

ING Bank Śląski S.A. Group

Qualitative and quantitative disclosures relating to
capital adequacy published for 2025





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Introduction

Pursuant to the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 as amended (Regulation CRR) and the Banking Law Act of 29 August 1997 as amended (Banking Law Act), ING Bank Śląski S.A., hereinafter referred to as the Bank, is obliged to make qualitative and quantitative disclosures relating to the capital adequacy, excluding information immaterial, proprietary or confidential.

Pursuant to the *Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A.*, disclosures relating to the ING Bank Śląski S.A. Group, hereinafter referred to as the Group, are published.

Disclosures in this document are based on the data as of the reporting date, i.e. 31 December 2025, unless otherwise indicated. The presented values have been prepared in Polish zlotys (PLN). Unless provided for otherwise, all values were given rounded up to PLN million. Therefore, there may be cases of mathematical inconsistency in the summaries or between individual tables.

For the disclosure of information, templates of forms included in the Commission Implementing Regulation (EU) 2024/3172 were used, hence the letter markings of the table columns and the numbering of lines. The comparative data are presented in selected tables, in accordance with the requirements of the comparative periods set out in Commission Implementing Regulation (EU) 2024/3172 for individual templates.

In implementing the requirement of article 447 and article 438 point d of the Regulation CRR, the Group discloses to the public collective data on own funds, own funds requirements, risk-weighted exposures, combined buffer requirement, leverage ratio and liquidity ratios - liquidity coverage ratio and net stable funding ratio. These data are presented in the table below, and detailed information on individual items is presented in the following chapters of this document.





Template EU KM1 - Key metrics template

	a	b	
	31 Dec 2025	31 Dec 2024 *	
Available own funds (amounts)			
1	Common Equity Tier 1 (CET1) capital	18,167	18,237
2	Tier 1 capital	18,167	18,237
3	Total capital	19,199	19,601
Risk-weighted exposure amounts			
4	Total risk exposure amount	128,129	125,111
4a	Total risk exposure pre-floor	128,129	125,111
Capital ratios (as a percentage of risk-weighted exposure amount)			
5	Common Equity Tier 1 ratio (%)	14.18%	14.58%
5a	Not applicable		
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	14.18%	14.58%
6	Tier 1 ratio (%)	14.18%	14.58%
6a	Not applicable		
6b	Tier 1 ratio considering unfloored TREA (%)	14.18%	14.58%
7	Total capital ratio (%)	14.98%	15.67%
7a	Not applicable		
7b	Total capital ratio considering unfloored TREA (%)	14.98%	15.67%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)			
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0.00%	0.00%
EU 7e	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	0.00%	0.00%
EU 7g	Total SREP own funds requirements (%)	8.00%	8.00%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)			
8	Capital conservation buffer (%)	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	1.0013%	0.0086%
EU 9a	Systemic risk buffer (%)	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	1.00%	1.00%
11	Combined buffer requirement (%)	4.50%	3.51%
EU 11a	Overall capital requirements (%)	12.50%	11.51%
12	CET1 available after meeting the total SREP own funds requirements (%)	6.98%	7.67%
Leverage ratio			
13	Total exposure measure	307,440	276,497
14	Leverage ratio (%)	5.91%	6.60%

Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)			
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)			
EU-14d	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-14e	Overall leverage ratio requirement (%)	3.00%	3.00%
Liquidity Coverage Ratio			
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	60,631	55,958
EU 16a	Cash outflows - Total weighted value	45,058	43,406
EU 16b	Cash inflows - Total weighted value	18,978	16,169
16	Total net cash outflows (adjusted value)	26,080	27,237
17	Liquidity coverage ratio (%)	234.00%	209.00%
Net Stable Funding Ratio			
18	Total available stable funding	228,964	214,865
19	Total required stable funding	142,380	120,405
20	NSFR ratio (%)	160.81%	178.45%

*) 29 April 2025 the Ordinary General Meeting of the Bank approved the distribution of profit for 2024. The data as at 31 December 2024 were recalculated taking into account the net profit generated in 2024 in own funds.



1. Own funds

1.1. Full reconciliation of own fund items to the audited financial statement

The capital comprises: the share capital, the supplementary capital - issuance of shares over nominal value, accumulated other comprehensive income, retained earnings and own shares for the purposes of the incentive program. All capitals and funds are recognised at their face value.

The share capital is recognised at its face value, in accordance with the charter and entry into the National Court Register.

The share premium account comprises the share premium earned from the issue of shares less the direct costs thereof.

Other comprehensive income is created as a result of:

- valuation of financial instruments classified for measurement at fair value through other comprehensive income,
- valuation of derivatives for the element being the effective cash flow hedge,
- valuation of non-current assets at fair value, and
- actuarial gains and losses.

The deferred tax assets and liabilities resulting from above mentioned valuations are included in the other comprehensive income. The other comprehensive income is not subject to profit distribution.

Retained earnings are created from profit write-offs and are allocated for purposes specified in the Articles of Association or other legal regulations. Retained earnings comprise of:

- other supplementary capital,
- other reserve capital,
- general banking risk fund,
- valuation of share-based payments,
- undistributed result from previous years,
- net result attributable to Parent entity.

Other supplementary capital, other reserve capital and general banking risk fund are created from profit write-offs and are allocated for purposes specified in the Articles of Association or other legal regulations.

General banking risk fund is created in accordance with the Banking Law Act of 29 August 1997 as amended, from profit after tax.

The net financial result attributable to the Parent entity represents the gross result under the statement of profit or loss for the current year, adjusted with the corporate income tax and the result attributable to the minority shares.

Own shares for the purposes of the incentive program include own shares purchased to fulfil the obligations arising from the incentive program, variable remuneration components.

The own funds include profit in the process of approval and the net profit of the current reporting period less expected charges and dividend in the amount not exceeding profit as verified by the chartered accountant.

Unrealised gains and losses on debt and equity instruments available for sale are recognized in own funds in accordance with the guidelines contained in the Regulation CRR and the Banking Law Act. In accordance with the article 171a of the Banking Law Act, unrealised gains and unrealised losses are included in own funds in 100%.

The Group adjusts own funds by the following values:

- goodwill and other intangible assets (accordance with the Regulation CRR),
- difference between the amount of provisions and the amount of expected losses - the value computed for the bank calculating risk-weighted exposure amounts using IRB approach (accordance with the Regulation CRR),
- value adjustment due to the requirements for prudent valuation (accordance with the Regulation CRR),
- adjustment to the deduction of software assets (accordance with Commission Delegated Regulation (UE) 2020/2176 of 12 November 2020 amending Delegated Regulation (EU) No 241/2014 as regards the deduction of software assets from Common Equity Tier 1),
- adjustment for insufficient coverage of non-performing exposures (accordance with the Regulation CRR).

The table below presents reconciliation of regulatory own funds to balance sheet in the audited financial statement of the Group in accordance with Article 437 of the Regulation CRR and according to the template presented in the Commission Implementing Regulation (UE) 2024/3172. The scope of subsidiaries covered by prudential consolidation does not differ from the scope of subsidiaries covered by financial consolidation carried out in accordance with International Financial Reporting Standards (IFRS).

In column c of the template below, the Group has included a cross-reference between the own funds items presented in Table EU CC1 and the corresponding balance sheet items for the purpose of showing the source of each significant input parameter for the information on own funds. A reference in column c of template EU CC2 is linked to a reference in column b of template EU CC1.



Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements

	a	b	c	
	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference	
	31 Dec 2025	31 Dec 2025		
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and cash equivalents	7,310	7,310	
2	Loans and other receivables to other banks	23,954	23,954	
3	Financial assets measured at fair value through profit or loss	2,340	2,340	
4	Derivative hedge instruments	73	73	
5	Investment securities	65,556	65,556	
6	Transferred assets	-	-	
7	Loans and other receivables to customers measured at amortised cost	180,309	180,309	
8	Investments in associates accounted for using the equity method	204	204	
9	Property, plant and equipment	938	938	
10	Intangible assets	551	551	(a)
11	Current income tax assets	12	12	
12	Deferred tax assets	621	621	(c)
13	Other assets	157	157	
14	Total assets	282,025	282,025	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Liabilities to other banks	15,042	15,042	
2	Financial liabilities measured at fair value through profit or loss	916	916	
3	Derivative hedge instruments	77	77	
4	Liabilities to customers	235,328	235,328	
5	Liabilities from debt securities issued	1,521	1,521	
6	Subordinated liabilities	2,548	2,548	(b)
7	Provisions	643	643	
8	Current income tax liabilities	924	924	
9	Deferred tax liabilities	-	-	(c)
10	Other liabilities	3,684	3,684	
11	Total liabilities	260,683	260,683	
Shareholders' Equity				
1	Share capital	130	130	(d)
2	Share premium	956	956	(d)
3	Accumulated other comprehensive income	-1,884	-1,884	(e)
4	Retained earnings	22,149	22,149	(f)
5	Own shares for the purposes of the incentive program	-9	-9	(q)
6	Total shareholders' Equity	21,342	21,342	



1.2. Information on the nature and amount of certain own fund items

The Group's equity is composed of:

- core capital Tier 1 which as at 31 December 2025 was PLN 18,167 million,
- core capital Tier 2 which as at 31 December 2025 was PLN 1,032 million.

As at 31 December 2025, the Group did not identify additional Tier 1 capital (AT1).

The table below presents nature and amount of certain own funds items required by Article 437 of the Regulation CRR. The presentation complies with the requirements of the Commission Implementing Regulation (UE) 2024/3172. The table lines that don't relate to the Group's own fund have been omitted.

Template EU CC1 - Composition of regulatory own funds

	a	b
	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	1,086 (d)
	of which: Ordinary shares	130 (d)
	of which: Agio	956 (d)
2	Retained earnings	54 (f)
3	Accumulated other comprehensive income (and other reserves)	14,363 (e)
EU-3a	Funds for general banking risk	1,215 (f)
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-
5	Minority interests (amount allowed in consolidated CET1)	-
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	- (f)
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	16,718
Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments (negative amount)	-42
8	Intangible assets (net of related tax liability) (negative amount)	-481 (a)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	2,023 (e)
12	Negative amounts resulting from the calculation of expected loss amounts	-243
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-9 (g)
27a	Other regulatory adjustments	201

28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	1,449
29	Common Equity Tier 1 (CET1) capital	18,167
Additional Tier 1 (AT1) capital: regulatory adjustments		
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-
44	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-
45	Additional Tier 1 (AT1) capital	18,167
Tier 2 (T2) capital: instruments		
46	Capital instruments and the related share premium accounts	1,030 (b)
50	Credit risk adjustments	2
51	Tier 2 (T2) capital before regulatory adjustments	1,032
Tier 2 (T2) capital before regulatory adjustments		
57	Total regulatory adjustments to Tier 2 (T2) capital	-
58	Tier 2 (T2) capital	1,032
59	Total capital (TC = T1 + T2)	19,199
60	Total Risk exposure amount	128,129
Capital ratios and requirements including buffers		
61	Common Equity Tier 1 capital	14.18%
62	Tier 1 capital	14.18%
63	Total capital	14.98%
64	Institution CET1 overall capital requirements	9.00%
65	of which: capital conservation buffer requirement	2.50%
66	of which: countercyclical capital buffer requirement	1.0013%
67	of which: systemic risk buffer requirement	-
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.00%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	-
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	6.98%
Amounts below the thresholds for deduction (before risk weighting)		
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	621 (c)
Applicable caps on the inclusion of provisions in Tier 2		
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	2
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	358



A detailed description of the main features of instruments included in own funds is presented in the table EU CCA. The table also presents the features of eligible liabilities instruments.

Template EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments

		a		
		Shares of series A and B	Subordinated liabilities	Non preferred senior loan (NPS)
1	Issuer	ING Bank Śląski S.A.	ING Bank Śląski S.A.	ING Bank Śląski S.A.
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	ISIN code: PLBSK0000017	ISIN code: PLBSK0000017	ISIN code: PLBSK0000017
2a	Public or private placement	Public	Not public	Not public
3	Governing law(s) of the instrument	Polish	Polish	Polish
3a	Contractual recognition of write down and conversion powers of resolution authorities	Not applicable	Yes	Yes
	Regulatory treatment	Yes	Yes	No
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Tier 2 capital Eligible liabilities	Eligible liabilities
5	Post-transitional CRR rules	Common Equity Tier 1	Tier 2 capital Eligible liabilities	Eligible liabilities
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and (Sub-)Consolidated	Solo and (Sub-)Consolidated	Solo and (Sub-)Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares Agio	Subordinated liabilities	Non preferred senior loan
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	<u>Nominal value:</u> PLN 93 million (series A) PLN 37 million (series B) <u>Agio:</u> PLN 956 million (series B) <u>Total capital worth:</u> PLN 93 million (series A) PLN 993 million (series B)	PLN 1,030 million (included in Tier 2) PLN 1,506 million (included in eligible liabilities)	PLN 8,949 million
9	Nominal amount of instrument	PLN 130 million	EUR 600 million	EUR 2,110 million
EU-9a	Issue price	Series A: PLN 5 (after the denomination and after the shares split*) Series B: PLN 26.5 (after the shares split*)	Not applicable	Not applicable
EU-9b	Redemption price	Not applicable	Not applicable	Not applicable
10	Accounting classification	Equity	Financial liabilities	Financial liabilities
11	Original date of issuance	08 October 1991	30 October 2018 (EUR 100 million) 30 September 2019 (EUR 250 million) 15 October 2025 (EUR 250 million)	5 January 2023 (EUR 260 million) 22 December 2023 (EUR 1,500 million) 10 October 2024 (EUR 350 million)
12	Perpetual or dated	Perpetual	Dated	Dated
13	Original maturity date	No maturity	30 October 2028 28 September 2029 15 October 2035	5 January 2029 22 December 2027 10 October 2028
14	Issuer call subject to prior supervisory approval	No	Yes	Yes



15	Optional call date, contingent call dates and redemption amount	Not applicable	The Bank has the right to prepay of loan after the lapse of 5 years from the date of granting	The Bank has the right to prepay of loan 1 year before the maturity date
16	Subsequent call dates, if applicable	Not applicable	Yes, for the second and third contract - on the interest payment date	Yes, during the last year of the loan contract, for the 1st contract - on the interest payment date and for the 2nd and 3rd contract - on any date
	Coupons / dividends	Dividends	Coupons	Coupons
17	Fixed or floating dividend/coupon	Floating	Floating	Floating
18	Coupon rate and any related index	Not applicable	EURIBOR 3M + margin	EURIBOR 3M + margin
19	Existence of a dividend stopper	Yes	Not applicable	Not applicable
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary; causes: - decisions of the General Meeting of the Bank - results - administrative decisions	Obligatory	Obligatory
EU-20b	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Obligatory	Obligatory
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	Not applicable	Not applicable	Not applicable
25	If convertible, fully or partially	Not applicable	Not applicable	Not applicable
26	If convertible, conversion rate	Not applicable	Not applicable	Not applicable
27	If convertible, mandatory or optional conversion	Not applicable	Not applicable	Not applicable
28	If convertible, specify instrument type convertible into	Not applicable	Not applicable	Not applicable
29	If convertible, specify issuer of instrument it converts into	Not applicable	Not applicable	Not applicable
30	Write-down features	No	No	No
31	If write-down, write-down trigger(s)	Not applicable	Not applicable	Not applicable
32	If write-down, full or partial	Not applicable	Not applicable	Not applicable
33	If write-down, permanent or temporary	Not applicable	Not applicable	Not applicable
34	If temporary write-down, description of write-up mechanism	Not applicable	Not applicable	Not applicable
34a	Type of subordination (only for eligible liabilities)	Not applicable	Not applicable	Not applicable
EU-34b	Ranking of the instrument in normal insolvency proceedings	Category 10	Category 8 (first and second contract) Category 7 (third contract) **	Category 6
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Satisfied last	Satisfied after non preferred liabilities	Satisfied after liabilities to shareholders other than those in Categories 10-7
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	Not applicable	Not applicable	Not applicable
37a	Link to the full term and conditions of the instrument (signposting)	https://en.ing.pl/company-profile/investor-relations	https://en.ing.pl/_files/1100912 https://en.ing.pl/_files/1101093 https://en.ing.pl/_files/bkodlad	https://en.ing.pl/_files/tjilcwt https://en.ing.pl/_files/imv5y7v https://en.ing.pl/_files/ln5dl9p

*) In 2011, the nominal value of shares was split. As a result, the nominal value of shares was reduced from PLN 10 to PLN 1 per share.

***) On 12 January 2026, after obtaining authorization from the Polish Financial Supervision Authority to include the loan funds in own funds, the classification changed from category 7 to category 8.



2. Capital buffers, regulatory capital requirements calculation

The minimum level of capital adequacy results from the obligation to maintain minimum levels of capital ratios resulting from the following external regulations:

- Regulation CRR (4.5% for CET1, 6% for T1 and 8% for TCR),
- Act of 5 August 2015 on macroprudential supervision of the financial system and crisis management in the financial system sanctioning additional capital buffers, including:
 - capital conservation buffer, which in 2025 was 2.5%,
 - other systemically important institution buffer of 1% imposed by decision of Polish Financial Supervision Authority (PFSA), received on 11 December 2024,
 - countercyclical capital buffer applicable to exposures to which such buffer has been imposed by the competent authorities. The countercyclical buffer is variable over time depending on the structure of the exposures concerned and the levels of countercyclical buffer rates imposed on the exposures concerned (as at the end of December 2025, the countercyclical buffer was effectively 1.0013%),
- Regulation of the Minister of Development and Finance of 18 March 2020 repealing the Regulation on the systemic risk buffer; however, following a cautious approach, the Bank monitors capital ratios taking into account the size of the systemic risk buffer.

On 26 November 2025, the Bank received a letter from the Polish Financial Supervision Authority on the non-determination of an additional capital charge recommended under Pillar II ("P2G") in order to absorb potential losses resulting from the occurrence of stress conditions.

Consequently, as at 31 December 2025, the minimum capital requirements for the Group are:

- CET1 \geq 9.00%,
- T1 \geq 10.50%,
- TCR \geq 12.50%.

The Group uses the Internal Ratings Based Approach (IRB) and the Standardised Approach (SA) to calculate the capital requirement for credit risk. The Group obtained the approval of the Polish Financial Supervision Authority (PFSA) and the National Bank of Netherlands for the use of advanced internal ratings method (A-IRB) for the exposure classes: corporates and credit institutions for the Bank and ING Lease Sp. z o.o. At the beginning of 2025, after the implementation of the Regulation CRR3, some credit exposures were covered by the Foundation Internal Ratings Based Approach (F-IRB). In the area of operational risk, the Group uses the business indicator approach. In the area of market risk, the Group uses the basic method and the updated average return period method (depending on the type of risks). The Group also determines capital requirements for concentration risk, settlement

risk and credit valuation adjustment risk (CVA). In all cases, the requirements are determined in accordance with the Regulation CRR.

The total capital requirement is dominated by the credit risk requirement. At the end of 2025, it accounted for 87% of the overall requirement.

Quantitative information on the risk-weighted exposure amount and capital requirements for individual risk types in accordance with the requirements of Article 438 of the Regulation CRR, according to the following templates contained in Commission Implementing Regulation (EU) 2024/3172, is presented below:

- Template EU OV1 – Overview of total risk exposure amounts,
- Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level,
- Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level,
- Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach,
- Template EU CR5 – standardised approach– the table presents the regulatory exposure values after the application of credit conversion factors and risk mitigation techniques for that part of the portfolio for which the Group applies the standardized approach,
- Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range– the table presents the exposures values, the average CCF, PD and LGD values in percentage terms and risk-weighted exposures amount for each exposures class in the portfolio for which the Group uses the internal ratings method (IRB),
- Template EU CR6-A – Scope of the use of IRB and SA approaches.

The Group does not disclose the information required in templates EU CVA4 – RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA) because the Group calculates capital requirements for credit valuation adjustment risk under the basic approach in accordance with Article 384 of the Regulation CRR.



Template EU OV1 – Overview of total risk exposure amounts*

		a		b	c
		Total risk exposure amounts (TREA)		Total own funds requirements	Total own funds requirements
		31 Dec 2025	30 Sep 2025		
1	Credit risk (excluding CCR)	110,463	109,487	8,837	
2	Of which the standardised approach	51,486	49,400	4,120	
3	Of which the Foundation IRB (F-IRB) approach	20,052	17,740	1,604	
4	Of which slotting approach	-	-	-	
EU-4a	Of which equities under the simple risk weighted approach	-	-	-	
5	Of which the Advanced IRB (A-IRB) approach	28,551	31,813	2,284	
6	Counterparty credit risk - CCR	673	694	54	
7	Of which the standardised approach	542	541	43	
8	Of which internal model method (IMM)	-	-	-	
EU-8a	Of which exposures to a CCP	60	62	5	
9	Of which other CCR	71	91	6	
10	Credit valuation adjustments risk - CVA risk	409	271	33	
EU 10a	Of which the standardised approach (SA)	-	-	-	
EU 10b	Of which the basic approach (F-BA and R-BA)	409	271	33	
EU 10c	Of which the simplified approach	-	-	-	
15	Settlement risk	-	-	-	
16	Securitisation exposures in the non-trading book (after the cap)	485	397	39	
17	Of which SEC-IRBA approach	-	-	-	
18	Of which SEC-ERBA (including IAA)	-	-	-	
19	Of which SEC-SA approach	485	397	39	
EU-19a	Of which 1250% / deduction	-	-	-	
20	Position, foreign exchange and commodities risks (Market risk)	1,643	1,579	131	
21	Of which the Alternative standardised approach (A-SA)	-	-	-	
EU 21a	Of which the Simplified standardised approach (S-SA)	1,643	1,579	131	
22	Of which Alternative Internal Model Approach (A-IMA)	-	-	-	
EU-22a	Large exposures	-	-	-	
23	Reclassifications between the trading and non-trading books	-	-	-	
24	Operational risk	14,456	14,456	1,157	
EU 24a	Exposures to crypto-assets	-	-	-	
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	1,790	1,824	143	
26	Output floor applied (%)	50.00%	50.00%		
27	Floor adjustment (before application of transitional cap)	-	-		
28	Floor adjustment (after application of transitional cap)	-	-		
29	Total	128,129	126,884	10,251	

*) rows of the table (11-14) that are not related to the Group have been deleted.

Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

		a	b	c	d	EU d
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	58,977	51,486	110,463	124,608	115,414
2	Counterparty credit risk	617	56	673	1,033	1,033
3	Credit valuation adjustment		409	409	409	409
4	Securitisation exposures in the banking book	-	485	485	485	485
5	Market risk	-	1,643	1,643	1,643	299
6	Operational risk		14,456	14,456	14,456	14,456
7	Other risk weighted exposure amounts		-	-	-	3,242
8	Total	59,594	68,535	128,129	142,634	135,338



Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

	a	b	c	d	EU d	
	Risk weighted exposure amounts (RWEAs)					
	RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor	
1	Central governments and central banks	-	-	1,795	1,795	1,795
EU 1a	Regional governments or local authorities	19	2	806	789	789
EU 1b	Public sector entities	-	-	-	-	-
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	1,245	1,340	1,245	1,340	1,340
3	Equity	-	-	999	999	999
4	Not applicable					
5	Corporates	29,400	39,718	34,470	53,982	44,788
5.1	Of which: F-IRB is applied	12,873	17,809	12,873	23,476	17,809
5.2	Of which: A-IRB is applied	12,695	16,561	12,695	19,280	16,561
EU 5a	Of which: Corporates - General	27,171	37,706	32,241	50,594	42,776
EU 5b	Of which: Corporates - Specialised lending	2,229	2,012	2,229	3,388	2,012
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-
6	Retail	-	-	19,272	19,272	19,272
6.1	Of which: Retail - Qualifying revolving	-	-	-	-	-
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	-	-	19,272	19,272	19,272
6.2	Of which: Retail - Secured by residential real estate	-	-	-	-	-
7	Not applicable					
EU-7a	Categorised as secured by immovable properties and ADC exposures in SA	13,085	20,621	33,368	40,904	40,904
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-
EU-7c	Categorised as exposures in default in SA	4,854	2,247	6,013	3,406	3,406
EU 7d	Categorised as subordinated debt exposures in SA	-	-	-	-	-
EU 7e	Categorised as covered bonds in SA	-	-	-	-	-
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
8	Other non-credit obligation assets	10,374	-	12,495	2,121	2,121
9	Total	58,977	63,928	110,463	124,608	115,414



Template EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

		a
		Risk weighted exposure amount
1	Risk weighted exposure amount as at the end of the previous reporting period*	58,251
2	Asset size (+/-)	-309
3	Asset quality (+/-)	-124
4	Model updates (+/-)	910
5	Methodology and policy (+/-)	-
6	Acquisitions and disposals (+/-)	-
7	Foreign exchange movements (+/-)	-122
8	Other (+/-)	75
9	Risk weighted exposure amount as at the end of the reporting period	58,681

*) The end of the previous reporting period means the balance as at 30 September 2025.

The amount of risk-weighted exposure resulting from the application of internal models increased in the fourth quarter of 2025 by PLN 430 million compared to the third quarter of 2025. This increase is a consequence of model changes related to the application of new parameters for calculating exposure values for SME clients and the implementation of a new model for leasing exposures. The increase was also influenced by other changes, such as the reclassification of clients and the resulting adjustments in the application of the SME supporting factor and the infrastructure supporting factor. The increase in the amount of risk-weighted exposure arising from the application of internal models was partially offset by a decrease in on-balance-sheet and off-balance-sheet exposures resulting from the existing loan portfolio and binding offers for clients, changes in the credit portfolio quality (client rating migration), and the update of exposure valuations due to changes in foreign exchange rates between reporting dates.



Template EU CR5 – standardised approach

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa
	Risk weight																										Total
	0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Other		
1 Central governments or central banks	64,040	-	1,972	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	687	-	-	-	-	66,699	64,727
2 Non-central government public sector entities	-	-	-	-	3,932	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,932	3,932
EU 2a Regional governments or local authorities	-	-	-	-	3,932	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3,932	3,932
EU 2b Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Multilateral development banks	9,805	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9,805	9,805
EU 3a International organisations	1,947	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,947	1,947
4 Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Corporates	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	5,372	-	-	-	-	-	-	-	-	-	5,373	5,373
6.1 Of which: Specialised Lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	399	-	-	-	-	399	399
EU 7a Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	399	-	-	-	-	399	399
8 Retail exposures	-	-	-	-	-	-	-	-	484	-	-	-	27,017	-	-	2	-	-	-	-	-	-	-	-	-	27,503	27,503
9 Secured by mortgages on immovable property and ADC exposures	-	-	-	-	48,981	-	-	-	-	-	19	-	12,908	-	-	335	-	9	-	286	-	-	-	-	158	62,696	62,696
9.1 Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	48,981	-	-	-	-	-	-	-	12,908	-	-	126	-	-	-	-	-	-	-	-	-	62,015	62,015
9.1.1 no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	8,881	-	-	126	-	-	-	-	-	-	-	-	-	9,007	9,007
9.1.2 loan splitting applied (secured)	-	-	-	-	48,981	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	48,981	48,981
9.1.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	4,027	-	-	-	-	-	-	-	-	-	-	-	-	4,027	4,027
9.2 Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-	-	19	-	-	-	-	209	-	-	-	-	-	-	-	-	-	228	228
9.3.1 no loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	209	-	-	-	-	-	-	-	-	-	209	209
9.3.2 loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19	19
9.3.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	-	22	-	-	-	-	158	189	189
9.5 Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	264	-	-	-	-	-	264	264
10 Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	887	-	-	-	181	-	-	-	-	-	1,068	1,068
EU 10a Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10c Other items	865	-	-	-	498	-	-	-	-	-	-	-	-	-	-	2,022	-	-	-	-	-	-	-	-	-	3,385	3,385
11 Not applicable																											
12 Total	76,657	-	1,972	-	53,411	-	-	-	484	1	19	-	39,925	-	-	8,618	-	9	-	467	1,086	-	-	-	158	182,807	180,835



Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

A-IRB	a	b	c	d	e	f	g	h	i	j	k	l
PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
Corporates Specialised lending												
0.00 to <0.15	1,547	14	0.69	1,557	0.13	52	18.68	3	209	13.42%	-	-
0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
0.10 to <0.15	1,547	14	0.69	1,557	0.13	52	18.68	3	209	13.42%	-	-
0.15 to <0.25	3,389	70	0.79	3,446	0.19	69	15.15	3	559	16.21%	1	-1
0.25 to <0.50	254	4	0.79	242	0.36	11	26.75	2	75	31.01%	-	-
0.50 to <0.75	869	5	0.40	871	0.53	16	29.43	3	363	41.69%	1	-1
0.75 to <2.50	1,000	25	0.40	1,010	1.11	25	18.67	2	343	34.00%	2	-1
0.75 to <1.75	888	25	0.40	898	1.00	23	20.13	2	324	36.11%	2	-1
1.75 to <2.5	112	-	-	112	2.07	2	6.96	1	19	17.03%	-	-
2.50 to <10.00	100	91	0.54	149	4.94	5	27.74	3	97	65.09%	2	-
2.5 to <5	48	67	0.42	76	3.55	2	35.27	3	51	66.85%	1	-
5 to <10	52	24	0.88	73	6.37	3	19.96	3	46	63.27%	1	-
10.00 to <100.00	485	6	1.00	490	42.09	10	8.90	1	169	34.47%	16	-3
10 to <20	111	6	1.00	117	12.51	4	13.50	1	49	41.89%	2	-1
20 to <30	-	-	-	-	-	-	-	-	-	-	-	-
30 to <100	374	-	-	373	51.36	6	7.46	2	120	32.15%	14	-2
100.00 (Default)	249	-	1.00	249	100.00	2	30.03	1	280	112.23%	54	-18
Subtotal	7,893	215	0.63	8,014	6.09	190	18.50	3	2,095	26.14%	76	-24
Corporates Other												
0.00 to <0.15	1	2	-	-	-	2	-	-	-	-	-	-
0.00 to <0.10	1	2	-	-	-	2	-	-	-	-	-	-
0.10 to <0.15	-	-	-	-	-	-	-	-	-	-	-	-
0.15 to <0.25	3,298	3,421	0.32	4,264	0.19	1,190	31.77	2	1,156	27.10%	3	-1
0.25 to <0.50	5,785	4,104	0.32	6,723	0.33	1,527	32.47	2	2,443	36.35%	7	-3
0.50 to <0.75	5,543	3,847	0.33	6,280	0.64	1,427	34.09	2	3,200	50.95%	14	-6
0.75 to <2.50	6,908	3,668	0.34	7,300	1.63	2,386	34.28	2	5,265	72.13%	41	-16
0.75 to <1.75	6,799	3,666	0.34	7,190	1.62	1,714	34.54	2	5,232	72.77%	41	-16
1.75 to <2.5	109	2	0.40	110	2.40	672	17.23	2	33	30.27%	-	-
2.50 to <10.00	6,770	2,565	0.34	6,388	4.92	2,128	35.00	2	6,145	96.20%	110	-57
2.5 to <5	4,279	1,646	0.35	4,056	3.58	1,371	35.28	2	3,493	86.11%	51	-23
5 to <10	2,492	919	0.33	2,332	7.25	757	34.51	2	2,652	113.74%	59	-34
10.00 to <100.00	2,896	776	0.33	2,464	24.60	2,492	35.71	2	3,672	148.91%	213	-138
10 to <20	1,635	543	0.33	1,444	12.37	2,010	35.23	2	1,983	137.16%	62	-44
20 to <30	640	144	0.34	516	25.88	206	38.95	2	1,028	199.37%	52	-34
30 to <100	621	89	0.33	504	58.36	276	33.76	2	661	131.01%	99	-60
100.00 (Default)	2,308	95	0.50	2,068	100.00	1,256	67.85	1	4,575	221.21%	1,102	-1,120
Subtotal	33,509	18,478	0.33	35,487	8.96	12,408	35.79	2	26,456	74.55%	1,490	-1,341
Total	41,402	18,693	0.33	43,501		12,598		2	28,551	65.63%	1,566	-1,365



Template EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

F-IRB	a	b	c	d	e	f	g	h	i	j	k	l
PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
Corporates Specialised lending												
0.00 to <0.15	101	-	-	101	0.14	2	40.00	5	40	39.17%	-	-
0.00 to <0.10	-	-	-	-	-	-	-	-	-	-	-	-
0.10 to <0.15	101	-	-	101	0.14	2	40.00	5	40	39.17%	-	-
0.15 to <0.25	218	102	0.40	259	0.24	16	40.00	5	158	60.94%	-	-
0.25 to <0.50	2,177	1,364	0.38	2,692	0.38	37	39.72	4	1,587	58.93%	4	-3
0.50 to <0.75	247	4	0.40	249	0.66	2	33.00	3	161	64.93%	1	-
0.75 to <2.50	294	161	0.38	356	1.50	50	40.00	4	296	83.31%	2	-5
0.75 to <1.75	162	143	0.39	217	1.16	12	40.00	4	162	74.85%	1	-1
1.75 to <2.5	132	18	0.35	139	2.02	38	40.00	5	134	96.54%	1	-4
2.50 to <10.00	-	-	-	-	-	-	-	-	-	-	-	-
2.5 to <5	-	-	-	-	-	-	-	-	-	-	-	-
5 to <10	-	-	-	-	-	-	-	-	-	-	-	-
10.00 to <100.00	-	-	-	-	16.32	3	40.00	1	-	194.81%	-	-
10 to <20	-	-	-	-	16.32	3	40.00	1	-	194.81%	-	-
20 to <30	-	-	-	-	-	-	-	-	-	-	-	-
30 to <100	-	-	-	-	-	-	-	-	-	-	-	-
100.00 (Default)	-	-	0.40	-	100.00	1	40.00	5	-	-	-	-
Subtotal	3,037	1,631	0.38	3,657	0.49	111	39.32	4	2,242	61.30%	7	-8
Corporates Other												
0.00 to <0.15	2,700	4,682	0.20	6,160	0.10	72	39.70	3	1,746	28.35%	2	-1
0.00 to <0.10	1,686	1,369	0.11	3,877	0.08	30	40.04	3	938	24.19%	1	-1
0.10 to <0.15	1,014	3,313	0.25	2,283	0.13	42	39.14	3	808	35.40%	1	-
0.15 to <0.25	3,408	5,685	0.15	4,243	0.19	102	37.15	2	1,468	34.60%	3	-1
0.25 to <0.50	5,088	4,705	0.16	5,741	0.35	177	35.59	2	2,531	44.09%	7	-3
0.50 to <0.75	3,034	2,104	0.25	3,545	0.61	142	32.94	2	1,920	54.14%	7	-4
0.75 to <2.50	3,937	4,256	0.30	5,176	1.35	322	30.53	2	3,344	64.60%	21	-10
0.75 to <1.75	3,937	4,255	0.30	5,176	1.35	317	30.53	2	3,344	64.60%	21	-10
1.75 to <2.5	-	1	0.20	-	2.23	5	35.15	1	-	86.64%	-	-
2.50 to <10.00	1,174	711	0.28	1,356	3.46	113	28.75	2	1,090	80.35%	13	-5
2.5 to <5	1,050	416	0.29	1,157	3.04	81	29.15	2	910	78.58%	10	-4
5 to <10	124	295	0.26	199	5.93	32	26.42	2	180	90.66%	3	-1
10.00 to <100.00	831	160	0.23	750	25.56	148	29.83	1	1,072	142.97%	58	-31
10 to <20	313	103	0.29	344	13.08	122	29.83	1	450	130.92%	13	-7
20 to <30	86	44	0.06	88	27.44	6	25.21	2	120	135.85%	6	-2
30 to <100	432	13	0.39	318	38.53	20	31.11	1	502	157.98%	39	-22
100.00 (Default)	1,442	68	0.08	1,448	100.00	24	38.50	1	-	-	558	-579
Subtotal	21,614	22,371	0.21	28,419	6.38	1,100	35.13	2	13,171	46.34%	669	-634



Institutions												
0.00 to <0.15	11,752	3,790	0.13	9,596	0.11	95	45.00	2	2,556	26.64%	4	-3
0.00 to <0.10	7,714	2,698	0.16	6,072	0.09	65	45.00	2	2,019	33.25%	3	-2
0.10 to <0.15	4,038	1,092	0.07	3,524	0.14	30	45.00	2	537	15.25%	1	-1
0.15 to <0.25	394	149	0.08	406	0.21	18	45.00	4	329	81.11%	-	-
0.25 to <0.50	1,494	440	0.23	1,595	0.44	19	45.00	3	1,392	87.30%	4	-2
0.50 to <0.75	300	-	0.24	300	0.72	5	45.00	1	189	62.94%	1	-
0.75 to <2.50	117	485	0.18	191	1.39	18	39.95	1	171	89.09%	1	-2
0.75 to <1.75	116	230	0.16	139	1.18	12	38.09	1	110	78.67%	1	-2
1.75 to <2.5	1	255	0.20	52	1.97	6	44.94	1	61	117.02%	-	-
2.50 to <10.00	1	-	-	1	6.84	5	38.08	1	1	139.18%	-	-
2.5 to <5	1	-	-	1	4.05	2	27.10	1	-	95.72%	-	-
5 to <10	-	-	-	-	7.60	3	41.10	1	1	151.13%	-	-
10.00 to <100.00	-	9	0.47	4	16.33	26	4.41	1	1	25.61%	-	-
10 to <20	-	9	0.47	4	16.32	25	4.39	1	1	25.54%	-	-
20 to <30	-	-	-	-	-	-	-	-	-	-	-	-
30 to <100	-	-	-	-	30.82	1	45.00	1	-	262.47%	-	-
100.00 (Default)	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal	14,058	4,873	0.15	12,093	0.20	186	44.90	2	4,639	38.36%	10	-7
Total	38,709	28,875	0.21	44,169		1,397		2	20,052	45.40%	686	-649



Template EU CR6-A – Scope of the use of IRB and SA approaches

	a	b	c	d	e
	Total exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to IRB Approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
1 Central governments or central banks	-	78,450	100.00	-	-
2 Regional governments and local authorities	-	3,933	100.00	-	-
3 Public sector entities	-	-	100.00	-	-
4 Institutions		13,903	-	100.00	-
5 Corporates	76,131	81,733	6.85	93.15	-
5.1 Of which Corporates - General	64,176	69,778	8.03	91.97	-
5.2 Of which Corporates - Specialised lending		11,955	-	100.00	-
5.2.1 Of which Corporates - Specialised lending, excluding slotting approach		11,955	-	100.00	-
5.2.2 Of which Corporates - Specialised lending under slotting approach		-	100.00	-	-
5.3 Of which Corporates - Purchased Receivables	-	-	100.00	-	-
6 Retail	-	91,039	22.12	-	77.88
6.1 Of which Retail – Qualifying revolving		-	100.00	-	-
6.2 of which Retail – Secured by residential immovable property		62,695	1.29	-	98.71
6.3 Of which Retail - Purchased Receivables		-	100.00	-	-
6.4 of which Retail - Other retail exposures		-	100.00	-	-
7 Equity	-	399	100.00	-	-
EU-7a Collective investment undertakings (CIU)	-	-	100.00	-	-
8 Other non-credit obligation assets	-	3,385	100.00	-	-
9 Total	90,034	272,842	41.02	33.00	25.98

Risk weighted assets for equity exposures are calculated as follows:

- according to simplified method (for the risk weight of 100%, 250% and 400%),
- using exemption thresholds for deductions from own funds items (for the risk weight of 250%).

Detailed information on equity exposure as at 31 December 2025 is presented in the table below.

Template EU CR10.5: Equity exposures

	On balance sheet exposure	Off balance sheet exposure	Risk weight	Exposure value	Risk weighted exposure amount
	a	b	c	d	e
With the use standardised approach	-	-	100%	-	-
With the use standardised approach	303	-	250%	303	757
With the use standardised approach	-	-	400%	-	2
With the use of threshold exclusions	96	-	250%	96	240
Total	399	-		399	999

The tables below present information on: the geographical distribution of the relevant credit exposures and the amount of the institution-specific countercyclical capital buffer– according to Article 440 of the Regulation CRR and in accordance with templates of the Commission Implementing Regulation (UE) 2024/3172.



Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures - Exposure value for non-trading book	Total exposure value	Own fund requirements			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures – Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				
010 Breakdown by country:													
PL	100,334	73,713	-	-	-	174,047	8,202	-	-	8,202	102,529	0.9908	0.0100
AU	1	-	-	-	-	1	-	-	-	-	-	-	0.0100
BE	4	-	-	-	-	4	1	-	-	1	7	0.0001	0.0100
CY	1	9	-	-	-	10	-	-	-	-	5	-	0.0100
CZ	2	35	-	-	-	37	2	-	-	2	27	0.0003	0.0125
DE	16	1,095	-	-	-	1,111	18	-	-	18	224	0.0022	0.0075
DK	1	-	-	-	-	1	-	-	-	-	1	-	0.0250
EE	-	5	-	-	-	5	-	-	-	-	5	0.0001	0.0150
ES	4	226	-	-	-	230	10	-	-	10	125	0.0012	0.0050
FR	1	-	-	-	-	1	-	-	-	-	1	0.0000	0.0100
GB	9	260	-	-	-	269	16	-	-	16	198	0.0019	0.0200
HU	-	59	-	-	-	59	1	-	-	1	15	0.0001	0.0100
IE	2	215	-	-	-	217	8	-	-	8	104	0.0010	0.0150
LU	1	292	-	-	-	293	9	-	-	9	117	0.0011	0.0050
NL	23	177	-	-	-	200	6	-	-	6	79	0.0008	0.0200
NO	1	1	-	-	-	2	-	-	-	-	2	-	0.0250
RO	1	13	-	-	-	14	1	-	-	1	14	0.0001	0.0100
SE	2	6	-	-	-	8	-	-	-	-	2	-	0.0200
SK	1	-	-	-	-	1	-	-	-	-	1	-	0.0150
Other	20	25	-	-	-	45	4	-	-	4	25	0.0003	0.0000
020 Total	100,424	76,131	-	-	-	176,555	8,278	-	-	8,278	103,481	1.0000	

Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	a
1 Total risk exposure amount	128,129
2 Institution specific countercyclical capital buffer rate	1.0013%
3 Institution specific countercyclical capital buffer requirement	1,283



3. Leverage ratio

The calculation of the regulatory leverage ratio of the ING Bank Śląski S.A. Group as at 31 December 2025 was based on the provisions of the Regulation CRR. Leverage ratio is calculated as Tier 1 capital measure divided by the total exposure measure and expressed as a percentage. The total exposure measure is the sum of exposure values determined in accordance with CRR from all non-deducted assets and off-balance sheet items when determining the Tier I capital measure.

The table below presents the reconciliation of total exposure to the calculation of the leverage ratio with the value of assets in the published annual financial statements in accordance with the requirements of Article 451 of the Regulation CRR and according to template of Commission Implementing Regulation (UE) 2024/3172.

Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	Applicable amount
1	282,025
2	-
3	-
4	-
5	-
6	-
7	-
8	1,390
9	146
10	25,445
11	-
EU-11a	-
EU-11b	-
12	-1,566
13	307,440

The table below presents information on the financial leverage ratio and the breakdown of the total exposure measure comprising the leverage ratio in accordance with the Commission Implementing Regulation (UE) 2024/3172:

- Template EU LR2 - LRCom: Leverage ratio common disclosure,
- Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures).



Template EU LR2 - LRCom: Leverage ratio common disclosure

		a		b
		CRR leverage ratio exposures		
		31 Dec 2025		30 Jun 2025
On-balance sheet exposures (excluding derivatives and SFTs)				
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	256,899		257,734
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-		-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-		-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-		-
5	(General credit risk adjustments to on-balance sheet items)	-		-
6	(Asset amounts deducted in determining Tier 1 capital)	-574		-733
6	Total on-balance sheet exposures (excluding derivatives and SFTs)	256,325		257,001
Derivative exposures				
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	815		780
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-		-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	1,465		1,313
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-		-
EU-9b	Exposure determined under Original Exposure Method	-		-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-		-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-		-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-		-
11	Adjusted effective notional amount of written credit derivatives	-		-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-		-
13	Total derivatives exposures	2,280		2,093
Securities financing transaction (SFT) exposures				
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	23,522		23,454
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-		-
16	Counterparty credit risk exposure for SFT assets	146		377
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-		-
17	Agent transaction exposures	-		-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-		-
18	Total securities financing transaction exposures	23,668		23,831
Other off-balance sheet exposures				
19	Off-balance sheet exposures at gross notional amount	62,882		59,498
20	(Adjustments for conversion to credit equivalent amounts)	-37,359		-33,911
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-78		-80
22	Off-balance sheet exposures	25,445		25,507
Excluded exposures				



EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-278	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m	(Total exempted exposures)	-278	-
Capital and total exposure measure			
23	Tier 1 capital	18,167	18,036
24	Total exposure measure	307,440	308,431
Leverage ratio			
25	Leverage ratio (%)	5.91%	5.85%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.91%	5.85%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	5.91%	5.85%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	transitional	transitional
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	24,181	23,422
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	23,522	23,454
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	308,099	308,399
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	308,099	308,399
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5.90%	5.85%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5.90%	5.85%



Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	256,637
EU-2	Trading book exposures	1,091
EU-3	Banking book exposures, of which:	255,546
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	70,131
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	3,487
EU-7	Institutions	14,052
EU-8	Secured by mortgages of immovable properties	62,209
EU-9	Retail exposures	26,636
EU-10	Corporate	66,953
EU-11	Exposures in default	3,232
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	8,846

On the basis of CRD IV Directive and implementing standards, the Group prepared and implemented *The procedure of preparing the report Leverage Ratio*. This document describes the recipients and detailed rules of leverage ratio calculation for the purpose of reporting to NBP by the Centre of Expertise Accounting Policy and Financial Reporting.

Within the ICAAP process, the excessive leverage ratio risk has been identified as immaterial. The metric used for materiality assessment has been the cost of capital needed to keep the ratio at the required level. Despite risk immateriality, the Group has implemented a management process for this type of risk, including: *Excessive financial leverage risk management policy* and *Leverage ratio planning procedure*. The documents set responsibilities of departments and ALCO Committee within the process.

The Centre of Expertise Accounting Policy and Financial Reporting is responsible for:

- the leverage ratio calculating methodology (in agreement with the Centre of Expertise Treasury) and current calculation of the ratio,
- carrying out the obligatory reporting process to external entities of the Bank, such as NBP, KNF.

The Centre of Expertise Management Accounting and Advice is responsible for preparing plans of on-balance and off-balance positions, which are necessary for calculating the components of the leverage ratio.

The Centre of Expertise Treasury is responsible for planning the leverage ratio (including for stress testing purposes) and initiating actions, which aim to maintain the leverage ratio at the required level.

The Integrated Risk Department is responsible for:

- reporting and monitoring the leverage ratio, as well as informing the Management Board on this issue,
- setting a limit of the leverage ratio,

- the methodology of estimating the economic capital for the excessive leverage ratio risk, in case of qualifying this risk as significant and carrying out stress tests including the excessive leverage ratio risk.

For internal purposes, the desired leverage ratio level applicable in 2025 was determined to ensure compliance with the regulatory level of 3%. In order to limit the risk of the ratio falling below the required level, the Integrated Risk Department monitored the level of the ratio in relation to the internal limit.

Moreover, the Group monitored the level of the leverage ratio at 5%, in accordance with the conditions specified by the Polish Financial Supervision Authority for the payment of dividends by banks.

If the current or planned leverage ratio falls below the unacceptable level, the Integrated Risk Department informs the ALCO Committee and the Management Board. Based on the information received, ALCO may decide on recommending the Management Board one of the following actions:

- not paying or reducing the amount of dividend,
- issuance of capital, which could be included to Tier 1,
- limiting the development of the Bank's lending activity or other components of the Bank's assets,
- securitization or sale of certain loan portfolios,
- other actions resulting in the ratio improvement.

In 2025 the leverage ratio has been above internal and regulatory limit. The main influencing factors have been:

- dynamics of asset value (denominator) – an internal strategic decision related with the implementation of the Bank's strategy, having a direct impact on the increase of the total exposure,
- dynamics of off-balance-sheet item values (denominator) – an internal strategic decision related with the implementation of the Bank's strategy, having a direct impact on the increase of the total exposure.



4. Information on liquidity

Group of ING Bank Śląski S.A. recognises the process of stable management of liquidity and funding risk as a major process at the Group. Liquidity and funding risk is understood by the Group as the risk of the lack of ability to perform financial liabilities under on- and off-balance sheet items at reasonable prices. The Group of ING Bank Śląski S.A. maintains liquidity so that the Group's financial liabilities can always be repaid with the available funds, inflows from maturing transactions, available funding sources at market prices and/or liquidation of negotiable assets.

4.1. Liquidity and funding risk management objectives

The main objective of the liquidity and funding risk management process is to maintain an appropriate level of liquidity in order to ensure safe and stable operation of the Group under normal market conditions and during the crisis.

4.2. Liquidity and funding risk management policies

In order to optimise the process of liquidity and financing risk management, the Bank has created the *Liquidity and Funding Risk Management Policy at ING Bank Śląski S.A.*, which aims to describe the rules ensuring appropriate sources of financing and minimising the risk and costs associated with funding. The Policy describes the general approach to the process of liquidity risk management and funding in the Group of ING Bank Śląski S.A. The *Liquidity and Funding Risk Management Policy at ING Bank Śląski S.A.* is complemented by the *Instruction Contingency Financing Plan at ING Bank Śląski S.A.*, which defines the organisation and activities aimed at eliminating liquidity shortages in stressed conditions.

The Policy results from the business risk management strategy approved by the Supervisory Board (including the liquidity and funding risk management strategy). In particular, it reflects the risk appetite defined in the strategy and approved by the Supervisory Board.

The permissible level of liquidity and funding risk is defined through a multi-element system. This approach is consistent with the approach described in the *Policy for determining and monitoring risk appetite in the area of market risk and liquidity*.

4.3. Liquidity and funding risk management process

The general approach to liquidity and funding risk management is composed of five recurring activities:

- 1) risk identification,
- 2) risk assessment,
- 3) risk control,
- 4) monitoring,
- 5) reporting.

Risk identification and assessment

Risk identification shall be carried out annually or ad-hoc through the organisation of risk identification workshops. Each identified risk is assessed in order to determine the significance of such risk for the Bank. Risk identification is also carried out in the process of implementing new products. The valuation of risk and its materiality is assessed on the basis of the probability with which this risk occurs and the magnitude of the financial impact if this risk materialises.

Control

Risks are controlled through actions that reduce the probability of a risk materialising or actions that reduce the impact if a risk materialises. One of the elements of risk control is the definition of an acceptable level of risk.

Monitoring and reporting

An important element of risk management is continuous checking whether the implemented risk control is performed. Regular checks show that risk control measures are effective. An important element of the liquidity and financing risk management process is appropriate reporting, which provides managers with information necessary for risk management. The ability to show shareholders and partners that the Bank controls risk allows them to gain their trust, one of the most important elements in banking. Well-organised and designed regular inspections and monitoring are essential for good risk management.

In addition, the Bank prepares an ILAAP process report. It presents, in a comprehensive and consistent manner, key indicators and figures on the Bank's liquidity risk profile. It takes into account the Bank's strategy, financing plan and risk tolerance. The report results are approved by the Management Board, which informs the Supervisory Board of the assessment results.

In accordance with Recommendation S, the Bank makes a detailed analysis of long-term liquidity with focus on mortgage loans. The above liquidity analysis shows risk levels related to long-term funding of mortgage loans. On the basis of the analysis, it was concluded that the currently implemented processes within the framework of long-term liquidity supervision are correct. Therefore, it was recommended to maintain the current activities.

The Group pursues an active policy of liquidity management with reference to core currencies. For those currencies, liquidity risk measurement and limitation is made per currency and the management of operational liquidity is performed separately for each currency, and it is incorporated in the risk transfer system. From the point of view of liquidity management, the Group considers the main (significant) currencies PLN, EUR, USD and CHF.

Intraday liquidity is actively managed by the Centre of Expertise Treasury. The process manages the position and risk of short-term liquidity (one day and intraday). The objective is to comply with payment and settlement duties in a timely manner in regular operations and in extraordinary/stress situations.

The Bank operates a risk transfer system within which market risks, including liquidity risk, are transferred to the Centre of Expertise Treasury. Applying adequate tools, it manages the risks in a centralised manner within the limit system applied by the Bank.



The liquidity risk management procedures adopted at the Bank are presented annually to the relevant Bank employees involved in the Bank's liquidity management process. Persons involved in the Bank's liquidity management process confirm that they have familiarized themselves with and understand the procedures used and control the correctness of their implementation.

4.4. Types of liquidity and funding risk

The Bank splits liquidity and funding risk into two groups:

- liquidity risk resulting from external factors,
- risk of internal factors relating to the specific bank.

The Bank's goal is a conservative approach to liquidity risk management that will allow safely survive events specific for ING Bank Śląski S.A. and for the entire banking sector.

In terms of time horizon, the Bank splits liquidity risk into:

- operational – focused on current funding of the Bank's position and on managing nostro positions,
- strategic – focused on ensuring that the Bank's structural liquidity positions are at an acceptable level.

Considering the tenor and clients' behaviour (the two aspects affecting the Bank's liquidity), the Bank identifies three types of liquidity and funding risk:

- structural – understood as a potentially adverse impact on the Bank's revenues due to a mismatch between the anticipated maturities of the Bank's assets and liabilities as well as the risk of no re-financing possibilities in the future,
- related to clients' behaviour – understood as a potentially adverse impact on the Bank's revenues due to the embedded liquidity options in the products offered by the Bank,
- related to stress conditions – understood as a risk of lack of possibility by the Bank to comply with its financial obligations when due to insufficient available funds or when the generation of such funds is impossible at any price which results in immediate insolvency of the Bank.

4.5. Structure and organisation of the risk management process

The Bank's Management Board and the Asset and Liability Committee (ALCO) play a specific role in liquidity and funding risk management.

The Supervisory Board is responsible for:

- approving the liquidity risk tolerance, the overall accepted level of liquidity and funding risk (in HL RAS) presented to the Supervisory Board by the Management Board.

The Bank's Management Board is responsible for:

- establishing strategies within the scope of funding and liquidity risk, a target liquidity position, the funding methods and the liquidity risk profile,
- determining the Bank's current and future risk appetite,
- establishment of an acceptable risk level (risk appetite), liquidity risk tolerance and its submission to the Risk Committee for recommendation and to the Supervisory Board for approval,
- acceptance of changes to the limits of liquidity and funding risk (in MB RAS),
- acceptance of a liquidity and funding risk management policy and significant changes in policy, in particular, the limits tailored to the overall acceptable level of risk, risk tolerance approved by the Supervisory Board,
- ensuring the allocation of adequate human resources and appropriate work tools (including IT solutions) within the Bank allowing for the policy implementation,
- introducing the separation of tasks, carried out in the Bank, ensuring the independence of liquidity and funding risk management at the first level (first line of defence), from risk management at the second level (second line of defence),
- supervising liquidity and funding risk management at the first and second levels,
- approving liquidity premium levels based on advised by CoE Treasury level resulted from the liquidity premium review and/or adjusts it when deemed necessary, because of the strategic changes in the balance sheet or other factors.

The Asset and Liability Committee (ALCO) is responsible for:

- implementation of the Bank's strategy with respect to liquidity and funding risk,
- management of a liquidity buffer within the relevant policies and limits approved by the Bank's Management Board, the related operational actions are delegated to the Centre of Expertise Treasury,
- supervision and monitoring of liquidity risk levels as well as the funding structure in the Bank's balance sheet,
- management of structural liquidity position (in terms of the flow gap),
- analysis of all proposed modifications to the *Liquidity and Financing Risk Management Policy at ING Bank Śląski S.A.* and submission of positively reviewed modifications to the Bank's Management Board,
- monthly analysis of the short-, medium- and long-term liquidity profile (strategic liquidity positions) presented in reports defined by the regulator and internal reports, in the event of identified structural problems (e.g. the need for very high refinancing in the future) ALCO is responsible for issuing instructions to the appropriate business units in order to obtain an appropriate liquidity profile,
- acceptance of changes in liquidity and funding risk limits (in LCS and ALCO RAS),



- approval of proposals to change liquidity risk limits in the scope of MB RAS and HL RAS in order to present these limits for approval by the Bank's Management Board and Supervisory Board, respectively,
- implementation of limits within the adopted risk appetite (approved in accordance with the division of responsibilities in determining the levels of limits defined in the *Policy for determining and monitoring risk appetite in the area of market risk and liquidity risk*),
- approving assumptions for reports and models used to measure, monitor and control liquidity and funding risk.

4.6. Risk management framework

The framework liquidity and funding risk management principles contain all material methods with respect to intraday, shorty-term, medium-term and long-term liquidity and funding risk management. This is made up of the following key elements:

- limit system and liquidity risk measurement,
- monitoring of funding sources and concentration risk,
- liquidity reserve management,
- management of intraday liquidity,
- management of hedging items,
- stress tests and contingency plans.

Limit system and liquidity risk measurement

Formal limits are set by the regulator of the banking sector and/or the Bank for various liquidity risk measures. The admissible level of funding and liquidity risk is defined with a system composed of several elements: the general level of risk acceptable to the Bank, approved by the Supervisory Board, and a limit system, approved in accordance with the division of responsibility in determining the levels of limits defined in the *RAS setting and monitoring policy within market risk and liquidity*. The Supervisory Board is provided with information on compliance with the measures, minimum on a quarterly basis.

The limit level is based on the Bank's strategic objectives, identified liquidity risks, results of stress tests and the principles set forth by regulatory authorities. The limits are taken into account in planning processes (implementation of the approved plans may not result in the limits being exceeded). The respective levels of the monitoring measure limits of the Emergency Financing Plan are linked (correlated) to the ranges defined for the initiation of the respective phases of the Contingency Funding Plan. The admissible liquidity risk level is determined and updated minimum once a year.

The limit system is more detailed than the risk level approved by the Supervisory Board.

The admissible risk level is guaranteed by risk monitoring in various reports concerning liquidity and funding risk in the course of the Bank's normal/regular activity and in extraordinary/stress situations. Inter alia, the Bank monitors funding concentration risk, the internal liquidity safety buffer and verifies the stability of external funding.

The Bank's Management Board receives a liquidity and funding risk report containing information on a weekly basis on key liquidity measures. On a monthly basis, the Bank's Management Board and the ALCO Committee receive comprehensive information on liquidity and funding risk.

As at 31 December 2025, the supervisory liquidity measures for the Group of ING Bank Śląski S.A. were as follows:

Liquidity measures		Minimum value	31 Dec 2025
LCR	Liquidity coverage ratio	100%	251%
NSFR	Stable funding ratio	100%	161%
WFD	Long-Term Funding Ratio	40%*	24.2%

*) This is the expected level of minimum value to apply from 31 December 2026, in accordance with WFD Recommendations. On 21 November 2025, the PFSA announced a project to change the methodology of calculating the ratio and its expected level to 20%.

Long-Term Funding Ratio (WFD)

In accordance with the obligations and principles set out in WFD recommendation regarding the Long-Term Funding Ratio - will be issued by the Polish Financial Supervision Authority on the basis of Resolution No. 243/2024 of 15 July 2024, Bank, starting from 31 July 2024, calculates the supervisory liquidity measure WFD (Long-Term Financing Ratio) on a consolidated basis and reports WFD to KNF monthly as of the last day of the month. In accordance with section 3.1. WFD Recommendations the level of 40% is to apply from 31 December 2026. On 21 November 2025, the PFSA announced a draft amendment to the WFD Recommendation of the PFSA, whose proposal is to change the methodology of calculating the ratio and its expected level to 20%.

Liquidity coverage ratio (LCR) and net stable funding ratio (NSFR)

In compliance with the duties and principles set out in the Regulation CRR and of the Council and Commission Delegated Regulation's (EU) No 2015/61, 2018/1620 and Commission Implementing Regulation (EU) 2022/1994, the Group calculates supervisory liquidity measures:

- short-term liquidity measures (LCR – Liquidity Covered Ratio) – this is to ensure that the Group holds adequate liquid high quality assets to cover liquidity needs for 30 calendar days in stress conditions. In 2025 a limit of 100% applied,
- long-term liquidity measures (NSFR – Net Stable Funding Ratio) – this is to ensure a minimum level of available funding in medium- and long-term. In 2025 a limit of 100% applied.

The Group is obligated to report the liquidity measures to the regulator monthly and quarterly.



In compliance with the Guidelines on the disclosure of the net outflow coverage ratio, in addition to the disclosure of information on liquidity risk management issued by EBA, the Group is obliged to disclose components of the LCR in the form as specified in the table LIQ1 (net outflow coverage ratio – total). It contains the following information:

- high quality liquid assets – a “weighted” amount subject to value reduction,
- cash outflows – weighted and unweighted outflows,
- cash inflows – weighted and unweighted inflows.

Such weighted inflows and outflows are calculated as values after application of inflow and outflow ratios. The numbers cover the values for each of the four calendar quarters preceding the report date. Those are average observed values at the end of each month in the 12-month period preceding the end of each quarter.

The information covers all positions irrespective of the denomination currency and are presented in PLN. The net outflow coverage ratio contains all important elements for the Group's liquidity profile.

Apart from the presented values of the net outflow coverage ratio calculated for all currencies, the Group also monitors ratios calculated for major currencies – PLN and EUR.

The detailed information on LCR required by Article 451a of the Regulation CRR is presented below, based on the EU LIQ1 template set out in Commission Implementing Regulation (EU) 2024/3172.



Template EU LIQ1 - Quantitative information of LCR

	a	b	c	d	e	f	g	h
	Total unweighted value (average)				Total weighted value (average)			
EU 1a	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 2025	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 Mar 2025
EU 1b Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS								
1 Total high-quality liquid assets (HQLA)					60,631	58,235	56,921	55,916
CASH - OUTFLOWS								
2 Retail deposits and deposits from small business customers, of which:	169,463	166,543	162,723	158,943	11,379	11,190	10,970	10,772
3 Stable deposits	126,959	124,549	121,027	117,212	6,348	6,227	6,051	5,861
4 Less stable deposits	42,504	41,994	41,696	41,731	5,031	4,963	4,919	4,911
5 Unsecured wholesale funding	57,103	55,215	53,841	53,429	21,692	20,845	20,224	20,001
6 Operational deposits (all counterparties) and deposits in networks of cooperative banks	20,003	19,896	20,011	20,362	4,993	4,967	4,995	5,083
7 Non-operational deposits (all counterparties)	37,100	35,319	33,830	33,067	16,699	15,878	15,229	14,918
8 Unsecured debt	-	-	-	-	-	-	-	-
9 Secured wholesale funding					-	-	-	-
10 Additional requirements	26,710	25,677	24,877	24,665	3,671	3,467	3,393	3,524
11 Outflows related to derivative exposures and other collateral requirements	996	891	829	907	996	891	829	907
12 Outflows related to loss of funding on debt products	3	3	36	36	3	3	36	36
13 Credit and liquidity facilities	25,711	24,783	24,012	23,722	2,672	2,573	2,528	2,581
14 Other contractual funding obligations	7,074	6,081	6,345	7,018	6,508	5,507	5,775	6,455
15 Other contingent funding obligations	34,138	33,312	32,624	31,995	1,808	1,778	1,737	1,698
16 TOTAL CASH OUTFLOWS					45,058	42,787	42,099	42,450
CASH - INFLOWS								
17 Secured lending (e.g. reverse repos)	14,463	13,223	12,156	11,586	11,949	10,992	10,195	9,706
18 Inflows from fully performing exposures	7,239	7,110	6,978	6,912	4,314	4,204	4,112	4,049
19 Other cash inflows	2,715	2,534	2,275	2,425	2,715	2,534	2,275	2,425
EU-19a (Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b (Excess inflows from a related specialised credit institution)					-	-	-	-
20 TOTAL CASH INFLOWS	24,417	22,867	21,409	20,923	18,978	17,730	16,582	16,180
EU-20a Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c Inflows subject to 75% cap	24,417	22,867	21,409	20,923	18,978	17,730	16,582	16,180
TOTAL ADJUSTED VALUE								
EU-21 LIQUIDITY BUFFER					60,631	58,235	56,921	55,916
22 TOTAL NET CASH OUTFLOWS					26,080	25,057	25,517	26,270
23 LIQUIDITY COVERAGE RATIO					2.34	2.34	2.24	2.16



The LCR ratio as at 31 December 2025 increased by 20 percentage points compared to 30 September 2025. This is mainly the result of an increase in liquid assets and inflows partially offset by an increase in outflows. The increase in liquid assets was mainly due to the rise in the volume of unencumbered government bonds (+4,436 million), which was offset by a decrease in the volume of NBP bills (-3,897 million). The increase in inflows was driven primarily by reverse repo transactions secured by securities not classified as HQLA (+2,609 million) and other inflows (+1,534 million). The increase in outflows resulted from higher deposit volumes (+1,094 million) and other liabilities (+901 million).

	31 Dec 2025		30 Sep 2025		31 Dec 2025 vs 30 Sep 2025	
	251%		231%		+20 p.p.	
	Value	Weighted value	Value	Weighted value	Value	Weighted value
Liquid assets	61,784	61,784	61,295	61,295	489	489
Outflows	308,540	48,811	309,536	46,567	-996	2,244
Inflows	27,489	24,174	27,221	20,038	268	4,136

The LCR ratio as at 31 December 2025 decreased by 13 percentage points compared to 31 December 2024, which is mainly the result of an increase in outflows, offset by a rise in inflows and an increase in liquid assets. The growth in liquid assets was driven primarily by a higher volume of unencumbered government bonds (+6,635 million), partially offset by a decrease in the volume of BGK bonds (-1,564 million). The increase in inflows was mainly due to higher volumes of reverse repo transactions secured by securities not classified as HQLA (+702 million), an increase in principal-and-interest instalments (+1,373 million), and higher other inflows (+1,259 million). The growth in outflows was driven by an increase in deposits (+3,374 million) and other liabilities (+2,281 million).

	31 Dec 2025		31 Dec 2024		31 Dec 2025 vs 31 Dec 2024	
	251%		264%		-13 p.p.	
	Value	Weighted value	Value	Weighted value	Value	Weighted value
Liquid assets	61,784	61,784	56,298	56,298	5,486	5,486
Outflows	308,540	48,811	282,781	42,184	25,759	6,627
Inflows	27,489	24,174	25,834	20,837	1,654	3,337

Level 1 liquid assets cover assets characterised with very high liquidity and credit quality. Here below there is a breakdown of level 1 liquid assets used by the Group to calculate the LCR ratio (as defined in the Commission Delegated Regulation (EU) No 2015/61) as at 31 December 2025.

Level 1 liquid assets	
Cash	865
Cash in nostro accounts with the Central Bank net of the required reserve	4
Other exposures to the Central Bank (O/N deposit, cash bills)	100
Unencumbered Treasury bonds	49,797
Assets constituting exposures to public sector entities	1,921
Unencumbered BGK bonds	192
Unencumbered bonds of the European Investment Bank	8,905
Total	61,784

In level 1 liquid assets, securities are presented by their market value. The Group's liquidity position is reduced by encumbered securities (constituting collateral, blocked) and increased by securities received as collateral in reverse-repo and buy-sell-back transactions.

The detailed information on net stable funding ratio - NSFR required by Article 451a of the Regulation CRR is presented below, based on the EU LIQ2 template set out in Commission Implementing Regulation (EU) 2024/3172. The table contains the following information:

- available stable funding,
- required stable funding, including: high-quality total liquid assets (HQLA), performing loans and securities, interdependent assets, other assets and off-balance sheet items,
- required stable funding.



Template EU LIQ2: Net Stable Funding Ratio

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	18,732	-	-	1,032	19,764
2	Own funds	18,732	-	-	1,032	19,764
3	Other capital instruments		-	-	-	-
4	Retail deposits		174,528	-	-	163,455
5	Stable deposits		127,590	-	-	121,211
6	Less stable deposits		46,938	-	-	42,244
7	Wholesale funding:		62,378	818	14,398	43,257
8	Operational deposits		20,849	-	-	10,424
9	Other wholesale funding		41,529	818	14,398	32,833
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	230	5,001	2,223	1,376	2,488
12	NSFR derivative liabilities	230				
13	All other liabilities and capital instruments not included in the above categories		5,001	2,223	1,376	2,488
14	Total available stable funding (ASF)					228,964
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					1,861
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		45	39	1,566	1,403
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		52,106	11,204	133,893	127,409
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		424	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		18,521	818	13,116	14,646
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		25,675	9,006	50,763	60,173
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		49	70	1,579	1,086
22	Performing residential mortgages, of which:		1,663	1,169	64,944	47,505
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		1,059	906	45,565	30,600
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		5,823	211	5,070	5,085
25	Interdependent assets		-	-	-	-
26	Other assets:	-	14,475	569	5,601	9,316
27	Physical traded commodities				-	-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	1,797	1,528
29	NSFR derivative assets		257	-	-	257
30	NSFR derivative liabilities before deduction of variation margin posted		240	-	-	12
31	All other assets not included in the above categories		13,978	569	3,804	7,519
32	Off-balance sheet items		12,715	6,262	26,474	2,391
33	Total RSF					142,380
34	Net Stable Funding Ratio (%)					161



The NSFR ratio as of 31 December 2025 decreased by 19.31 percentage points compared to its level as of 30 June 2025. The decline in the ratio was driven by an increase in items requiring stable funding (+16,826 million), accompanied by a lower increase in items providing stable funding (+2,819 million). The increase in items requiring stable funding resulted mainly from the rise in securities-financed transactions with financial clients (+8,093 million), the increase in other loans to non-financial clients (+5,361 million), the increase in initial margin posted (+639 million), and the increase in other assets (+289 million). The increase in items providing stable funding resulted from the rise in stable funding from retail deposits (+3,989 million), the increase in liabilities from financial clients (+1,165 million) and the increase in other liabilities (+497 million), while at the same time stable funding from non-financial clients decreased (-3,646 million).

Additional liquidity monitoring measures (ALMM)

In compliance with the Commission Implementing Regulations (EU) 2022/1994, the Bank reports a set of additional monitoring ratios for liquidity reporting.

The reports include:

- maturity ladder,
- concentration of funding by counterparty,
- concentration of funding by product type,
- prices for various lengths of funding,
- roll-over of funding,
- concentration of counterbalancing capacity by issuer/counterparty.

Internal liquidity reports

Another major element in the Bank's liquidity management risk process covers internally defined reports presenting detailed and varied approach by the Bank to measurement and management of the risk. The Bank models liquidity characteristics, both of its assets and liabilities in order to provide for customer's anticipated/actual behaviour. Modelling is mixed. This means that an analysis of customers' behaviour relies on historic data and expert judgement.

A structural liquidity report is one of such internal liquidity reports. The report presents the gap between the Bank's assets and liabilities in time buckets on correctly functioning markets. The report is used to monitor and manage medium- and long-term liquidity positions. It serves as a support in the planning process of the balance sheet and funding. It also indicates all major funding needs in the future.

The report is a scenario for the current balance sheet in normal market conditions. It does not cover any additional projections of balance sheet development. However, it provides for customers' typical behaviour observed in previous periods. For instance: cash flows under mortgage loans, cash loans and overdrafts provide for

prepayments and cash flows for savings accounts and current accounts are allocated subject to characteristics of liquidity.

Report of structural liquidity as at 31 December 2025:

	1-6 months	7-12 months	1-5 years	6-10 years	11-15 years	over 15 years
Liquidity gap	68,930	11,877	26,047	-18,644	-77,097	-11,112
Cumulated liquidity gap	68,930	80,807	106,854	88,210	11,112	-

In the Group of ING Bank Śląski S.A., the Bank follows liquidity risk monitoring and limiting based on measurements of the cumulated gap. In order to properly exercise supervision over liquidity risk in the Group entities, limits are set separately for each company.

Monitoring of funding sources and concentration risk

Once a year, the Group determines the Group's overall business strategy and the resulting medium-term financial plan with a general risk strategy. Financial plan is an indispensable element of the strategy which provides for an effective diversification of funding sources and tenors.

ALCO actively manages the funding base. Additionally, it monitors funding sources in order to:

- verify compliance with the strategy and financial plan,
- identify potential risks related to funding.

Customers' deposits (retail and corporate) are the core funding source for ING Bank Śląski S.A. Group. The Group monitors the funding structure and thus verifies concentration risk by analysing its deposit base split into:

- type of financing,
- customer segment,
- product type,
- currencies,
- geographical region,
- concentration of large deposits.

Periodical analyses also monitor the risk generated by related customers (within Groups).

In accordance with the Commission Implementing Regulation (EU) 2022/1994, the Group reports a set of additional monitoring indicators for the purposes of reporting on liquidity. The reports include, inter alia, reports on the concentration of funding sources:

- concentration of financing by counterparty,

- concentration of funding by product type.

As at 31 December 2025, the following were reported:

- concentration of financing by counterparty, includes information on the funds of one financial client. The Group includes the non-preferred senior loan (NPS) here. The funds raised exceed the threshold of 1% of total liabilities,
- concentration of financing by product type, confirms that the main source of financing at the ING Bank Śląski S.A. Group there are customer deposits. The most important are current and savings accounts of retail clients. Unsecured wholesale financing is only 30% of the financing indicated in reporting in accordance with the EU Commission Regulation. The information includes the total amount of funding received for each product category.

The existing funding structure is well diversified. The funding structure as at 31 December 2025 split into direct and mutual funding is presented below. Direct funding covers products where transaction is "one-sided": funds are taken and then repaid. Mutual funding covers products where funding is simultaneously given and taken (in separate currencies or in separate products). Direct funding is provided mainly by retail and corporate customers while mutual funding comprised primarily funds acquired from other banks.

Direct funding

	value	% share
Retail customers	135,054	49.9%
Corporate customers.	98,636	36.4%
Equity	23,560	8.7%
Own issues (including NPS)	12,954	4.8%
Banks	436	0.2%

Mutual funding

	value	% share
Banks	27,114	85.0%
Corporate customers.	4,780	15.0%

Liquidity reserve management

Maintenance of an adequate liquidity buffer is a major element in managing the Group's liquidity. The liquidity buffer presents the available liquidity, required to cover the gap between cumulated outflows and inflows within a relatively short time. It covers assets that are "unencumbered" and easily available to acquire liquidity.

Unencumbered assets are understood as assets that are free of any legal, regulatory, contractual restrictions to have them disposed of by the Bank. The liquidity buffer is crucial in the times of a crisis when the Group has to obtain liquidity in a short time when the standard funding sources are unavailable or insufficient.

The liquidity buffer is maintained as a safeguard against materialisation of various extraordinary scenarios, providing for needs of additional liquidity which may arise at any time in extraordinary circumstances and in normal conditions.

The table below presents the structure of the liquid asset buffer as at 31 December 2025.

Structure of the liquidity buffer

	value	% share
Bonds issued by the government or central bank in Poland in PLN	48,786	75.1%
Bonds issued by the government or central bank in Poland in EUR	1,938	3.0%
Bonds issued by foreign governments or foreign banks in PLN	7,174	11.0%
including EIB in PLN	7,174	11.0%
Bonds issued by foreign governments or foreign banks in EUR	5,072	7.8%
including EIB in EUR	2,747	4.2%
Bonds of BGK and PFR in PLN	2,025	3.1%

The Group provides for realistic reductions due to impairment of securities with the level thereof being regularly reviewed and approved by ALCO. The reductions are assessed inter alia on the basis of market liquidity and depth, volatility of market prices, requirements of the central bank.

The Group also observes asset concentrations ensuring their safe diversification in terms of issuer, maturity and currency.

Management of intraday liquidity

The Bank actively manages positions and risks of short-term (one-day and intraday) liquidity in order to comply with its payment and settlement obligations when due in normal market conditions and in extraordinary/stress situations.

The intraday liquidity management process is critical for correct functioning of the Bank as a whole and applies to normal market conditions and extraordinary (crisis) situations. It is a component of current operational liquidity management. Managing its intraday liquidity, the Bank applies intraday ratios. Intraday liquidity ratios are monitored on an ongoing basis and presented to the competent liquidity risk management units and to ALCO.

Intraday liquidity management includes the maintenance of readiness to comply with the Bank's obligations also in crisis circumstances. In this connection, it is necessary to maintain an adequate liquidity buffer on the basis of information on the potential worsening of the Bank's access to intraday liquidity as a result of a market stress. In order to maintain an adequate liquidity buffer, the Bank applies intraday stress tests in its stress test program.

Management of hedging items

The management of hedging items covers both positions under CSA and GMRA contracts as well as positions of liquid assets related to operations with the central bank. This is performed on the level corresponding to the provided services, the Bank's portfolio, funding profile and liquidity requirements.



Most of the Bank's counterparties in derivative transactions have signed Credit Support Annexes (CSA) to ISDA agreements. They regulate the issue of support to portfolios of derivative transactions. They provide for the right to demand margin deposits by parties whose valuation of the portfolio is positive on a specific day (the party's portfolio is in-the-money) and the right to demand release of the margin when the valuation changes. Within the strategy of setting margins for each counterparty to CSA, the transaction portfolio is measured daily for margin requirements.

Derivative instruments, such as FRA, IRS, are settled via CCP (Central Clearing Party) clearing houses. This provides for effective management of margin deposits and mitigates the counterparty settlement risk. ING Bank Śląski S.A. has signed agreements with KDPW CCP and London Clearing House (LCH) and EUREX.

Stress tests and contingency plans

In compliance with regulatory requirements, the Bank has implemented a stress test program. It guarantees that such tests are planned, designed, held and analysed in order to identify sources of potentially restricted liquidity. Additionally, it stresses that such situations may be prevented so that the existing exposures remain within the approved limits. The Bank pays special attention to the test process under which every six months the Bank holds measurements and analyses the sensitivity of liquidity risk in various scenarios.

The results of stress tests are relied on in the following instances:

- development of the strategy,
- implementation of remedial actions or actions aimed at reducing the Bank's exposure to risk,
- designing of contingency plans should stress situations materialise,
- day-to-day practice of risk management,
- setting the risk appetite and internal limits,
- adaptation and enhancement of internal regulations in the Bank.

The test program includes a scenario analysis, sensitivity tests and reversed tests.

Such scenario analysis combined shock elements that are likely to materialise at the same time.

Three variants are analysed in the test:

- idiosyncratic – specific for the Bank: market conditions remain good, the banking sector is not subject to stress conditions,
- systemic – an external market crisis: the Bank is affected by stress tests as a result of deteriorated market conditions,
- mixed – a combination of the variants specified above.

In each variant a number of risk factors are analysed, and a set of scenarios are developed. As a rule, the test scenarios are designed on conservative assumptions.

The objective of sensitivity analyses is to understand the Bank's sensitivity to various risk factors.

Reversed tests are additional elements which are to analyse potential hazards to the Bank. The tests are held in the entire Bank and cover various risks in order to obtain a complete and comprehensive picture of risks prevailing at the Bank. In the liquidity test process, an important element covers specific scenarios to intraday liquidity hazards as well as intraday liquidity ratios and measures.

The results of the internal liquidity stress tests held in 2025 confirm a stable and secure position of the Bank. The Bank holds liquidity reserves on an adequate level.

An important process of liquidity risk management covers the development of a contingency liquidity plan for the Bank which is related to the stress test program. The Contingency Funding Plan developed by the Bank provides guidelines relating to identifying a liquidity crisis and should such crisis be identified – actions to be taken to overcome the crisis. The Contingency Funding Plan covers the Bank's entire business. The Liquidity Crisis Team plays the key role when the Contingency Funding Plan is activated. The Contingency Funding Plan is subject to periodic testing. The ALCO Committee was briefed on the results of the annual test of the contingency funding plan conducted on 22 October 2025. The test was aimed to check both the Bank ability to manage stress liquidity needs as well as organizational aspects (availability of key staff, data & reports). The results of the test were assessed as positive: it can be concluded with high probability that the Bank would survive a liquidity crisis as defined in the prepared hypothetical scenario; data and reports were available on time, key employees were available on time. Actions demonstrated the adequacy of the actions described in the Contingency Funding Plan to overcome the liquidity crisis.

4.7. Centralised organisation of the risk management process

The liquidity and funding risk management process is fully centralised in treasury and risk management functions. Liquidity risk (along with the generated liquidity position) of each business line is transferred to the Centre of Expertise Treasury for central management.

The Bank provides for costs and benefits of various types of liquidity risks in the system of internal transfer pricing, in its measurement of profitability and the approval process of new products in all major business areas (both on- and off-balance sheet). The Centre of Expertise Treasury manages the positions transferred to its books over the risk transfer system, including the management of liquidity risk related to resetting the premium for liquidity.

In order to ensure correct, independent and centralised performance of the tasks in the liquidity risk management process (including risk management and reporting as well as preparation, review and updates of documentation), the Bank operates the Market Risk Management Department which reports to a Deputy President of the Management Board.

4.8. Reporting and liquidity risk management system

Liquidity risk reporting and measurement processes are automated. The Bank holds tools automatically generating a set of liquidity reports on a daily or monthly basis. Information of risk measures supports ongoing monitoring of liquidity profiles and control of basic measures. The reports on liquidity and funding risk are submitted to units involved in the risk management process.

4.9. Risk management in subsidiaries

ING Bank Hipoteczny S.A. performs an important role in managing the Group's long-term liquidity. Its role is to raise long-term liquidity so that the Group:

- improves funding stability,
- ensures diversified funding for the mortgage loan portfolio,
- is able to better manage any mismatch of its assets and liabilities.

ING Bank Hipoteczny S.A. is a company operating on an autonomous basis. This unit operates within the risk appetite accepted by ING Bank Śląski S.A. and managed at the level of ING Bank Hipoteczny S.A.

Liquidity risk of the Bank's other subsidiary companies is maintained at a minimum level with funding being provided within the ING Group.

4.10. Maturity analysis of financial assets and liabilities and derivative financial instruments by contractual payment days

The tables below present financial assets and liabilities split by remaining (from the reporting date) contractual maturities as at 31 December 2025. The presented values provide for future interest payments. With respect to contingent liabilities granted, the maturity analysis covers the closest possible performance of the liabilities by the Group.

Financial assets payable on demand, financial assets for which the maturity date has expired and financial liabilities due to current and saving deposits are recognised in the period up to 1 month.

	without a specific date	up to 1 month	1-12 months	1-5 years	over 5 years
Financial assets, of which:	504	38,985	52,841	161,345	115,284
Cash and cash equivalents	-	7,310	-	-	-
Loans and other receivables to other banks	-	14,642	66	9,290	-
Financial assets measured at fair value through profit or loss (excluding the valuation of derivatives)	1	426	60	1,079	177
Investment securities	299	829	6,117	65,507	1,871
Loans and other receivables to customers measured at amortised cost	-	15,778	46,566	85,469	113,236
Investments in associates accounted for using the equity method	204	-	-	-	-
Other financial assets	-	-	32	-	-
Financial liabilities, of which:	-	221,591	16,688	13,543	3,000
Liabilities to other banks	-	1,412	414	9,493	9
Financial liabilities measured at fair value through profit or loss (excluding the valuation of derivatives)	-	15	4	405	97
Liabilities to customers	-	218,233	15,903	54	1,138
Liabilities from debt securities issued	-	-	80	1,713	-
Subordinated liabilities	-	14	82	1,784	1,267
Other financial liabilities	-	1,917	205	94	489
Contingent liabilities granted	-	3,463	24,802	18,442	16,272

The tables below present a maturity analysis of derivative financial instruments with a negative valuation as at the reporting date. The analysis is based on remaining contractual maturities.

Derivative financial instruments settled in net amounts

Derivative financial instruments settled by the Bank on a net basis cover IRS, FRA, options and FX Forward NDF transactions. The data below reflects – in case of IRS transactions – non-discounted future interest cash flows; in case of other transactions, the cash flows equivalent to the valuation as at 31 December 2025.

	up to 1 month	1-12 months	1-5 years	over 5 years
IRS transactions, of which:	-232	-166	-6,844	-523
hedging transactions in hedge accounting	-17	-9	-2,499	-252
other derivatives	-5	-21	-9	-

Derivative instruments settled in gross amounts

Derivative financial instruments settled by the Bank on a gross basis cover FX Swap, FX Forward and CIRS transactions. The above data reflects non-discounted contractual cash outflows and inflows of nominals and – in case of CIRS transactions – as interest, as at 31 December 2025.



	up to 1 month	1-12 months	1-5 years	over 5 years
outflows	-1,936	-2,637	-2,925	-205
inflows	1,896	2,566	2,799	201

5. Quantitative information on credit risk

5.1. Credit risk adjustments

At each reporting date, the Group measures the impairment for expected credit losses for a financial asset at an amount equal to the lifetime expected credit losses if the credit risk on that financial asset has increased significantly since initial recognition. If at the reporting date, the credit risk on the financial asset has not increased significantly since initial recognition, the Group measures the impairment for expected credit losses for that financial asset at an amount equal to 12-month expected credit losses.

The Group estimates expected credit losses in a way that takes account of:

- an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes,
- the time value of money,
- reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

5.1.1. Accounting definitions of past due and impaired items

For the accounting and regulatory purposes, the Group classifies the past due exposures as financial exposures with the capital or interest default. Days past due are calculated from the due date of the earliest payment defined in the credit agreement with the client.

The Group applies the definition of exposures in default status, impaired exposures and non-performing exposures in accordance with regulatory requirements. A debtor or an exposure is assessed as default is also identified as an impaired and non-performing exposure.

At each balance sheet date, the Group assesses whether a financial assets item or a group of financial assets is impaired. A financial asset item or a group of financial assets is impaired if and only if, there is evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset item (a 'loss event') and that loss event (or events) has (have) an impact on the expected future cash flows of the financial asset item or a group of financial assets that can be reliably estimated. The Group recognizes the expected credit losses based on reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

Evidence of impairment

The evidence of impairment is:

- identification of objective evidence of impairment (in the case of corporate and retail credit exposures), or
- a delay in repayment above 90 days and at the same time exceeding the absolute and relative materiality threshold by the amount of the arrears in repayment.

Objective evidence of impairment does not require expert judgment – identification of the occurrence of such evidence causes the credit exposure to be considered defaulted and, at the same time, impaired without further analysis. Objective impairment evidence of corporate or retail credit exposures cover the occurrence of minimum one of the following situations:

- restructuring of the credit exposure for non-commercial reasons related to significant financial difficulties of the client, resulting in a change to the existing terms of the contract, full or partial refinancing of the exposure at risk, which would not have taken place if the client had not experienced financial difficulties (including forbearance), resulting in a loss of more than 1% of the present value of discounted future cash flows; for retail credit exposures – non-performing restructuring,
- write-down or write-off by the Group in the process of restructuring of a significant amount of corporate client receivables resulting in a reduction in cash flows from a given financial asset,
- filing by the Group, the client's counterparty or another bank for the client's bankruptcy or the initiation of proceedings under the restructuring law,
- declaration of bankruptcy; in the case of corporate credit exposures, the client was put into liquidation, ceased operations,
- the credit exposure becomes due to the termination of the credit agreement by the Group,
- sale by the Group of a credit receivable (or its part) with a loss greater than 5% of the balance sheet exposure amount, if the sale was caused by the deteriorating credit quality of the exposure,
- the occurrence of an overdue exceeding 30 days or granting another forbearance on a credit exposure classified initially as forbearance non-performing, and then healed and in the forbearance performing status during the trial period,
- interest-free status (interest stoppage) for a credit exposure,
- for retail credit exposure, over 3-month arrears in repayment of due liabilities under the loan with a one-off repayment of the entire mobilised capital at the end of the loan period,
- for corporate credit exposures – making a decision to recover debts as part of the debt collection strategy,



- questioning the balance sheet credit exposure by the client in court proceedings,
- delay in repayment of more than 90 exposure days, which represents 20% of the balance of all on-balance sheet exposures of this client.

Impairment triggers

Impairment triggers require an individual expert assessment of the debtor's situation and a decision as to whether the classification to default as an impaired exposure is justified.

The triggers for impairment for corporate credit exposures (excluding exposures to entrepreneurs) include:

- granting by a natural person in default of obligations, a surety at the Bank for significant obligations of a company belonging to it or when a natural person is a debtor of the Bank and the company belonging to it is in default,
- over 3-month arrears in repayment (including all interest, principal and commissions) under the loan with a one-off repayment of all disbursed capital at the end of the loan period (not applicable if the repayment frequency exceeds one month),
- the customer belongs to the same economic or legal group as the defaulting debtor,
- disappearance of the possibility of refinancing,
- for exposures resulting from transactions concluded on the financial market – disappearance of an active market (e.g. suspension of quotations on the WSE) for a given financial asset (shares, bonds, other securities) held by the Group due to financial difficulties of the issuer / client, which may have a negative effect on the future cash flows of a given financial asset,
- the customer ceases to repay principal, interest or commission and the delay in repayment or the oldest unauthorised overdraft continues for more than 45 calendar days,
- bankruptcy threat, submission of an application to initiate proceedings under restructuring law or other financial reorganization, which may result in non-repayment of a financial asset or its delay,
- the client's cessation of repayment of a due liability exceeding EUR 10,000, and a repayment delay or unauthorised overdraft persisting for more than 1 business day in the case of banks and 5 business days in the case of financial institutions, while maintaining a 14-day clarification period for the Group to determine whether the failure to meet the payment obligation resulted from non-operational reasons,
- no intention or possibility of repayment by the debtor due to the existing financial problems,
- a material breach of contractual terms by the customer, which may have a negative impact on future cash flows from a given financial asset (if there has been a material breach of contractual terms, but the Group, after identifying and assessing the causes and effects of such breach, accepted them (temporarily or permanently) or changed, such an event is not treated as a trigger for impairment),

- lack of intention or ability of the financial institution to repay its obligation due to existing financial difficulties, which may result in non-repayment of the financial asset or a delay in its repayment,
- unknown whereabouts of the client, resulting in a lack of representation in contacts with the Group and undisclosed assets of the client,
- crisis of the sector in which the client operates, combined with the borrower's weak position in a given sector,
- restructuring of the loan receivable for non-commercial reasons related to significant financial difficulties of the client, resulting in a change to the existing terms of the contract, full or partial refinancing of the exposure at risk, which would not have occurred if the client had not experienced these financial difficulties (including forbearance) and loss of the net present value of cash flows is equal to or less than 1%,
- credit fraud of the debtor towards the Bank or another ING Group entity,
- the exposure has received a forbearance 2 or more times in the last 5 years,
- a significant deterioration of the client's rating resulting in its reclassification to a risk class of at least 17 with a simultaneous drop by at least 4 classes.

The Group has also determined the following additional triggers for impairment for leveraged transactions (i.e. transactions with a high level of debt relative to operating profit):

- a significant breach of an important financial clause or failure to return to the state from before the breach, especially when the customer simultaneously requests a repayment facility,
- forbearance refinancing of the existing borrower with an increased level of financial leverage (IBD / EBITDA, i.e. interest bearing debt / earnings before interest, taxes, depreciation and amortization, total liabilities / profit before deduction of interest on interest-bearing liabilities, taxes and depreciation) compared to leverage levels at the time of funding or previous refinancing,
- refinancing of the exposure with the repayment of the entire mobilised capital at the end of the loan period in the event of financial difficulties of the client and with a low probability of refinancing by another bank under current market conditions,
- the base case and stress case scenarios indicate the lack of sufficient and stable cash flows to service the debt in accordance with the adopted schedule;

and the following additional triggers for the revenue-generating real estate financing transactions:

- LTV (Loan to Value) > 90% and this is not a temporary situation,
- historical DSCR (debt service cover ratio) ratio < 1.0 or ICR (interest coverage ratio) < 1.0 (depending on which indicator is used for transaction risk assessments) for two consecutive annual accounting periods and cash flows generated by the real estate are, in the opinion of experts, insufficient to repay and service the loan in accordance with the adopted schedule.



The triggers for impairment for retail credit exposures and credit exposures to entrepreneurs include:

- failure to meet a minimum of three debt repayment arrangements within the current period of arrears,
- a natural person who is liable with all their assets for significant obligations of their company is in default or a natural person is the sole owner of their company is in default,
- the business client is related to the same group of debtors (legally or economically) in which one of the debtors is defaulted,
- no intention or possibility of repayment – in the Group's opinion, the debtor does not want to pay off the obligation or is unable to pay; the inability to repay the liability occurs when the debtor's sources of income are insufficient to repay the instalments due, e.g.:
 - for an individual client: loss of job, termination of social benefits payments, divorce, serious illness, death of the debtor, obtaining information on untimely servicing of a debt of significant value in another bank (over 90 days overdue) or commencement of enforcement / debt collection activities by another bank,
 - for a business client: (anticipated) cash shortfall, (anticipated) high or sudden increase in leverage, (anticipated) breach of financial clauses, (anticipated) deterioration in a market where the debtor's position is weak,
- approving a forbearance to the customer that is not able to repay its financial obligations under a loan agreement with the Group due to existing or anticipated financial difficulties,
- credit fraud of the debtor towards the Group – reasonable suspicion of extortion of a loan, i.e. an obligation whose credit documentation or the established facts indicate that it was granted as a result of deliberate misrepresentation of the Group by presenting documents, certificates, and statements that are not factually correct,
- occurrence of minimum two forbearance instances within 5 years of granting the first forbearance.

5.1.2. Description of approaches and methods adopted for determining specific and general credit risk adjustments

During the process of estimating expected credit losses, the change of the credit quality for a particular credit exposure since initial recognition is described based on three stages, the reflecting the various approaches to measurement the expected credit losses:

- Stage 1 includes performing exposures that have not had a significant increase in credit risk since initial recognition. Expected credit loss shall be measured based on 12-month expected credit losses (or till maturity date if such exposures will expire in less than 12 months).
- Stage 2 includes performing exposures that have had a significant increase in credit risk since initial recognition. Expected credit loss is calculated on the basis of anticipated losses throughout the lifetime, or from the reporting date until the remaining maturity.

- Stage 3 – impaired exposures, which means non-performing loans. Expected credit loss shall be measured based on lifetime expected credit losses and the probability of default (PD) = 100%.

The Group qualifies the financial exposures to Stage 1, 2 or 3 using a cascade approach in the following order:

1. Identification of impaired exposures and classification thereof to Stage 3,
2. Allocation to Stage 2 based on triggers for significant increase of credit risk.
3. Allocation of other exposures to Stage 1.

In order to measure the expected credit losses under collective approach, the Group uses the adjusted to IFRS 9 requirements the existing regulatory capital models (PD, LGD, EAD) developed for the Advanced Internal Ratings Based (AIRB) approach. The models of risk parameters for the purpose of IFRS 9 follow the same structure as the models for regulatory capital purposes, however the manner of estimating the specified value of PD, LGD and EAD is adjusted to IFRS 9 requirements, in particular it includes reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecast of future economic conditions. The model's parameters were calibrated in accordance with the "point-in-time" approach. EAD parameter includes the repayment schedules in accordance with credit agreements.

The amount of the revaluation charge calculated collectively is based on the history of losses for asset portfolios with similar credit risk characteristics. For the purposes of determining risk parameters, the Group uses over thirty models for the needs of which exposures are classified into homogeneous groups with similar characteristics based on different criteria (mainly product characteristics, e.g. loan duration, form of collateral and purpose of the loan, and type of client and financing). Exposures from the retail banking segment are divided into mortgage and consumer. Corporate banking exposures are grouped mainly by customer size (e.g. small and medium-sized enterprises, corporations), customer type (e.g. financial institutions), loan application (e.g. real estate financing, project financing) and product.

The Group measures the lifetime expected credit losses LEL (Lifetime Expected Loss) on exposures without impairment recognised as the discounted sum of partial losses during the life of the exposure, relating to the events of default in each 12-month period remaining to the maturity date of the exposure, taking into account the weights of the scenarios

For credit exposures classified to Stage 1, a 12-month expected credit loss is applied.

For credit exposures in default at Stage 3 and for which the collective provision is computed, the Group measured the lifetime expected credit losses.

The time value of money was reflected in expected credit losses by two discount factors:

- The discount factor between the moment of default and the moment of debt recovery. It is used for the parameters of the regulatory LGD models.



- Discounting between the reporting date and the moment the exposure becomes in default which is partly taken into account in calculating the lifetime expected loss LEL. The Group assumes that for each time window of 12 months the event of default occurs on average in the middle of the period 0-12 months.

The Group measures the expected credit losses as the probability weighted average of the few macroeconomic scenarios (mostly three: a baseline, negative and positive scenario) with different probability to occur. The expected loss is determined separately for each scenario and the probability weighted average results from the weights (probabilities) assigned to each scenario (sum of weights = 100%). Such approach fulfils IFRS 9 requirements that the impairment for expected credit losses should reflect an unbiased and probability-weighted amount that is determined based on a number of possible outcomes.

Weightings of scenarios result directly from macroeconomic assumptions made. The Group has chosen for the 90th percentile of macroeconomic factors distribution as a downside scenario because it corresponds the assumptions of other calculations in the Group related to risk appetite, which use 90% confidence level (e.g. RWA at risk) and 10th percentile for positive scenario as a mirror approach. 90th and 10th percentile of the distribution imply directly the probabilities of realization of these scenarios – both have statistically a 20% probability of realization. Consequently, the baseline scenario is a supplement of these extreme scenarios and it has 60% probability weighting.

The forecast (measurement) of the expected loss is conducted at each point in time in the future depending on the expected future economic conditions at a given point. Based on the data about past events, the Group determined the relation between the observable parameters of expected loss (PD, LGD) and macroeconomic factors as functions, based on which – at predicted macroeconomic factors – Bank computes the predicted parameter values of expected loss in a given year in the future in accordance with forward looking “point in time” approach. The impact of macroeconomic factors on expected credit losses is ensured in the Group by including them in the modelling of particular risk parameters, which enables appropriate selection of factors specific for a given parameter and portfolio type. Selection of appropriate macroeconomic factors constitutes a part of model building process and includes several stages, both expert based that guarantee an economically interpretable relation as well as statistical approach which enables the assessment of their significance and power of relations. The assessment of the adequacy of the impact of macroeconomic factors is part of the overall assessment of the models for determining impairment for expected credit losses as part of the model monitoring performed by the Group.

For the purpose of measurement of the expected credit loss, the Group determines the level of EAD exposures only for irrevocable loan commitments through the use of CCF conversion factors (the range of utilization of the undrawn loan commitment during a period from the reporting date till the default event) from regulatory EAD models (estimated in accordance with “through the cycle” approach). EAD decreases during the time according to payment schedule of the particular credit exposure.

For exposures with a specified final repayment date, the time to maturity is equal to the final repayment date. If the final repayment date exceeds 30 years, the expected loss calculation period is limited to 30 years.

For the financial exposures without maturity payment date (e.g.: some revolving credit facilities and credit cards) the expected lifetime is determined by the statistical behavioural parameter.

The LGD parameter, which is a function of used techniques for mitigation of credit risk and it is expressed as percentage of EAD, it is estimated on a product and exposure level based on the parameters of the regulatory LGD models (estimated according to “through the cycle” approach) which were properly calibrated for the purpose of IFRS 9. Collateral recoveries are an integral part of the construction of LGD models and, as a rule, the criteria for recognizing collateral are consistent with the CRR requirements. The most important collaterals recognized by the Group include mortgage collaterals (residential and commercial) as well as guarantees and sureties.

5.1.3. Quantitative information on credit risk adjustments

The tables below present detailed quantitative information on credit risk adjustments, in accordance with the requirements of Art. 442 of the Regulation CRR and the Commission Implementing Regulation (UE) 2024/3172:

- Template EU CR1: Performing and non-performing exposures and related provisions,
- Template EU CQ3: Credit quality of performing and non-performing exposures by past due days,
- Template EU CR1-A: Maturity of exposures,
- Template EU CR2: Changes in the stock of non-performing loans and advances,
- Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry,
- Template EU CQ7: Collateral obtained by taking possession and execution processes.

Additional quantitative information on the quality of credit exposures and significant credit risk concentrations (recommendation 36.4 of Recommendation R) was presented in the annual consolidated financial statements of the ING Bank Śląski S.A. Group for the year 2025 in the part Risk and capital management, in chapter II. Risk management, point 2.9. Quantitative disclosure on credit risk.

Ratio between the gross carrying amount of loans and advances classified as non-performing exposition and the total gross carrying amount of loans and advances in the Group is lower than 5%, therefore the Group does not disclose the information required in templates EU CR2a- Changes in the stock of non-performing loans and advances and related net accumulated recoveries, EU CQ2- Quality of forbearance, EU CQ6- Collateral valuation - loans and advances and EU CQ8- Collateral obtained by taking possession and execution processes – vintage breakdown. The Group does not disclose also the information required by template EU CQ4: Quality of non-performing exposures by geography because of the Group's primary foreign exposures in all "external" countries in all exposure categories are less than 10% of the Group's total primary exposure (domestic and foreign).



Template EU CR1: Performing and non-performing exposures and related provisions

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount/nominal amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions							Collateral and financial guarantees received		
	Performing exposures		Non-performing exposures			Performing exposures – accumulated impairment and provisions				Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumulated partial write-off	On performing exposures	On non-performing exposures
		Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3	Of which stage 2	Of which stage 3				
005 Cash balances at central banks and other demand deposits	6,423	6,423	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	196,957	182,950	14,000	6,821	-	6,821	-799	-242	-557	-3,353	-	-3,353	-	113,030	1,747
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	2,114	2,044	70	-	-	-	-2	-1	-1	-	-	-	-	320	-
040 Credit institutions	23,976	23,976	-	-	-	-	-	-	-	-	-	-	-	-	-
050 Other financial corporations	11,674	11,371	303	24	-	24	-19	-17	-2	-15	-	-15	-	3,087	5
060 Non-financial corporations	71,190	60,978	10,207	4,882	-	4,882	-352	-80	-272	-2,146	-	-2,146	-	43,546	1,387
070 Of which SMEs	35,238	29,096	6,138	2,803	-	2,803	-251	-59	-192	-1,520	-	-1,520	-	17,983	675
080 Households	88,003	84,581	3,420	1,915	-	1,915	-426	-144	-282	-1,192	-	-1,192	-	66,077	355
090 Debt securities	69,947	69,774	173	-	-	-	-23	-22	-1	-	-	-	-	-	-
100 Central banks	100	100	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	55,127	54,954	173	-	-	-	-23	-22	-1	-	-	-	-	-	-
120 Credit institutions	10,000	10,000	-	-	-	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	4,668	4,668	-	-	-	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	52	52	-	-	-	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	62,721	56,531	6,190	258	-	258	49	24	25	90	-	90	-	-	-
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	1,814	1,799	15	-	-	-	-	-	-	-	-	-	-	-	-
180 Credit institutions	1,912	1,912	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	2,458	2,455	3	-	-	-	1	1	-	-	-	-	-	-	-
200 Non-financial corporations	48,807	42,886	5,921	228	-	228	31	15	16	84	-	84	-	-	-
210 Households	7,730	7,479	251	30	-	30	17	8	9	6	-	6	-	-	-
220 Total	336,048	315,678	20,363	7,079	-	7,079	-871	-288	-583	-3,443	-	-3,443	-	113,030	1,747



Template EU CQ3: Credit quality of performing and non-performing exposures by past due days

		a	b	c	d	e	f	g	h	i	j	k	l	
		Gross carrying amount/nominal amount												
		Performing exposures			Non-performing exposures									
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days	Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted			
005	Cash balances at central banks and other demand deposits	6,423	6,423	-	-	-	-	-	-	-	-	-	-	
010	Loans and advances	196,957	196,653	304	6,821	3,154	331	815	1,355	914	242	10	6,821	
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	
030	General governments	2,114	2,114	-	-	-	-	-	-	-	-	-	-	
040	Credit institutions	23,976	23,976	-	-	-	-	-	-	-	-	-	-	
050	Other financial corporations	11,674	11,673	1	24	4	-	7	7	5	1	-	24	
060	Non-financial corporations	71,190	71,061	129	4,882	2,404	201	570	916	620	170	1	4,882	
070	Of which SMEs	35,238	35,146	92	2,803	703	196	556	613	568	167	-	2,803	
080	Households	88,003	87,829	174	1,915	746	130	238	432	289	71	9	1,915	
090	Debt securities	69,947	69,947	-	-	-	-	-	-	-	-	-	-	
100	Central banks	100	100	-	-	-	-	-	-	-	-	-	-	
110	General governments	55,127	55,127	-	-	-	-	-	-	-	-	-	-	
120	Credit institutions	10,000	10,000	-	-	-	-	-	-	-	-	-	-	
130	Other financial corporations	4,668	4,668	-	-	-	-	-	-	-	-	-	-	
140	Non-financial corporations	52	52	-	-	-	-	-	-	-	-	-	-	
150	Off-balance-sheet exposures	62,721			258								258	
160	Central banks	-			-								-	
170	General governments	1,814			-								-	
180	Credit institutions	1,912			-								-	
190	Other financial corporations	2,458			-								-	
200	Non-financial corporations	48,807			228								228	
210	Households	7,730			30								30	
220	Total	336,048	273,023	304	7,079	3,154	331	815	1,355	914	242	10	7,079	



Template EU CR1-A: Maturity of exposures

	a	b	c	d	e	f
	Net exposure value					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1 Loans and advances	3,433	46,664	55,322	92,397	1,810	199,626
2 Debt securities	-	4,625	55,629	9,670	-	69,924
3 Total	3,433	51,289	110,951	102,067	1,810	269,550

Template EU CR2: Changes in the stock of non-performing loans and advances

	a	f
	Gross carrying amount	
010 Initial stock of non-performing loans and advances	6,462	6,462
020 Inflows to non-performing portfolios		3,263
030 Outflows from non-performing portfolios		-2,904
040 Outflows due to write-offs		-62
050 Outflow due to other situations		-2,842
060 Final stock of non-performing loans and advances	6,821	6,821

Template EU CQ7: Collateral obtained by taking possession and execution processes

	a	b
	Collateral obtained by taking possession	
	Value at initial recognition	Accumulated negative changes
010 Property, plant and equipment (PP&E)	-	-
020 Other than PP&E	-	-
030 Residential immovable property	-	-
040 Commercial Immovable property	-	-
050 Movable property (auto, shipping, etc.)	-	-
060 Equity and debt instruments	-	-
070 Other collateral	-	-
080 Total	-	-

Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

	a	b	c	d	e	f
	Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing		Of which loans and advances subject to impairment			
		Of which defaulted				
010 Agriculture, forestry and fishing	1,509	81	81	1,504	-53	-
020 Mining and quarrying	989	4	4	989	-2	-
030 Manufacturing	22,301	2,400	2,400	22,301	-1,086	-
040 Electricity, gas, steam and air conditioning supply	3,209	31	31	3,209	-23	-
050 Water supply	748	45	45	748	-31	-
060 Construction	3,332	291	291	3,332	-210	-
070 Wholesale and retail trade	16,431	715	715	16,431	-478	-
080 Transport and storage	5,659	459	459	5,659	-152	-
090 Accommodation and food service activities	905	41	41	905	-27	-
100 Information and communication	3,621	73	73	3,621	-47	-
110 Financial and insurance activities	717	-	-	717	-1	-
120 Real estate activities	9,141	478	478	9,141	-210	-
130 Professional, scientific and technical activities	1,290	88	88	1,290	-62	-
140 Administrative and support service activities	4,830	100	100	4,830	-59	-
150 Public administration and defence, compulsory social security	3	-	-	3	-	-
160 Education	112	10	10	112	-6	-
170 Human health services and social work activities	651	21	21	651	-15	-
180 Arts, entertainment and recreation	123	11	11	123	-10	-
190 Other services	501	34	34	501	-26	-
200 Total	76,072	4,882	4,882	76,067	-2,498	-



The tables below present qualitative and quantitative information on credit exposures regarding the parameters PD, LGD, EAD, broken down into homogeneous portfolios in accordance with the requirements of Recommendation 36.2 of Recommendation R.

Information on parameters PD, LGD, EAD – Stage 1

PD scale (at the date of initial recognition)	a	b	c	d	e	f	g	h
	On-balance sheet exposures	Off-balance sheet exposures	EAD post CCF and post CRM	Average PD (%)	Number of exposures	Average LGD (%)	Average maturity	Expected loss amount (ECL)
Small business								
0.00% to <0.15%	654	14	662	0.09	5,512	80.91	9	-
0.15% to <0.25%	462	53	488	0.40	6,725	48.80	4	1
0.25% to <0.50%	597	68	628	0.58	10,347	55.93	4	2
0.50% to <0.75%	582	137	639	0.77	13,519	62.38	5	4
0.75% to <2.50%	4,123	488	4,334	1.07	69,050	60.30	6	29
2.50% to <10.00%	770	206	848	2.81	19,873	38.43	3	9
10.00% to <45.00%	87	9	89	2.48	1,374	69.06	9	1
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	7,275	975	7,688	1.09	126,400	58.85	5	46
Small/medium enterprises								
0.00% to <0.15%	735	731	1,035	0.17	2,407	23.16	4	-
0.15% to <0.25%	1,113	1,117	1,642	0.31	5,232	25.97	3	1
0.25% to <0.50%	976	648	1,287	0.62	7,797	27.49	3	2
0.50% to <0.75%	1,870	1,130	2,360	0.68	9,317	24.28	3	3
0.75% to <2.50%	3,310	1,568	3,970	1.27	22,521	24.14	2	9
2.50% to <10.00%	2,154	899	2,510	2.17	15,865	23.34	2	9
10.00% to <45.00%	214	59	239	3.74	1,777	26.99	2	2
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	10,372	6,152	13,043	1.11	64,916	24.55	3	26
Medium corporations								
0.00% to <0.15%	4,459	2,065	5,077	0.16	2,463	39.38	7	3
0.15% to <0.25%	2,677	3,030	3,587	0.32	4,192	21.74	4	3
0.25% to <0.50%	3,474	2,124	4,112	0.49	4,634	20.31	3	6
0.50% to <0.75%	5,257	3,151	6,355	0.70	10,148	20.78	4	9
0.75% to <2.50%	10,489	6,813	12,708	0.87	30,530	19.93	3	25
2.50% to <10.00%	3,320	2,320	4,061	1.43	7,485	19.83	3	13
10.00% to <45.00%	189	104	223	1.63	629	18.22	1	1
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	29,865	19,607	36,123	0.71	60,081	23.01	4	60

Strategic clients

0.00% to <0.15%	86,936	10,350	89,228	0.08	4,114	41.59	1	21
0.15% to <0.25%	3,235	3,861	3,530	0.26	3,142	17.92	2	1
0.25% to <0.50%	10,004	5,860	11,282	0.28	3,635	23.40	4	3
0.50% to <0.75%	360	513	428	0.68	1,242	18.72	3	-
0.75% to <2.50%	3,803	3,330	4,383	0.79	6,480	16.70	3	2
2.50% to <10.00%	149	560	218	0.34	916	29.87	4	-
10.00% to <45.00%	1	247	67	0.16	354	38.88	1	-
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	104,488	24,721	109,136	0.14	19,883	37.83	1	27

Retail – mortgage

0.00% to <0.15%	50,184	3,400	51,393	0.06	208,946	22.45	21	6
0.15% to <0.25%	7,140	304	7,241	0.12	29,551	22.23	21	2
0.25% to <0.50%	6,933	153	6,974	0.14	24,611	23.01	22	2
0.50% to <0.75%	3,640	95	3,667	0.26	14,197	22.89	22	2
0.75% to <2.50%	16	1	17	0.34	354	15.74	13	-
2.50% to <10.00%	3	-	3	1.39	11	18.94	21	-
10.00% to <45.00%	-	-	-	0.25	5	14.51	7	-
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	67,916	3,953	69,295	0.09	277,675	22.51	21	12

Retail – other loans

0.00% to <0.15%	288	1,386	839	0.32	155,574	69.25	-	3
0.15% to <0.25%	267	333	398	0.51	58,419	69.07	2	2
0.25% to <0.50%	1,617	254	1,708	0.59	101,178	68.83	4	7
0.50% to <0.75%	1,866	148	1,913	0.84	107,469	68.80	5	11
0.75% to <2.50%	4,251	192	4,302	1.62	278,078	68.78	5	47
2.50% to <10.00%	1,361	235	1,446	3.13	190,240	68.92	4	30
10.00% to <45.00%	26	2	27	6.38	5,614	69.04	3	1
45.00% to <100.00%	3	-	3	7.79	562	69.07	5	-
Subtotal	9,679	2,550	10,636	1.39	897,134	68.86	4	101

Total Stage 1	229,595	57,958	245,921	0.34	1,446,089	32.63	8	272
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Information on parameters PD, LGD, EAD – Stage 2

PD scale (at the date of initial recognition)	a	b	c	d	e	f	g	h
	On-balance sheet exposures	Off-balance sheet exposures	EAD post CCF and post CRM	Average PD (%)	Number of exposures	Average LGD (%)	Average maturity	Expected loss amount (ECL)
Small business								
0.00% to <0.15%	108	4	106	1.68	1,541	66.99	7	4
0.15% to <0.25%	85	3	81	3.19	1,140	59.08	5	6
0.25% to <0.50%	100	3	92	4.65	1,540	53.75	4	10
0.50% to <0.75%	117	4	105	5.50	2,284	57.23	4	15
0.75% to <2.50%	534	12	456	8.03	9,690	51.76	4	85
2.50% to <10.00%	137	3	121	8.59	2,529	33.60	3	18
10.00% to <45.00%	32	-	27	9.48	604	55.24	5	5
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	1,113	29	988	6.48	19,328	52.63	4	143
Small/medium enterprises								
0.00% to <0.15%	185	57	207	3.76	1,954	27.13	2	3
0.15% to <0.25%	158	43	177	5.43	502	25.62	2	3
0.25% to <0.50%	253	92	288	7.72	1,376	26.45	3	8
0.50% to <0.75%	379	110	411	7.18	1,588	24.81	2	12
0.75% to <2.50%	868	208	915	8.23	4,999	26.82	3	33
2.50% to <10.00%	847	224	936	7.16	6,057	24.08	2	25
10.00% to <45.00%	130	34	140	7.66	1,188	26.47	1	4
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	2,820	768	3,074	7.23	17,664	25.62	2	88
Medium corporations								
0.00% to <0.15%	469	138	494	1.00	632	29.95	4	2
0.15% to <0.25%	313	114	352	5.04	230	21.28	4	7
0.25% to <0.50%	383	157	427	6.80	590	19.62	4	13
0.50% to <0.75%	592	248	658	6.21	1,285	20.00	2	15
0.75% to <2.50%	1,964	959	2,208	6.72	5,042	16.74	2	49
2.50% to <10.00%	1,366	715	1,538	4.95	2,547	21.27	2	33
10.00% to <45.00%	193	65	216	4.52	207	24.73	1	3
45.00% to <100.00%	-	2	-	-	4	-	-	-
Subtotal	5,280	2,398	5,893	5.55	10,537	20.16	2	122

Strategic clients

0.00% to <0.15%	632	744	720	0.89	636	21.65	4	3
0.15% to <0.25%	243	94	269	0.82	301	25.38	6	1
0.25% to <0.50%	859	127	877	14.96	616	8.20	1	15
0.50% to <0.75%	6	29	6	10.75	175	15.28	2	-
0.75% to <2.50%	570	292	592	9.53	717	17.80	2	39
2.50% to <10.00%	129	18	131	1.09	110	32.02	1	1
10.00% to <45.00%	-	3	2	11.33	87	43.84	4	-
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	2,439	1,307	2,597	7.65	2,642	17.14	3	59
Retail – mortgage								
0.00% to <0.15%	999	17	1,003	1.23	4,120	20.83	20	25
0.15% to <0.25%	179	-	179	1.98	738	20.42	20	7
0.25% to <0.50%	145	-	144	1.55	451	22.86	23	6
0.50% to <0.75%	132	-	132	2.40	494	22.94	22	7
0.75% to <2.50%	1	-	1	3.76	17	16.67	15	-
2.50% to <10.00%	-	-	-	1.77	4	13.03	16	-
10.00% to <45.00%	-	-	-	-	-	-	-	-
45.00% to <100.00%	-	-	-	-	-	-	-	-
Subtotal	1,456	17	1,459	1.46	5,824	21.17	20	45
Retail - other loans								
0.00% to <0.15%	86	123	134	1.53	27,021	68.72	-	11
0.15% to <0.25%	32	7	35	2.85	6,078	68.11	1	5
0.25% to <0.50%	93	4	94	3.55	8,532	69.27	3	9
0.50% to <0.75%	104	3	105	4.83	9,132	69.16	4	12
0.75% to <2.50%	281	3	281	8.22	25,248	69.41	4	44
2.50% to <10.00%	195	4	195	11.68	25,461	69.48	4	42
10.00% to <45.00%	9	-	9	14.49	1,924	69.48	3	2
45.00% to <100.00%	1	-	1	14.67	186	69.73	3	-
Subtotal	801	144	854	6.88	103,582	69.22	3	125
Total Stage 2	13,909	4,663	14,865	6.00	159,577	25.84	4	582



Information on parameters PD, LGD, EAD – Stage 3

	a	b	c	d
Time in default	EAD post CCF and post CRM	Number of exposure	Average LGD (%)	Expected loss amount (ECL)
Small business				
to 12 months	277	6,660	32.34	414
from 13 to 24 months	56	1,994	69.17	248
from 25 to 36 months	22	943	76.51	120
from 37 to 48 months	6	433	73.03	78
from 49 to 60 months	1	126	85.89	22
from 61 to 84 months	1	74	73.67	15
above 84 months	-	-	-	-
Subtotal	363	10,230	41.73	897
Small/medium enterprises				
to 12 months	619	5,374	38.28	202
from 13 to 24 months	320	3,122	63.17	216
from 25 to 36 months	199	1,339	66.55	107
from 37 to 48 months	79	473	61.55	44
from 49 to 60 months	21	163	76.37	12
from 61 to 84 months	143	730	74.71	73
above 84 months	-	-	-	-
Subtotal	1,381	11,201	53.79	654
Medium corporations				
to 12 months	897	1,454	32.85	280
from 13 to 24 months	226	1,333	60.57	149
from 25 to 36 months	178	128	51.85	130
from 37 to 48 months	41	118	62.99	46
from 49 to 60 months	39	285	64.77	33
from 61 to 84 months	89	50	64.37	69
above 84 months	-	-	-	-
Subtotal	1,470	3,368	43.00	707
Strategic clients				
to 12 months	1,340	168	25.24	509
from 13 to 24 months	380	119	16.04	61
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	4	44.55	-
above 84 months	-	-	-	-
Subtotal	1,720	291	23.20	570

Retail – mortgage loan

to 12 months	98	875	28.06	52
from 13 to 24 months	16	144	50.90	17
from 25 to 36 months	12	128	57.36	17
from 37 to 48 months	6	75	63.62	10
from 49 to 60 months	4	41	68.19	7
from 61 to 84 months	3	46	85.71	6
above 84 months	3	31	100.00	8
Subtotal	142	1,340	38.02	117
Retail - other loans				
to 12 months	154	34,482	63.85	287
from 13 to 24 months	55	9,759	77.54	127
from 25 to 36 months	17	2,613	95.14	49
from 37 to 48 months	3	851	98.37	19
from 49 to 60 months	1	371	98.53	8
from 61 to 84 months	2	480	98.53	11
above 84 months	-	15	98.53	-
Subtotal	232	48,571	70.21	501
Total Stage 3	5,308	75,001	40.36	3 446



***Information on parameters PD, LGD, EAD – POCI**

	a	b	c	d
Time in default	EAD post CCF and post CRM	Number of exposure	Average LGD (%)	Expected loss amount (ECL)
Small business				
to 12 months	-	-	-	-
from 13 to 24 months	-	-	-	-
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	-	-	-
above 84 months	-	-	-	-
Subtotal	-	-	-	-
Small/medium enterprises				
to 12 months	-	-	-	-
from 13 to 24 months	-	-	-	-
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	-	-	-
above 84 months	-	-	-	-
Subtotal	-	-	-	-
Medium corporations				
to 12 months	-	-	-	-
from 13 to 24 months	-	-	-	-
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	-	-	-
above 84 months	-	-	-	-
Subtotal	-	-	-	-
Strategic clients				
to 12 months	-	-	-	-
from 13 to 24 months	-	-	-	-
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	-	-	-
above 84 months	-	-	-	-
Subtotal	-	-	-	-

Retail – mortgage loan

to 12 months	-	3	13.49	-
from 13 to 24 months	-	-	-	-
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	-	-	-
above 84 months	-	-	-	-
Subtotal	-	3	13.49	-
Retail - other loans				
to 12 months	2	28	67.70	-
from 13 to 24 months	-	-	-	-
from 25 to 36 months	-	-	-	-
from 37 to 48 months	-	-	-	-
from 49 to 60 months	-	-	-	-
from 61 to 84 months	-	-	-	-
above 84 months	-	1	100.00	-
Subtotal	2	29	67.70	-
Total POCI	2	32	52.14	-



5.2. Use of credit risk mitigation techniques

5.2.1. Rules and procedures as well as the scope of on- and off-balance sheet netting

The Group offsets financial assets and financial liabilities and presents them in a net amount in the statement of financial position when and only when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis or realise the asset and settle the liability simultaneously.

In order to mitigate credit risk, the Group concludes master agreements with contracting parties, with which the Bank concludes transactions. These master agreements provide for offsetting financial assets and liabilities in case of a breach of the master agreement. Due to the conditional nature of these contractual provisions, there is no netting in the financial statements, and the effects of conditional netting are presented in note 38 in the annual consolidated financial statements of the ING Bank Śląski S.A. Group for the year 2025 in chapter V. Notes to the consolidated financial statements.

5.2.2. Rules and procedures of collateral valuation and management

The Group applies collateral to mitigate credit risk and the amount of losses that may be suffered when clients' default on loan repayment. Before collateral is accepted, the Bank assesses the collateral and its value and effectiveness.

Bank

The Bank's regulations on collateral describe the valuation method for each type of collateral across the tangible and personal collateral group.

The Bank identifies the following collateral values:

- face value,
- adjusted face value,
- fair value.

Collateral face value is the value expressed in the collateral currency, established on the basis of current prices, excluding the influence of other factors (in particular: market value, book value, value of the accounts receivable transferred to the Bank), and set for each collateral individually.

Adjusted face value is the value of collateral realigned taking into account the factors omitted in the calculation of face value. Such value is worked out if in the Bank's opinion there exist factors which were omitted while calculating collateral face value or were included but to an insufficient degree and have an adverse impact on collateral value.

Collateral fair value is calculated as the product of recovery rate on collateral (defined using the parameters of an appropriate LGD model) and collateral value accepted by Bank (face value or adjusted face value providing the triggers of its calculation have emerged. The fair value is corrected in the case of mismatch between the date of collateral maturity and the exposure maturity day and currency of the collateral and currency of the exposure.

Value of property is verified by the Bank's Appraisal Team. The aforementioned obligation to verify the value by the Bank arises from the Polish Financial Supervision Authority's recommendations.

When appraising the value and liquidity of tangible collateral one takes into account the assets use/occupancy period, their age and market for specialist collateral items.

Depending on the type of collateral, the value is monitored at specified intervals, aligned with the provisions of the Regulation CRR.

The list of the aspects analysed in the course of the credit approval process, collateral establishment and collateral monitoring includes the following issues:

- verification of the collateral value,
- physical check of the tangible collateral (inspections),
- check of the collateral formal-and-legal status (if put in place, if legally binding, if insured),
- verification of the guarantor's financial standing (setting the risk rating).

At the same time, Bank recommends for the decision-makers to consider that if certain circumstances occur, the frequency of monitoring should be increased. Such circumstances are, inter alia.:

- risk of collateral loss,
- collateral value fluctuation or significant decrease risk,
- reputation risk.

If the Bank decides that collateral value should be monitored at shorter intervals, they should take into consideration the economic effectiveness, i.e. the relation between the cost and effects of monitoring.

Monitoring performed at shorter intervals, e.g. in the case of property, is required under the circumstances of substantial fluctuations in the market conditions; the frequency of monitoring also depends on the specific nature of such property and individual factors affecting its value.

With respect to other tangible collateral, beside the material fluctuations in the market conditions, more frequent monitoring may be dictated by the technical condition of machines and equipment, means of transport, etc.

The Bank's regulations also define the way in which collateral is presented and approved in the process of credit exposure award in accordance with the credit mandates and the rules of collateral monitoring presentation and approval.

ING Lease (Polska) Sp. z o.o. (ING LP)

For lease facilities, ownership of the leased object is the main security collateral of lease transactions. Principles of collateralizing arise from the nature of leasing. The principles of valuation of the collaterals in terms of requirements under the Regulation CRR are governed not only by the nature of leasing itself but also from the *Collateral*



Management Policy referring to the estimation of the recoveries and capital requirements calculation at ING Lease (Polska) Sp. z o.o.

ING LP as a lease company buying the leased object from a supplier becomes its owner and then, as the owner, gives the lease object to the lessee (customer) for use. The purchase from the supplier of the assets item to be leased, under the law, is made at the market price. Acquisition value of the leased assets item from the supplier is the initial value of the lease transaction.

The principles for verifying the leased assets at ING LP are included in three regulations. For movables it is the *Supplier and leased asset verification procedure*, for properties it is the *Real estate policy paper* and *Collateral Management Policy regarding the estimation of recoveries and capital requirements at ING Lease (Polska) Sp. z o.o*

Purchase price (market value) of a new object – movable acquired from a supplier unrelated to the lessee can be verified under so called internal verification, in particular depending on:

- supplier status (applies to suppliers with no trusted status in ING LP),
- type of leased asset,
- the value of the transaction.

In individual cases, the purchase price of a new item may require additional verification with an external valuation by an independent valuator.

In other cases, the market value of the new movable object is not verified.

The value of second-hand assets item - movable (regardless who is the seller) or the value of the new assets item - movable but purchased from a customer or a company associated with the customer is verified with an independent expert's valuation or, if possible, internal market value verification.

In certain cases, verification is not required for used movable property.

The value of the property to be financed is always verified in an appraisal prepared by an independent valuator.

The values of financed movables are not verified throughout the lease contract duration.

Market values of financed properties are verified at least every three years on the basis of an appraisal prepared by an independent valuator, unless the leasing contract specifies a different, more conservative frequency.

Additionally, in those years when the external valuation of the property is not required, ING LP prepares an internal market value verification of the financed property.

ING Commercial Finance S.A. (ING CF)

Primary collateral for classic factoring transactions with and without recourse are the receivables accepted and purchased from the Client by ING CF.

At the stage of the factoring application analysis and throughout the factoring agreement duration, ING CF makes ongoing assessments of the quality of receivables (analysis of the history of collaboration between client and

debtor, quality of the settlements, the provisions of trade agreements) and monitors the debtors' financial situation.

ING CF uses other forms of collateral, such as bank guarantees or personal guarantees. The principles of collateral value verification are defined in the ING CF's *Credit Risk Manual*.

Since usage of additional collateral is rare occurrence in ING CF, the *Credit Risk Manual* includes a clause that collateral liquidity assessment and valuation are made in accordance with the Bank's rules.

ING Bank Hipoteczny S.A. (ING BH)

The ING BH loan portfolio consists exclusively of mortgage loans for housing purposes purchased from the Bank. Pursuant to the *Act on Mortgage Bonds and Mortgage Banks*, the maximum amount of a single mortgage-secured loan on the date of acquisition of receivables under such a loan may not exceed the mortgage lending value of the property (BHWN).

BHWN is a value determined in accordance with the provisions of the Act, which, in the opinion of the mortgage bank, reflects the level of risk associated with the property as collateral. ING BH determines BHWN based on the mortgage lending value expertise. The expertise is performed with due care and caution. It takes into account only those features of real estate that are permanent and which, assuming rational exploitation, are possible to obtain by every real estate owner. It takes into account all possible types of risk which, based on experience and analyses, may have a negative impact on BHWN. The expertise documents the assumptions and parameters adopted for the analysis, the process of determining BHWN and the resulting BHWN proposal. The expertise takes into account analyzes and forecasts regarding parameters specific to a given property that influence the assessment of credit risk, as well as general factors, e.g. population development, unemployment rate, local development plans. The processes of preparing the expertise BHWN and determining the BHWN are carried out by two different people.

Detailed rules are specified in the *Regulations for Determining the Mortgage Lending Value of Real Estate in ING Bank Hipoteczny SA*. The Regulations, as well as any amendment thereto, require approval by the Polish Financial Supervision Authority. The regulations take into account the provisions of Recommendation F of the Polish Financial Supervision Authority regarding the basic criteria used by the Polish Financial Supervision Authority when approving the regulations for determining the mortgage lending value of real estate issued by mortgage banks.

The value of real estate at ING BH is monitored on an annual basis.

5.2.3. Description of the main types of collateral taken by the Group

Bank

The Bank accepts all permitted legal forms of collateral, at the same time specifying their preference as to their application in the collateral regulations. Yet, the collateral should be chosen based on:

- correlating the value and quality of collateral with the probability of client's default. It means that the worse the client's risk rating is, the better the collateral for credit exposure should be put in place,



- seeking to fulfil the conditions specified in the regulations which enable, inter alia, including the recovery rates assigned to collateral items in the process of calculation of capital requirements and provisions,
- respecting the limitations in accepting collateral and accounting for the guidelines presented in the regulations, aimed at the minimisation of the negative departure of the actual recovery rates from those estimated in the LGD model,
- optimising the collateral catalogue for a given credit exposure when there is a specific pool of collateral items available.

In retail area, the Bank uses the standard method for regulatory capital calculation. To use preferential risk weights for mortgaged exposures, the quality criteria described in Articles 124, 208 and 229 section 1 of the Regulation CRR.

The Bank has identified the following collateral groups:

- Tangible collateral which makes it possible for the Bank to recover debt in the event of a client's default by liquidating the collateral provider's specific assets – funded credit protection. The Bank recognises the following types of assets that may serve as tangible collateral for the Bank's receivables under credit exposure:
 - properties,
 - movable assets - things with specified identity,
 - movable assets - inventory or things of a specified type,
 - cash (security deposits, term deposits and funds deposited as letter of credit coverage),
 - accounts receivable,
 - Treasury bonds,
 - bonds traded on a stock exchange,
 - bonds not traded on a stock exchange/investment certificates,
 - shares traded on a stock exchange,
 - shares not traded on a stock exchange,
 - participation units in Open-end Mutual Funds,
 - purchased receivable with recourse.
- Personal collateral which makes it possible for the Bank to recover debt in the event of a client's default by resorting to any component of the collateral provider's assets - unfunded credit protection. The Bank recognises the following forms of personal collateral:
 - surety under the Bills of Exchange Law or Civil Code,
 - bank guarantee/reguarantee and corporate guarantee,

- debt accession,
- joint and several liability.
- In some LGD models applied by the Bank the recovery rate on the unsecured part of exposure is also affected by the so-called “negative pledge” covenant which obliges a client not to create any collateral on the client's assets or to significantly limit the collateral created in favour of other creditors. The client's acceptance of such a clause increases the recovery rate on the unsecured part of exposure.
- There are also additional types of collateral used by the Bank that strengthen their position in negotiations or expand the Bank's control entitlements as the creditor. Additional collateral includes (inter alia):
 - letter of intent/letter of comfort/statement of comfort,
 - blank promissory note,
 - assignment of rights under property insurance policy,
 - credit insurance coverage from an insurance company,
 - insurance coverage for domestic accounts receivable (an insurance policy issued to ING BSK or insurance policy assignment).

In addition, Bank introduced rules on identification of agricultural properties taken as collateral as a result of entering into force the Act on Formation of the Agricultural System dated on 11 April 2003 as amended and Act on Land and Mortgage Registers and Mortgages dated on 6 July 1982 as amended.

Structure of individual collateral groups is diversified. The collateral with the biggest share is the following:

- mortgages - their share results from the fact that mortgage is usually used to secure longterm capex loans and housing loans, which represent the majority of the value of the retail portfolio. In addition, mortgage is the main collateral in the case of commercial property loans,
- non-current and current assets,
- bank guarantees, corporate sureties and guarantees - this group of collateral includes guarantors from various industries having diversified financial standing. Therefore, there is no material risk of concentration. If a particular recovery rate has been assumed, higher than 0%, it is necessary to investigate the guarantor's financial standing and assign a risk rating thereto.

Accounts receivable and securities have a small share in the overall pool of collateral accepted by the Bank.

ING Lease (Polska) Sp. z o.o. (ING LP)

In the case of lease facilities, ownership of the leased assets item is the main security of lease transactions. The principles for pledging collateral and determining their value stem from the very nature of leasing itself and the *Collateral Management Policy concerning estimation of recoveries and capital requirements at w ING Lease (Polska) Sp. z o.o.* referring to capital requirements calculation at ING Lease (Polska) Sp. z o.o.



ING Commercial Finance S.A. (ING CF)

Primary collateral for the classic factoring with and without recourse are the receivables accepted and purchased from the Client by ING CF.

In addition to the assignment of receivables ING CF also acquires as a collateral promissory note issued by the client, often guaranteed by its owners, and power of attorney to client's bank account or an assignment from a trade receivables insurance policy. Factoring without recourse is secured by the ING CF own insurance covering the risk of debtor's insolvency issued.

For the reverse factoring the basic collateral is a power of attorney to the client's bank account. This is due to the fact that the product is targeted only at selected customers (in a very good financial situation) from the strategic customers' segment.

ING CF occasionally uses other forms of collateral, such as bank guarantee.

ING Bank Hipoteczny S.A. (ING BH)

ING BH accepts as mandatory legal collateral for the repayment of the purchased loan:

- mortgage on real estate, entered in the land and mortgage register in the first place,
- assignment of rights under the insurance policy against fire and other accidental events of the mortgaged property to the Bank.

5.2.4. Main types of guarantors and credit derivative counterparties and their creditworthiness

The following table presents the main types of guarantors and own their collateral value as at 31 December 2025. The Group does not use credit derivatives.

Guarantee delivery type	Collateral value*	Share %
Companies – "investment" category (rating below 10)	23,869	90.8%
Companies – "speculative" category (ratings 11-17)	2,265	8.6%
Companies – "irregular" category (ratings 18-22)	134	0.5%
Local authorities (GL, GW, GI prefix)	16	0.1%
Total	26,284	100%

*) The value presented in the table is the value of collateral, and not of exposure.

5.2.5. Market or credit risk concentrations within the credit mitigation taken

Since the institution has a significant exposure to financing the purchase of residential and commercial properties, mortgages (69.2% of the total) form the main collateral.

Collateral type	Collateral value*	Share %
Mortgages	167,980	69.2%
Machinery and equipment	32,218	13.3%
Guarantees	26,284	10.8%
Inventory	10,103	4.2%
Debts	5,148	2.1%
Cash	781	0.3%
CPRI insurance	51	0.1%
Securities	13	0.0%
Total	242,578	100%

*) The value presented in the table is the value of collateral, and not of exposure.

5.2.6. Quantitative information regarding the use of credit risk mitigation techniques

The tables below present detailed quantitative information regarding the use of credit risk mitigation techniques required by Article 453 of the Regulation CRR and in accordance with the following templates set out in Commission Implementing Regulation (EU) 2024/3172:

- Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques,
- Template EU CR4 – standardised approach – Credit risk exposure and CRM effects,
- Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques,
- Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques.



Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

	a	b	c	d	e	
	Secured carrying amount					
	Unsecured carrying amount		Of which secured by collateral	Of which secured by financial guarantees		
				Of which secured by credit derivatives		
1	Loans and advances	84,849	114,777	102,651	12,126	-
2	Debt securities	69,924	-	-	-	-
3	Total	154,773	114,777	102,651	12,126	-
4	Of which non-performing exposures	1,721	1,747	1,287	460	-
EU-5	Of which defaulted	1,721	1,747	-	-	-

Template EU CR4 – standardised approach – Credit risk exposure and CRM effects

	a	b	c	d	e	f
	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
Exposure classes	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density (%)
1	Central governments or central banks	58,373	-	65,092	1,607	2.69
2	Non-central government public sector entities	3,487	1,114	3,487	445	20.00
EU 2a	Regional governments or local authorities	3,487	1,114	3,487	445	20.00
EU 2b	Public sector entities	-	-	-	-	-
3	Multilateral development banks	9,805	-	9,805	-	-
EU 3a	International organisations	1,947	-	1,947	-	-
4	Institutions	-	-	-	-	-
5	Covered bonds	-	-	-	-	-
6	Corporates	5,115	5,533	4,949	424	94.37
6.1	Of which: Specialised Lending	-	-	-	-	-
7	Subordinated debt exposures and equity	399	-	399	-	250.15
EU-7a	Subordinated debt exposures	-	-	-	-	-
EU 7b	Equity	399	-	399	999	250.15
8	Retail	26,636	7,393	24,573	2,930	70.07
9	Secured by mortgages on immovable property and ADC exposures	62,209	1,232	62,202	494	32.35
9.1	Secured by mortgages on residential immovable property - non IPRE	61,546	1,169	61,547	468	31.59
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	210	43	210	18	74.47
9.4	Secured by mortgages on commercial immovable property - IPRE	185	10	185	4	66.85
9.5	Acquisition, Development and Construction (ADC)	268	10	260	4	150.00
10	Exposures in default	1,240	9	1,065	3	108.49
EU-10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-
EU 10c	Other items	3,385	-	3,385	2,121	62.67
11	Not applicable	-	-	-	-	-
12	Total	172,596	15,281	176,904	5,903	28.16



Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

	a	b
	Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
1 Central governments and central banks - F-IRB	-	-
EU 1a Regional governments and local authorities -F-IRB	-	-
EU 1b Public sector entities - F-IRB	-	-
2 Central governments and central banks - A-IRB	-	-
EU 2a Regional governments and local authorities A-IRB	-	-
EU 2b Public sector entities A-IRB	-	-
3 Institutions – F-IRB	5,553	4,639
4 Not applicable		
5 Corporates – F-IRB	14,597	15,413
EU 5a Corporates - General	12,355	13,171
EU 5b Corporates - Specialised lending	2,242	2,242
EU 5c Corporates - Purchased receivables	-	-
6 Corporate – A-IRB	28,561	28,551
EU 6a Corporates - General	26,456	26,456
EU 6b Corporates - Specialised lending	2,105	2,095
EU 6c Corporates - Purchased Receivables	-	-
7 Not applicable		
8 Not applicable		
EU-8a Retail - A-IRB	-	-
9 Retail – Qualifying revolving (QRRE)	-	-
10 Retail – Secured by residential immovable property	-	-
EU10a Retail – Purchased receivables	-	-
EU10b Retail – Other retail exposures	-	-
17 Exposures under F-IRB	20,150	20,052
18 Exposures under A-IRB	28,561	28,551
19 Total Exposures	48,711	48,603



Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	
A-IRB		Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs			
		Total exposures	Part of exposures covered by Financial Collaterals (%)	Funded credit Protection (FCP)						Unfunded credit Protection (UFCP)					RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
				Part of exposures covered by Other eligible collaterals (%)			Part of exposures covered by Other funded credit protection (%)			Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)		
				Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)							
1	Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	Regional governments and local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Corporates	43,501	0.49	48.12	33.44	14.62	0.07	-	-	-	-	0.08	-	33,224	28,551	
5.1	Corporates – General	35,487	0.52	42.93	24.93	17.92	0.08	-	-	-	-	0.10	-	31,111	26,456	
5.2	Corporates – Specialised lending	8,014	0.36	71.11	71.11	-	-	-	-	-	-	-	-	2,113	2,095	
5.3	Corporates - Purchased Receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6.1	Retail – Qualifying revolving	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6.2	Retail – secured by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6.3	Retail - Purchased Receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6.4	Retail - Other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Total	43,501	0.49	48.12	33.44	14.62	0.07	-	-	-	-	0.08	-	33,224	28,551	



Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

F-IRB	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	Credit risk Mitigation techniques											Credit risk Mitigation methods in the calculation of RWEAs		
	Total exposures	Part of exposures covered by Financial Collaterals (%)	Funded credit Protection (FCP)			Unfunded credit Protection (UFCP)			RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)				
			Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)								
		Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)				Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)					
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional governments and local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Institutions	12,093	0.03	0.39	-	0.39	-	-	-	-	-	-	-	6,822	4,639
5 Corporates	32,076	0.46	22.86	10.65	12.14	0.08	-	-	-	-	0.06	-	15,695	15,413
5.1 Corporates – General	28,419	0.52	25.24	11.92	13.24	0.09	-	-	-	-	0.07	-	13,453	13,171
5.2 Corporates – Specialised lending	3,657	-	4.34	0.78	3.56	-	-	-	-	-	-	-	2,242	2,242
5.3 Corporates - Purchased Receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Total	44,169	0.34	16.70	7.73	8.92	0.06	-	-	-	-	0.05	-	22,517	20,052



5.3. Exposure to the counterparty credit risk

Counterparty credit risk is the risk of a counterparty defaulting on a transaction before the cash flows associated with that transaction are finally settled.

Counterparty credit risk exposures relate to exposures from derivatives, repo transactions, securities or commodities lending or borrowing transactions, transactions with long settlement dates and transactions with the obligation to supplement the credit collateral.

At the end of 2025, the Group had derivative instruments and repo transactions, but there were no securities or commodities lending or borrowing transactions, transactions with long settlement dates and transactions with the obligation to supplement credit collateral.

The Group presents its exposures to counterparty credit risk mainly due to hedging derivatives, derivative instruments resulting from contracts concluded with customers and repo transactions.

The tables below present detailed quantitative information on counterparty credit risk exposure required by Article 439 and 452 of the Regulation CRR and in accordance with the following templates set out in Commission Implementing Regulation (EU) 2024/3172:

- Template EU CCR1 - Analysis of CCR exposure by approach,
- Template EU CCR4 - IRB approach – CCR exposures by exposure class and PD scale.

Template EU CCR1 - Analysis of CCR exposure by approach

	a	b	c	d	e	f	g	h
	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	493	728		1.4	1,914	1,709	1,709	542
2 IMM (for derivatives and SFTs)			-	-	-	-	-	-
2a Of which securities financing transactions netting sets			-		-	-	-	-
2b Of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c Of which from contractual cross-product netting sets			-		-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					439	439	439	71
5 VaR for SFTs					-	-	-	-
6 Total					2,353	2,148	2,148	613



Template EU CCR4 – IRB approach - CCR exposures by exposure class and PD scale

PD scale	a	b	c	d	e	f	a
	Exposure value	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	RWEA	Density of risk weighted exposure amounts
Institutions							
0.00 to <0.15	1,571	0.11	25	45.00	1	277	17.68%
0.15 to <0.25	101	0.22	6	45.00	-	36	35.66%
0.25 to <0.50	121	0.41	17	45.00	1	51	41.91%
0.50 to <0.75	-	-	-	-	-	-	-
0.75 to <2.50	16	0.97	12	45.00	-	12	78.25%
2.50 to <10.00	-	-	-	-	-	-	-
10.00 to <100.00	-	16.32	1	45.00	1	1	241.47%
100.00 (Default)	-	-	-	-	-	-	-
Subtotal	1,809	0.14	61	45.00	1	377	20.86%
Corporates Specialised lending							
0.00 to <0.15	21	0.13	19	32.30	1	3	14.58%
0.15 to <0.25	34	0.21	39	36.04	1	8	24.16%
0.25 to <0.50	180	0.36	41	40.02	1	62	34.37%
0.50 to <0.75	9	0.59	7	43.85	1	5	49.50%
0.75 to <2.50	39	1.74	14	39.65	1	30	76.97%
2.50 to <10.00	-	3.65	1	24.00	1	-	37.34%
10.00 to <100.00	3	32.08	4	37.55	1	5	190.14%
100.00 (Default)	-	-	-	-	-	-	-
Subtotal	286	0.80	125	39.01	1	113	39.38%
Corporates Other							
0.00 to <0.15	38	0.12	6	41.84	1	7	20.33%
0.15 to <0.25	29	0.19	22	40.18	1	7	25.87%
0.25 to <0.50	92	0.35	52	40.09	1	36	38.81%
0.50 to <0.75	57	0.61	46	40.29	1	30	52.13%
0.75 to <2.50	30	1.46	40	40.27	1	23	74.89%
2.50 to <10.00	19	3.47	36	40.70	1	20	103.75%
10.00 to <100.00	3	12.33	18	41.11	1	4	138.80%
100.00 (Default)	-	100.00	1	84.00	1	-	123.75%
Subtotal	268	0.82	221	40.47	1	127	47.26%
Total	2,363	0.30	407	43.76	1	617	26.09%

5.4. Information on forbore exposures

The Group supports to its clients at each stage of financing. The Bank and subsidiaries offer products suited to their needs; should delays occur in repayment, the Group propose flexible repayment schedules. In case of more serious problems in repayment, the Group may offer to restructure the debt. Then, jointly with the client, the Bank or subsidiaries set the best form of support or a settlement.

The main objective of the actions taken in the portfolio in Stage 3 is to mitigate the risk of losses to the Group or the volume of such losses.

Forbearance occurs when the Group determines that the client is not able to comply with their financial obligations due to financial difficulties (identified or expected) and decides to grant forbearance.

Forbearance is identified if all of the following conditions are satisfied:

- the client is unable to meet his financial obligations under a loan agreement due to existing or anticipated financial difficulties,
- the Bank or bank's subsidiary grants a facility for the mitigation of conditions of the loan agreement which would not have been granted had the customer not been in financial difficulty.

Financial difficulties are understood as the situation of a client who is experiencing or will soon begin to experience difficulties in fulfilling his financial obligations.

The table below presents detailed quantitative information on restructured exposures required by Article 442 of the Regulation CRR, in accordance with requirements of the Commission Implementing Regulation (UE) 2024/3172.

Template EU CQ1: Credit quality of forbore exposures

	a		b		c		d		e		f		g		h							
	Gross carrying amount/nominal amount of exposures with forbearance measures														Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				Collateral received and financial guarantees received on forbore exposures			
	Performing forbore		Non-performing forbore		Of which defaulted		Of which impaired		On performing forbore exposures		On non-performing forbore exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures									
005	Cash balances at central banks and other demand deposits		-	-	-	-	-	-	-	-	-	-	-	-	-	-						
010	Loans and advances		2,645	3,434	3,434	3,434	3,434	-107	-1,495	2,970	851											
020	Central banks		-	-	-	-	-	-	-	-	-	-	-	-	-							
030	General governments		-	-	-	-	-	-	-	-	-	-	-	-	-							
040	Credit institutions		-	-	-	-	-	-	-	-	-	-	-	-	-							
050	Other financial corporations		1	8	8	8	8	-	-5	2	2											
060	Non-financial corporations		2,094	2,777	2,777	2,777	2,777	-91	-1,080	2,462	758											
070	Households		550	649	649	649	649	-16	-410	506	91											
080	Debt Securities		-	-	-	-	-	-	-	-	-											
090	Loan commitments given		379	121	121	121	121	-	67	-	-											
100	Total		3,024	3,555	3,555	3,555	3,555	-107	-1,562	2,970	851											



5.5. Use of IRB approach to credit risk

Pursuant to the letter of 4 July 2013, the Group obtained approval of the Polish Financial Supervision Authority and the National Bank of the Netherlands to use the advanced internal ratings method (AIRB method) for the Bank and ING Lease Sp. z o.o. for exposure classes:

- companies (excluding companies for which the Bank has obtained supervisory approval for permanent use of the standardised approach based on Article 150 of the Regulation CRR),
- institutions (excluding lending exposures to entities consolidated by the Bank and covered by a unified risk management system for which the Bank has obtained consent to apply the standardised approach with the possibility of applying a 0% risk weight under Article 113 sec. 7 and 150 sec. 1 point f) of the Regulation CRR).

5.5.1. The control mechanisms for rating systems and the role of the functions involved in the development, approval and subsequent changes of models

The Group's model risk management and control structure is based on the three-line model defense approach:

- The first line of model defense (1MLoD) includes, among others, units executing their strategies using models, support units for these units, and in particular risk units, units responsible for model development, and data management units. In these units, the roles of the model owner, modeler, data owner/custodian are identified,
- The second line of model defense (2MLoD) consists of units performing supervisory functions and specializing in model risk management and model validation, in the Bank it is the Model Risk Management Department, within which the roles of the model risk manager and validator are identified,
- The third line of model defense (3MLoD) is internal audit (DAW).

The concept of 3 lines of defense of a model is similar to the three lines of defense used in individual risks management, which aims to provide a sound framework for managing financial and non-financial risks by defining and implementing three "levels" of risk management, with distinct roles, executive responsibilities and supervisory responsibilities. The difference between traditional lines of defense and model lines of defense is that any of the traditional lines of defense can be the first line of defense of the model, e.g. if it is the model owner.

Each activity related to the implementation of extensions and changes to the IRB method is assigned to local participants from the Bank who fulfil specific roles.

In the event of a significant extension and modification that require permission from the competent authorities, the Internal Audit Department (DAW) – the third lines of defence:

- audits the construction and validation of models,
- verifies the correctness of the application, before its submission,
- is informed about the content of the documentation submitted to the PFS / ECB,

- conducts an independent review of the implementation of potential supervisory conditions.

In the event of extensions and changes involving the need to notify the competent authorities before their implementation - DAW receives information to be forwarded, developed on the basis of the Bank's decision to change the IRB method by the initiator of the change.

The DAW does not participate in the extension and modification process that requires notification after their implementation.

DAW also verifies the results of the annual self-assessment of compliance with regulatory requirements in relation to the guidelines set out in Part 3 of the Regulation CRR, with appropriate consideration of other necessary requirements (supervisory regulations). As part of this self-assessment, DAW is responsible for the preparation of documentation for monitoring the correct operation of the IRB method, including the preparation of a list of internal audits carried out in the field of the functioning of rating systems - both in relation to the models used and other aspects of the rating systems functioning, along with information on significant findings resulting from the reviews carried out.

The bank regularly reviews the compliance of the IRB approach with regulatory requirements. As part of this monitoring, the Bank performs:

- self-assessment of the IRB method, under which it submits to the Polish Financial Supervision Authority:
 - the results of the annual self-assessment of compliance with regulatory requirements in relation to the guidelines set out in Part 3 of the Regulation CRR, with due consideration of other necessary requirements (supervisory regulations),
 - a list of internal audits performed on the operation of the rating systems,
 - a list of other extensions and changes to the IRB method that require notification after implementation,
 - a list of planned extensions or changes to the IRB method within 1 year,
 - the results of periodic review of the IRB estimates for each of the parameters used under the IRB Approach,
 - a statement of the value of own funds and capital requirements, including information on additional restrictions.

The results of the review and self-assessment of the Bank's compliance with the regulatory requirements of the IRB method are approved by the Bank's Management Board,

- assessment of compliance with the application test (hereinafter: use test) in accordance with Article 144, section 1, letter b) of the Regulation CRR. The report is approved by the Credit Policy Committee,
- as part of ensuring the consistency of the Policy at the level of the ING Bank Śląski Group, the Bank, during the compliance reviews of the AIRB method, controls the correct operation of the IRB method in all rating systems covered by this method, including subsidiaries.



The Bank reduces the model risk primarily by establishing a comprehensive and reliable model management process ensuring comprehensive identification, measurement, control, response and monitoring of model risk. The principles of model and model risk management are set out in the *Model Risk Management Policy* and its standards, including the standards of model building, model monitoring and model risk management. These rules are subject to periodic reviews aimed at continuous improvement of the methodology of model and risk management.

The key controls in the model risk management process used in individual rating systems are:

- development of models by a specialized internal unit responsible for the construction of models,
- determination of model significance and annual reviews of model significance,
- approval of models and their changes by the Credit Policy Committee,
- conducting model tests,
- periodic monitoring of the effectiveness of models,
- model validation, which is performed by a validation unit independent of the model builder, prior to model approval and periodically,
- assessment of model risk in aggregated terms and monitoring of the model risk level in the context of the adopted model risk tolerance level,
- recording models, information about models and model changes in the model register,
- recording findings regarding the weaknesses of models identified during the monitoring of the effectiveness of models and their validation and audits, as well as monitoring the status of implementation of actions taken,
- quarterly reporting of the model risk level and key information on its management to the Credit Policy Committee, Model and AI Risk Management Committee, the Bank's Management Board and the Supervisory Board.

The independence of the model validation unit from the model building unit is ensured at the organizational level by reporting directly to the vice president responsible for risk management (CRO).

The key roles involved in model development and approval are:

- Model owner - is responsible for the model throughout its lifecycle, both to internal stakeholders and, where appropriate, to an external validator. The model owner is responsible for ensuring that all stages of the model life cycle are completed correctly, the functionality of the model meets the needs of users, the information about the model in the model registry is complete and up-to-date,
- Model builder - is responsible for developing/changing the model in accordance with the internal and external requirements,
- Model validator - is responsible for the independent assessment (validation) of the model and for informing the internal validator whether the model is suitable for its intended use. A model validator must not be

involved in the modelling process and must be independent of the model owner, model validator and modeller.

- Credit Policy Committee - approves newly developed or rebuilt models for use, their documentation and model validation results, and approves the standards for building, monitoring and managing credit risk models,
- Data owner/custodian - defines a data strategy for a specific data category and model; The data guardian (administrator) is responsible for implementing the data owner's strategy. The data owner and custodian are responsible for data provision and overall data support during the model lifecycle: data quality, validation and improvement,
- Model risk manager - monitors model risks and is responsible for supervising the model life cycle and the model risk management process. The Model Risk Manager verifies and approves the model classification and may consult with the model validator. He advises the first line of model defence units (the owner and his/her support roles) and monitors and reports exposures to model risk and has the right to verify the implementation of model risk management at any stage of the model life cycle.

5.5.2. The scope and main content of the reporting related to credit risk models

Credit risk management at the Bank is based on advanced credit risk assessment models. In the credit risk reporting process, information relating to IRB models is taken into account with the frequency adjusted to the materiality and type of information presented and the recipient's position. As a rule, detailed information related to the IRB models is presented to senior management, in particular:

- to the Bank's Management Board - results of monitoring the correct operation of the IRB method, in accordance with the *Policy of changes and monitoring of the internal ratings method at ING Bank Śląski S.A.*,
- Credit Policy Committee - results of monitoring of credit risk models in accordance with the *Instructions for managing credit risk models at ING Bank Śląski S.A.* and the results of model validation in accordance with the *Policy for models validation*,
- Asset and Liability Committee (ALCO) - stress tests in accordance with the *Policy of conducting stress tests*.

As part of the quarterly report of the Risk Division (Risk Management Report), the results of the credit risk profile analysis of corporate exposure portfolios and mortgage-secured retail exposures are presented to the Bank's Management Board, Supervisory Board and the Risk Committee of the Supervisory Board in accordance with the model monitoring process, in particular:

- risk profile by grade,
- migration across grades,
- estimation of the relevant parameters per grade,



- comparison of realized default rates, realised LGDs and realised conversion factors (CCFs) against expectations.

In the credit risk management process, the Bank also takes into account data on impairment losses (credit provisions) presented in a dedicated report. The monthly report in a shortened version is presented to the Bank's Management Board and the quarterly report in a full and shortened version is presented to the Bank's Supervisory Board.

5.5.3. A description of the internal ratings process

Determination of the client's risk class is an integral part of the Group's credit risk evaluation process for credit exposures. The risk class itself is determined by coherently-used rating system. The rating assignment process is independent of the credit decision approval process or reviews within the credit process. At the same time, the rating process is finalized before the credit decision is made.

As far as the exposures to companies and institutions are concerned, ING Group applies a 22-grade rating scale with respect to entrepreneurs where classes reflect the borrower's risk. Some credit risk models used by the Bank assign rating sub-classes to have better granularity of the rating scale. Those subclasses should be treated as a part of the full rating class.

The largest number of customers is concentrated in the rating range 9-15. The customer is assigned to a given risk class based on the rating models, using the data from the customer's financial reports, evaluation of qualitative factors and, in particular cases, financial standing of the parent company.

Risk rating is assigned to the customer in the first place in line with the value of probability of default given by rating model. The following description of characteristics for each risk class is treated alternatively, in particular when ratings assigned on the basis of models are subject to appeal.

Risk classes can be divided into below basic groups:

- group of low risk grades equivalent to investment grades (risk classes 1-10),
- group of medium and high risk grades equivalent to speculative grades (risk classes 11-17),
- group of potentially non-performing grades (risk classes 18-19) and group of non-performing grades (risk classes 20-22).

Group of low risk classes (1-10) include borrowers with solid income and margin levels, strong balance sheet structure and stable long-term perspectives. In the top grades of this range, the borrowers occupying the position of market leaders are classified who are relatively less susceptible to adverse market fluctuations. Such borrowers have free, that is "at their discretion", access to the financing available on the markets at any time.

Group of medium and increased risk classes (11-17) covers a relatively large range of risk levels, and can be divided into:

- the borrowers with the best grades within this class, who currently meet their financial obligations, however their debt servicing capacity (the principal and interest) may turn out to be uncertain over a longer period of time. So the safety margin is limited. In adverse business environment or unfavourable economic conditions there is a real threat that credit risk may increase,
- the borrowers assigned higher risk grades (the worst grades in this class) which, in a longer perspective, may be characterized by: uncertainty as to their income perspectives, lower quality of assets and risk of the capital level mismatch that may translate into possible losses.

Borrowers with grades 18-22 is a group that includes the borrowers who show clear indications of problems with debt servicing or are in the situation referred to as 'an event of default' has already occurred. This group includes also the clients whose exposures are in Forbearance status in the event that, during the trial period of exiting Forbearance, an exposure with the Forbearance status is overdue by more than 30 calendar days or another forbearance facility is granted to a given exposure. The definition of a default event determines the reclassification of such a client to rating class 20-22.

The table below presents the structure of correlations between internal and external rating systems:



ING Rating Risk class	S&P/Fitch IBCA Rating	Moody's Rating
1	AAA	Aaa
2	AA+	Aa1
3	AA	Aa2
4	AA-	Aa3
5	A+	A1
6	A	A2
7	A-	A3
8	BBB+	Baa1
9	BBB	Baa2
10	BBB-	Baa3
11	BB+	Ba1
12	BB	Ba2
13	BB-	Ba3
14	B+	B1
15	B	B2
16	B-	B3
17	CCC	Caa1, Caa2, Caa3
18	CC	Ca
19	C	C
20	D	C
21	D	C
22	D	C

5.5.4. Models for basic risk parameters

Following the requirement of the continuous compliance with the advanced internal-ratings based approach (AIRB) for the purpose of regulatory capital calculation, the Bank developed, implemented, monitored and validated local and global models for the following basic risk parameters for classes of assets in line with AIRB:

- PD (probability of default),
- LGD (loss given default),
- EAD (exposure at default).

The models used by the Group for risk management are systematically validated and developed.

In assessing credit risk, the Group uses the following models of the IRB method:

- SME Rating Model (KM) - the SME Rating Model is applicable to business entities registered in Poland, with annual sales to EUR 100 million, that are out of the scope of mass segment for business clients (Easy Lending).

Excluded from the models are governments and public administration units, banks and financial institutions as well as specialised entities. The KM Model generates ratings from 8.1 to 19.1. It consists of a Quantitative (Financial Strength and behavioural assessment) and Qualitative sub-modules (quality of management).

- Large Corporate Rating Model (CL, CR) - the Large Corporate Rating Models are applicable to large corporates with annual consolidated sales exceeding EUR 100 million (CR) or registered outside of Poland and not meeting the requirements of the CR model (CL), except for specialised entities. The CL model generates ratings from 1 to 19, the ratings 18 and 19 can be determined automatically or in an expert approach. The CR model cover classes from 1.1 to 19.2. The CR model is the next version of the CL model. Clients assessed using the CL model will gradually migrate to the CR model by the end of March 2026 (excluding Large Corporate Orphans). The CL model consists of financial and qualitative sub-modules. The CR model consists of financial, static, qualitative and behavioral sub-modules.
- Trade and Commodity Finance Rating Model (CT) - the CT Model is a rating model for the Trade and Commodity Finance type of clients (financing of commodity trading such as, for example, oil and gas, chemicals, fertilizers or grains). It is an expert model consisting of a scorecard module and a parent-influence module (only for subsidiaries); the scoring card comprises five main risk categories (financial and business-related). The model produces a score ranging from 10 to 40 that is mapped to a rating ranging from 8 to 17, whereas start-ups receive an automatic rating of CT 14.
- Project Finance Rating Model (JP) - the model is applicable to project finance entities. It is an expert model consisting of a main scorecard (for post-completion projects), including five categories of risk drivers and a set of possible adjustments (for pre-completion projections, sector-specific or the Debt Service Coverage Ratio). The model produces ratings from 8 to 17.
- Commercial Property Finance (RD, RF) and Commercial Property Finance Orphans (RR) - rating models broken down by main exposure criterion at the time of granting above EUR 3 million eligible for the CPF or CPF Orphans model. The CPF model is a statistical model divided into sub-models of financing the operation phase (IPRE) and construction phase (Construction), while the CPF Orphans model is an expert model, divided into 4 sub-models: for clients generating rental income (IPRE type), investment funds (REIF type), real estate developers (RPRJ type) and land owners for future investments. The designated risk classes are in the range of 5 to 19 for the CPF Orphans model and 6 (IPRE) or 10 (Construction) to 19 for the CPF model.
- Finance Institutions Rating Models (FA, FB, FM, FF, FH, FU) - rating models for financial entities, such as lending institutions, entities granting instalment loans, mortgage loans, leasing, factoring, vendor companies, liquidity management groups of other entities, investment funds, hedge funds, brokers/dealers, insurance companies and fund managers. These are expert models consisting of a scoring card, a mechanism of adjustments adapted to the specificity of the portfolio and limitations to the level of the central government. Risk classes range from 1 to 19.



- Commercial Banks Rating Model (BC) - it is an expert rating model for commercial banks, consisting of 14 risk drivers, eight quantitative and six qualitative. The model has a scorecard that determines the financial strength which can be subject to certain adjustments (for example, quality of management, regulatory environment, domestic macro risk, or sovereign risk). Ratings range from 1 to 19.

The Bank's LGD models (Loss Given Default) – applied depending on the client type – are used to determine the anticipated loss in the event of a default of a customer. It is expressed as a portion of the Exposure at Default (EAD) that the Bank will not recover in such an event. LGD is the function of – among others – the type and value of collateral as well as the type of facility (product). Specific groups of collateral have assigned recovery rates that, for example in the LGD ML-CORP (CL) model, range from 100% for cash collateral to, for example, 30% for inventory (a separate set of recovery rates exists for guarantees).

The aforementioned Exposure at Default takes into account the type of facility through the Cash Conversion Factor. It is the portion of the unutilised amount of the limit that is expected to be utilised at the time of default (expressed as a percentage larger than zero).

Following the requirement of the continuous compliance with the advanced internal-ratings based approach (AIRB) for the purpose of regulatory capital calculation the ING Group and the ING Bank Śląski S.A. developed regulations to ensure compliance with Article 452 point f) Regulation 2019/876 of the European Parliament and of the Council of 20 May 2019:

- Methodology Standards for Credit Risk IRB Models,
- Monitoring and Testing Standards for Credit Risk IRB Models,
- ING Bank Śląski technical guidelines for validation of IRB model.

The above regulations contain guidelines covering:

- the definitions, methods and data for estimation and validation of PD,
- information on how PDs are estimated for low default portfolios,
- whether there are regulatory floors and the drivers for differences observed between PD and actual default rates at least for the last three periods,
- the definitions, methods and data for estimation and validation of LGD, such as methods to calculate downturn LGD,
- how LGDs are estimated for low default portfolio,
- the time lapse between the default event and the closure of the exposure,
- the definitions, methods and data for estimation and validation of conversion factors, including assumptions employed in the derivation of those estimations.

The tables below (broken down by exposure classes) present the PD values, the number of obligors and the values of default rate for the IRB method, accordance with the requirements of Article 452 point h) of the Regulation CRR, using template EU CR9 contained in the Commission Implementing Regulation (UE) 2024/3172.



Template CR9 –IRB approach – Back-testing of PD per exposure class (fixed PD scale) – A-IRB

a	b	c	d	e	f	g
PD range	Number of obligors at the end of previous year	Of which number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
Corporates Specialised lending						
0.00 to <0.15	55	-	-	0.13	0.12	-
0.00 to <0.10	-	-	-	-	-	-
0.10 to <0.15	55	-	-	0.13	0.12	-
0.15 to <0.25	33	-	-	0.19	0.19	1.43
0.25 to <0.50	105	-	-	0.36	0.40	-
0.50 to <0.75	14	-	-	0.53	0.57	-
0.75 to <2.50	88	-	-	1.11	1.01	0.11
0.75 to <1.75	81	-	-	1.00	0.90	-
1.75 to <2.5	7	-	-	2.07	2.20	1.18
2.50 to <10.00	5	-	-	4.93	5.51	0.95
2.5 to <5	1	-	-	3.55	3.46	1.54
5 to <10	4	-	-	6.37	6.02	-
10.00 to <100.00	16	-	-	42.09	27.48	1.90
10 to <20	5	-	-	12.51	15.43	-
20 to <30	2	-	-	-	23.41	6.67
30 to <100	9	-	-	51.37	35.07	-
100.00 (Default)	-	-	-	-	-	-
Corporates Other						
0.00 to <0.15	538	5	0,93	-	0.10	1.09
0.00 to <0.10	-	-	-	-	-	-
0.10 to <0.15	538	5	0,93	-	0.10	0.72
0.15 to <0.25	800	4	0,50	0.19	0.19	0.22
0.25 to <0.50	1,075	2	0,19	0.33	0.33	0.22
0.50 to <0.75	1,148	8	0,70	0.64	0.62	0.45
0.75 to <2.50	1,539	23	1,49	1.63	1.60	1.30
0.75 to <1.75	1,309	18	1,38	1.62	1.52	1.04
1.75 to <2.5	230	5	2,17	2.40	2.07	1.76
2.50 to <10.00	1,623	33	2,03	4.92	5.03	2.61
2.5 to <5	1,039	19	1,83	3.58	3.72	2.20
5 to <10	584	14	2,40	7.25	7.37	3.81
10.00 to <100.00	776	72	9,28	24.58	22.04	7.50
10 to <20	510	23	4,51	12.37	12.97	4.75
20 to <30	121	10	8,26	25.88	26.00	7.39
30 to <100	145	39	26,90	58.36	50.64	16.40
100.00 (Default)	-	-	-	-	-	-



Template CR9 –IRB approach – Back-testing of PD per exposure class (fixed PD scale) – F-IRB

	a	b	c	d	e	f	g
PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)	
		Of which number of obligors which defaulted in the year					
Corporates Specialised lending							
0.00 to <0.15	-	-	-	-	-	-	-
0.00 to <0.10	-	-	-	-	-	-	-
0.10 to <0.15	-	-	-	-	-	-	-
0.15 to <0.25	-	-	-	-	-	-	-
0.25 to <0.50	-	-	-	-	-	-	-
0.50 to <0.75	-	-	-	-	-	-	-
0.75 to <2.50	1	-	-	1.50	1.45	-	-
0.75 to <1.75	1	-	-	1.16	1.45	-	-
1.75 to <2.5	-	-	-	-	-	-	-
2.50 to <10.00	-	-	-	-	-	-	-
2.5 to <5	-	-	-	-	-	-	-
5 to <10	-	-	-	-	-	-	-
10.00 to <100.00	-	-	-	-	-	-	-
10 to <20	-	-	-	-	-	-	-
20 to <30	-	-	-	-	-	-	-
30 to <100	-	-	-	-	-	-	-
100.00 (Default)	-	-	-	-	-	-	-
Corporates Other							
0.00 to <0.15	39	-	-	0.10	0.09	-	-
0.00 to <0.10	17	-	-	0.07	0.07	-	-
0.10 to <0.15	22	-	-	0.13	0.11	-	-
0.15 to <0.25	129	-	-	0.19	0.20	-	-
0.25 to <0.50	236	-	-	0.35	0.40	-	-
0.50 to <0.75	56	-	-	0.61	0.63	-	-
0.75 to <2.50	271	-	-	1.35	1.19	-	-
0.75 to <1.75	264	-	-	1.35	1.16	-	-
1.75 to <2.5	7	-	-	2.23	2.31	-	-
2.50 to <10.00	121	-	-	3.46	3.99	-	-
2.5 to <5	86	-	-	3.04	3.28	-	-
5 to <10	35	-	-	5.94	5.75	-	-
10.00 to <100.00	30	-	-	25.56	20.85	-	-
10 to <20	17	-	-	13.08	16.17	-	-
20 to <30	13	-	-	27.44	26.97	-	-
30 to <100	-	-	-	-	-	-	-
100.00 (Default)	-	-	-	-	-	-	-

Institutions							
0.00 to <0.15	107	-	-	0.10	0.08	-	-
0.00 to <0.10	89	-	-	0.09	0.07	-	-
0.10 to <0.15	18	-	-	0.14	0.12	-	-
0.15 to <0.25	24	-	-	0.21	0.20	-	-
0.25 to <0.50	21	-	-	0.44	0.39	-	-
0.50 to <0.75	1	-	-	0.72	0.72	-	-
0.75 to <2.50	24	-	-	1.41	1.20	-	-
0.75 to <1.75	23	-	-	1.22	1.15	-	-
1.75 to <2.5	1	-	-	1.97	2.37	-	-
2.50 to <10.00	-	-	-	-	-	-	-
2.5 to <5	-	-	-	-	-	-	-
5 to <10	-	-	-	-	-	-	-
10.00 to <100.00	5	-	-	16.33	16.32	-	-
10 to <20	5	-	-	16.32	16.32	-	-
20 to <30	-	-	-	-	-	-	-
30 to <100	-	-	-	-	-	-	-
100.00 (Default)	-	-	-	-	-	-	-



6. Operational risk

Operational risk is defined as the possibility of direct or indirect loss resulting from maladjustment or failure of internal processes, people and systems or from external events. Operational risk also includes legal risk and model risk.

Operational risk management is an integral part of the Bank's management process. The operational risk management process and business processes show mutual dependence, which means that information obtained in the operational risk management process is taken into account when making decisions concerning business activities, and the operational risk management process takes into account business decisions.

6.1. Operational risk management objectives

The operational risk management objectives, which are part of the overall risk management strategy, are defined on the basis of:

- regulatory requirements,
- recommendations of the Bank's Management Board and Supervisory Board,
- plans and good practices of the ING Group,
- the need to implement the risk mitigation measures identified in the course of external and internal evaluations and audits,
- improvement plans in the area of risk management.

The Bank's Management Board - after obtaining the approval of the Supervisory Board - defined the operational risk management strategy.

In addition, in consultation with the Supervisory Board, in the risk appetite declaration the Management Board has specified the maximum permissible loss limits, capital limits and the scope of risk that it is willing to take in order to achieve the planned business objectives - in full compliance with the law and regulations. The level of utilisation of limits is monitored and periodically presented to the Non-Financial Risk Committee, the Risk Committee and Supervisory Board.

The main objective in operational risk management is to continuously improve the safety of the Bank and its customers and improve operational efficiency of risk function. These activities focus on comprehensive strengthening of non-financial risk management by optimizing structures and processes, as well as increasing automation and integration of the used tools.

In addition to the implementation of basic processes in the area of operational risk, in 2025 the Bank focused its activities on:

- optimization of the organizational risk management team structure and rules of operation of the Non-Financial Risk Committee,

- developing a single control framework for subsidiaries,
- commencement of work on the integration of local and group tools in the area of non-financial risk,
- transfer of selected operational activities to the first line of defense (registration and monitoring of recommendations and deviations),
- automation of control function matrix,
- optimization of data metrics and the risk monitoring and reporting process, as well as the list of significant processes,
- clarification of the definition of events at the interface of operational and credit risk,
- updating regulations and methodologies, including those related to DORA, AI Act, CRR 3, ESG, principles of third and intra-group entity management and policies and standards for IT risk (including digital resilience), business continuity and security of people and resources,
- increasing the granularity of risk appetite limits by creating additional KRI indicators,
- raising the risk culture among employees through training and webinars, with particular emphasis on proactive risk identification in the first line of defense.

6.2. Operational risk management policies

With regard to operational risk management, there is a consistent and continuously updated package of internal normative documents.

The principles and guidelines contained in the regulations are aimed at limiting the effects and probability of financial losses and reputational damage.

The operational risk management system is based on:

- legal norms,
- regulatory requirements,
- *operational risk management Policy* and detailed regulations, instructions and procedures relating to individual sub-processes related to operational risk management.

6.3. Organisational structure of operational risk management

The Group has a management structure with clearly defined, transparent and consistent areas of responsibility based on the Three Lines of Defence model and principles of cooperation with the parent entity.

The scope of responsibility is defined starting from the Supervisory Board and the Risk Committee supporting it, and the Bank's Management Board, through all the organisational units. In the scope of operational risk, there is also



supervision of significant subsidiaries of the Bank, aiming at optimizing the second line of defense in subsidiaries and establishing a uniform control framework for these subsidiaries.

For years, the Bank has had a permanent Non-Financial Risk Committee, whose main task is supervision of non-financial risk management. In mid-2025, the Bank increased the frequency of the Committee's work from quarterly to monthly.

6.4. Operational risk management process

The Bank has effective and consistent processes for identifying, monitoring and controlling non-financial risk in all of the products, activities, processes and systems.

The operational risk management system applies to all areas of the Bank's operations and the Group's operations, as well as cooperation with clients, suppliers and partners, that has been developed in accordance with the principle of proportionality, i.e. taking into account the nature, scale and complexity of the business, as well as the materiality of the processes and the operational risk profile of the Bank. It constitutes a coherent, continuing practice that includes the following elements:

- risk identification and assessment, including, among others, risk assessments, analysis of internal and external events or scenario analyses and stress tests,
- risk mitigation and monitoring of mitigation actions,
- carrying out inspections,
- monitoring and quality assurance.

6.5. Methods applied to quantify capital requirement for the operational risk

In order to ensure continuity of operations, the capital Group allocates adequate capital to operational risk. The business indicator method to determine regulatory capital for operational risk is used.

To calculate the economic capital requirement, an advanced method developed at the ING Group level is implemented. The model used is a hybrid model that allows risk to be measured on the basis of, among other things, internal and external data on operational risk events, scenario analyses, and business environment and internal control factors.

6.6. Gross losses due to the operational risk

In 2025, the ING Bank Śląski S.A. Capital Group reported operational risk losses from internal events at the level of PLN 133 million, including ING Bank Śląski S.A. PLN 125 million, ING Commercial Finance Polska PLN 6 million and ING Lease Polska Sp. z o.o. PLN 2 million.

The operational risk also includes losses resulting from compliance and legal risk. Established provisions are included in gross losses. Released provisions reduce the gross loss and increase Bank's income for given year.

Actual losses distribution of the ING Bank Śląski S.A. Group as per type and category of events

Event type	Event category	Gross losses
1 Clients, Products and Business Practices	Product Flaws / Suitability, Disclosures and Fiduciary / Improper Business or Market Practices /Customer classification and exposures	93
2 External Fraud	Theft and Fraud	37
3 Internal Fraud	Theft and Fraud	2
4 Execution, Delivery and Process Management	Customer Intake and Documentation / Transaction/Data Management / Customer/Client Account Management / Vendors and Suppliers / Trade Counterparties	1
Total		133

The operational risk losses recorded in 2025 did not exceed the loss limit set at the beginning of the year. The utilisation level of the limit at the end of the year was at 49.5% for the Bank and 45.5% for the Group. At the same time, as a result of direct recoveries and compensation from insurance, the Group recovered the amount of PLN 19 million, which is 14.1% of the total amount of gross losses incurred by Group.

The largest losses from operational risk events were the result of:

- an increase in portfolio provisions for foreign currency indexed (CHF) mortgage loans,
- additional provisions established or increased for regulatory proceedings,
- costs of legal fees and mediations related to CHF loans legal claims,
- external and internal fraud,
- employee errors during operational activities or delays in the execution of transactions.

7. Information on ESG risk and aggregate exposure to shadow banking entities

In accordance with the proposal of the European Banking Authority (EBA), presented in the consultation paper published on 22 May 2025, on amendments to Commission Implementing Regulation (EU) 2024/3172, allowing for the deferral of the mandatory disclosure obligation under Article 13(1) of the Regulation CCR (for large subsidiaries) until 31 December 2026, and the positive opinion of the Polish Financial Supervision Authority in this regard expressed in a letter dated on 10 July 2025 and 12 February 2026, the Group waives the obligation to disclose the information required by Articles 449a (Information on ESG risks) and 449b (Information on aggregate exposure to shadow banking entities) of the Regulation CRR within the document *Qualitative and quantitative disclosures relating to capital adequacy published for 2025*. Qualitative and quantitative information on ESG risk, related to the requirements included in Article 449a of the Regulation CRR, were presented in the Management Board Report on operations of the ING Bank Śląski S.A. in 2025 in the section ESG risk, on a voluntary basis.



8. Internal capital adequacy assessment

In the Group, the level of own funds is maintained at a level adequate to the risk profile and the scale of the Group's operations. In accordance with the provisions of the Banking Law, the assessment of the adequacy of capital maintained by the Group is made both in normative and internal (economic) perspective, where the economic capital adequacy ratio is a supplement to regulatory measures, i.e. capital ratios and leverage ratio.

The Group defines economic capital (internal capital) as capital needed to cover all material risks identified by the Group in its activities and macroeconomic environment. The capital covers potential unexpected losses to which the Group could be exposed in the future with confidence interval corresponding with desired A- rating (99.9%) and one year horizon. When calculating the total internal capital, the Group sums up the amounts of economic capital per risk type (credit, market, business, liquidity and funding, and operational) and does not take into account the diversification effect between these risk types. The Group assesses the adequacy of internal capital by determining whether own funds are sufficient to cover the total economic capital (surplus of own funds over total economic capital) and by determining whether the economic capital adequacy ratio (ratio of own funds to 12.5 times total economic capital as an analogous measure to capital ratios in Pillar 1) is above 8%.

In 2025, the value of own funds for the Group was above the value of internal capital.

8.1. Material risk types identification

In the Group the *Capital Management Policy at ING Bank Śląski S.A.* details the process of material risk types identification, the basic elements for their quantification and capital adequacy management rules.

On the basis of above-mentioned document, the Group identifies the following types of risk:

- permanently material risk - the risk which, in view of the nature of the Group's business, is currently material and will be material in the future. The nature of the Group's business shall be understood as deposit and credit services along with related: liquidity, acting in macroeconomic environment and risk management connected with inappropriate and unreliable internal processes, people and technical systems or external events,
- material risk - the risk that may cause potential losses with the frequency of occurrence value qualifying it as material in line with the table below:

Risk materiality classification				
Potential loss (PLN)	up to 0.2% of own funds	from 0.2% to 1% of own funds	from 1% to 5% of own funds	above 5% of own funds
At least once a year	Non-material	Material	Material	Material
At least once in 5 years	Non-material	Non-material	Material	Material
Less than once in 5 years	Non-material	Non-material	Non-material	Material

Within ICAAP in the first quarter of 2025 the Risk Materiality Assessment Workshops have taken place in the Group. During the Workshops subcategories of risks within credit risk were modified in the following way:

- a new subcategory was created: the risk of deterioration of portfolio quality, which include residual risk and the risk of a decrease in the economic value of a credit exposure as a result of a deterioration in the counterparty's ability to service the obligation (moved from default and counterparty risk),
- due to the development of market standards regarding the interpretation of regulations and the approach to monitoring changes in applicable regulations, the previously identified risk of the definition of "default" has been removed (the risk was non-material).

As a result of the Workshops the risks have been assessed according to the below listing.



8.2. Economic capital assessment methodology

At present, the Group calculates capital for the following risks:

- Default and counterparty risk and deterioration of portfolio quality risk - the risk of potential losses due to counterparty / debtor's failure to fulfil their obligations towards the Group (including transaction settlement and delivery of financial instrument at agreed date) and the risk of loss as a result of portfolio quality deterioration, resulting from deterioration of the client rating within the non-default portfolio or lower than assumed effectiveness of credit risk mitigation techniques. Economic capital requirement is calculated using



CREC method complemented with methods elaborated in the Regulation CRR for: the default and counterparty credit risk for defaulted portfolios, the central counterparty credit risk, the credit valuation adjustment (CVA) risk, the settlement risk and the credit risk for securitisation portfolios.

- Other non-credit obligation assets risk - the risk of not recovering the value of balance non-credit obligation assets by the Group (DTA, capital exposures and other). The economic capital is calculated in compliance with the Regulation CRR (standardised approach) or by recognizing capital add-ons for credit risk resulting from imperfections in the models used.
- Concentration risk - the risk resulting from an excessive exposure or risk factors that have the potential to generate losses large enough to threaten the financial health, have an impact on the ability to conduct core business or may lead to a significant change in the risk profile. The capital requirement is calculated based on the following rules:
 - for large exposure – within CREC method (for concentration towards individual entities i.e. single name concentration) and additionally based on exceeding defined thresholds for the use of concentration limits (for concentrations resulting from related clients),
 - for sectoral concentration - within CREC method,
 - for geographical concentration which is important for the retail portfolio of residential mortgages (MTG) - based on defined categories / levels of concentration risk, defining the acceptable share of a given region in the MTG portfolio.
- Residual value risk - the risk arising from the residual value of the leased asset, which is the difference between the value of the asset and the sum of the lease payments. The contractor has the right to purchase the leased asset, but it is not absolutely obliged to do this. Capital requirement is calculated according to the Regulation CRR.
- Exchange rate risk – risk of losses due to currency rate fluctuations. Economic capital is calculated by VaR methodology .
- General and specific interest rate risk in trading book – the risk of loss on positions in trading books due to interest rate changes. Economic capital is calculated by VaR methodology.
- Interest rate risk in banking book – risk of loss due to unexpected non-linear shift of the interest rate curve. Economic capital is calculated, depending on the source of risk, based on the IR movement simulation, VaR methodology or a result of two elements: Monte Carlo simulation and replicating portfolio market value.
- Macroeconomic risk - the risk arising from macroeconomic changes and their impact on the minimum capital requirements. The capital requirement determination methodology uses in-house stress tests and required capital adequacy metrics.
- Liquidity and funding risk - the risk involving the inability to meet, at a reasonable price, financial obligations resulting from the balance sheet and off-balance sheet. The Group maintains liquidity in such a way that the

monetary liabilities of the Group may have always done with the available funds, proceeds from maturing transactions, available funding sources at market prices and/or the liquidation of transferable assets. Economic capital is reflecting costs of additional funding acquirement allowing to recover internal levels of LCR metric or internal concentration limit for the ten largest depositors.

- Operational risk - the risk of direct or indirect material loss resulting from inadequate or unreliable internal processes, bank employees and systems or from external events as well as the risk that the financial or reputational position of the Group is negatively impacted as a consequence of the use of models. Operational risk includes also consequences of losing reputation, conduct risk and concentration risk (within the area of operation risk). To calculate the economic capital requirement, the Group applies the Advanced Measurement Approach (AMA). The model applied is a hybrid model, allowing the Group to measure risk with the use of internal and external data on operational risk events, scenario analysis as well as business environment and internal control factors. For the model risk, the Group allocates economic capital by imposing capital add-ons directly on the model results or on the risks in which the models are used.

8.3. ICAAP review process

In the Group, capital adequacy is assessed, both on an individual and consolidated basis, on an ongoing basis. In this process, reports are prepared with information on realized and planned capital requirements for all significant types of risk, in relation to the approved limits. These reports are the basis for monthly monitoring of internal capital adequacy by the Assets and Liabilities Committee (ALCO) and the Management Board. The Supervisory Board is regularly informed about the capital adequacy of the Bank and the Group, including the adequacy of internal capital. The Group also assesses capital adequacy based on stress tests.

The internal capital adequacy assessment process (ICAAP) is one of the responsibilities of the Management Board and is subject to an annual review, the report of which is submitted to the Management Board and the Supervisory Board of ING Bank Śląski S.A. In addition, the ICAAP process is subject to an additional, independent audit, for which the Internal Audit Department is responsible.



9. Impact of the implementation of IFRS 9 on capital adequacy

In the calculation of capital ratios, the Group applied the temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in accordance with Article 468 of the Regulation CRR. As at 31 December 2025 the total capital ratio and Tier 1 ratio would be 14.78% and 13.98%, respectively, if the Group did not use this provision. Since the beginning of 2025, the Group has not applied the transitional provisions related to mitigating the impact of the implementation of IFRS 9 on the level of own funds in the calculation of capital ratios.

IFRS 9/Article 468-FL: Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 of the CRR

	31 Dec 2025	30 Jun 2025	30 Jun 2025	31 Mar 2025	
Available capital (amounts)					
1	CET1 capital	18,167	17,746	18,036	18,098
2	CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,167	17,746	18,036	18,098
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied	17,884	17,530	17,768	17,855
3	Tier 1 capital	18,167	17,746	18,036	18,098
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,167	17,746	18,036	18,098
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	17,884	17,530	17,768	17,855
5	Total capital	19,199	18,862	19,220	19,338
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19,199	18,862	19,220	19,338
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	18,916	18,646	18,952	19,096
Risk-weighted assets (amounts)					
7	Total risk-weighted assets	128,129	126,884	122,524	119,695
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	128,129	126,884	122,524	119,695
Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	14.18%	13.99%	14.72%	15.12%
10	CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.18%	13.99%	14.72%	15.12%
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	13.98%	13.83%	14.52%	14.93%
11	Tier 1 (as a percentage of risk exposure amount)	14.18%	13.99%	14.72%	15.12%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.18%	13.99%	14.72%	15.12%
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	13.98%	13.83%	14.52%	14.93%
13	Total capital (as a percentage of risk exposure amount)	14.98%	14.87%	15.69%	16.16%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.98%	14.87%	15.69%	16.16%
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	14.78%	14.71%	15.49%	15.97%
Leverage ratio					
15	Leverage ratio total exposure measure	307,440	313,183	308,431	293,750
16	Leverage ratio	5.91%	5.67%	5.85%	6.16%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5.91%	5.67%	5.85%	6.16%
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	5.82%	5.60%	5.77%	6.08%



10. Disclosures in the area of the minimum requirement for own funds and eligible liabilities

The Bank is obliged to meet the MREL (minimum requirement for own funds and eligible liabilities "MREL") requirements, pursuant to Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms.

On 5 June 2025, the Bank received a letter from the Bank Guarantee Fund (BFG) regarding a joint decision of the resolution authorities, i.e. Single Resolution Board (SRB) and the BFG, on the minimum level of own funds and write-down/conversion liabilities (MREL). This decision is based on the ING Group's 'Single Point of Entry' (SPE) forced restructuring strategy.

The BFG, in consultation with the SRB, set the MREL requirement for the Bank at 16.25% of the total risk exposure amount (TREA) - with the obligation to supplement by the combined buffer requirement of 4.50% as at 31 December 2025 and 5.91% of the total exposure measure (TEM) at the individual level. The Bank is obliged to meet the MREL requirement for both, TREA and TEM, at the same time. The entire MREL requirement should be met in the form of own funds and liabilities meeting the criteria set out in Article 98 of the Act on the BGF, which transposes Article 45f(2) of the BRRD2.

In addition, the BFG indicated that the part of the MREL corresponding to the recapitalisation amount should be satisfied in the form of the following instruments: additional Tier 1 (AT1), Tier 2 capital instruments (T2) and other subordinated eligible liabilities acquired directly or indirectly by the parent entity. The Bank estimates that the MREL part of the recapitalisation amount requirement is 8.25% TREA and 2.91% TEM.

At the same time, the BFG indicated that the Common Equity Tier 1 (CET1) instruments held by the Bank for the purpose of the combined buffer requirement cannot be included in the MREL requirement expressed as a percentage of the total risk exposure amount (TREA).

As at 31 December 2025, the Bank had three non-preferred senior loans (NPS) from ING Bank N.V., with a nominal value of EUR 2,110 million. This value includes:

- a loan of EUR 350 million, taken out on 10 October 2024 for a period of 4 years (with the right to early repayment after 3 years),
- a loan of EUR 1,500 million, taken out on 22 December 2023 for a period of 4 years (with the right to early repayment after 3 years),
- a loan of EUR 260 million, taken out on 5 January 2023 for a period of 6 years (with the right to early repayment after 5 years).

All loans are an element of the SPE strategy for ING Group. The Bank includes NPS funds in eligible liabilities for the purposes of the minimum requirement of own funds and eligible liabilities (MREL). Interest on the loans is payable quarterly at EURIBOR 3M plus a margin (1.50% for the October 2024 loan, 2.01% for the December 2023 loan and

2.35% for the January 2023 loan). The financial conditions of the loans are in line with market standards. As at 31 December 2025, the carrying amount of liabilities due to NPS loans amounted to PLN 8,949 million.

The scope of disclosures regarding the MREL requirement results from the fact that the Bank is not a resolution entity.

The quantitative data in terms of the MREL requirement are presented in the table below (in accordance with the EU ILAC template presented in Commission Implementing Regulation (EU) 2021/763). Column b does not apply to Bank.



EU ILAC - Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs

	a	b	c
	Minimum requirement for own funds and eligible liabilities (internal MREL)	Non-EU G-SII requirement for own funds and eligible liabilities	Minimum requirement for own funds and eligible liabilities (internal MREL)
Applicable requirement and level of application			
EU-1	Is the entity subject to a non-EU G-SII requirement for own funds and eligible liabilities? (Y/N)		N
EU-2	If EU-1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)		-
EU-2a	Is the entity subject to an internal MREL? (Y/N)		Y
EU-2b	If EU-2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)		I
Own funds and eligible liabilities			
EU-3	Common Equity Tier 1 capital (CET1)	18,219	
EU-4	Eligible Additional Tier 1 capital	-	
EU-5	Eligible Tier 2 capital	1,030	
EU-6	Eligible own funds	19,249	
EU-7	Eligible liabilities	10,455	
EU-8	of which permitted guarantees	-	
EU-9a	(Adjustments)	-	
EU-9b	Own funds and eligible liabilities items after adjustments	29,704	
Total risk exposure amount and total exposure measure			
EU-10	Total risk exposure amount (TREA)	117,756	
EU-11	Total exposure measure (TEM)	287,845	
Ratio of own funds and eligible liabilities			
EU-12	Own funds and eligible liabilities as a percentage of the TREA	25.22%	
EU-13	of which permitted guarantees	-	
EU-14	Own funds and eligible liabilities as a percentage of the TEM	10.32%	
EU-15	of which permitted guarantees	-	
EU-16	CET1 (as a percentage of the TREA) available after meeting the entity's requirements	8.97%	
EU-17	Institution-specific combined buffer requirement		
Requirements			
EU-18	Requirement expressed as a percentage of the TREA	16.25%	
EU-19	of which part of the requirement that may be met with a guarantee	-	
EU-20	Requirement expressed as percentage of the TEM	5.91%	
EU-21	of which part of the requirement that may be met with a guarantee	-	
Memorandum items			
EU-22	Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013		

The creditor ranking is presented in the below table (in accordance with the EU TLAC2b template presented in Commission Implementing Regulation (EU) 2021/763.

EU TLAC2b: Creditor ranking - Entity that is not a resolution entity

	Insolvency ranking				Total
	1 (most junior)	1	3	5 (most senior)	
	Resolution entity	Other	Resolution entity	Resolution entity	
1	Empty set in the EU				
2	Description of insolvency rank (free text)	Tier 1 Capital	Tier 1 Capital	Subordinated liabilities	Non preferred senior loan (NPS)
3	Empty set in the EU				
4	Empty set in the EU				
5	Empty set in the EU				
6	Own funds and eligible liabilities for the purpose of internal MREL	13,664	4,555	2,536	8,949
7	of which residual maturity ≥ 1 year < 2 years	-	-	-	6,347
8	of which residual maturity ≥ 2 year < 5 years	-	-	1,479	2,602
9	of which residual maturity ≥ 5 years < 10 years	-	-	1,057	-
10	of which residual maturity ≥ 10 years, but excluding perpetual securities	-	-	-	-
11	of which perpetual securities	13,664	4,555	-	-
					29,704



Statement

Based on Article 431 (3) of the Regulation CRR Lead of Centre of Expertise Accounting Policy and Financial Reporting of ING Bank Śląski S.A. declares that:

- information contained in the disclosure document is adequate to the facts,
- information required by the provisions of part eight of the Regulation CRR was disclosed in accordance with the *Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A.* and internal procedures, systems and controls described in the above-mentioned Policy and the *Instruction of verification of the “Policy of disclosing qualitative and quantitative information on capital adequacy and variable components of remuneration of ING Bank Śląski S.A.”*, which has been included in annex to this Policy.

2026-03-03

Jolanta Alvarado Rodriguez

Lead of Centre of Expertise Accounting Policy and Financial Reporting

The original Polish document is signed with a qualified electronic signature



Statement and signatures of the Management Board members of ING Bank Śląski S.A.

The Management Board of ING Bank Śląski S.A. declares that, to the best of their knowledge, the adequacy of risk management arrangements ensures that the risk management systems used are appropriate from the point of view of the risk profile and strategy of the Bank and the Group and approves this *Qualitative and quantitative disclosures relating to capital adequacy published for 2025 of ING Bank Śląski S.A. Group*, which provides information on risk, discusses the overall risk profile of the Bank and the Group related to the business strategy, and provides key indicators and figures that provide external stakeholders with a holistic picture of risk management, including the interaction between the risk profile and the risk appetite, as determined by the Management Board and approved by the Supervisory Board.

2026-03-03	Michał Bolestawski President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Joanna Erdman Vice-President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Marcin Giżycki Vice-President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Bożena Graczyk Vice-President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Marcin Kościński Vice-President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Maciej Ogórkiewicz Vice-President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Wojciech Sieńczyk Vice-President	The original Polish document is signed with a qualified electronic signature
2026-03-03	Alicja Żyła Vice-President	The original Polish document is signed with a qualified electronic signature