work of the same value.

⁴As part of the KPI revision, the target for the end of 2024 is 95%.

Risks to the implementation of the business strategy (1)

Geopolitical tensions	 High number of conflicts, including armed conflicts. The timing, manner and effects of the end of the war in Ukraine and the Middle East. 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 trade, supply chains.
Climate crisis	 Growing social unrest, deepening divisions, new elites, hosts of discontented. Resolving political choices that deepen divisions between the parties. The shape of the European Union and its cohesion remains uncertain. Increasing number of natural disasters / Extreme weather conditions. Intensification of population migration.
Energy transformation	 Energy costs – a factor of competitive advantage and national security. Energy transformation of economies and companies, including its implementation costs. Necessary technological changes. Burdening economic growth with the costs of CO2 emissions and changing the energy mix.
Sovereign debt	 High debt servicing costs due to the persistence of elevated levels of market interest rates. High costs incurred to resolve military conflicts (including the war in Ukraine). The rising costs of the climate crisis.
Inflation	 Persistence of high local persistent inflation in Poland. Wage inflation. Continued pressure on companies' costs. Ease of transfer of increasing product prices and charges to the final client.

Risks to the implementation of the business strategy (2)

Cyber security	 The availability of modern technologies (including AI) that can be used by cybercriminals will lead to lower entry thresholds for cybercriminal activity. Sophisticated criminals will be backing themselves up on cloud solutions and vendor-provided services in an attempt to negatively influence/penetrate the financial market, looking for the weakest link. The number of cybercriminal actions will increase, along with the number of attacks on clients, banks and suppliers. The Bank will continue its prevention and detection actions, implement further strong and consistent security mechanisms in a very heterogeneous application and infrastructure environment. The Bank will continue to introduce strong controls and very high standards for working with suppliers.
Regulatory uncertainty	 Large number of announced regulatory changes awaiting implementation or recently implemented (e.g. 6th AML Directive, DORA, ESG, AI Act, MiFiD III, Accessibility Act). High regulatory volatility. Interpretative challenges (including mutual conflicts) in regulatory provisions requiring rapid implementation. Growing trend of integrating AI into AML/CFT compliance solutions, increasing technical and interpretive challenges. Lack of predictability of regulatory changes.
Reform of the benchmarks	 Difficult and complicated process of implementing benchmark reform. Transition to WIRON to be abandoned in favour of POLSTR.
Housing market financing model	 Uncertainty of regulation and legal prejudices. Restoring the sustainability of contractual relationships. Streamlining the relationship between monetary policy and the impact on the client/consumer. Failure to finalise a standard contract template, lack of defined terms and conditions for prepayments.
Structural over-liquidity of the sector	 Inflow of deposits and funding from the professional market. Limited demand for loans. Increased levels of investment in Treasury securities.

Opportunities for the implementation of the business strategy

Customers	 Maintain (above market levels) the rate of acquisition, transactionality and new customer activity. Increase the share of primary and primary mobile customers in the total number of customers. Taking advantage of electronic banking potential. High adaptability of new solutions, including technological ones, positively influencing cost efficiency.
Sustainable development	 Potential for investment and economic activity as a strong boost to GDP growth rates. Increased environmental awareness among the public, which will generate greater demand for sustainable products. Increased availability of green energy sources. EU climate neutrality. New sources of state funding, including access to the EU Reconstruction Fund and how to use it.
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 mortgages. High level of capital buffers and met decile level of MREL. High dividend-paying capacity.
Economic growth	 Expected acceleration of economic growth (GDP). High potential for increased investment. Additional potential impetus related to the reconstruction of Ukraine.
New technologies	 Stability and security of systems. Productivity and flexibility. New regulations - AI Act.

Our financial ambitions for 2024 (published in March 2022*)

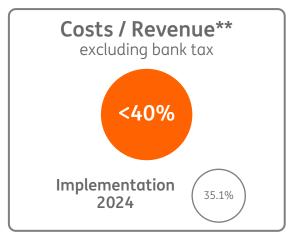
Loans (gross)

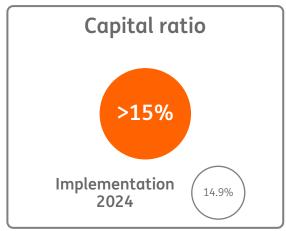


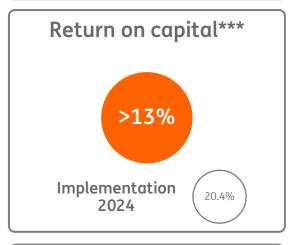














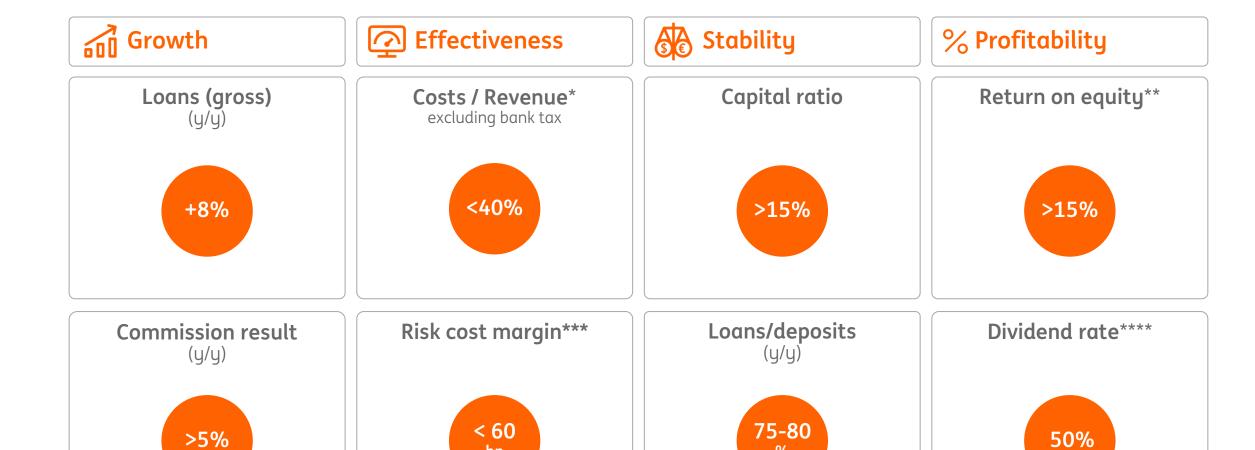






^{*} Developed prior to the outbreak of war in Ukraine; **Earnings with share of profits of associates; ***ROE adjusted for MCFH; ****Excluding legal risk costs of foreign currency mortgages; *****The Board's intention is to pay out approximately 75% of net profit for 2024 as dividends.

Our financial ambitions for 2025



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^{*}Revenue with share of profit of associates; **ROE adjusted for MCFH; ***Excluding legal risk costs of foreign currency mortgages; ****Dividend from 2025 profit.

