



ESG Report

# Pekao Bank

2024



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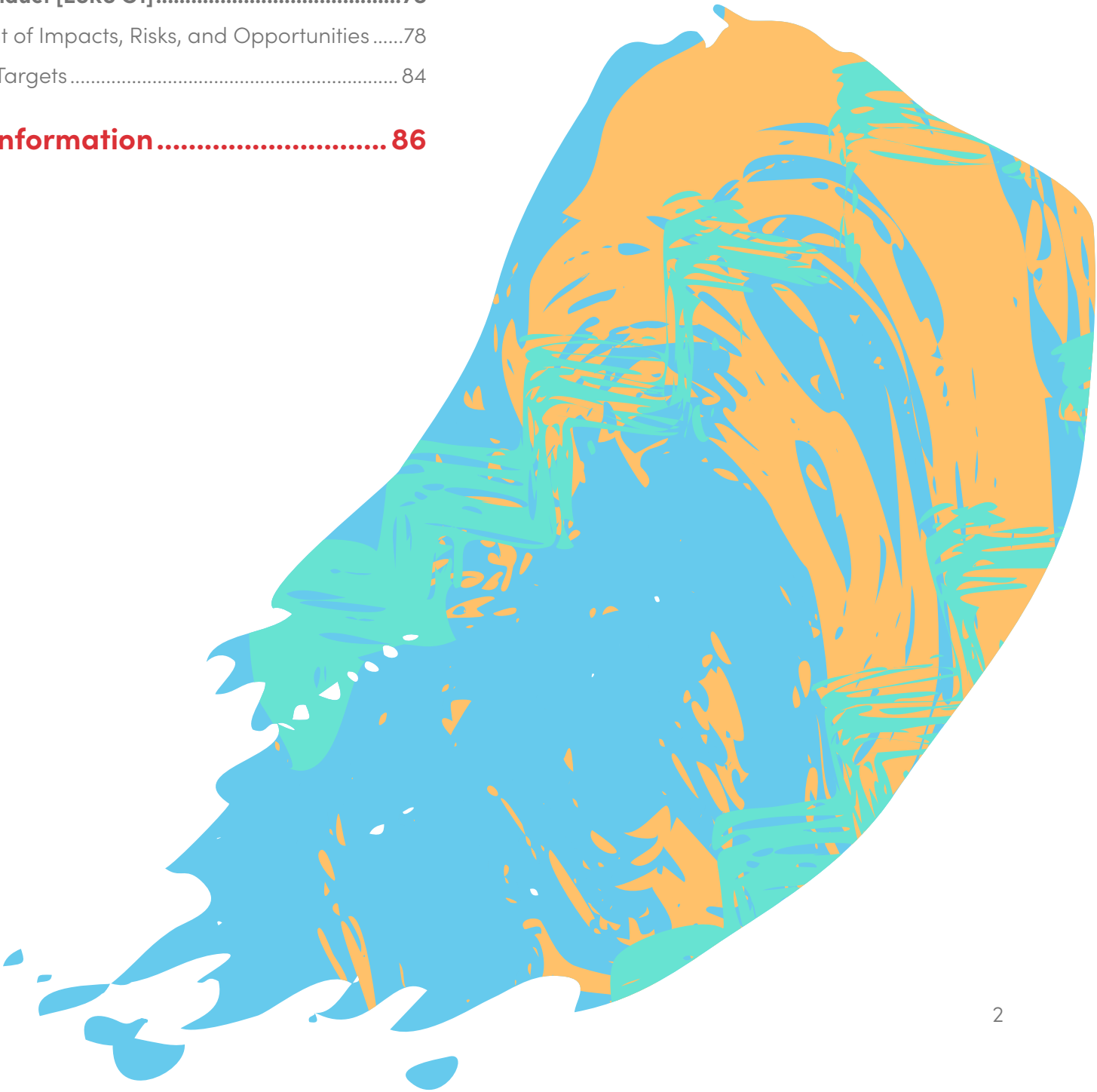
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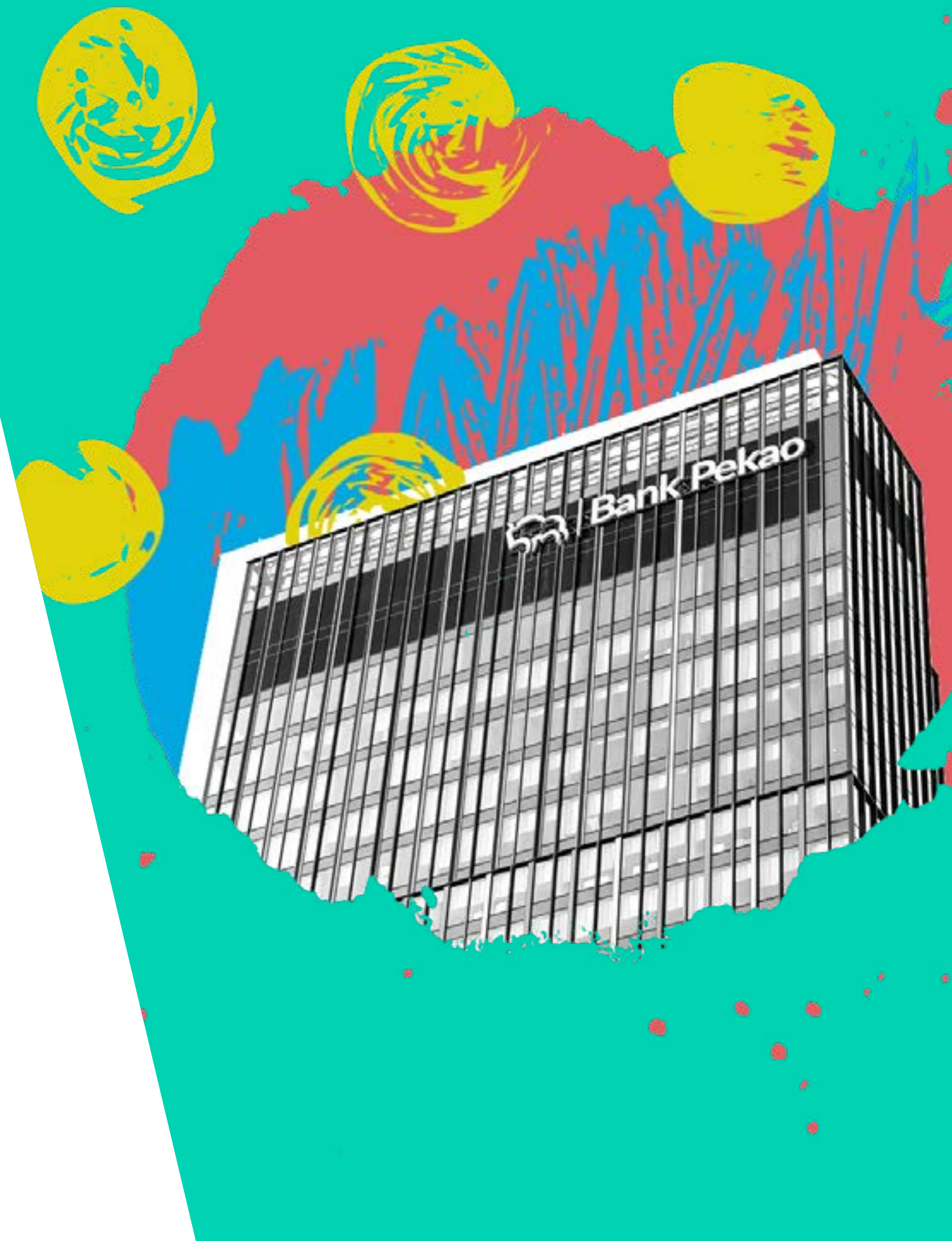
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# General Information



Principles for Preparing the Sustainability Statement [BP-1] [BP-2]

The consolidated sustainability statement of Bank Pekao S.A. Capital Group (hereinafter: “Pekao Group”) has been prepared in accordance with the Accounting Act of 29 September 1994, as well as the provisions of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment. It also complies with the European Sustainability Reporting Standards (ESRS), introduced by Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, supplementing Directive 2013/34/EU of the European Parliament and of the Council regarding sustainability reporting standards.

Pekao Group reports non-financial data on an annual basis. This statement covers sustainability information related to the Capital Group for the period from 1 January 2024 to 31 December 2024. The data has been fully consolidated, and the consolidation scope aligns with the financial statements.

The Capital Group consists of: Bank Pekao Kasa Opieki Spółka Akcyjna (hereinafter: “Bank Pekao”) as the parent entity, along with its subsidiaries and indirect subsidiaries, which operate in the banking, asset management, brokerage services, transaction advisory, leasing, and factoring markets. Additionally, Bank Pekao holds shares and equity interests in associated entities, as well as minority investments.

In 2024, Pekao Group comprised Bank Pekao and the following subsidiaries and indirect subsidiaries:

Company name	Registered office	Business activity
Pekao Bank Hipoteczny S.A.	Warsaw	Banking
Centrum Kart S.A.	Warsaw	Financial auxiliary service
Pekao Direct Sp. z o.o.	Cracow	all-centre services
Pekao Faktoring Sp. z o.o.	Lublin	Factoring services
Pekao Financial Services Sp. z o.o.	Warsaw	Transfer agent services
Pekao Investment Banking S.A.	Warsaw	Brokerage services
Pekao Investment Management S.A., including:	Warsaw	Holding
Pekao TFI S.A.	Warsaw	Asset management
Pekao Leasing Sp. z o.o., including:	Warsaw	Leasing services
PEUF Sp. z o.o.	Warsaw	Insurance services
Pekao Fundusz Kapitałowy Sp. z o.o (in liquidation)	Warsaw	No operational activity
Pekao Property S.A. w (in liquidation), including:	Warsaw	No operational activity
FPB Media Sp. z o.o. (in bankruptcy)	Warsaw	No operational activity

The statement applies to the entire value chain, both upstream and downstream, within Pekao Group. Pekao Group has not exercised the right to omit specific information related to intellectual property, know-how, or innovation results. Furthermore, it has not deviated from the medium- and long-term time perspectives defined in ESRS. The metrics presented in the report do not include data concerning the value chain estimates derived from indirect sources.

The double materiality analysis process and the Statement contain forward-looking information. As such, assumptions and judgments were applied, including forecasts and projections regarding, among other factors, climate risks, transition risks, and opportunities. Forward-looking information reflects the Group’s current expectations and may be subject to uncertainty and changes, particularly due to economic conditions, regulatory changes, market shifts, or climate-related developments.

For the first time, the 2024 statement has been prepared in line with the European Sustainability Reporting Standards (EU ESRS). In previous years, Pekao Group published a non-financial report based on GRI Standards (GRI 1: Foundation 2021)

## External Verification

This Sustainability Statement of Pekao Group has undergone limited assurance attestation, in compliance with applicable requirements. The assurance was conducted by the audit firm PricewaterhouseCoopers Polska Spółka z ograniczoną odpowiedzialnością Audyt Spółka komandytowa, in accordance with the National Assurance Standard 3002 for assurance engagements other than audits or reviews of historical financial information and the National Standard on Assurance Services Other than Audits and Reviews 3000 (Z) as read in the International Standard on Assurance Services 3000 (revised) “Assurance Services Other than Audits and Reviews of Historical Financial Information”





# Corporate Governance

Bank Pekao S.A. is one of the largest financial institutions in Central and Eastern Europe and the second-largest universal bank in Poland, with total assets exceeding PLN 319 billion

Bank Pekao operates as a joint-stock company, conducting its business in compliance with applicable legal regulations, particularly the Banking Law Act, the Commercial Companies Code, and the Statute of Bank Pekao (hereinafter: “Bank Pekao Statute”). The consolidated version of the Statute of Bank Pekao is available at: <https://www.pekao.com.pl/o-banku/lad-korporacyjny.html>. Bank Pekao operates within the territory of the Republic of Poland, with its head office located in Warsaw, at ul. Żubra 1 (postal code: 01-066).

The Polish Financial Supervision Authority (KNF – Komisja Nadzoru Finansowego) oversees the bank’s activities. Since 1998, Bank Pekao has been listed on the Warsaw Stock Exchange, and since 2017, it has been part of PZU S.A. Capital Group (hereinafter: “PZU Group”).

## Role of Administrative, Management, and Supervisory Bodies

GOV-1

Both Bank Pekao and its Group entities have an organisational structure tailored to their size and business profile. The competencies of corporate bodies are defined by legal regulations, in particular: the Commercial Companies Code, the Banking Law Act, supervisory recommendations from regulatory authorities, the Statute of Bank Pekao, the articles of association and internal regulations of the Group entities

### General Meeting of Shareholders

The General Meeting of Shareholders (hereinafter: “GMS”) is the highest governing body of Bank Pekao. It operates under the Commercial Companies Code and the Statute of Bank Pekao. The competencies of the GMS are defined by legal regulations, particularly the Commercial Companies Code, the Banking Law Act, supervisory recommendations, and the Statute of Bank Pekao. Resolutions are adopted by absolute majority, unless otherwise specified by the Commercial Companies Code or the Statute of Bank Pekao.

### Supervisory Board

The Supervisory Board is responsible for the ongoing oversight of Bank Pekao’s activities. It consists of seven to nine members, appointed by the GMS for a joint three-year term. As of 31 December 2024, the Supervisory Board comprised eight members, including seven men (87.5%) and one woman (12.5%). 75% of the members were independent. None of the Supervisory Board members belonged to underrepresented social groups. The Chairman of the Supervisory Board was not a member of the executive management.

The organisation and operation of the Bank’s Supervisory Board are defined by the Rules of Procedure the Supervisory Board of the Bank S.A.

The composition of the Bank’s Supervisory Board was as follows:

As at the date of submission of the 2024 report	31.12.2024
<b>Artur Olech</b> Chairman of the Supervisory Board	<b>Artur Olech</b> Chairman of the Supervisory Board
<b>Bartosz Grześkowiak</b> Deputy Chairman of the Supervisory Board	<b>Bartosz Grześkowiak</b> Deputy Chairman of the Supervisory Board
<b>Artur Nowak-Far</b> Deputy Chairman of the Supervisory Board	<b>Artur Nowak-Far</b> Deputy Chairman of the Supervisory Board
<b>Krzysztof Czeszejko-Sochacki</b> Member of the Supervisory Board	<b>Krzysztof Czeszejko-Sochacki</b> Member of the Supervisory Board
<b>Magdalena Joanna Dziewguć</b> Member of the Supervisory Board	<b>Magdalena Joanna Dziewguć</b> Member of the Supervisory Board
<b>Radosław Niedzielski</b> Member of the Supervisory Board	<b>Radosław Niedzielski</b> Member of the Supervisory Board
<b>Jacek Nieścior</b> Member of the Supervisory Board	<b>Jacek Nieścior</b> Member of the Supervisory Board
<b>Witold Walkowiak</b> Member of the Supervisory Board	<b>Witold Walkowiak</b> Member of the Supervisory Board

The Bank’s Supervisory Board performs its duties collectively; however, for the execution of specific tasks or to streamline its work, it may appoint committees and teams from among its members.

Further details on the committees of the Supervisory Board can be found in section „Information Provided to Administrative, Management, and Supervisory Bodies and Their Engagement in Sustainability Matters [GOV-2]”

In connection with the implementation of the CSRD Directive in the 2024 reporting year, the Supervisory Board has not yet fully identified the necessary competencies regarding the management of impacts, risks, and opportunities (IRO). Within the Supervisory Board, there is an Audit Committee, which addresses issues related to sustainable development and has access to knowledge in this area. However, considering that sustainable development is a rapidly evolving field requiring the continuous expansion of knowledge and skills, we plan to undertake actions in the near future to support the further development of the Supervisory Board members’ competencies. This will enable effective management of these issues in the future.

## Management Board of the Bank

The Bank’s Management Board manages the Bank’s affairs and represents it. All matters not reserved for the competence of other bodies by law or the Statute of the Bank fall within the scope of the Management Board’s activities.

The Bank’s Management Board consists of between five and nine members, appointed for a joint term lasting three full financial years. In 2024, the Management Board operated with nine members, and changes in the Bank’s management were carried out in accordance with the provisions of the Banking Law Act of 29 August 1997 and the Statute of the Bank.

As of 31 December 2024, the Bank’s Management Board consisted of six members, including five men (83.3%) and one woman (16.7%), resulting in a gender ratio of 1:5. The Management Board of Bank Pekao S.A. did not include a representative of employees or other individuals providing work.

None of the persons appointed to the Bank’s Management Board, in accordance with their submitted statements, conduct competitive activities against the Bank, participate in a competing company as a partner in a civil partnership, general partnership, limited partnership, or capital company, nor are they members of a competing legal entity’s governing body. Moreover, none of the appointed persons are listed in the Register of Insolvent Debtors maintained under the Act of 20 August 1997 on the National Court Register.

The Bank’s Supervisory Board, following conducted assessments, confirmed that all members of the Management Board, as well as the Management Board as a whole, meet the requirements set out in Article 22aa of the Banking Law Act of 29 August 1997 and the suitability requirements specified in the Policy for the Selection and Suitability Assessment of Candidates for the Management Board and Key Function Holders as well as the suitability assessment of proposed and appointed members of the Management Board, the Supervisory Board, and key function holders at Bank Polska S.A

## Suitability Assessment

The Bank adheres to the *Policy for the Selection and Suitability Assessment of Candidates* for the Management Board, Supervisory Board and Key Function Holders, approved by the Supervisory Board on 30 December 2020 (hereinafter: “*Selection and Suitability Assessment Policy*”). Its purpose is to ensure an optimal and uniform process for selecting candidates for Management Board and Key Function positions so that tasks related to the implementation of the Bank’s business plans and strategies are performed by individuals possessing the necessary knowledge, experience, and skills, while also maintaining a good reputation.

*The Selection and Suitability Assessment Policy* also defines the criteria for assessing the individual and collective suitability of candidates and members of the Bank’s Management Board, the Supervisory Board, and key function holders both at the appointment stage and throughout their tenure. It also outlines the events triggering a suitability assessment, the process for conducting such assessments – including roles and responsibilities – and the consequences of the assessment, including corrective measures necessary to ensure compliance with suitability requirements.

In 2024, initial and subsequent individual suitability assessments were conducted, as well as collective suitability assessments of the Supervisory Board and Management Board members. Additionally, suitability assessments were conducted following changes in the roles held by the Bank’s governing body members.

Subsidiaries have implemented Suitability Assessment Policies in accordance with applicable legal regulations.

## Responsibility for Sustainable Development

The Bank’s Management Board, in its daily communication with employees, emphasises the importance of ESG factors in building a sustainable organisation that:

- Maintains high corporate governance standards;
- Adopts an ethical approach to business;
- Undertakes initiatives for society and the environment;
- Supports the development of human capital.

Transparency in ESG policies and sustainability reporting remains a priority for us. Therefore, sustainability is an area of ongoing focus for the management team, including the Board and senior management of the Bank Pekao S.A. The Board of the Bank possesses the requisite expertise in sustainability and plays a pivotal supervisory role, performing several critical tasks, including:

- Approval of ESG reports: The Board holds primary responsibility for the preparation and approval of sustainability reports, ensuring that the data within these documents is accurate, reliable, and compliant with applicable regulations. The Board is accountable for the completeness and correctness of these reports;
- Responsibility for risk management: The Board is responsible for managing risks, including financial risks and those associated with sustainability reporting;
- Legal compliance: The Board ensures compliance with legal requirements related to sustainability;
- Management of the sustainability reporting process: The Board is responsible for the strategy and process of sustainability reporting within the organization, including the implementation of relevant procedures and methodologies to ensure compliance with ESG reporting requirements and transparency in this area.



The ESG Council, established by a resolution of the Management Board in 2020, acts as an advisory body coordinating ESG-related matters, including sustainability reporting. Its main tasks include:

- Supporting decision-making processes concerning ESG issues;
- Identifying strategic directions and the Bank’s engagement in corporate social responsibility and sustainable development projects;
- Providing guidance on the development of sustainable banking products and services;
- Reviewing the engagement of the Bank’s subsidiaries in ESG-related projects while considering their specific business activities and autonomy.

In 2024, the ESG Council did not address material impacts, risks, and opportunities. However, in December 2024, in response to the need for better management of these issues, the Council’s competencies were expanded to include monitoring the management of impacts, risks, and opportunities associated with the Bank’s operations and approving the results of the double materiality analysis. Sustainable development objectives are monitored by the directors of units accountable for their implementation.

The ESG Council comprises four Management Board members:

- Marcin Gadomski – Vice President of the Management Board overseeing the Risk Management Division, including ESG risk, responsible for supervising the bancassurance risk management process. Chairman of the ESG Council;
- Dagmara Wojnar – Vice President of the Management Board supervising the Finance Division, responsible for overseeing the Whistleblowing Procedure. Deputy Chairwoman of the ESG Council;
- Robert Sochacki – Vice President of the Management Board supervising the Corporate Banking, Markets, and Investment Banking Division, the Business Banking Division, and the Pekao Brokerage House. Member of the ESG Council;
- Błażej Szczecki – Vice President of the Management Board supervising the the Retail and Private Banking Division. Member of the ESG Council.

Additionally, the ESG Council includes representatives from key Bank entities responsible for ESG-related matters (both business and support functions).

The Council meets at least once per quarter.

# Information Provided to Administrative, Management, and Supervisory Bodies and Their Engagement in Sustainability Matters [GOV-2]

In 2024, we conducted our first double materiality assessment, enabling us to identify key impacts, risks, and opportunities arising from our business activities. This analysis expanded our perspective on these areas, considering both impacts and risks as well as potential opportunities that may drive our further development.

As we have identified new areas of impact and opportunity, we are currently working on developing management mechanisms, systematic monitoring of results, and evaluating the effectiveness of policies, actions, indicators, and sustainability goals. This will allow us to effectively implement and oversee initiatives supporting the realisation of identified impacts and opportunities in the future.

In 2024, the Board did not receive regular reports on matters related to significant impacts, risks, and opportunities (IRO). Nevertheless, selected elements of IRO, such as

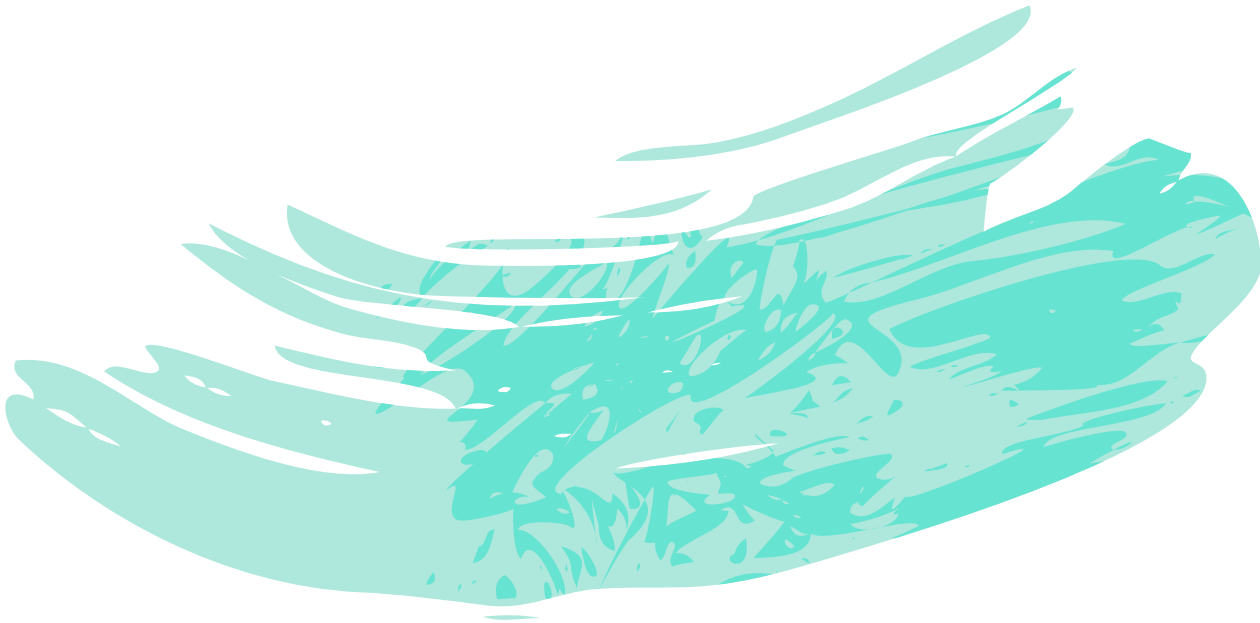
- Organizing financing for new sustainable projects,
- Supporting the energy transition of our clients and the shift to a low-emission economy,
- Implementing various actions aimed at achieving climate neutrality,
- Fostering employee development with respect for diversity and creating an attractive workplace, which will remain the foundation of our actions,
- Reducing the gender pay gap,

- Raising societal awareness and environmental consciousness,
- Developing the Bank while maintaining high standards of corporate governance and ethical business practices, were monitored by the Board as part of the Bank’s Strategy

Regarding risk management, in line with internal regulations and established reporting processes, the following information is reported to the Bank’s Management Board on a quarterly basis:

- Utilisation of the strategic limit for ESG risk at the Bank and Group level;
- Progress on Bank’s ESG Strategy KPIs.

Annually, the Management Board receives a self-assessment report on compliance with applicable ESG requirements. Certain areas of IRO are also considered in the oversight of Bank’s Strategy, decision-making related to risk management processes, as well as decision concerning key transactions, such as establishing terms/limits for financing projects that have a positive environmental impact.





In accordance with internal regulations and reporting procedures, the ESG Council is informed quarterly on the following matters:

- Key ESG risk indicators at the Bank level;
- Accuracy of asset classification for selected Bank's ESG Strategy KPI calculations;
- Progress on Bank's ESG Strategy objectives, initiatives, and KPIs;
- Monitoring of compliance with regulatory requirements.

The impact of climate change mitigation and adaptation has been analysed by the ESG Council in terms of risk factors and market opportunities for the Bank.

In 2024, key risk-related topics addressed by the Council included:

- Monitoring results of strategic ESG risk indicators within the Bank's ESG risk management system, particularly regarding transition risk associated with Scope 3, Category 15 greenhouse gas emissions (Investments);
- Evaluation of ESG Strategy KPI achievements.

Additionally, the ESG Council assessed strategic directions and the potential for realising opportunities in selected areas of sustainable development, including:

- Development of products and services supporting customers in their sustainability transformation;
- Building the Bank's reputation as a responsible institution supporting customers' transition;
- Establishing cooperation with development banks and investors;
- Collaborating with industry organisations engaged in sustainability;
- Managing the Bank's internal processes effectively.

The Supervisory Board reviews the Financial Statements of the Capital Group, including the Management Report, which incorporates the Sustainability Statement. It appoints the Audit Committee, the Nominations and Remuneration Committee, and the Risk Committee, all of which monitor specific areas of the Bank's activities

The objective of the Audit Committee of the Supervisory Board is to support the Supervisory Board in fulfilling its responsibilities concerning sustainable development by:

- Monitoring the financial reporting process and sustainable development reporting, ensuring compliance with applicable laws and internal regulations governing the Bank's operations;
- Monitoring the effectiveness of internal control systems as well as risk management and internal audit systems, including in the field of financial reporting;
- Supervising the financial audit process, including the review and assurance of sustainability reports conducted by the audit firm, taking into account any findings and recommendations issued by the Agency following inspections at the audit firm;
- Overseeing and monitoring the independence of the statutory auditor and the audit firm, particularly when the audit firm provides non-audit services to the public interest entity, beyond the statutory audit and assurance of sustainability reporting;
- Informing the Supervisory Board of the results of the audit or assurance of sustainability reporting and explaining how the process contributed to the reliability of financial reporting, sustainability reporting, or the consolidated sustainability reporting of the public interest entity, as well as clarifying the Audit Committee's role in the review and assurance process;
- Performing other tasks as required by law.

The Nomination and Remuneration Committee of the Supervisory Board assists the Supervisory Board by

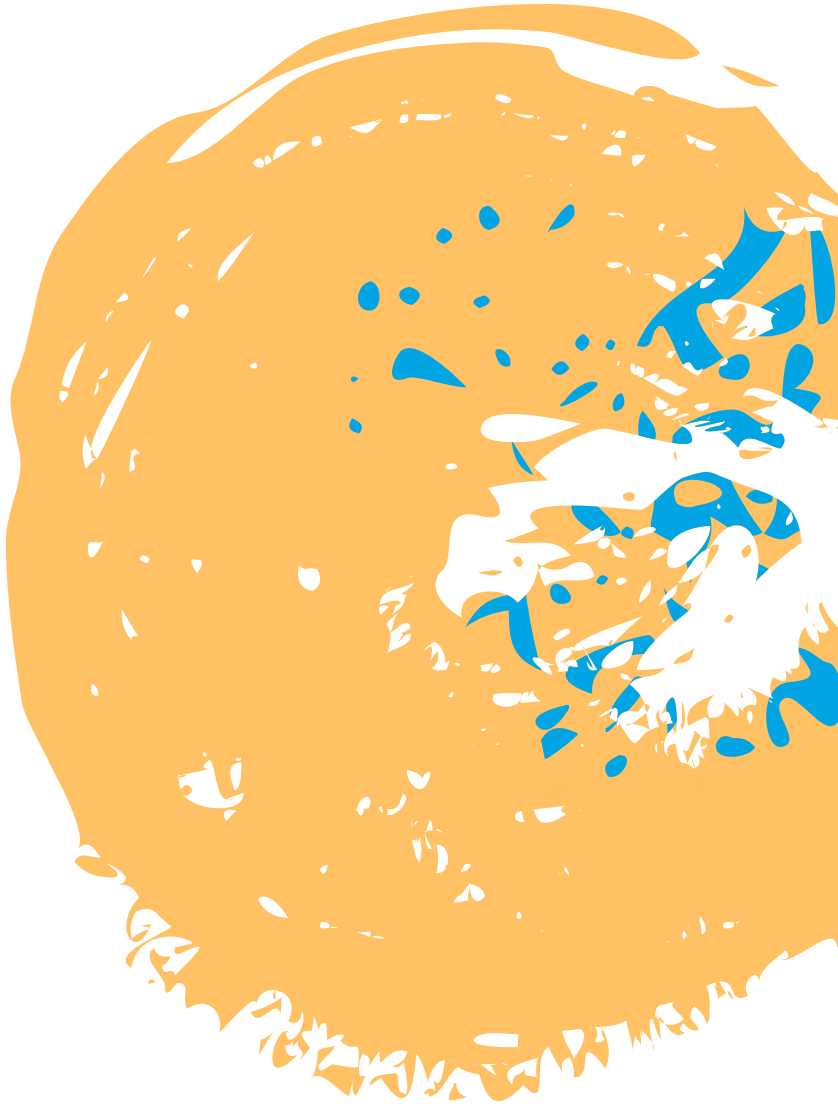
- Submitting proposals regarding the terms of agreements governing the employment or other legal relationships between Management Board members and the Bank, including remuneration of the Management Board members, as well as approving the policy for variable remuneration components for senior executives in the Bank in line with separate regulations;
- Presenting proposals to the General Meeting concerning the remuneration of the Supervisory Board members;

- Preparing recommendations on meeting suitability requirements for the appointment of the Bank's Management Board and Supervisory Board members in accordance with applicable regulations;
- Compiling reports for the General Meeting on the evaluation of the remuneration policy's effectiveness within the Bank.

The Risk Committee is responsible, in particular, for:

- Evaluating the Bank's overall current and future risk appetite.
- Assessing the risk management strategy developed by the Management Board, including policies related to credit, financial, and operational risks.
- Supporting the Supervisory Board in overseeing the implementation of the Bank's risk management strategy by senior management and verifying whether the pricing of liabilities and assets offered to customers appropriately reflects the Bank's business strategy and risk exposure. In cases where pricing does not adequately reflect the risk profile, recommending adjustments to the Management Board to ensure alignment with risk types and exposure;
- Presenting the Management Board of the Bank with proposals aiming to ensure that the prices of assets and liabilities are adequate to these risks.

The Management Board member responsible for risk management, as well as other individuals accountable for risk management at the Bank, may communicate directly with the Risk Committee or its individual members to discuss key issues, including potential inconsistencies with the Bank's management strategy, risk management strategy, approved risk appetite, and other policies adopted by the Management Board.





# Incorporating Sustainability Performance into Incentive System

[GOV-3]

The remuneration strategy, developed in line with the Bank’s operational standards, is reflected in internal regulations. It serves as a crucial mechanism for maintaining the Bank’s reputation and generating long-term value for all stakeholders.

The Remuneration Policy for Members of the Supervisory Board and Management Board of Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: “Remuneration Policy”) sets out the framework for determining, monitoring, and controlling the Bank’s remuneration principles and practices applicable to the members of its Supervisory Board and Management Board. The Remuneration Policy is drafted by the Bank’s Management Board, reviewed by the Nomination and Remuneration Committee and the Risk Committee, and subsequently approved by the Supervisory Board before being adopted by a resolution of the General Meeting.

The Nomination and Remuneration Committee is responsible for reviewing and monitoring the Remuneration Policy while supporting other Bank bodies in shaping and implementing it. Meanwhile, the Risk Committee assesses whether the incentive system described in the Remuneration Policy, as well as the Bank’s overall remuneration practices, adequately consider risk, capital, and liquidity management, as well as the likelihood and time horizon of generating profits. The General Meeting adopts a resolution on the Remuneration Policy at least every four years, with any significant amendments requiring a new resolution.

- The Remuneration Policy aims to:
- Promote sound and effective risk management;
  - Discourage excessive risk-taking beyond the risk appetite approved by the Supervisory Board;
  - Support the Bank’s management strategy and risk management strategy;
  - Address and mitigate conflicts of interest in the Bank’s operations;
  - Ensure that remuneration and related employment conditions, including compensation criteria and payout conditions, are gender-neutral, i.e., not differentiated based on gender

The Remuneration Policy specifies that defined criteria (indicators) should align with the Bank’s long-term strategy, considering social interests, environmental commitments, and measures aimed at preventing and mitigating the negative social impacts of the Bank’s operations. It also incorporates sustainability-related risks into the investment decision-making process.

As part of the Variable Remuneration System for Management Board Members, a management target has been established to enhance the Bank’s transformation towards sustainable social development, ensuring proper integration of environmental, social, and corporate governance (ESG) factors.

he individual variable remuneration awarded annually depends, among other factors, on the assessment of a Management Board Member’s performance in relation to: Employee engagement indicators, volunteering initiatives, financing sustainable projects, advancements in digitalisation and mobile banking. In 2024, these objectives were not linked to specifically defined material impacts, risks, and opportunities. Furthermore, climate-related aspects, including greenhouse gas reduction targets, were not incorporated into the variable remuneration framework.

### Remuneration Principles

Supervisory Board members are entitled to a fixed monthly remuneration and do not receive additional variable remuneration. The total remuneration of a Management Board Member consists of a fixed part constituting the basic monthly remuneration and a variable part, representing supplementary remuneration for the fiscal year. The variable remuneration for a Management Board member is contingent on achieving predefined management targets (such as increasing the Bank’s value and improving financial and economic indicators). It cannot exceed 100% of the fixed remuneration received by the Management Board member in the previous fiscal year for which the variable remuneration is being calculated.

# Due Diligence Statement

[GOV-4]

## Due Diligence Elements

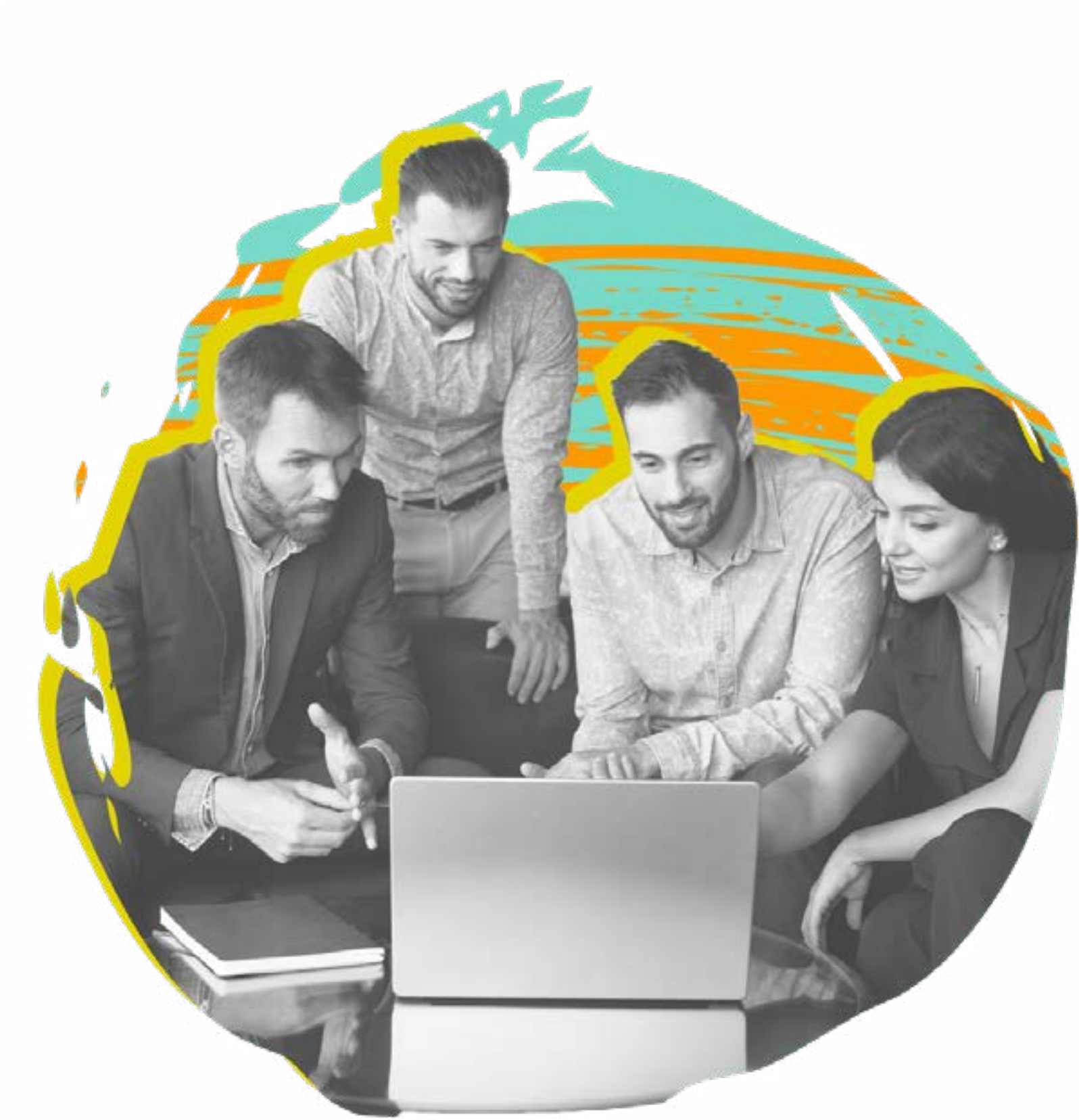
Key elements of the due diligence process	References in the sustainability statement
Integration of due diligence into governance, strategy, and business model	GOV-2, GOV-3, SBM-3,
Engagement with stakeholders affected by the entity at all key stages of the due diligence process	GOV-2, SBM-2, IRO-1, MDR - P, S1-2, S4-2, G1 -1 , G1-3,
Identification and assessment of adverse impacts	IRO-1, SBM-3,
Actions taken to mitigate identified adverse impacts	MDR – A, S1-3, S4-3, G1-1,
Monitoring the effectiveness of these efforts and reporting relevant information	MDR-T, MDR-M, S1-17, S4-4, G1-3,

# Risk Management and Internal Controls in Sustainability Reporting

[GOV-5]

As part of our sustainability reporting management, we have established internal assessment and control mechanisms designed to ensure high quality and compliance of reporting processes with applicable standards and best market practices. Sustainability reports are submitted for approval by the Bank’s Management Board and approved by the Bank’s Supervisory Board.

Additionally, to ensure adequate oversight, the internal audit function conducts an annual in-depth review of the reporting process, covering data verification, compliance with adopted guidelines, and the effectiveness of implemented procedures.





# Strategy

## Strategy, Business Model, and Value Chain [SBM-1]

At Bank Pekao, we conduct operations in both Polish zloty and foreign currencies, actively participating in domestic and international financial markets. We offer a comprehensive range of banking services for both individual and institutional customers. Our operations span corporate banking, private banking, asset management, and brokerage services. This diverse business profile is underpinned by a strong capital and liquidity position, while maintaining the highest risk management standards.

Through a broad product offering, innovative solutions, and a customer-centric approach, we provide comprehensive financial services. Our integrated service model ensures that we deliver top-tier services to our customers, enabling optimal adaptation to evolving needs. We systematically strengthen the Bank's market position across strategic business areas. A detailed catalogue of activities conducted in both domestic and international markets is outlined in Paragraph 6 of the Statute of Bank Pekao.

In 2024, the timeline of the current strategy for Bank Pekao concluded, and we are currently developing a new business strategy to define the Bank's key development directions for the coming years. Over the past year, we have continued to implement the existing business strategy Responsible Bank. Modern Banking for 2021-2024, delivering on plans and achieving a set of strategic objectives built upon four pillars: Customer, Growth, Efficiency, and Responsibility

Our approach to sustainability is reflected in the ESG Strategy: Responsible Bank Supporting Sustainable Development (hereinafter: "ESG Strategy"), which was adopted by the Management Board and reviewed by the Supervisory Board on 25 June 2021. This document aligns with the Bank Pekao Business Strategy 2021-2024 and serves as an extension of its fourth pillar: Responsibility.

Within the ESG Strategy 2021-2024, we have defined the Bank's sustainability objectives and ambitions in relation to environmental, social, and corporate governance (ESG) issues, structured across three pillars:

- **First Pillar: "Environment"** focuses on increasing financing for sustainable projects, supporting the energy transition, and shifting towards a low-carbon economy, with the goal of achieving our own carbon neutrality by 2030. Additionally, we strive to actively participate in governmental and EU recovery and climate transition programmes.
- **Second Pillar: "Social Responsibility"** emphasises strengthening actions for the sustainable development of society, the economy, and general welfare. We engage in various social initiatives aimed at providing assistance, promoting equal opportunities, and preventing exclusion, including awareness campaigns, educational initiatives, and collaboration with social

organisations. We also support environmental awareness through partnerships and digital tools for our customers. As a Bank, we participate in programmes supporting the growth and innovation of Polish enterprises, collaborating with technology firms and developing electronic and mobile payment channels.

- **Third Pillar: "Corporate Governance"** concerns ethical business practices incorporating ESG considerations. A key strategic direction is to promote development, diversity, and equality to ensure an inclusive organisation. We also prioritise transparency in policy-making, internal regulations, and high corporate governance standards. Our aim is to make the Bank an attractive workplace, which we support through training programmes, development initiatives, open communication, and ongoing dialogue.

Since the ESG Strategy was implemented in 2021, its pillars are not directly linked to the identified impacts, risks, and opportunities within the double materiality analysis.



Business Model

The Bank’s business model is structured around customer segmentation, encompassing the following areas:

- **Retail and Private Banking** – erves individual customers, including high-net-worth individuals in private banking, as well as micro-enterprises. Private banking customers receive investment advisory services through private banking centres and remote channels, while all individual customers and micro-enterprises are supported via branch networks and partner outlets, supplemented by remote service channels, including digital platforms
- **Corporate Banking** – provides financial services to small and medium-sized enterprises (SMEs), served by relationship managers with the support of product specialists. Services are delivered through Business Customer Centres, Corporate Centres, and universal retail branches. SME customers benefit from tailored products and services adapted from corporate banking solutions.
- **Corporate and Investment Banking** – offers financial services to large corporate customers, public sector entities, financial institutions, and commercial real estate financing customers. Corporate and investment banking customers are served by relationship managers supported by product specialists.

Value Chain

Bank Pekao’s operations fall within a single sector: Banking, as part of the broader financial institutions macro-sector. Based on this classification, we have conducted a value chain mapping analysis, considering the following elements:

- Value chain element
- Type of value chain element
- Implementing element

- Identification of three key entities or categories for each element
- Geographical location of key entities
- Identification of ESG topics relevant to each value chain element.

Subsequently, based on expert analysis, we developed the Group’s value chain, taking into account the complexity of internal processes, regulatory and technological requirements, the diversity of services, and customer segments

According to the obtained results, our value chain consists of:

**UPSTREAM** of the value chain, which includes key elements of financial infrastructure, such as:

- payment systems, clearing houses, and deposit systems;
- cooperation with international payment card networks (Visa, Mastercard), technology and infrastructure providers, utility service providers, as well as telecommunications companies





Within Upstream, we ensure operational continuity, reliability, and availability of provided services, as well as modern, user-friendly solutions

**ORGANISATION** ENTITY’S OPERATIONS IN THE SECTOR) constitutes the banking service system, which includes

- retail banking;
- business banking;
- corporate banking;
- capital markets; and
- investment banking.

Our activities at this level are based on strong foundations, such as risk management, finance, human resources, and strategy. Within ORGANISATION, we strive to ensure continuous development of technology and operations, as well as employee competencies and the building of organisational culture.

**DOWNSTREAM** of the value chain is focused on serving various customer groups:

- Individual customers benefit from personal banking services, loans, and savings accounts;
- Public sector customers, including governments and local authorities, receive support in public finance management and bond issuance;
- Corporate customers and businesses have access to commercial loans, treasury services, and transaction handling, among others.

DOWNSTREAM also includes financial counterparties, such as other banks and supranational institutions. Activities within this segment are supported by advanced digital platforms, a professional distribution network, and marketing channels

# Stakeholder Interests and Opinions [SBM-2]

We place great importance on managing relationships with stakeholders, taking their needs into account, and ensuring equal access to information. The manner in which we conduct communication with the external environment is governed, among others, by the Bank Pekao Information Policy Principles regarding interactions with investors, securities market analysts, media, and customers, available on our website (Bank’s Information Policy Principles).

The key stakeholder groups of the Group were identified during a materiality assessment conducted in 2024. Based on the results of the sectoral classification, a tool for mapping the value chain of Pekao Group was developed, covering activities in the credit institutions sector. As a result, we defined a list of stakeholders, which was subsequently assessed within the Group by eighteen business units as part of the Pekao S.A. Group Stakeholder Map development. The collected data was integrated and analysed to determine the key stakeholder groups. The visualised results in the form of the Stakeholder Map are presented below.

In line with the guidelines of the Corporate Sustainability Reporting Directive (CSRD), a double materiality analysis was conducted to gain insight from the Pekao Group stakeholders on how they perceive the Group’s impact on various ESRS sub- topics within ESG. The dialogue was carried out through a survey, which also allowed participants to raise additional concerns and topics in open-ended questions. The survey included a total of 42 questions: general (1), environmental (18), social (14), and governance-related (5), as well as an open-ended question. Respondents were categorised into two groups: Internal Stakeholders, including Employees and Subsidiaries (78%), and External Stakeholders (22%). The survey did not include non- employee participants, considered as the Bank’s own human resources.

Participants were asked to identify and assess the impacts related to ESG areas and determine whether they were positive or negative. On average, stakeholders identified the strongest positive impact in the social area and the strongest negative impact in the area of corporate governance. The results of stakeholder opinions were presented in an aggregated form as part of the summary of the double materiality analysis to the Steering Committee and the ESG Council.

In relations with key stakeholders of the Group (as mentioned above), the Bank consistently maintains open communication and takes actions aimed at achieving a positive impact while striving to minimize any negative effects the Group may have on these entities.

Pekao S.A. Capital Group Stakeholder Map

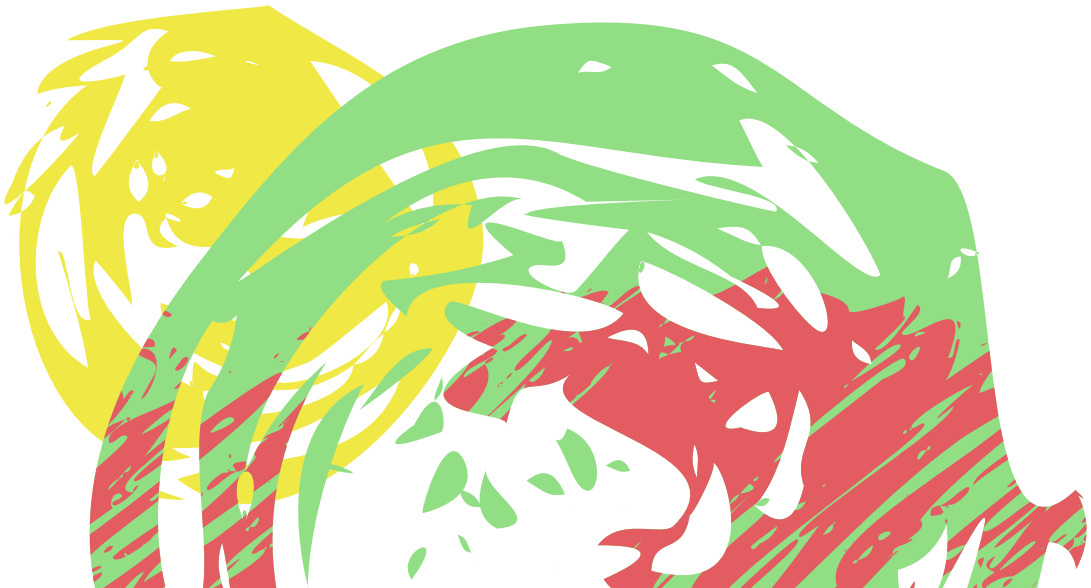


Relation with key stakeholders

Stakeholder groups	Communication tool	Topics addressed	Bank’s actions
Shareholders, including the strategic owner (1)	General Shareholders’ Meeting Conferences and meetings Stock exchange and press releases Financial reports, data summaries, and performance presentations Bank’s website and online communication channels Meetings with rating agencies Ongoing cooperation with the Investor Relations Department (institutional and individual investors, financial analysts, and capital market organizations) ESG online report Branches, online and mobile banking	Strategy implementation, value creation, organizational changes Macroeconomic and market forecasts Profit distribution to shareholders	Operational transparency, easy and quick access to Bank information, adherence to external regulations and market standards.
Customers and recipients (4)	Bank’s website and online communication channels Online banking platform and mobile banking Customer hotline Complaints Satisfaction surveys for products and services and service quality Advertising campaigns and marketing activities Product offers, Mailings Participation in fairs Internal communication	High-quality products and services offered, consumer fair practices Security of entrusted funds Ease of communication with the Bank	Offering competitive, highquality products and services tailored to customer needs  Adherence to procedures ensuring fair and secure management of customer funds  Providing multiple access channels; creating transparent offer and contract conditions, collecting customer expectations and feedback  Co-creating and adhering to good advertising practices and financial services standards.
Employees and employee organizations and trade unions (3)	Intranet, chats, discussion forums Meetings involving the Management Board Employee volunteerism Webinars Employee performance evaluations Internal publications Topic surveys, evaluation surveys, employee opinion surveys Whistleblowing reporting system Meetings with employer representatives, negotiations, consultations Supplier meetings, negotiations	Job stability and career development opportunities Attractive remuneration system Bank’s strategy and key goals Transparent organizational structure Work-life balance Collective Labor Agreement provisions Employee matters Detailed information about social partners is available on individual intranet pages. Trade Unions Employee Council Social Labor Inspection	Listening to employees’ feedback (chats, satisfaction surveys) Ensuring employee development (promotions, training) Clear, measurable goals to be achieved and monitored Adequate salary and benefits policy Meetings with employees and ongoing communication  Providing a friendly workplace: including the introduction of remote work opportunities, as well as health and preventive activities  Dialogue with all trade unions operating in the Bank, based on respect for the legitimate interests of the parties.



Stakeholder groups	Communication tool	Topics addressed	Bank's actions
Regulatory Environment and Supervisory Organizations (10)	Email Reports, statements Business and trading platform	Adherence to requirements and regulations Supporting the creation of new market rules, including best practices.	Adherence to regulations, ongoing cooperation with regulators
Central banks, financial institutions (9)	Email Reports, statements Business and trading platform	ESG projects	Dialogue and cooperation Experience exchange Shaping good market practices
Pekao Group Entities (2)	Phone, email Meetings	Implementation of policies and procedures at the Group level	Cooperation in experience exchange and implementing good practices
Suppliers and business partners (5)	Procurement platform, phone, email Ongoing cooperation andcontract fulfillment Charitable and sponsorship activities, climate-relatedactions	Transparent supplier selection and cooperation principles	Adherence to transparent supplier selection procedures; Timely fulfillment of contract provisions, promoting good purchasing practices
Industry organizations and competitors (6)	Communication on the Bank's website and online communication channels Fairs, conferences, industry meetings	Non-financial reports Results, strategy and goals implementation Ongoing initiatives and projects	Monitoring market changes to develop best practices Trend analysis
Natural Environment (16)	Employee volunteerism Press conferences	Social and environmental projects Reducing negative environmental impact, environmental education for customers and employees	Encouraging employees to participate in environmental initiatives Reducing negative environmental impact



### New Business and ESG Strategy

Changes in the regulatory environment regarding sustainability, implementation of supervisory institutions' recommendations, observation of market practices, and growing stakeholder expectations (including investors and customers) require us to systematically increase our engagement in ESG matters. This includes adjusting internal procedures and incorporating ESG considerations into product, credit, and investment processes. Integrating these topics as an essential part of strategic actions and objectives for the coming years will be a crucial component of the new Business and ESG Strategy of Bank Pekao, which will be published in 2025.

The new strategy will reflect the Bank's development aspirations, considering the current position based on the Baseline Analysis, macroeconomic scenario, and banking sector scenario. Various Bank units, including the Management Board, are involved in the work

The strategy formulation stages include the assessment of the proposed assumptions by the Bank's Management Board and the Supervisory Board, followed by approval from these bodies. Our goal is to prepare an aspirational strategy that will foster excellent relationships with all stakeholders

## Material Impacts, Risks, and Opportunities and Their Interrelation with Strategy and Business Model

[SBM-3]

As a result of the double materiality analysis, we identified 26 topics aligned with ESRS and four additional topics (not covered under ESRS) that Pekao Group significantly impacts (impact materiality) or that significantly affect the Group's operations (financial materiality). More details about the process can be found in subsection [Description of the Process for Identifying and Assessing Material Impacts, Risks, and Opportunities \[IRO-1\]](#)

In assessing impacts, we considered:

- type of impact (positive/negative);
- place of impact occurrence (value chain – mainly through the credit portfolio/organisation);
- time of impact occurrence – actual (currently occurring) / potential (possible future occurrence);
- three time horizons covering periods:
  - short-term (1 year),
  - medium-term (1 to 5 years),
  - long-term (over 5 years).

We conducted the financial materiality analysis regarding opportunities and risks related to the business model, value chain, strategy, and decision-making process in:

- three time horizons covering periods:
  - short-term (1 year),
  - medium-term (1 to 5 years),
  - long-term (over 5 years);
- divided by place of impact occurrence (value chain – mainly through the credit portfolio/organisation).

The analysis also examined potential financial consequences related to the materialisation of risks concerning the Group's financial position. In the current reporting year, we identified an increased risk associated with the imposition of fines by the UOKiK resulting from practices employed by Bank Pekao S.A. related to enhanced consumer protection. In the medium-term horizon, we do not foresee any indications of events that could lead to significant financial consequences for the Bank or its ability to generate cash flows. We identified one potential risk related to tax transparency, namely increased credit risk arising from financing companies that do not adhere to international transparency standards.

Based on the results obtained, we do not identify any material risks to the Bank's business model, strategy or value chain. We also do not expect the related financial effects in the current reporting year or the materialization of risks that could result in a material adjustment of the carrying amounts of assets and liabilities in the next year. With regard to medium and long periods, we also do not see any indications indicating the possibility of events materializing. As part of conducted analysis, we did not assess the resilience of the strategy and business model in the context of climate change. The analysis of climate risks conducted does not indicate threats to resilience.

A detailed list of impacts, risks, and opportunities is presented in the table below





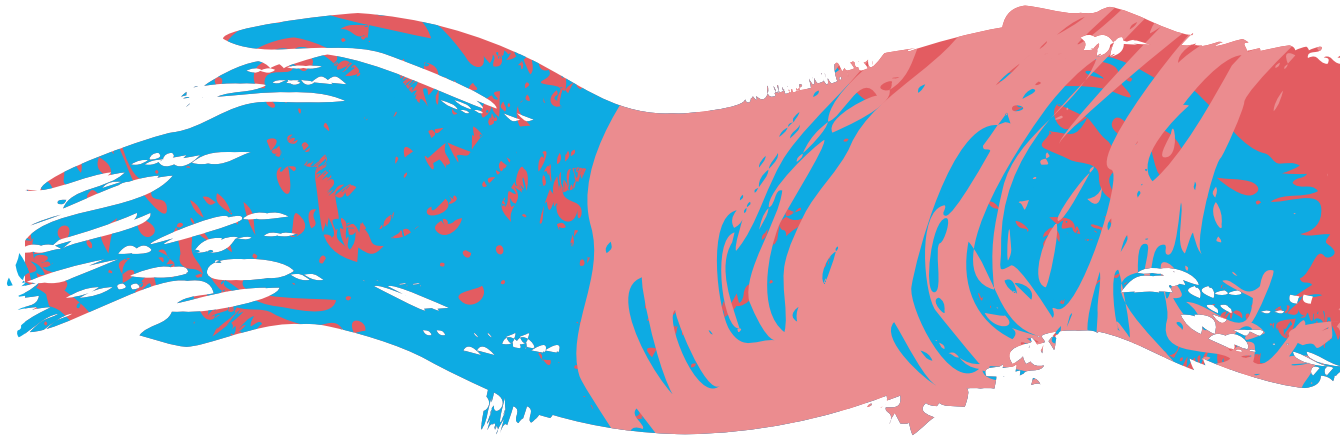
IDENTIFIED ISSUES IN MATERIALITY ASSESSMENT	IMPACT MATERIALITY			FINANCIAL MATERIALITY			
	TYPE	PLACE	OUTLOOK	CATEGORY	TYPE	PLACE	OUTLOOK
E1: CLIMATE CHANGE							
Adaptation to Climate Change	Positive Impact: We support climate adaptation initiatives primarily through financing infrastructure projects designed to withstand extreme weather events and other effects of climate change.	DOWNSTREAM	Medium-term	Actual and Potentia	Opportunity: Increased revenues related to offering financial products or financing projects aimed at climate adaptation.	DOWNSTREAM	Long-term
Climate Change Mitigation	Positive Impact: We engage in financing projects that directly contribute to mitigating climate change (e.g., investments in renewable energy sources).	DOWNSTREAM		Actual	Opportunity: Increased revenues associated with offering financial products or financing projects aimed at mitigating climate change, such as investments in renewable energy and energy efficiency.	DOWNSTREAM	Medium-term Long-term
	Negatywny: Działalność w odniesieniu do portfela kredytów. Posiadamy ekspozycję na sektory wysokoemisyjne, w tym sektor nieruchomości oraz produkcję energii	ORGANISATION DOWNSTREAM		Actual			
Sustainable finance (additional issue)	Positive Impact: We engage in numerous projects aimed at improving corporate customers' energy efficiency, implementing ecological initiatives, financing renewable energy sources, and supporting social projects. We have published a Sustainable Finance Framework defining the eligibility of investments financed from proceeds of EMTN bonds issued by the Bank.	DOWNSTREAM		Actual			
S1: OWN WORKFORCE							
Secure Employment Conditions	Positive Impact: We have a positive impact on employment security. The majority of our employees are employed under employment contracts. However, in response to market needs and evolving expectations regarding employment flexibility, we also offer various types of contracts, including fixed-term and permanent employment contracts, civil law contracts (contract for specific work and contract of mandate), as well as consultant agreements under body leasing arrangements.	ORGANISATION		Actual	No material opportunities or risks identified.		
	Negative Impact: The automation and implementation AI-based solutions may present a risk of job stability.	ORGANISATION	Medium-term	Potencjalny	No material opportunities or risks identified.		
Employee Working Hours	Positive Impact: We regulate employees' working hours through appropriate systems; we apply work time recording principles and monthly work schedules within settlement periods. We have signed an "Agreement on Remote Work Principles" with Trade Unions.	ORGANISATION		Actual	No material opportunities or risks identified.		
Fair Employee Remuneration	Positive Impact: We ensure fair remuneration for employees, considering both legal requirements and market conditions. We implement incentive systems that support the Bank's strategy execution.	ORGANISATION		Actual	No material opportunities or risks identified.		

IDENTIFIED ISSUES IN MATERIALITY ASSESSMENT	IMPACT MATERIALITY		FINANCIAL MATERIALITY				
	TYPE	PLACE	OUTLOOK	CATEGORY	TYPE	PLACE	OUTLOOK
Social Dialogue with Employees	Positive Impact: We engage in dialogue with employees through internal communication channels such as intranet, chats, and regular meetings with the Management Board. We maintain dialogue with al trade union organisations operating within the Bank.	ORGANISATION		Actual	No material opportunities or risks identified.		
Freedom of Association, Works Councils, and Employees’ Right to Information, Consultation, and Participation	Positive Impact: Trade union organisations operate within the Bank. We maintain dialogue with all trade union organisations and provide them with dedicated intranet pages for communication with employees.	ORGANISATION		Actual	No material opportunities or risks identified.		
Collective Bargaining, Including Percentage of Employees Covered by Collective Agreements	Positive Impact: Over 70% of employees are covered by a collective agreement.	ORGANISATION		Actual	No material opportunities or risks identified.		
Work-Life Balance	Positive Impact: We offer flexible working models and participate in health campaigns related to mental health and physical activity.	ORGANISATION		Actual	No material opportunities or risks identified.		
Occupational Health and Safety	Positive Impact: We undertake health and safety initiatives, including training, employee health surveys, and information campaigns.	ORGANISATION		Actual	No material opportunities or risks identified.		
Gender Equality and Equal Pay for Work of Equal Value	Positive Impact: We have implemented an equality and diversity policy aimed at ensuring gender equality and preventing workplace discrimination. We consider gender balance in management and succession planning.	ORGANISATION	Medium-term	Potential	No material opportunities or risks identified.		
	Negative Impact: There is a gender pay gap in the Bank. As part of the ESG Strategy 2021-2024, the Bank is taking measures to reduce this disparity.	ORGANISATION		Actual			
Employee Training and Skills Development	Positive Impact: We offer our employees access to a variety of training formats, including webinars, mentoring, coaching, and e-learning courses.	ORGANISATION		Actual	No material opportunities or risks identified.		
Measures to Prevent Workplace Violence and Harassment	Positive Impact: We have implemented the “Procedure for Counteracting Mobbing, Discrimination, Harassment, or Other Undesirable Behaviour at Bank Polska Kasa Opieki Spółka Akcyjna”, which serves as a mechanism for handling employee complaints, including issues related to workplace violence and harassment. We provide communication channels that allow employees to report unethical practices, such as harassment and violence	ORGANISATION		Actual	No material opportunities or risks identified.		

IDENTIFIED ISSUES IN MATERIALITY ASSESSMENT	IMPACT MATERIALITY		FINANCIAL MATERIALITY				
	TYPE	PLACE	OUTLOOK	CATEGORY	TYPE	PLACE	OUTLOOK
Workplace Diversity	Positive Impact: Our recruitment processes are based solely on assessing the experience and competencies of candidates and their alignment with the job requirements. We implement initiatives that support diversity for all employees and provide managerial training on diversity management.	ORGANISATION		Actual	No material opportunities or risks identified.		
Employee Privacy	Positive Impact: We adhere to personal data protection principles through technical and organisational measures that ensure secure data processing. We take appropriate actions to secure sensitive information, ensuring full compliance with GDPR. We invest in data protection technologies, as well as the development and implementation of procedures and training programs, aimed not only at securing employee privacy but also at building trust and promoting a positive organizational culture	ORGANISATION		Actual	No material opportunities or risks identified.		
S4: CONSUMERS AND END USERS							
Consumers and End Users Privacy	Positive Impact: We are implementing measures aimed at safeguarding consumers through the introduction of technological, systemic and organizational solutions. These include, in particular, educational campaigns that raise awareness about potential threats, frauds prevention methods, and ways to mitigate risks, as well as new transitions monitoring functionalities and updates to banking systems	ORGANISATION		Actual	No material opportunities or risks identified.		
Access to High-Quality Information	Positive Impact: We maintain active and effective communication with all stakeholders through various channels. We prioritise transparency in sales processes and the provision of accurate product information.	ORGANISATION		Actual	No material opportunities or risks identified.		
Personal Safety of Consumers and/or End Users	Positive Impact: We implement numerous measures to protect customer data and financial assets.	ORGANISATION		Actual	No material opportunities or risks identified.		
	Negative Impact: Due to the nature of our activities, we influence consumers' financial security. Failure to comply with internal procedures may expose customers to financial loss and/or deterioration of their financial situation and that of their families	DOWNSTREAM	Medium-term	Potential			



IDENTIFIED ISSUES IN MATERIALITY ASSESSMENT	IMPACT MATERIALITY			FINANCIAL MATERIALITY			
	TYPE	PLACE	OUTLOOK	CATEGORY	TYPE	PLACE	OUTLOOK
Non-discrimination	Positive Impact: The Group takes the obligation of non-discrimination towards consumers very seriously and assesses its impact in this regard as unequivocally positive. This is reflected in a survey conducted among key external stakeholders, in which as many as 30% of respondents indicated a very positive impact (4 or 5 on a 5- point scale), while only 6% of respondents reported a negative impact on a similar scale. The Pekao24 online service provides the option of consulting with an advisor in sign language for the hearing impaired.	ORGANISATION		Actual	No material opportunities or risks identified.		
Access to Products and Services	Positive Impact: We offer a wide range of financial services, including modern transaction banking products, settlement and treasury products, custodian services, and depositary banking. We support Polish micro, small, and medium-sized enterprises. Additionally, we provide an application that facilitates the acquisition and parametrisation of products for new customers	ORGANISATION		Actual	Risk: The heightened risk associated with potential fines by UOKIK as a result of practices employed by Bank Pekao, including issues related to sanctions on free credit and unauthorized transactions, has been identified. Due to the increasing activity of clients and consumer protection efforts by the regulator, which has initiated proceedings against the bank, there is a probability of risk materializing in 2025.	DOWNSTREAM	Short-term
Responsible Marketing Practices	Positive Impact: Every employee of the Bank serves as an ambassador for the products and services offered by Pekao Group. Our marketing and advertising activities are conducted in accordance with the New Product Introduction Policy and the Marketing Communication Creation Principles, in line with the Corporate Governance Principles for Supervised Institutions issued by the Polish Financial Supervision Authority (KNF).	ORGANISATION		Actual	No material opportunities or risks identified.		
Financial Education (additional issue)	Positive Impact: We conduct educational programmes, workshops, and information campaigns for a broad audience on the use of banking products, investment strategies, household budget management, and saving.	ORGANISATION		Actual	No material opportunities or risks identified.		



IDENTIFIED ISSUES IN MATERIALITY ASSESSMENT	IMPACT MATERIALITY		FINANCIAL MATERIALITY				
	TYPE	PLACE	OUTLOOK	CATEGORY	TYPE	PLACE	OUTLOOK
G1: BUSINESS CONDUCT							
Corporate Culture	Positive Impact: We foster an organisational culture based on mutual respect, openness to dialogue, and collective pursuit of organisational goals. The fundamental values and principles underlying our corporate culture are outlined in our internal documents. We conduct educational and awareness initiatives for employees and monitor their implementation through employee opinion surveys and engagement tracking.	ORGANISATION		Actual	No material opportunities or risks identified.		
Whistleblower Protection	Positive Impact: We have implemented the Bank Pekao S.A. Whistleblowing Procedure, which sets out the principles and procedures for reporting irregularities and ensures protection for individuals reporting potential misconduct.	ORGANISATION		Actual	No material opportunities or risks identified.		
Supplier Relationship Management, Including Payment Practices	Positive Impact: We enforce the Bank Pekao S.A. Supplier Code of Conduct, outlining expectations regarding environmental protection, social factors, and corporate governance standards. The Code is used in procurement processes, and each supplier is required to declare compliance and the completion of the ESG Form regarding the verification of its activities in terms of considering ESG factors. We verify outsourcing agreements in accordance with banking law and EBA guidelines.	ORGANISATION		Actual	No material opportunities or risks identified.		
Corruption Prevention and Detection, Including Training	Positive Impact: We maintain and regularly communicate the Anti- Corruption Policy. Every employee is required to complete anti-corruption training and pass an assessment test.	ORGANISATION		Actual	No material opportunities or risks identified.		
Corruption and Bribery Incidents	Positive Impact: We monitor compliance with internal anti-corruption regulations, implement preventive measures, and have established procedures for handling such incidents.	ORGANISATION		Actual	No material opportunities or risks identified.		
Tax Transparency (additional issue)	Positive Impact: We collaborate with tax authorities in exchanging information and complying with international tax information exchange regulations (CRS, FATCA)	ORGANISATION		Actual	Risk: Increased credit risk due to financing enterprises that do not adhere to international tax transparency standards.	DOWNSTREAM	Long-term
Cybersecurity and Data Protection (additional issue)	Positive Impact: The bank, ensuring a high level of data and system protection, contributes to the stability of the banking sector and the privacy protection of its clients. Investing in modern technologies, conducting audits, and applying best market practices not only minimizes threats to the bank and its stakeholders but also supports trust in the financial sector as a whole. The bank conducts continuous cybersecurity risk analysis, and the risks identified during this process are appropriately mitigated.	ORGANISATION		Actual	No material opportunities or risks identified.		

# Management of Impacts, Risks, and Opportunities

## Description of the Process for Identifying and Assessing Material Impacts, Risks, and Opportunities [IRO-1]

As part of the preparation for this Report, we conducted for the first time a double materiality assessment to identify key stakeholder groups relevant to Bank Pekao S.A. and the entire Capital Group, as well as material impacts, risks, and opportunities related to sustainability issues. The results of the assessment form the basis for actions taken and the definition of Bank Pekao S.A.'s strategic goals for the future.

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The process was carried out by a project team representing key units of the Bank, under the supervision of the Steering Committee, which included Directors of the Bank's Departments and representatives of the Management Board. The Steering Committee monitored the progress of work and its compliance with the adopted methodology during regular meetings. The results were discussed and approved by the Steering Committee.

The assessment was conducted in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), incorporating two perspectives: impact materiality and financial materiality – examining both the impact of the Capital Group on sustainability issues and how these issues may affect our financial performance in the future. To ensure consistency with the Bank's risk management approach and enable full integration of ESG risks and opportunities into the existing risk management framework in future years, the risk management unit actively participated in the process. This unit was involved in the identification and assessment of risks and opportunities, including the determination of materiality thresholds for ESG-related risks and opportunities.

- The assessment was structured into four phases:
- Identification of key business sectors and value chain mapping;
  - Analysis of existing data, including market context (benchmarking) and stakeholder dialogue for impact materiality assessment;
  - Financial materiality assessment of risks and opportunities;
  - Matrix analysis of results and the development of a list of ESG topics material to Pekao S.A. Group.
- The double materiality assessment was conducted in 2024 using various research tools and involving
- Experts from Bank Pekao S.A., responsible for assessing the impact and financial materiality of the Organisation;
  - Key internal and external stakeholders who participated in a survey on sustainability issues;
  - Selected members of Bank Pekao's management staff, who were interviewed in a structured format;
  - Comparative analysis of reference entities, ESG ratings, and industry reports.
- The methodology for sector identification was based on the most recent Polish version of ESRS 1 and 2 (published on 19 April 2024) and the publicly available EFRAG sector classification. The threshold for identifying sectors was set at >10% of revenue in the last fiscal year. The sectoral survey was designed based on EFRAG recommendations (Exposure Draft European Sustainability Reporting Standard SEC1 – Sector classification and General approach to sector-specific ESRS), aligned with Taxonomy regulations.
- The key stakeholders of Bank Pekao S.A. were identified through a questionnaire-based assessment of 16 stakeholder groups, where two parameters were evaluated:
- The impact of Pekao S.A. Group on the given stakeholder group;
  - The stakeholder group's interest in the Pekao S.A. Group

- As a result of the analysis and stakeholder mapping, we identified nine key stakeholder groups.
- The impact materiality assessment was conducted in stages, beginning with an analysis of reference entities, ESG ratings, and industry reports, as well as interviews with key internal stakeholders. The assessment methodology involved a comprehensive examination of the Group's impact on its environment, including
- Timing of impact occurrence;
  - Scale of the impact;
  - Probability of the impact;
  - Extent of the impact;
  - Reversibility of the impact.
- To ensure a neutral approach, a variety of data sources were utilised, including
- Interviews with internal stakeholders;
  - Benchmarking analysis, including
    - Benchmarking of reference entities;
    - Benchmarking of industry reports;
    - Benchmarking of ESG ratings,
  - An anonymous survey among stakeholders (internal and external).

The final impact assessment was conducted using an MS Excel-based tool, in accordance with ESRS requirements. The results from the above analyses provided an initial indication of potentially material topics. All ESRS thematic areas were assessed, with the assumption that for those topics confirmed as material in the preliminary analyses, the Group's impact on stakeholders could be deemed non-material. For actual negative impacts, materiality was determined based on severity (scale, extent, duration), while for potential negative impacts, severity and probability were considered. Positive impacts were assessed based on scale and extent (for actual impacts) and scale, extent, and probability (for potential impacts). Each category of

- impact assessment was assigned a 1 to 5 scale, where 1 represents the lowest value and 5 the highest. A topic was deemed material if it scored more than half of the total possible points and was validated in preliminary analyses. Topics that met the minimum required score but were not identified as material in the preliminary analysis were reassessed by the project team.
- The financial materiality assessment was based on the previous phases, leading to the identification of 151 financial risks and opportunities related to all ESRS topics. Each was assessed in terms of probability and financial impact across three time horizons: current reporting year, up to five years, and beyond five years. Following the assessment, we identified a list of the most material risks and opportunities, which, after being mapped to the corresponding ESRS topics, formed a list of potentially material financial topics. A topic was deemed potentially material if an associated risk or opportunity was material in at least one time horizon. The final list was subject to review by Bank experts. Topics to which risks/opportunities were assigned with a total score greater than 8 on a five-point scale for probability and financial impact (e.g., probability 5, financial impact 3) in any of the analysed time perspectives were included in the list of financially material topics. Based on the conducted analyses, we identified four financially material topics in line with ESRS, along with one additional topic
- Additionally, we thoroughly examined climate-related topics, recognising E1 (Climate Change) as a material topic we have examined physical risks and transition risks:
- Physical risks: with respect to physical risks, the identification and assessment of risks carried out as part of the financial materiality analysis was based, in accordance with the requirements of Article 20.b) i., AR 11, on a climate scenario assuming high emissions (SSP5-8.5). Using the transitional provisions (Table in Appendix C), the assessment of climate- related



financial impacts (requirement E1-9) has been based on qualitative methods in order to enable a consistent methodology for all risks and opportunities (with the assessment of most of the physical risks indicated for assessment in AR 11 already based on quantitative methods, and the results of the analyses are published in the following reports: „Information on the capital adequacy of the Bank Pekao S.A. Group” – it includes, m.in, the size of exposure and impairment by type of threat and sector). As a result of the qualitative approach to the requirement E1-9, the conclusions for the resistance analysis are also qualitative (to be supplemented with reference to AR 7 c)

- Transition risks: the identification and assessment of transition risks takes into account elements that are broadly consistent with the SSP1-1.9 scenario, in line with the Paris Agreement, assuming climate neutrality by 2050 (Article 20 c) and AR 12 c)), such as e.g. continuation of political and legal trends within EU regulations, reputation pressure on the implementation of changes. As in the case of physical risks, the Group is currently conducting quantitative analyses for transition risks, publishing data on e.g. credit quality of exposures by sector, issuance and residual maturity, and risk related to the value of real estate with different levels of energy efficiency in relation to loan collateral. In addition, as the Bank is currently working on a transformation plan, we assume that the risks and opportunities for the Paris-compliant scenario will be deepened for the purposes of this plan (the need to determine, for example, emission reduction targets and methods, which may give rise to additional risks of transition)

Regarding other environmental topics:

- E2 (Pollution) – Assessed the Bank’s own operations and product portfolio. No consultations with affected communities were conducted, as the Pekao Group’s operations and value chain do not impact the local environment;
- E3 (Water and Marine Resources) – Assessed the operational impact on water consumption, particularly in central offices and branches. The Bank’s portfolio, including credit exposures, was also analysed. No material impact was identified; therefore, we did not engage in dialogue with the local community;
- E4 (Biodiversity and Ecosystems) – Examined the impact on biodiversity and ecosystems within our own locations, from the perspective of the portfolio, and within the higher and lower tiers of the value chain. We identified and assessed the related risks. However, we did not identify or assess transition risks and opportunities, nor physical risks and opportunities related to biodiversity and ecosystems. We did not consider systemic risk or assess ecosystem services. Given the nature of the Bank’s services, we do not affect biodiversity and ecosystems; thus, we did not conduct local consultations.
- E5 (Circular Economy) – Examined the process of identifying material impacts, risks, and opportunities related to resource use and the circular economy within our own operations and portfolio. We did not identify any material impact within the organisation or the value chain, and we did not conduct consultations on this matter.

To summarise, as a result of the study, we identified:

- The inclusion of Pekao S.A. Capital Group within a single sector: Credit Institutions within the Financial Institutions macro-sector;
- 9 key stakeholder groups;
- 26 topics aligned with ESRS, with 26 material sub-topics for Pekao Group, most of which (19) fall under the social pillar, focusing on aspects related to our own workforce (13) and consumers and end users (6). Within the environmental pillar, two topics are material for Pekao Group: climate change adaptation and climate change mitigation. The corporate governance pillar includes five material topics related to organisational culture, whistleblower protection, supplier relationship management, and anti-corruption measures, including corruption and bribery incidents;
- 4 additional topics material to Pekao S.A. Capital Group, beyond the ESRS list.

The results of the double materiality analysis were approved by the ESG Council.



# Disclosure Requirements under ESRS Covered by the Entity’s Sustainability Statement [IRO-2]

Disclosure Requirements under ESRS Covered by the Entity’s Sustainability Statement.

ESRS Compliance Table

	DISCLOSURE	LOCATION IN THE REPORT	OMISSIONS AND EXPLANATIONS
ESRS 2	BP-1 General basis for preparing sustainability statements	4	
	BP-2 Disclosures related to specific circumstances	4	
	GOV-1 Roles and responsibilities of administrative, management, and supervisory bodies of the company	5	
	GOV-2 Informing administrative, management, and supervisory bodies about sustainability issues	7	
	GOV-3 Integration of sustainability-related results in incentive systems	9	
	GOV-4 Due diligence statement	10	
	GOV-5 Risk management and internal controls in sustainability reporting	10	
	SBM-1 Market position, strategy, business model, and value chain	12	
	SBM-2 Views, interests, and expectations of stakeholders	13	
	SBM-3 Interaction of influences, strategy, and business model of the company	16	
	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities	21	
	IRO-2 Disclosure requirements under ESRS covered by the entity’s sustainability statement	24	
CLIMATE CHANGE			
ESRS E1	GOV-3 Integration of sustainability-related results in incentive systems	9	
	SBM-3 Interaction of influences, strategy, and business model of the company	16	
	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities	21	
	E1-1 Transition plan for climate change mitigation	34	
ESRS E1	E1-2 Policies related to climate change mitigation and adaptation	35	
	E1-3 Actions and resources related to climate policy	39	
	E1-4 Climate change mitigation and adaptation targets	40	

	DISCLOSURE	LOCATION IN THE REPORT	OMISSIONS AND EXPLANATIONS
	E1-5 Energy consumption and energy mix	42	
	E1-6 Gross greenhouse gas emissions for Scopes 1, 2, and 3 and total greenhouse gas emissions	43	
	E1-7 Greenhouse gas removal and emission reduction projects financed through carbon emission units	46	N/A
	E1-8 Internal carbon pricing	46	N/A
	E1-9 Anticipated financial impacts of material physical risks, transition risks, and potential climate-related opportunities	46	N/A
POLLUTION			
ESRS E2	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities	21	
	E2-1 Policies related to pollution		N/A
	E2-2 Actions and resources related to pollution		N/A
	E2-3 Pollution-related targets		N/A
	E2-4 Air, water, and soil pollution		N/A
	E2-5 Potentially hazardous substances and substances of very high concern		N/A
	E2-6 Anticipated financial impacts of risks and opportunities related to pollution		N/A
WATER AND MARINE RESOURCES			
ESRS E3	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities related to pollution	21	
	E3-1 Policies related to water and marine resources		N/A
ESRS E3	E3-2 Actions and resources related to water and marine resources		N/A
	E3-3 Targets related to water and marine resources		N/A
	E3-4 Water consumption		N/A
	E3-5 Anticipated financial impacts of influences, risks, and opportunities related to water and marine resources		N/A

DISCLOSURE		LOCATION IN THE REPORT	OMISSIONS AND EXPLANATIONS
BIODIVERSITY AND ECOSYSTEMS			
ESRS E4	IRO-1 Description of processes for identifying and assessing material impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems		N/A
	E4-1 Biodiversity and ecosystem transformation plan and inclusion of biodiversity and ecosystems in strategy and business model	21	
	E4-2 Policies related to biodiversity and ecosystems		N/A
	E4-3 Actions and resources related to biodiversity and ecosystems		N/A
	E4-4 Targets related to biodiversity and ecosystems		N/A
	E4-5 Impact metrics related to biodiversity and ecosystem change		N/A
	E4-6 Anticipated financial impacts of risks and opportunities related to biodiversity and ecosystems		N/A
RESOURCE USE AND CIRCULAR ECONOMY			
ESRS E5	IRO-1 Description of processes for identifying and assessing material impacts, risks, and opportunities related to resource use and circular economy	21	
	E5-1 Policies related to resource use and circular economy		N/A
	E5-2 Actions and resources related to resource use and circular economy		N/A
	E5-3 Targets related to resource use and circular economy		N/A
	E5-4 Resource inflows		N/A
	E5-5 Resource outflows		N/A
	E5-6 Anticipated financial impacts of risks and opportunities related to resource use and circular economy		N/A
OWN WORKFORCE			
ESRS S1	SBM-2 Views, interests, and expectations of stakeholders	13	
	SBM-3 Interaction of influences, strategy, and business model of the company	16	
	S1-1 Policies related to own workforce	52	
	S1-2 Procedures for engagement with own employees and employee representatives regarding impacts	58	
	S1-3 Processes for mitigating negative impacts and employee grievance mechanisms	59	

DISCLOSURE		LOCATION IN THE REPORT	OMISSIONS AND EXPLANATIONS
	S1-4 Actions taken regarding material impacts on own employees and approaches to managing material risks and leveraging material opportunities related to own workforce, as well as the effectiveness of such actions	59	
	S1-5 Targets related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities	62	
	S1-6 Characteristics of the entity's employees	62	
	S1-7 Characteristics of non-employee workers classified as part of the entity's own workforce	63	
	S1-8 Scope of collective bargaining and social dialogue	63	
	S1-9 Diversity indicators	64	
	S1-10 Fair remuneration	64	
	S1-11 Social protection	64	
	S1-12 Persons with disabilities		N/A
	S1-13 Training and skills development indicators	64	
	S1-14 Occupational health and safety indicators	65	
	S1-15 Work-life balance indicators	66	
	S1-16 Remuneration indicators (gender pay gap and total remuneration)	66	
	S1-17 Incidents, complaints, and material impacts on human rights compliance	66	
WORKERS IN THE VALUE CHAIN			
ESRS S2	SBM-2 Views, interests, and expectations of stakeholders		N/A
	SBM-3 Interaction of influences, strategy, and business model of the company		N/A
	S2-1 Policies related to employees in the value chain		N/A
	S2-2 Processes for engagement with employees in the value chain regarding impacts		N/A
	S2-3 Processes for mitigating negative impacts and grievance mechanisms for employees in the value chain		N/A
	S2-4 Actions taken regarding material impacts on employees in the value chain and approaches to managing material risks and leveraging material opportunities related to employees in the value chain, as well as the effectiveness of such actions		N/A
	S2-5 Targets related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities		N/A



DISCLOSURE		LOCATION IN THE REPORT	OMISSIONS AND EXPLANATIONS
AFFECTED COMMUNITIES			
ESRS S3	SBM-2 Views, interests, and expectations of stakeholders		N/A
	SBM-3 Interaction of influences, strategy, and business model of the company		N/A
	S3-1 Policies related to affected communities		N/A
	S3-2 Processes for engagement with affected communities regarding impacts		N/A
	S3-3 Processes for mitigating negative impacts and grievance mechanisms for affected communities		N/A
	S3-4 Actions taken regarding material impacts on affected communities and approaches to managing material risks and leveraging material opportunities related to these communities, as well as the effectiveness of such actions		N/A
	S3-5 Targets related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities		N/A
CONSUMERS AND END-USERS			
ESRS S4	SBM-2 Views, interests, and expectations of stakeholders	13	
	SBM-3 Interaction of influences, strategy, and business model of the company	16	
	S4-1 Policies related to consumers and end-users	67	
	S4-2 Processes for engagement with consumers and end-users regarding impacts	72	
	S4-3 Processes for mitigating negative impacts and grievance mechanisms for consumers and end-users	74	
	S4-4 Actions taken regarding material impacts on consumers and end- users and approaches to managing material risks and leveraging material opportunities related to consumers and end-users, as well as the effectiveness of such actions	75	
	S4-5 Targets related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities	76	

DISCLOSURE		LOCATION IN THE REPORT	OMISSIONS AND EXPLANATIONS
BUSINESS CONDUCT			
ESRS G1	GOV-1 Roles and responsibilities of administrative, management, and supervisory bodies of the company	78	
	IRO-1 Description of processes for identifying and assessing material impacts, risks, dependencies, and opportunities related to biodiversity and ecosystems	21	
	G1-1 Corporate culture and business conduct policies	78	
	G1-2 Management of relationships with suppliers	80	
	G1-3 Prevention, detection, and mitigation of corruption and bribery	82	
	G1-4 Confirmed incidents of corruption or bribery	84	
	G1-5 Political influence and lobbying activities		N/A
	G1-6 Payment practices	84	
ADDITIONAL ISSUES			
	Financial education	67	
	Cybersecurity and data security	85	
	Tax transparency	84	
	Sustainable finance	35	



List of Data Points Contained in Cross-Cutting and Thematic Standards Derived from Other EU Regulations **[IRO-2]**

Disclosure requirement and associated data point	Reference to the regulation on sustainability- related disclosures in the financial services sector (section no.)	Reference to the third pillar (2)	Reference to the benchmark regulation (3)	Reference to the european climate law (4)
<b>ESRS 2 GOV-1</b> Gender diversity of the Management Board members (point 21(d))	Role of Administrative, Management, and Supervisory Bodies		Annex II to Commission Delegated Regulation (EU) 2020/1816 (5)	
<b>ESRS 2 GOV-1</b> Percentage of independent Management Board members (point 21(e))	Role of Administrative, Management, and Supervisory Bodies		Article 2(1) of Regulation (EU) 2021/1119	
<b>ESRS 2 GOV-4</b> Due diligence statement (point 30)	Due Diligence Statement			
<b>ESRS 2 SBM-1</b> Participation in fossil fuel-related activities (point 40(d)(i))	Strategy, Business Model, and Value Chain			
<b>ESRS 2 SBM-1</b> Participation in chemical production activities (point 40(d)(ii))	N/A			
<b>ESRS 2 SBM-1</b> Participation in controversial weapons-related activities (point 40(d)(iii))	N/A			
<b>ESRS 2 SBM-1</b> Participation in tobacco cultivation and production activities (point 40(d)(iv))	N/A			
<b>ESRS E1-1</b> Transition plan to achieve climate neutrality by 2050 (point 14)	Transition Plan for Climate Change Mitigation			Article 2(1) of Regulation (EU) 2021/1119
<b>ESRS E1-1</b> Entities excluded from the scope of Paris Agreement-aligned benchmarks (point 16(g))	Transition Plan for Climate Change Mitigation	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking portfolio – Climate change transition risk: credit quality of exposures by sector, issue and residual maturity	Article 12(1)(d)- (g) and 12(2) of Delegated Regulation (EU) 2020/1818	
<b>ESRS E1-4</b> Greenhouse gas emission reduction targets (point 34)	Gross Greenhouse Gas Emissions for Scopes 1, 2, and 3 and Total Greenhouse Gas Emissions	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking portfolio – Transition risks associated with climate change: measures of adaptation	Article 6 of Delegated Regulation (EU) 2020/1818	

Disclosure requirement and associated data point	Reference to the regulation on sustainability- related disclosures in the financial services sector (section no.)	Reference to the third pillar (2)	Reference to the benchmark regulation (3)	Reference to the european climate law (4)
<div>ESRS E1-5</div> <div>Energy consumption from fossil sources disaggregated by source (applies only to sectors with significant climate impact), point 38</div>	Climate Change Mitigation and Adaptation Targets			
<div>ESRS E1-5</div> <div>Energy consumption and energy mix, point 37</div>	Climate Change Mitigation and Adaptation Targets			
<div>ESRS E1-5</div> <div>Energy intensity associated with activities in sectors with significant climate impact, points 40–43</div>	Climate Change Mitigation and Adaptation Targets			
<div>ESRS E1-6</div> <div>Gross greenhouse gas emissions for Scopes 1, 2, and 3 and total greenhouse gas emissions, point 44</div>	Gross Greenhouse Gas Emissions for Scopes 1, 2, and 3 and Total Greenhouse Gas Emissions	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking portfolio – Climate change transition risk: credit quality of exposures by sector, issue and residual maturity	Article 5(1), Article 6, and Article 8(1) of Delegated Regulation (EU) 2020/1818	
<div>ESRS E1-6</div> <div>Gross greenhouse gas emission intensity, points 53–55</div>		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking portfolio – Transition risks associated with climate change: measures of adaptation	Article 8(1) of Delegated Regulation (EU) 2020/1818	
<div>ESRS E1-7</div> <div>Greenhouse gas removals and carbon emission units, point 56</div>	Gross Greenhouse Gas Emissions for Scopes 1, 2, and 3 and Total Greenhouse Gas Emissions			Article 2(1) of Regulation (EU) 2021/1119
<div>ESRS E1-9</div> <div>Portfolio reference exposure to physical climate risk, point 66</div>	Expected Financial Impacts of Significant Physical and Transition Risks and Potential Climate-Related Opportunities		Annex II to Delegated Regulation (EU) 2020/1818 Annex II to Delegated Regulation (EU) 2020/1816	
<div>ESRS E1-9</div> <div>Disaggregation of monetary amounts by acute and chronic physical risk, point 66(a)</div>	Expected Financial Impacts of Significant Physical and Transition Risks and Potential Climate-Related Opportunities	Article 449a of Regulation (EU) No 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking portfolio – physical risk related to climate change: exposures subject to physical risk		
<div>ESRS E1-9</div> <div>Location of significant asset components subject to substantial physical risk, point 66(c)</div>				
<div>ESRS E1-9</div> <div>Breakdown of book value of real estate by energy efficiency classes, point 67(c)</div>	Expected Financial Impacts of Significant Physical and Transition Risks and Potential Climate-Related Opportunities	Article 449a of Regulation (EU) No 575/2013; point 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2: Banking portfolio – Transition risk related to climate change: real estate- backed loans – energy efficiency of collateral		
<div>ESRS E1-9</div> <div>Degree of portfolio exposure to climate-related opportunities, point 69</div>	Expected Financial Impacts of Significant Physical and Transition Risks and Potential Climate-Related Opportunities		Annex II to Delegated Regulation (EU) 2020/1818	



Disclosure requirement and associated data point	Reference to the regulation on sustainability- related disclosures in the financial services sector (section no.)	Reference to the third pillar (2)	Reference to the benchmark regulation (3)	Reference to the european climate law (4)
<div>ESRS E2-4</div> <div>Quantity of each pollutant listed in Annex II to the Regulation on the European Pollutant Release and Transfer Register (E-PRTR) emitted into air, water, and soil, point 28</div>	N/A			
<div>ESRS E3-1</div> <div>Water and marine resources, point 9</div>	N/A			
<div>ESRS E3-1</div> <div>Specific policy, point 13</div>	N/A			
<div>ESRS E3-1</div> <div>Total volume of water recycled and reused, point 28(c)</div>	N/A			
<div>ESRS E3-4</div> <div>Total volume of water recycled and reused, point 28(c)</div>	N/A			
<div>ESRS E3-4</div> <div>Total water consumption in m3 per net revenue from own operations, point 29</div>	N/A			
<div>ESRS 2 IRO1-E4</div> point 16(a)(i)	N/A			
<div>ESRS 2 IRO1-E4</div> point 16(b)	N/A			
<div>ESRS 2 IRO1-E4</div> point 16(c)	N/A			
<div>ESRS E4-2</div> <div>Sustainable land/agriculture practices or policies, point 24(b)</div>	N/A			
<div>ESRS E4-2</div> <div>Sustainable ocean/marine practices or policies, point 24(c)</div>	N/A			
<div>ESRS E4-2</div> <div>Policies for deforestation prevention, point 24(d)</div>	N/A			
<div>ESRS E5-5</div> <div>Non-recycled waste, point 37(d)</div>	N/A			

Disclosure requirement and associated data point	Reference to the regulation on sustainability- related disclosures in the financial services sector (section no.)	Reference to the third pillar (2)	Reference to the benchmark regulation (3)	Reference to the european climate law (4)
<div>ESRS E5-5</div> <div>Hazardous and radioactive waste, point 3</div>	N/A			
<div>ESRS 2 SBM-3-S1</div> <div>Risk of forced labour cases, point 14(f)</div>	13.3.3			
<div>ESRS 2 SBM-3-S1</div> <div>Risk of child labour cases, point 14(g)</div>	13.3.3			
<div>ESRS S1-1</div> <div>Commitments regarding policies on human rights respect, point 20</div>	Policies Related to Own Workforce			
<div>ESRS S1-1</div> <div>Due diligence strategies concerning issues covered by core International Labour Organization Conventions No. 1–8, point 21</div>	Policies Related to Own Workforce			
<div>ESRS S1-1</div> <div>Procedures and measures for preventing human trafficking, point 22</div>	Policies Related to Own Workforce		Annex II to Commission Delegated Regulation (EU) 2020/1816	
<div>ESRS S1-1</div> <div>Policy or management system for accident prevention at work, point 23</div>	Policies Related to Own Workforce			
<div>ESRS S1-3</div> <div>Complaint-handling mechanisms, point 32(c)</div>	Processes for Addressing Negative Impacts and Employee Reporting Channels			
<div>ESRS S1-14</div> <div>Number of work-related deaths and the number and rate of work-related accidents, point 88(b)–(c)</div>	Occupational Health and Safety Metrics			
<div>ESRS S1-14</div> <div>Number of days lost due to injuries, accidents, fatalities, or illnesses, point 88(e)</div>	Occupational Health and Safety Metrics		Annex II to Commission Delegated Regulation (EU) 2020/1816	
<div>ESRS S1-16</div> <div>Unadjusted gender pay gap, point 97(a)</div>	Remuneration Metrics (Pay Gap and Total Remuneration)			
<div>ESRS S1-16</div> <div>Excessive CEO pay level, point 97(b)</div>	Remuneration Metrics (Pay Gap and Total Remuneration)		Annex II to Commission Delegated Regulation (EU) 2020/1816	

Disclosure requirement and associated data point	Reference to the regulation on sustainability- related disclosures in the financial services sector (section no.)	Reference to the third pillar (2)	Reference to the benchmark regulation (3)	Reference to the european climate law (4)
<div>ESRS S1-17</div> <div>Cases of discrimination, point 103(a)</div>	Incidents, Complaints, And Material Impacts On Human Rights Compliance			
<div>ESRS S1-17</div> <div>Non-compliance with UN Guiding Principles on Business and Human Rights and OECD Guidelines, point 104(a)</div>	Incidents, Complaints, And Material Impacts On Human Rights Compliance		Annex II to Delegated Regulation (EU)	
<div>ESRS 2 SBM-3-S2</div> <div>Significant risk of child labour or forced labour in the value chain, point 11(b)</div>	N/A			
<div>ESRS S2-1</div> <div>Commitments regarding policies on human rights respect, point 17</div>	N/A			
<div>ESRS S2-1</div> <div>Policies related to employees in the value chain, point 18</div>	N/A			
<div>ESRS S2-1</div> <div>Non-compliance with UN Guiding Principles on Business and Human Rights and OECD Guidelines, point 19</div>	N/A			
<div>ESRS S2-1</div> <div>Due diligence strategies concerning issues covered by core International Labour Organization Conventions No. 1–8, point 19</div>	N/A			
<div>ESRS S2-4</div> <div>Human rights-related issues and incidents related to the upstream and downstream value chain, point 36</div>	N/A			
<div>ESRS S3-1</div> <div>Commitments regarding policies on human rights respect, point 16</div>	N/A			
<div>ESRS S3-1</div> <div>Non-compliance with UN Guiding Principles on Business and Human Rights, ILO standards, or OECD Guidelines, point 17</div>	N/A			



Disclosure requirement and associated data point	Reference to the regulation on sustainability- related disclosures in the financial services sector (section no.)	Reference to the third pillar (2)	Reference to the benchmark regulation (3)	Reference to the european climate law (4)
<div>ESRS S3-4</div> <div>Human rights-related issues and incidents, point 36</div>	N/A			
<div>ESRS S4-1</div> <div>Policy concerning consumers and end-users, point 1</div>			Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818	
<div>ESRS S4-1</div> <div>Non-compliance with UN Guiding Principles on Business and Human Rights and OECD Guidelines, point 17</div>	Management of Impacts, Risks, and Opportunities			
<div>ESRS S4-4</div> <div>Human rights-related issues and incidents, point 35</div>	Actions Taken Regarding Material Impacts on Consumers and End-Users and Approaches to Managing Material Risks and Leveraging Material Opportunities Related to Consumers and End- Users, as well as the Effectiveness of Such Actions			
<div>ESRS G1-1</div> <div>United Nations Convention against Corruption, point 10(b)</div>	Role of Administrative, Supervisory, and Management Bodies			
<div>SRS G1-1</div> <div>Whistleblower protection, point 10(d)</div>	Role of Administrative, Supervisory, and Management Bodies			
<div>ESRS G1-4</div> <div>Fines for breaches of anti-corruption and anti-bribery regulations, point 24(a)</div>	Corruption or Bribery Incidents			
<div>ESRS G1-4</div> <div>Standards on anti-corruption and anti-bribery, point 24(b)</div>	Corruption or Bribery Incidents		Annex II to Commission Delegated Regulation (EU) 2020/1816	



# Environmental Information



# Climate Chang [ESRS E1]

## Transition Plan for Climate Change Mitigation [E1-1]

As of the reporting date, 31 December 2024, we did not have a transition plan for climate change mitigation. In 2024, we initiated analytical work related to the calculation and assessment of the materiality of financed emissions (particularly in relation to the portfolio of credit and investment exposures, i.e., Category 15 of Scope 3). Based on the outcomes of these efforts, we will formalise, within the next two years, a transition plan that complies with regulatory requirements.

In 2024, we conducted analytical work on the calculation and assessment of the materiality of financed emissions (particularly in relation to the portfolio of credit and investment exposures, i.e., Category 15 of Scope 3). Based on the results of this work, by the end of 2024, we adopted the Decarbonisation Guidelines for the Pekao Group’s Credit Portfolio. These guidelines define the key substantive assumptions and directions for further decarbonisation actions, which will be utilised in the process of developing the business model transformation plan.

In the ongoing work on the transformation plan for climate change mitigation and the Decarbonisation Guidelines for the Pekao Group’s Credit Portfolio set at the end of 2024, we are focusing on the International Energy Agency’s (IEA) Net Zero Emissions (NZE) scenario. This scenario aligns with limiting global warming to no more than 1.5°C above pre-industrial levels by 2100. Under our adopted scenario, global greenhouse gas emissions are expected to decrease by 38% by 2030 and by 100% by 2050, relative to the 2020 baseline year.

Using the carbon footprint calculation methodology for financed emissions in both absolute terms and economic intensity (Category 15, Scope 3) developed

by the Partnership for Carbon Accounting Financials (hereinafter: “PCAF”) and available data sources, the Bank calculated the carbon footprint of its credit and investment portfolio (as of 31 December 2023, the balance sheet exposure value amounted to EUR 34,014 million) at 5.4 mtCO2e (including Scope 1 and Scope 2 of financed entities).

The following asset categories were included:

- Listed shares and corporate bonds;
- Corporate loans and unlisted company shares;
- Project finance;
- Commercial real estate;
- Mortgage loans;
- Vehicle loans.

Within this portfolio structure, corporate loans, unlisted company shares, and project finance collectively accounted for 60% of

the Bank’s financed emissions in Category 15, Scope 3. From the perspective of decarbonisation potential and contribution to financed emissions, we identified the portfolios financing electricity generation and iron and steel production as the most material within the above structure.

The results of this analysis will serve as the foundation for setting quantitative decarbonisation targets for 2030 and 2050 as part of the comprehensive decarbonisation plan covering the entire credit and investment portfolio of the Bank. We will utilise the best available data (including transitioning to an emissions intensity measure based on production intensity, in line with decarbonisation scenario requirements) and modelling solutions that ensure the decarbonisation process adheres to the 1.5°C

warming limit, as stipulated by the Paris Agreement and updated international commitments. In the coming years, we will also establish credible decarbonisation targets for additional sectors identified as material in terms of emissions reduction potential and strengthening market position. The transformation plan will be subject to periodic updates to ensure consistency and adequacy in the context developments.

The most significant activities supporting sustainable development and, primarily, climate change mitigation that we undertake as a Bank include the continuous implementation of eco-friendly solutions in our own operations and engagement in financing Poland’s energy transition, alongside tailored product offerings to meet the dynamically evolving market demand. We are introducing dedicated solutions for corporate customers, businesses, and retail customers). The Bank perceives relatively the highest leverage potential in relation to strategic customers, whose total share in a given sector’s exposure exceeds 65%. Despite the current absence of quantitative decarbonisation targets based on scientific evidence, we identify these actions and initiatives as the primary decarbonisation levers for the credit and investment portfolio. This is reflected in the quantitative key performance indicators adopted in the ESG Strategy (detailed in section Climate Change Mitigation and Adaptation Targetsof this Report). At the same time, during the reporting period, the Bank, due to the lack of established decarbonisation targets, did not correlate the impact of undertaken actions with potential achieved emission reductions in the financing portfolio and own operations.

In the coming years, to achieve the objectives set within the transformation plan, we will develop a selective growth strategy, increasing financing for sectors involved in new low-emission investments while simultaneously limiting exposure to high- emission entities. Specific solutions, including our role in the cooperation model, will be determined by the transformation maturity of our customers and their needs.

Where applicable, we will also analyse locked-in emissions that may negatively impact the feasibility of achieving set targets, both in our own operations and in managing the credit and investment exposure portfolio. Our transformation plan will be incorporated into the overall development strategy and financial plans, with progress being subject to periodic regulatory disclosures. Given the nature of our operations, we are not excluded from the EU climate benchmarks aligned with the Paris Agreement. The decarbonisation guidelines forming the basis for the transition plan of Bank Pekao S.A. were approved by the ESG Council, which serves as an advisory and supervisory body for implementing strategic ESG assumptions.





# Management of Impacts, Risks, and Opportunities

## Policies Related to Climate Change Mitigation and Adaptation [E1-2]

At our Bank, climate aspects are integrated into the internal regulatory framework and implemented across various operational areas as sustainable development factors. Consequently, most internal regulations address not only climate change-related aspects but also broader environmental, social, and corporate governance matters. The internal regulations outlined below address climate change mitigation and adaptation aspects identified through the IRO process, both concerning our own operations and the management of the credit and investment exposure portfolio.

As of the end of 2024, we did not have a single document serving as a climate policy that shapes the Bank’s approach to climate change mitigation, adaptation, and the utilisation of market opportunities arising from the transition to a sustainable economy. Qualitative and quantitative goals, as well as the pathways for their implementation – along with procedures for monitoring and managing climate risks and opportunities – are dispersed across internal documents of varying levels of authority, from the Bank’s ESG Strategy to implementing regulations such as the Supplier Code of Ethics or internal guidelines on transaction identification and monitoring.

In the process of shaping selected internal regulations, we take into account external standards and market norms, particularly best market practices and codes of sustainable development values. In cases where such norms have been applied, this has been indicated in the description of the regulations.

We have identified the key internal and external stakeholder groups that exert the greatest influence on the functioning of the unit. Among our internal

stakeholders, the most important to us are employees and employee and trade union organisations; in the case of external stakeholders, these include shareholders, customers, broadly understood regulatory and supervisory authorities of the banking sector, as well as our suppliers and business partners. We do not conduct thematic consultations for the purpose of setting objectives and directions of regulations forming internal rules that constitute our climate policy; however, we remain in constant dialogue with internal and external stakeholders through channels appropriate to each group (e.g. General Meeting of Shareholders, financial results conferences, participation in industry associations, internal communication). Each time, the process of developing relevant regulations involves operational units appropriately selected in terms of their competencies.

All of the regulations listed below are internal in nature and thus take into account the interests and demands of key stakeholders in this context (e.g. employees and employee organisations). At the same time, they are not, as a rule, subject to discussion with external stakeholders and are not made available to the public in their full form and content. The most important content of selected documents (e.g. Supplier Code of Ethics or ESG Strategy) is published on the dedicated websites of the Bank.

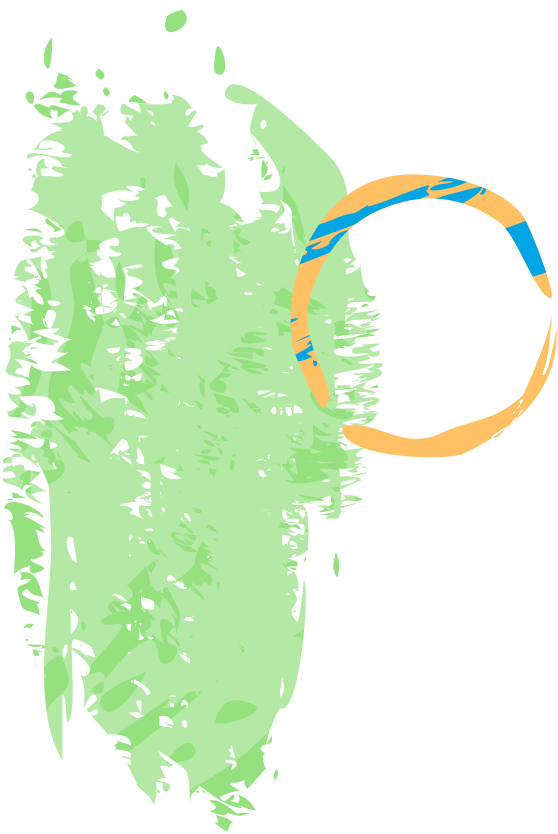
Withing the timeframe of the future strategy , we plan to develop a regulatory document that will systematically coordinate aspects related to managing the impacts, risks, and opportunities arising from climate change across all areas of the Bank’s operations.

Our primary document supporting the identification of opportunities related to climate change mitigation and adaptation, as well as outlining possibilities for reducing our negative impact on the climate, is the ESG Strategy for 2021-2024. This document was developed prior to the introduction of European sustainability reporting standards; therefore, the structure of the goals, directions of action, and development plans presented in it does not always fully correspond with the regulatory requirements specifying the characteristics of these elements

The ESG Strategy sets out our course of action both in the area of our own operations and in relation to lending and investment activities

The final wording of the Strategy is the result of dialogue between the Bank’s internal stakeholders. The ESG Strategy has been reviewed by the ESG Council, adopted by the Management Board, and presented to the Supervisory Board. It has also been made available to our stakeholders on the Bank’s website. The implementation of the Strategy is monitored by the ESG Council, which includes members of the Bank’s Management Board and designated operational units.

The achievement of key objectives defined in the ESG Strategy is communicated to stakeholders in annual non-financial reports.





In the area of our own operations, the Strategy identifies the most important areas of action supporting our efforts to reduce our negative impact on the climate and, where possible, to remedy the negative climate effects resulting from our activities. In the context of our commitment to mitigating climate change and preventing further changes, our priority is to introduce processes for calculating and monitoring our carbon footprint in Scope 1 and Scope 2, as well as in the supply chain (Scope 3). To achieve this, we implement eco-friendly improvements at the Bank's locations to optimise their functioning and reduce the volume of materials consumed.

In the area of lending and investment activities, we see the greatest opportunities for reducing our negative impact on the climate in the gradual transformation of our credit portfolio towards reducing our exposure to high-emission activities (e.g. limiting the financing of new hard coal and lignite mining projects and coal-fired power generation projects) and increasing our involvement in financing low-emission (green) projects that support the transformation of the Polish energy sector (including support for regions most exposed to economic transformation risks related to the decarbonisation of the Polish economy). To identify the effects of our actions and their impact on the scale of emissions financed by us, we also commenced the calculation of the carbon footprint of our credit and investment portfolio in 2024 (Scope 3, category 15).

We are also leveraging our business opportunities related to climate change mitigation and adaptation by supporting customers in both the retail and corporate banking segments through the development of financial solutions dedicated to sectors such as renewable energy (including wind farms, biogas plants, and photovoltaics), new low-emission technologies, low-emission transport, and green construction. An important area where we see opportunities to capitalise business potential related to climate change mitigation and the development of climate adaptation solutions is our participation in government and EU climate recovery and transformation programmes.

Own Operations and Supply Chain

The climate policy regarding our own operations and supply chain, in addition to the directions indicated by the ESG Strategy, is described in the following documents

*The Policy on Energy Consumption Optimisation at Bank Polska Kasa Opieki Spółka Akcyjna*, relating to climate change mitigation within the daily operations of the Bank's employees,  
*The Procurement Policy at Bank Polska Kasa Opieki Spółka Akcyjna*, integrating ESG factors into the procurement process,  
*The Supplier Code of Ethics at Bank Pekao S.A.*, which addresses suppliers' own practices related to climate change mitigation

We currently do not have regulations implementing strategic decarbonisation targets established for our own emissions (Scope 1 and Scope 2). However, as we adopt specific decarbonisation goals for the Bank and introduce a business model transformation plan, we will establish appropriate dedicated regulations and guidelines to support the management of greenhouse gas emissions. Nonetheless, the Bank currently has guidelines that indirectly support efforts to reduce our negative climate impact in the area of our own operations (e.g. energy consumption management) and selected aspects of the supply chain (Supplier Code of Ethics).

Energy Consumption Management

The Bank has implemented the Policy on Energy Consumption Optimisation at Bank Polska Kasa Opieki Spółka Akcyjna, adopted by the Management Board in 2019, which defines principles and rules related to energy consumption within activities aimed at minimising the negative climate effects resulting from the use of real estate and equipment (e.g. guidelines for better property management and utilisation help us reduce greenhouse gas emissions within our own operations). The Real Estate Department is responsible for overseeing the Policy on Energy Consumption Optimisation at Bank Polska Kasa Opieki Spółka Akcyjna. The regulations included in this policy apply to all Bank employees and their practices in the daily use of real estate and resources, particularly to the Bank units responsible for managing and maintaining owned and leased properties, as well as units involved in the procurement of equipment used in the Bank's operations



Supplier Code of Ethics and Procurement Policy

Incorporating climate change mitigation and adaptation considerations into the processes of establishing and conducting cooperation with external entities (including suppliers) is one of our strategic objectives. The documents regulating this cooperation are the internal Procurement Policy at Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: “Procurement Policy”), adopted in 2024, and the Supplier Code of Ethics at Bank Pekao S.A. (hereinafter: “Code of Ethics”). The Procurement Department is responsible for overseeing the Bank’s Procurement Policy, and its provisions define the roles of both this Department and other participants in the Bank’s procurement process, as well as the role of the Code.

The Code of Ethics supplements the Bank’s internal regulations and includes provisions promoting climate change mitigation as well as compliance with social and corporate governance factors. In accordance with the provisions of the Code of Ethics, each supplier is required to submit a statement confirming their awareness of and compliance with its provisions. More information on both documents can be found in section **Supplier Relationship Management [G1-2]** Supplier Relationship Management of this Report.

Climate Risk and ESG Management in the Credit and Investment Portfoli

With regard to managing sustainability risk in the credit and investment portfolio, we have implemented a range of internal regulations and guidelines that support the execution of our strategic objectives while ensuring compliance with regulatory requirements

Credit Risk Strategy and Policy

In our credit and investment operations, the Bank’s ESG Strategy sets the framework for managing business opportunities linked to climate adaptation, climate change mitigation, and reducing our environmental impact. These principles are embedded in our lending processes through a series of internal policies, the most significant of which are the Credit Risk Strategy (approved by the Bank’s Supervisory Board) and the Credit Risk Policy (approved by the Bank’s Management Board). The level of integration depends on the customer segment and the nature of the transaction.

These policies aim to:

- nsure effective credit risk management across the Bank and the Capital Group;
- Define our risk appetite, including ESG-related risks in our lending portfolio;
- Integrate ESG risk, particularly climate risk, into our credit process

The Credit Risk Policy complements the Credit Risk Strategy, focusing on principles and guidelines concerning credit risk, including ESG factors. These regulations apply across all units involved in customer acquisition, transaction assessment, risk management, and portfolio oversight. The Integrated Risk Management Department is responsible for overseeing these policies within the Bank.

Both the Credit Risk Strategy and the Credit Risk Policy support the reduction of our negative impact on climate change by shaping the balance sheet structure towards low-emission exposures. As a rule, we do not undertake new financing and limit financing for existing customers operating in high-emission sectors, such as electricity and heat generation using hard coal and lignite, ancillary services supporting coal mining and extraction, and the production of machinery and installations for the coal mining industry. Exceptions are made for transformational projects in the Polish energy sector.

The Credit Risk Policy is accompanied by a range of detailed supporting regulations dedicated to identifying and assessing risks in the sustainable development area, particularly climate risk, in relation to strategic and corporate customers, small and medium-sized enterprises, business customers, and local government financing. These regulations enable us to:

- Redirect financial flows towards strategically prioritised areas while maintaining risk appetite;
- Identify high- and medium-emission portfolios and exposures, allowing us to assess the potential for managing the portfolio’s carbon footprint to reduce our climate impact

Additionally, these detailed regulations serve an informational and educational role, outlining key aspects of ESG risk, including climate risk (transition risk and physical risk) and environmental risk, while defining concepts such as green (sustainable) financing and brown (high-emission) financing. Stakeholders involved in the credit process contribute to the establishment and implementation of credit regulations. Selected aspects of the Bank’s ESG risk appetite are made available to external stakeholders.

From 2024 onwards, ESG risk management processes within the exposure portfolio are governed by a procedure approved by the Vice President overseeing the Risk Management Division, with ownership assigned to the Risk Strategy and Development and ESG Department. This regulation, incorporating the requirements of the Polish Financial Supervision Authority (KNF), the European Banking Authority, and best market practices relevant to the banking sector’s sustainable development, sets out actions for identifying ESG risks, along with methodologies and tools for measurement and control. Specifically, the procedure governs the operation of the strategic limit on green financing for Bank Pekao and the Pekao Group, defined as the percentage share of green financing within the overall financing portfolio. The purpose of this indicator is to support decision-making processes related to business opportunities associated with climate change mitigation and adaptation. The regulation also introduces internal indicators to monitor exposure to high-emission financing (in fossil fuel sectors and fossil-fuel-based energy production) and greenhouse gas emission intensity in corporate financing. These indicators are used to manage and reduce our negative climate impact at the portfolio level. Responsibility for implementing and modifying this regulation is assigned to the Risk Area, as outlined in the Bank’s internal regulations. Additionally, the regulation specifies the scope and manner in which Pekao Capital Group companies report ESG risk information and data to the Bank.





Sustainable Finance Framework Pekao S.A.

In the area of products and customer collaboration, it is essential to address market needs and leverage related opportunities. Since 2023, the Sustainable Finance Framework Pekao S.A. (hereinafter: "Framework") has governed the Bank's investment policy in corporate and investment banking. The Framework establishes not only the issuance framework for the Bank's sustainable bonds, but also specifies conditions that must be met for an investment transaction with a customer to be considered sustainable in environmental or social terms.

The issuance framework, positively reviewed by an independent second-party opinion (SPO) from Sustainalytics, is available to all Bank stakeholders on the Bank's website. Responsibility for managing processes regulated by the Framework is assigned to the areas of Corporate Banking, Markets and Investment Banking, Business Banking Division, and Pekao Brokerage House (Biuro Maklerskie Pekao), as per the Bank's internal regulations.

The Framework defines the eligibility of investments financed by proceeds from EMTN bonds issued by the Bank. The document outlines the process for project selection, proceeds management, allocation of funds, and impact reporting. The classification criteria for eligible climate change mitigation projects are based on selected technical criteria from the EU Taxonomy (in line with Annex 1 to Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021). The Framework aligns

with leading international market best practices, including::

- Green Bond Principles (June 2021, updated in June 2022);
- Social Bond Principles (June 2023);
- Sustainability Bond Guidelines (June 2021), published by the International Capital Market Association;
- Green Loan Principles (February 2023);
- Social Loan Principles (February 2023), published by the Loan Market Association on 17 October 2023

Offering green products

The modus operandi associated with either offering green products or supporting sustainable financing depends on the type of product offered:

In the case of residential customers and consumer loans, the offering is regulated by the Energy Efficiency Law of May 20, 2016, which introduces a national target of 5580,000 toe of final energy savings to be achieved by the end of 2030, which is implemented from January 1, 2021 to December 31, 2030. The 2030 target will be implemented, among other things, through a system of energy efficiency certificates;

For businesses, we use the European Funds for a Modern Economy Program operating under the Bank of National Economy (BGK) Act of March 14, 2003; Financing for corporate clients is governed by, among other things, the Sustainable Finance Framework, which was prepared in accordance with applicable international standards published by ICMA and LMA (as described above)



## Actions and Resources Related to Climate Policy [E1-3]

Both the strategic objectives and the related actions were established prior to the introduction of regulatory requirements under the European Sustainability Reporting Standards. As a result, the objectives and actions presented by us do not fully correspond to the regulatory requirements of ESRS E1. The implementation of the objectives and operational directions set out in the regulations shaping the Bank's climate policy required us to undertake a range of initiatives regarding the Bank's operations. Due to the nature of our business, our ability to implement measures aimed at mitigating and adapting to climate change is not dependent on the availability and distribution of resources. In 2024, we undertook a series of actions in the areas of our own operations, financing portfolio, credit and investment activities related to the management of sustainable development risks and opportunities in the context of climate change mitigation and adaptation. At the same time, due to the lack of defined decarbonisation targets for our own operations, we did not translate the actions carried out during the ESG Strategy period into expected and achieved reductions in greenhouse gas emissions

We did not identify any incidents in which the Bank's operational activities or customer financing resulted in significant harm to third parties. Consequently, no remedial or compensatory actions were undertaken.

### Own Operations

Due to our nature as a financial institution, the Bank's capital expenditures (CAPEX) and operating expenses (OPEX), in accordance with the provisions of Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, are not subject to assessment in terms of eligibility or compliance with the sustainability criteria of the EU Taxonomy (including the application of nature-based solutions, engineering, or dedicated technological solutions). The expenditures and investments incurred in relation to our own operations during the period covered by the ESG Strategy are also financially insignificant from the perspective of the unit's operations. We apply a prudent approach to avoid

misclassification risks, greenwashing, and the inability to directly link expenditures to the implementation of climate policy objectives and directions. Consequently, we do not identify any significant activities in the area of own operations. If we can reliably identify relevant actions and related expenditures, we will disclose the appropriate amounts in subsequent years

**In 2024, we maintained strategic initiatives aligned with the Bank's long-term objectives of reducing negative climate impact and supporting adaptation processes in our locations. The most notable initiatives included**

- Gradual replacement of older lighting systems with energy-efficient LED lighting;
- Energy consumption optimisation (reducing contracted power levels);
- Replacement of uninterruptible power supplies (UPS) with new, more efficient models;
- Decommissioning of unnecessary emergency power connections;
- Installation of energy-efficient air conditioning systems;
- Analyses for the installation of reactive power compensation devices (to eliminate unnecessary energy expenditures);
- Switching electronic devices to standby mode in the evening hours;
- Installation of water pressure reducers or aerators and replacement of household appliances with new, energy-efficient models.

In 2024, we signed a one-year contract for the purchase of electricity, alongside the purchase of guarantees of origin for the entire contracted volume from renewable energy sources. We also received Certificate RGP\_ENERGAOB\_2024-12-02\_10645 for the entire year of 2024, confirming the introduction of 28,000 MWh of electricity generated from wind sources into the grid.

We continue to enhance communication processes by implementing digital solutions where possible (e.g., introducing electronic handover protocols) and aligning with our strategic objectives. In 2024, we also replaced part of our fleet with low-emission (EURO 6) and hybrid vehicles and placed additional orders for delivery in 2025

### Credit and Investment Activities

Given our role as a financial institution, the most significant contributions to sustainable development, particularly climate change mitigation and adaptation, involve allocating substantial financial resources to support Poland's energy transition and adapting our product offering to evolving market demand. This includes financing investment goals and providing sustainability-linked financing. To this end, we are implementing tailored solutions for corporate, business, and retail customers. The initiatives reported as of the end of 2024 were defined before the European Sustainability Reporting Standards became mandatory and before the Bank calculated financed emissions under Scope 3, Category 15. As a result, we do not relate the amounts of financing granted to potential reductions in financed emissions. Despite the absence of quantified decarbonisation targets for the credit and investment portfolio, we see these actions as key drivers of credit and investment portfolio decarbonisation. Key information about the financial products and solutions offered is available to external stakeholders on the Bank's website. Due to the lack of established decarbonisation targets, the Bank has not linked the impact of activities undertaken in 2024 to potential achieved emissions reductions in the financing portfolio

### Sustainable Financing for Corporate, Investment, and Business Banking Customer

In 2024, we continued to implement our strategic objectives. The most significant actions increasing the Bank's involvement in sustainable development financing, including addressing material climate change mitigation and adaptation issues and responding to the evolving market, included:

- Green financing – approximately **PLN 13.738 billion**;
- New sustainable financing – **PLN 12.697 billion**;
- Customer bond issuance financing – **PLN 20.92 billion**;
- EU Taxonomy-aligned financing: gross carrying amount exposure aligned with the EU Taxonomy under CAPEX KPI (**PLN 3.173 billion**) and TURNOVER KPI (**PLN 2.092 billion**);
- Other initiatives:
  - introduction of a corporate banking customer carbon footprint calculator;
  - In the area of business loans, in 2024, guarantee limits from portfolio agreements with BGK in the amount of Biznesmax plus: working capital loans – limit: PLN 136,000,000 and investment loans – PLN 204,000,000; Ekomax – limit: PLN 250,000,000.

In November 2024, we prepared the first allocation report for funds raised through the 2023 issuance of EMTN bonds with a total nominal value of EUR 500 million, aligned with the Sustainable Finance Framework adopted in 2023. In November 2024, we prepared the first report on the allocation of funds raised under the EMTN bond series issued in 2023 for a total nominal amount of €500 million consistent with the 2023 Sustainable Finance Framework. We also achieved the target set by the Sustainable Finance Framework – as of October 15, 2024, the total value of the Qualified Financing Portfolio included 33 projects for a total amount of EUR 526,837,201 under the green Eurobond issue. This value exceeded the issued amount (EUR 500 million), which means that the full allocation was realized within a year from the date of the green bond issue (XS2724428193)



Retail customer financing

In the retail customer segment, we are implementing the ESG Strategy by introducing products dedicated to environmental goals that meet the needs of the financing market for individuals. The Bank is maximizing its business opportunities in this area by continuing to offer:

- Express Loan for EKO purposes up to PLN 100,000 – a PLN 281 million<sup>1</sup> – cash loan with 0% commission and reduced margin/interest rate, when the customer allocates it for EKO purposes related to the purchase / installation of: among others. renewable energy sources: solar collectors, photovoltaic panels / cells including energy storage, central heating boilers (excluding coal and eco-pea boilers), heat pumps and with the use of geothermal heating, vehicles with electric or hybrid propulsion, domestic bio-purification plants, ventilation with heat recovery, domestic water treatment plants from own intakes or rainwater recovery system.
- KODOM residential loan – PLN 204 million<sup>2</sup> a loan offer with a reduced margin if the customer invests in energy-saving installations such as solar panels, photovoltaic panels/fires, including energy storage, heat pumps or central heating boilers with geothermal heating as part of the property being financed.

As of November 1, 2024, we have implemented a new process that allows us to evaluate energy performance criteria as early as when a customer applies for a mortgage. If the EP indicator criteria required by the Bank are met, the customer also benefits from a lower margin. The Bank aggregates data on delivered Energy Performance Certificates for statistical purposes.

1 Gross carrying amount of loans as of 31.12.2024  
2 Gross carrying amount of loans as of 31.12.2024

Metrics and Targets

Climate Change Mitigation and Adaptation Targets [E1-4]

Monitoring the Results of Actions Derived from the Climate Polic

The results of implementing the Bank’s climate policy objectives and directions set out in the ESG Strategy are subject to quarterly internal supervision, in accordance with the provisions of the internal regulations governing the processes of developing and monitoring the ESG Strategy. For the timeframe of the ESG Strategy (2021–2024) we did not set reduction targets aligned with the requirements set forth in ESRS E1. The targets outlined in the ESG Strategy are linked to performance metrics used to assess the effectiveness and efficiency of undertaken actions (a detailed description is provided in Table below), expressed in the appropriate unit depending on the assigned target (these targets refer to financial quotas, not carbon dioxide equivalent as they were not intended as financed emission cutting targets). The metrics reported below were methodically designed and implemented prior to the introduction of the requirements stemming from the European Sustainability Reporting Standards. Where possible, we have directly referenced the relevant ESRS E1–4 requirements concerning the reporting of metrics related to our undertaken actions. The specified targets and metrics relate, at the level of the credit and investment portfolio, to reducing the Bank’s exposure to transition risk associated with maintaining exposure to high-emission sectors, as well as to seizing business opportunities linked to climate change mitigation and adaptation. Regarding the Bank’s own operations, we have introduced a long-term reduction target extending beyond the scope of the Strategy. We have not assigned climate neutrality at the organizational level or reduction targets. This represents, from the perspective of the ESG Strategy, our ambition and aspiration.

Even though the presented targets and metrics do not fully align with the regulatory requirements of ESRS E1 (as mentioned before, they were set before the said regulatory requirements entered into force),

they translate into significant outcomes as regards our ambitions to capitalize on climate change opportunities and mitigate climate risks.

The definitions forming the basis of the strategic targets and metrics related to the credit and investment portfolio are built on expert knowledge, best market practices, and evidence-based substantive standards, including alignment with the EU Taxonomy (activities with a positive impact on the environment and society), the International Capital Market Association (Green Bond Principles and Sustainability-Linked Bond Principles), the Loan Market Association (for green loans and Sustainability-Linked Loan Principles), the European Green Bond Standard (EU GBS) in accordance with Regulation 2023/2631, and the Climate Bonds Initiative. The assumptions, methodology, and performance metrics for the ESG Strategy have also been developed based on a critical analysis of the actions of our peer group; however, the outputs of these efforts were not subject to evaluation by an external body validating them.

As noted in the introduction to this subsection, the target related to reducing greenhouse gas emissions from own operations and the supply chain (beyond the credit and investment portfolio, i.e., Category 15 of Scope 3) has been set beyond the horizon of the ESG Strategy and refers to 2030. Thus, it aligns with the provisions of the Paris Agreement and the European Green Deal, aiming for climate neutrality of the EU economy by 2050.

As part of the ESG Strategy implementation, we have set a number of measurable quantitative and directional targets (see Table 9 below). The reference values of indicators used to assess the effectiveness of undertaken actions have been established, where applicable, for the baseline year designated for the





ESG Strategy covering 2021–24, which was set as 2020. Throughout the four-year implementation period of the ESG Strategy, we have not set intermediate targets or milestones, neither for targets related to reducing greenhouse gas emissions from own operations nor for actions concerning the credit and investment portfolio. During the ESG Strategy’s duration, we have not modified the performance metrics.

We have not established targets directly related to environmental issues; however, the green financing eligibility criteria defined within the ESG Strategy are based on the environmental objectives presented in the EU Taxonomy. The Bank has also not involved external

stakeholders in the target-setting processes for the ESG Strategy.

The quantitative targets related to financing the credit and investment portfolio set for 2021–24 have been achieved, in all cases significantly exceeding the minimum thresholds indicated as cumulative targets for 2024. A synthetic summary of the results, including progress in reducing greenhouse gas emissions from own operations, is presented in the table below

We also supported our clients in their ESG bonds issuance. As set out in our ESG Strategy, we intended to mobilise over PLN 22 billion in this manner and achieved, as of end of 2024, PLN 20.92 billion.

The methodology for the above disclosures is based on the following assumptions

Financing of sustainable projects refers to the execution of financing in the form of green or social loans based on agreements concluded during the ESG Strategy period (cumulative indicator);  
Support for customer ESG bond issuance pertains to financed green bonds, social bonds, or KPI-linked bonds based on agreements concluded during the ESG Strategy period (cumulative indicator);

The share of green financing represents the proportion of green loans and acquired green bond issuances as of 31 December 2024 within the Bank’s gross financing. The share of high-emission financing represents the proportion of high-emission financings (loans or acquired bond issuances) as of 31 December 2024 within the Bank’s gross financing

We have not set climate targets related to the decarbonisation of our credit and investment portfolio. However, we have implemented a strategic directional goal associated with calculating portfolio-financed emissions within Scope 3 (Category 15) in 2024. In subsequent years, these calculations will serve as the foundation for defining appropriate methodological frameworks and a timeline for the reduction of financed emissions, ultimately achieving net-zero financed emissions by 2050 in line with the Paris Agreement and the pathway to limiting global temperature rise to a maximum of 1.5° C above pre-industrial levels. In 2024, we adopted strategic decarbonisation directions for the energy generation and iron and steel sectors, which will form the basis for further actions within the framework of the transformation plan under regulatory requirements. A more detailed elaboration of this issue is provided in section [Transition Plan for Climate Change Mitigation \[E1-1\]](#) of this Report

Achievement of Quantitative Targets Related to Financing the Credit and Investment Portfolio 2021–202

Target	Metric description	Cumulative target	Baseline year level (2020)	2024
Amount of new sustainable projects	Balance sheet commitment amount in PLN for new sustainable projects	> PLN 8 billion	N/A	PLN 12.697 billion
Increase in the share of green financing in the Bank’s portfolio	Share of green financing in total carrying amount of the credit and investment portfolio	> 4%	3.2%	7.90%
Reduction of high-emission financing in the Bank’s portfolio	Share of high-emission financing [1] in total carrying amount of the credit and investment portfolio	<1%	1.3%	0.69%
Reduction of own emissions (Scope 1 and 2) by 2024	Absolute emissions in Scope 1 and 2	Climate neutrality by 2030	69,790.9 tCO2e	30,973 tCO2e

Disclosure Requirement [E1-5] – Energy Consumption and Energy Mix

The objective of the disclosure requirement is to provide insight into the Bank’s total energy consumption in absolute terms, to enhance our energy efficiency, to assess our exposure to coal, oil, and gas-related activities, and to determine the share of renewable energy in our overall energy mix.

When preparing the energy consumption information required by regulations, we report only the energy consumption from processes that we operate or manage as a Group. In the calculations presented below, we applied the same control boundary used for greenhouse gas emissions calculations within the Group. Our presented figures exclude raw materials and fuels that are not combusted for energy production – given our business profile as a financial institution, we do not conduct such operations. We also do not use fuel as a raw material.

The quantitative information provided in Table 10 below regarding energy consumption is expressed in megawatt-hours. Where the original information was provided in a different unit, we have converted it to megawatt-hours using the appropriate conversion factors. The data we present refers solely to final energy consumption (actual energy used by the Group). We generate renewable energy for our own needs, and to avoid double counting, we report this energy only within fuel consumption. We do not apply energy consumption offsetting methods, and the energy we generate is not sold to third parties. We also do not include energy acquired within the Group in the category of “purchased or acquired energy”

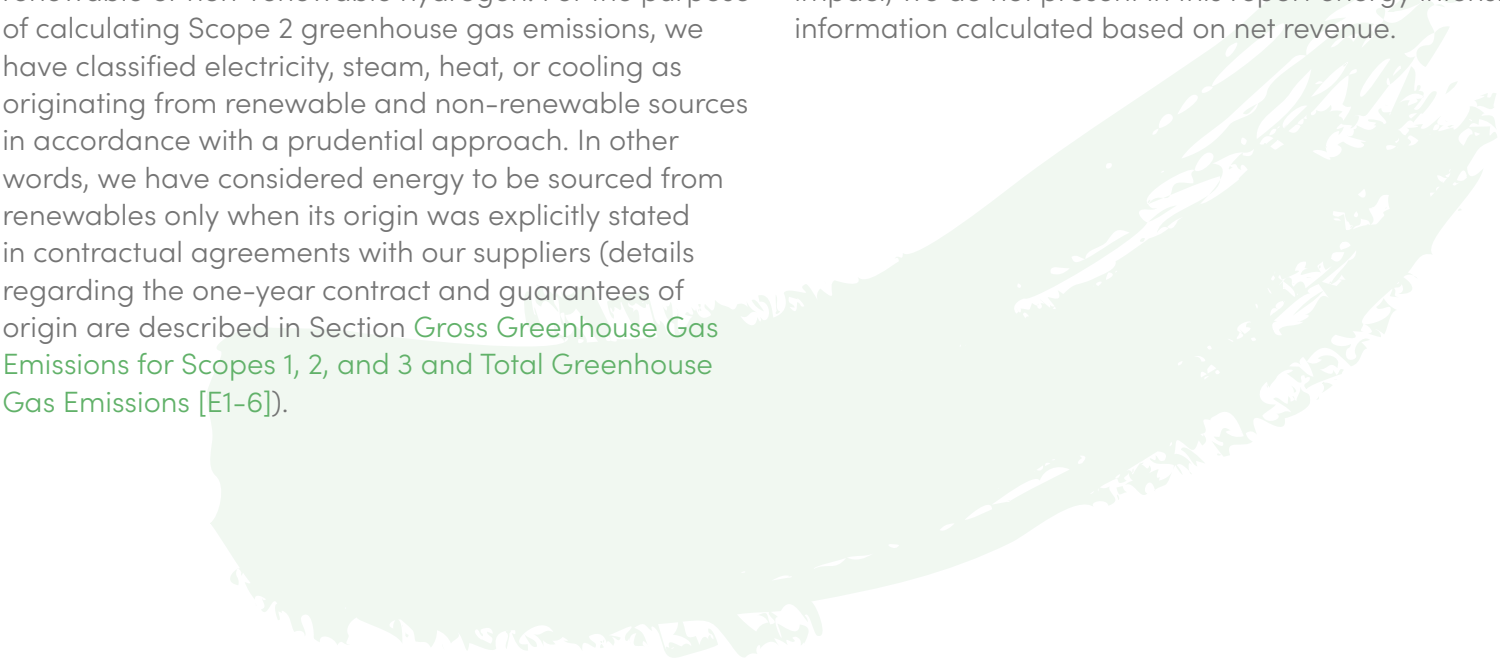


Energy Consumption and Energy Mix

	2023	2024
1) Total fossil fuel energy consumption (MWh) (sum of rows 1–5)	86,112.77	69,165.09
Share of fossil sources in total energy consumption (%)	72%	71%
2) Nuclear energy consumption (MWh)	0	0
Share of nuclear energy in total energy consumption (%)	0	0
3) Fuel consumption from renewable sources, including biomass (industrial and municipal biological waste, biogas, renewable hydrogen, etc.) (MWh)	0	0
4) Purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	33,214.64	28,352.02
5) Self-generated renewable energy without fuel consumption (MWh)	0	53.7
6) Total renewable and low-emission energy consumption (MWh) (sum of rows 8–10)	33,214.64	28,405.72
Share of renewable sources in total energy consumption (%)	28%	29%
Total energy consumption (MWh) (sum of rows 6, 7, and 11)	119,327.41	97,570.82

Due to the nature of Pekao Group’s business activities, we do not account for steam, heat, or cooling (considered as “waste energy”) from third-party industrial processes. Similarly, we do not account for renewable or non-renewable hydrogen. For the purpose of calculating Scope 2 greenhouse gas emissions, we have classified electricity, steam, heat, or cooling as originating from renewable and non-renewable sources in accordance with a prudential approach. In other words, we have considered energy to be sourced from renewables only when its origin was explicitly stated in contractual agreements with our suppliers (details regarding the one-year contract and guarantees of origin are described in Section [Gross Greenhouse Gas Emissions for Scopes 1, 2, and 3 and Total Greenhouse Gas Emissions \[E1-6\]](#)).

We do not operate in a sector with significant climate impact; therefore, we do not present the structure of energy consumption by type of fossil fuel. As Pekao Group does not operate in sectors with a significant climate impact, we do not present in this report energy intensity information calculated based on net revenue.



# Gross Greenhouse Gas Emissions for Scopes 1, 2, and 3 and Total Greenhouse Gas Emissions [E1-6]

To calculate greenhouse gas emissions under Scopes 1 and 2, we applied the methodology outlined in the GHG Protocol Corporate Standard. Due to the nature of our business activities, we do not fall under the European Union Emissions Trading System. The scope of the calculation covered Pekao Group. The calculations were based on internally collected data on the volumes of raw materials consumed (e.g., electricity, petrol, mileage) as well as information published by the National Centre for Emissions Management (KOBIZE), the Energy Regulatory Office (URE), the Department for Environment, Food and Rural Affairs UK (DEFRA), and electricity suppliers. We do not identify biogenic emissions in any category. Greenhouse gas emissions are consistently expressed in tonnes of carbon dioxide equivalent. No external calculation tools were used in the estimation.

As of the reporting date, we had no information regarding circumstances that would significantly impact greenhouse gas emissions.

Pekao Group makes use of guarantees of origin for electricity from renewable sources and engages in Power Purchase Agreements (PPA). The electricity procured under these agreements accounts for 29% of the Group’s total electricity consumption.

The GHG balance for Scope 3, prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard, includes only Category 15 in 2024. Categories 1–14 were excluded from the Scope 3 balance in 2024. An assessment for 2023/24 to determine the materiality of emissions from these categories showed that only Category 2 (Capital Goods), Category 3 (Fuel- and Energy-Related Activities [location-based]), and Category 7 (Employee Commuting) exceeded 0.1% of the emissions calculated for Category 15. Nonetheless, as part of our GHG inventory process within the supply chain, we have identified categories that are relevant for estimation and

reporting from the perspective of a financial institution’s business profile (in addition to Category 15), namely::

- Purchased Goods (Category 1),
- Capital Goods (Category 2),
- Fuel- and Energy-Related Activities (Category 3),
- Business Travel (Category 6),
- Employee Commuting (Category 7),
- Upstream Leased Assets (Category 8),
- Downstream Leased Assets (Category 13), and
- Franchises (Category 14).

These will be included in the Scope 3 category balance in subsequent years. The remaining Scope 3 categories were deemed irrelevant due to the nature of the Bank’s operations or the unavailability of reliable data for precise calculations. This approach aligns with domestic market practices. In the current reporting year, we do not identify any biogenic emissions resulting from biomass combustion or biodegradation in any emissions category within our value chain.

The calculated GHG emissions are consistently expressed in tonnes of carbon dioxide equivalent. The scope of calculations for Category 15 covered the exposures of the Bank and its subsidiaries: Pekao Bank Hipoteczny, Pekao Leasing, and Pekao Faktoring. As a result, all entities under the Group’s operational control that provide financing and hold investments in debt and equity instruments were included. The calculation also included the finance lease portfolio. The calculation did not include assets in the value chain, primarily assets and investments managed by the Group and not recognized on the Group’s balance sheet, such as assets of investment funds managed by the Group, were not included.

We identified three asset classes in the financial statement that are considered to calculate the financed emissions (financial assets other than held for sale at fair value through profit or loss, financial assets at fair value through other comprehensive income and

financial assets valued at amortised cost). Pekao does not calculate average data quality per asset class in the financial statement, however, the Group calculates average data quality per asset classes as defined by PCAF. The averages

are as follows:

- Business loans – 4.64
- Equity and bonds – 4.02
- Project finance – 4.77
- Commercial Real Estate – 3.83
- Retail Real Estate – 4.0
- Motor vehicle loans – 3.96

For the purposes of financed emissions calculation for the sovereign debt portfolio we used data sources recommended by PCAF, such as the World Bank and databases managed by the United Climate Change.

We covered 77.82% of the Group on-balance financial assets

The calculations were conducted within the following asset classes, as defined by the Global GHG Accounting and Reporting Standard for the Financial Industry, developed by the PCAF, of which we have been a member since July 2024. The calculation covered all asset classes defined by this standard that exist within the Group

- Corporate Financing Portfolio, including general-purpose exposures (business loans and unlisted equity) and project finance exposures;
- Motor Vehicle Loan Portfolio, which in the Group encompasses both credit exposures and all leasing exposures<sup>26</sup>;
- Mortgage-Backed Loan Portfolio, including retail mortgages and commercial real estate loans;
- Listed Equity and Corporate Bonds Portfolio;
- Sovereign Debt Financing Portfolio.

he calculations for each asset class were carried out in accordance with the Global GHG Accounting and Reporting Standard for the Financial Industry, developed by the PCAF.

For the purpose of financed emissions calculations, the Group relied on both internal and external data sources. The scope of data obtained from external sources included

- Data from the Central Register of Energy Performance of Buildings, maintained by the Ministry of Development and Technology;
- Average emission factors from the European building emissions database maintained by the PCAF, used for calculating financed emissions related to mortgage loans;
- Reported emissions (emission data collected directly from borrowers or companies in which investments were made);
- Average emission factors from the European asset emissions database maintained by the PCAF;
- Financial and corporate emissions data reported by customers, obtained from Bloomberg and Refinitiv Eikon

The percentage of financed GHG emissions in the Group’s portfolio, calculated based on primary data (energy performance certificates and corporate reporting), amounted to 40% in 2024<sup>1</sup>.

Other Scope 3 categories identified as materially relevant will be disclosed in subsequent years

<sup>1</sup> The calculations do not include the motor vehicles financing portfolio (data not available).



Greenhouse gas emissions by Scope 1, 2 and 3 in Pekao Group

	Pekao Group							
	RETROSPECTIVE DATA				INTERMEDIATE OBJECTIVES AND YEARS COVERED BY THE OBJECTIVE			
	2022	2023	2024	% 2024 / 2023	2025	2030	2050	Annual target in % / base year
SCOPE 1 GREENHOUSE GAS EMISSIONS								
Gross Scope 1 GHG emissions in metric tons of CO2 equivalen	8104	8121	8704	107%	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emissions trading systems (%)	0	0	0	0	-	-	-	-
SCOPE 2 GREENHOUSE GAS EMISSIONS								
Gross Scope 2 GHG emissions in metric tons of CO2 equivalent (location based	64153	33529	24498	73%	-	-	-	-
Gross Scope 2 greenhouse gas emissions in metric tons of CO2 equivalent (market based)	57312	No calculation	24604	-	-	-	-	-
SIGNIFICANT SCOPE 3 GREENHOUSE GAS EMISSIONS								
Total gross indirect (Scope 3) greenhouse gas emissions in metric tons CO2 equivalen			14 657 189		-	-	-	-
15) Investments			14 657 189		-	-	-	-
TOTAL GREENHOUSE GAS EMISSIONS								
Total emissions in metric tons of CO2 equivalent (location-based)	72257	41650	32382	78%	-	-	-	-
Total emissions in metric tons of CO2 equivalent (market-based)	65416	No calculation	32513	-	-	-	-	-

Greenhouse gas emissions by Scope 1, 2 and 3 in Bank Pekao and its subsidiaries:

	Bank								Spółki łącznie							
	Retrospective data				Intermediate objectives and years covered by the objective				Retrospective data				Intermediate objectives and years covered by the objective			
	2022	2023	2024	% 2024 / 2023	2025	2030	2050	Annual Target in % / base year	2022	2023	2024	% 2024 / 2023	2025	2030	2050	Annual Target in % / base year
SCOPE 1 GREENHOUSE GAS EMISSIONS																
Gross Scope 1 GHG emissions in metric tons of CO2 equivalent	7380	7180	7667	107%	-	-	-	-	724	941	1037	110%	-	-	-	-
Percentage of Scope 1 GHG emissions from regulated emissions trading systems (%)	0	0	0	0	-	-	-	-	0	0	0	0	-	-	-	-
SCOPE 2 GREENHOUSE GAS EMISSIONS																
Gross Scope 2 GHG emissions in metric tons of CO2 equivalent (location based)	62634	32236	23306	72%	-	-	-	-	1520	1293	1193	92%	-	-	-	-
Gross Scope 2 greenhouse gas emissions in metric tons of CO2 equivalent (market based)	55681	No calculation	23269	-	-	-	-	-	1631	No calculation	1335	-	-	-	-	-
SIGNIFICANT SCOPE 3 GREENHOUSE GAS EMISSIONS																
Total gross indirect (Scope 3) greenhouse gas emissions in metric tons CO2 equivalent			11 809 197		-	-	-	-			2 847 993		-	-	-	-
15) Investments			11 809 197		-	-	-	-			2 847 993		-	-	-	-
TOTAL GREENHOUSE GAS EMISSIONS																
Total emissions in metric tons of CO2 equivalent (location-based)	70014	39416	30152	76%	-	-	-	-	2244	2234	2230	100%	-	-	-	-
Total emissions in metric tons of CO2 equivalent (market-based)	63061	No calculation	30141	-	-	-	-	-	2355	No calculation	2372	-	-	-	-	-

Greenhouse gas emission intensity to revenue ratio

GREENHOUSE GAS EMISSION INTENSITY RELATIVE TO REVENUE	2024	% 2024 / 2023
Total greenhouse gas emissions (location-based method) per net revenue (t CO2 equivalent / monetary unit)	0.00019%	0.00014%
Total greenhouse gas emissions (market-based method) per net revenue (t CO2 equivalent / monetary unit)	In 2023, we did not calculate emissions using the market-based method	0.00014%

As net income we define income from: Interest, commissions and dividends (values are in accordance with the Bank’s 2024 Financial Statements).



# Greenhouse Gas Removal Projects and Greenhouse Gas Emission Reduction Projects Financed through Carbon Emission Units [E1-7]

The purpose of disclosing information on greenhouse gas removal and emission reduction projects financed through carbon emission units is to provide insight into the unit’s actions aimed at permanently removing or actively supporting the removal of greenhouse gases from the atmosphere, potentially with a view to achieving emission neutrality targets. The scope of these disclosures is not applicable to the Bank’s activities, as neither the Bank nor the Pekao Group

undertakes such projects within their own operations. Even if the Bank holds capital involvement in the implementation of such projects within its value chain, due to the lack of control over these projects, it does not meet the requirements for actively supporting the aforementioned activities.

# Establishment of internal carbon emission pricing [E1-8]

The subject of disclosure is information on whether the Pekao Group uses systems for establishing internal carbon dioxide emission prices, and if so, how they assist in decision-making and encourage the implementation of climate-related policies and goals. Due to the fact that both the Pekao Group and the Bank do not engage in carbon dioxide emission trading, the scope of disclosure does not pertain to our activities.

# Expected Financial Impacts of Significant Physical and Transition Risks and Potential Climate-Related Opportunities [E1-9]

Pursuant to Annex C to Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, units preparing their reports in accordance with ESRS requirements for the first time have the option to omit the information included in E1-9. We are exercising this option in the current report.






# EU Taxonomy


Regulation (EU) 2020/852, known as the EU Taxonomy, was developed by the European Commission as part of the European Green Deal. It serves as a key framework for classifying and defining environmentally sustainable investments, supporting the achievement of the EU’s climate and energy targets for 2030.


Under the Taxonomy, environmentally sustainable investments must:


- Make a substantial contribution to at least one of the six environmental objectives,
- Do no significant harm (DNSH) to any of the other objectives,
- Comply with minimum social safeguards.


The criteria for substantial contribution and DNSH have been defined for the following six environmental objectives:


- 

Climate Change Mitigation (CCM),
- 

Climate Change Adaptation (CCA),
- 

Sustainable Use and Protection of Water and Marine Resources (WMR),
- 

Transition to a Circular Economy (CE),
- 

Pollution Prevention and Control (PPC),
- 

Protection and Restoration of Biodiversity and Ecosystems (BIO),

**Disclosures on Key Performance Indicators**  
Pursuant to Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088 (hereinafter: “Taxonomy” or “EU

Taxonomy”), and its implementing acts:  
RCommission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information on environmentally sustainable economic activities to be disclosed by undertakings subject to Article 19a or 29a of Directive 2013/34/EU and defining the methodology for compliance with this disclosure obligation (Regulation 2021/2178), as amended by Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023<sup>1</sup>,  
Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or adaptation, as well as specifying whether that economic activity does not cause significant harm to any of the other environmental objectives, as amended by Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023<sup>2</sup>.

In its disclosures for 2024, Pekao S.A. Group (“Group”), as a capital group with a credit institution as its parent entity, is required to disclose key performance indicators (KPIs) related to compliance with the Taxonomy concerning two climate objectives:  
CCM (climate change mitigation),  
CCA (climate change adaptation).

**Contextual Information on Quantitative Indicators, Including the Scope of Assets and Activities Covered by Key Performance Indicators, Data Sources, and Limitations**

**Green Asset Ratio**  
The Green Asset Ratio (GAR) represents the proportion of assets associated with economic activities aligned with the Taxonomy relative to total covered assets. In accordance with Regulation 2021/2178, the numerator of the Green Asset Ratio includes:  
eCredit/loan, debt instrument, or equity exposures to financial institutions subject to non-financial reporting obligations under the Non-Financial Reporting Directive;  
Credit/loan, debt instrument, or equity exposures to non-financial corporations subject to non-financial reporting obligations under the Non-Financial Reporting Directive;  
Exposures to households, including:  
■ Mortgage-backed loans for residential real estate;  
■ Loans for building renovations;  
■ Motor vehicles loans.  
Financing of local government authorities.



<sup>1</sup>Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing technical qualification criteria to determine the conditions under which an economic activity qualifies as making a significant contribution to the sustainable use and conservation of water and marine resources, to the transition towards a closed loop economy, to the prevention and control of pollution, or to the protection and restoration of biodiversity and ecosystems, and determining whether that economic activity does not cause serious harm to any other environmental objective, and amending Commission Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information in relation to those economic activities.  
<sup>2</sup>Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria to determine the conditions under which certain economic activities qualify as contributing significantly to climate change mitigation or climate change adaptation, and to determine whether those activities do not cause significant harm to any other environmental objective.

Pursuant to Regulation 2021/2178, the following are excluded from the numerator and included in the denominator of the Green Asset Ratio:

- Exposures to non-financial corporations not subject to Directive 2014/95/EU<sup>1</sup> of the European Parliament and the Council (hereinafter: “NFRD Directive”, “NFRD”), including SMEs – all entities financed by the Group or whose instruments the Group holds that are not subject to the NFRD and conduct non-financial activities;
- Exposures to non-financial corporations not subject to the NFRD, outside the EU;
- Gross carrying amount of:
  - derivative instruments,
  - interbank demand loans;
- Cash and cash-related assets;
- Other assets (goodwill, commodities, etc.).

The following are not included in the calculation of the Green Asset Ratio (i.e., in either the numerator or denominator of theratio):

- Exposures to central governments and supranational issuers;
- Exposures to central banks;
- Trading portfolio.

In accordance with Regulation 2021/2178, financial corporations use the latest data and key performance indicators of their counterparties to calculate their own key performance indicators. To comply with this requirement, based on the 2023 nonfinancial reports of customers classified as non-financial corporations, the Group has verified whether counterparties have modified their calculations since the last reporting period and whether they have provided comparative data. Given that the reformulated performance indicators identified by the Group from counterparty corporations do not materially affect the value of the key performance indicators published in the 2023 taxonomy disclosure, the reformulated data has not been presented. Consequently, the value of assets used for the calculation of the Green Asset Ratio as of 31 December 2023 in Formula 1 remains identical to their value in the 2023 taxonomy disclosure.

**Key Performance Indicators for Off-Balance Sheet Exposures**

Key performance indicators for off-balance sheet positions serve as supplementary metrics that illustrate the extent to which the Group’s off-balance sheet positions, such as:

- Financial guarantees securing loans, advances, and debt securities issued to enterprises subject to the NFRD,
- Managed assets (equity and debt instruments) of enterprises subject to the NFRD, comply with the taxonomy framework.

**Green Asset Ratio for Financial Guarantees**

– this metric represents the percentage share of financial guarantees supporting loans, advances, and debt securities that finance business activities aligned with the taxonomy, in relation to the total financial guarantees supporting loans, advances, and debt securities issued to enterprises.

**Green Asset Ratio for Managed Assets**

– this metric reflects the percentage of managed assets (equity and debt instruments) originating from enterprises that finance business activities aligned with the taxonomy, in relation to total managed assets (equity instruments, debt instruments, and other assets).

**Financing of Entities Subject to Non-Financial Reporting Obligations under the Non-Financial Reporting Directive**

To support disclosures on key performance indicators, the Bank and its subsidiaries have analysed their exposure to financial institutions and non-financial corporations to identify customers required to report non-financial information under the Non- Financial Reporting Directive (NFRD). As part of this process, the Bank calculated the gross carrying amount of loans, advances, debt securities, and equity instruments in the banking portfolio for each identified entity as of 31 December 2024.

For general-purpose financing, the Group determined the gross carrying amount of Taxonomy-eligible and Taxonomy-aligned exposures for customers subject to NFRD reporting, based on the key performance indicators published by these customers in their 2023 Taxonomy disclosures. The Group did not assess the exposures toward companies which were not subject to Article 19a or 29a of the Non-Financial Reporting Directive but remain subsidiaries of a mother company which is subject to the said directive.

In the case of exposures toward undertakings dependent on a parent entity falling within the scope of Article 19a of the Non- Financial Reporting Directive but exempted from sustainability reporting at an individual level, the key performance indicator of that undertaking disclosed by its parent undertaking was applied. Given limited access to relevant data and supporting documentation, the Group did not classify these financings as Taxonomy-aligned. Instead, they have been disclosed solely as Taxonomy-eligible exposures. Where sufficient data was unavailable to reliably assess compliance with the technical screening criteria, the Group only assessed the Taxonomy eligibility of the exposure.

For the Minimum Safeguards assessment, the Group relied on information disclosed by its customers in their Taxonomy disclosures.

The Group is working on integrating enhanced data collection processes into its credit assessment processes, ensuring that in future periods, eligibility and alignment with the EU Taxonomy can be assessed at the financing approval stage.



<sup>1</sup> Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards the disclosure of non-financial and diversity information by certain large units.

Household Financing

To calculate the Green Asset Ratio, the Group classified its residential mortgage portfolio (secured by residential properties and granted to households) as Taxonomy-eligible. It then assessed Taxonomy alignment by verifying compliance with the criteria outlined in section 7.7 (Acquisition and Ownership of Buildings) of the technical screening criteria for climate change mitigation, as set out in Annex I to Regulation 2021/2139.

This assessment was conducted in line with requirements set forth in sections 1.2.1.3 of Annex V to Commission delegated regulation (EU) 2021/2178 regarding retail clients. The assessment covered compliance with: substantial contribution criteria for climate change mitigation, and Do No Significant Harm (DNSH) criteria, however, it did not cover – as set forth in the aforementioned sections – minimum safeguards..

The Group disclosures regarding retail clients include mortgage-backed loans for residential real estate; loans financing purchase of goods and services e.g. electric vehicles or photovoltaic panels are not considered. Therefore, the Group did not obtain relevant documents confirming that producers of goods and services purchased by the Group’s retail clients adhere to specific technical qualification criteria and minimum safeguards.

For residential properties built before 31 December 2020, the Group examined whether the property fell within the top 15% most energy-efficient buildings in the country or region, based on primary energy demand (PED). This was assessed using a communication from the Ministry of Development and Technology <sup>1</sup> which defines eligible buildings as those with primary energy demand below the thresholds outlined in Table 1<sup>2</sup> of its communication. To determine primary energy demand, the Group used: Energy Performance Certificates, and data from the Central Register of Building Energy Performance, maintained by the Minister of Development and Technology.

For properties built after 31 December 2020, the Group assessed whether the building’s primary energy demand was at least 10% lower than the threshold set for nearly zero-energy buildings in accordance with the Regulation of the Minister of Infrastructure (12 April 2002) on building technical requirements and their locations. This regulation sets maximum primary energy demand limits separately for multi-family and single-family buildings, as well as specific energy use thresholds for heating, ventilation, domestic hot water, and cooling. Given this, the Group’s assessment was based on partial energy demand values stated in the Energy Performance Certificate. Exposures from agreements for which the Group did not hold certificates were disclosed as Taxonomy-eligible but not Taxonomy-aligned.

For properties classified as meeting the substantial contribution criteria, the Group conducted an additional DNSH assessment, evaluating exposure to physical risks such as floods and landslides. This assessment followed an internally developed methodology, considering factors such as: property location, year of construction, floor level, and building type. Properties were deemed DNSH-compliant if the analysis found no significant exposure to physical risks or if the risk level was deemed low based on the adopted methodology. As of 31 December 2024, the Group did not identify any financing in its credit portfolio granted to households for building renovation or the purchase of motor vehicles.

Financing of Local Government Units

To support key performance indicator disclosures, the Group conducted a review of its exposure to local government units, identifying use-of-proceeds financing that contributes to the Green Asset Ratio.

Based on the purpose of financing, the Group identified Taxonomy-eligible loans for local governments and conducted an additional Taxonomy alignment assessment

This assessment considered compliance with substantial contribution criteria, and Do No Significant Harm (DNSH) criteria.

To ensure consistent and accurate evaluations, the Group developed internal assessment guidelines covering the most common types of financing provided to local government entities. Due to limited access to supporting data and documentation, the Group did not classify these financings as Taxonomy-aligned but instead disclosed them as Taxonomy-eligible exposures.

The Group is continuing its efforts to enhance credit processes, which will enable the collection of comprehensive data at the financing approval stage to better assess Taxonomy eligibility and alignment in the future.

As of 31 December 2024, the Group did not identify any financing in its credit portfolio related to public housing projects for local government entities.

Following Commission Notice C/2024/6691<sup>3</sup> the Group has changed its approach to the presentation of exposures to local governments for which the purpose of the proceeds is unknown. Such financing has been excluded from the numerator of key performance indicators and unlike the approach used in the Group’s disclosure for 2023, it has been included in the denominator of key performance indicators denominator of key performance indicators.

**Key Performance Indicator Disclosures in Line with Annex VI to Regulation 2021/2178**  
In the attachment the Group presents its key performance indicator disclosures in accordance with the mandatory disclosure framework for 2024, as outlined in Templates 1–5 of Annex VI to Regulation 2021/2178. Following section 1.1.1 of Annex V to Regulation 2021/2178, the disclosures are provided on a consolidated basis, reflecting the prudential consolidation scope of the Group. The total assets value reported in the disclosures is equal to the gross carrying amount of total assets as of 31 December 2024.

<sup>1</sup> <https://www.gov.pl/web/rozwoj-technologie/Taksonomia-zrownowazonego-finansowania-inwestycji-budynki>  
<sup>2</sup> Communication from the Ministry of Development and Technology: Table 1 Energy demand values corresponding to the 15% most energy-efficient buildings.  
<sup>3</sup> Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (third Commission Notice)



# Social Aspects



# Own Workforce

## [ESRS S1]

The Bank accounts for 83% of the total number of employees within the Group and, as the parent entity, sets the human resources standards for the entire organisation. Given the Bank’s leading role, its workforce management practices are crucial in assessing the impacts, opportunities, and risks relevant to other Group entities as well. Therefore, to streamline communication, the discussion of matters related to Standard S1 – Own Workforce focuses on the largest segment of the Group’s personnel – Bank employees.

The policies and processes related to IRO and described below apply to the Bank’s employees (83% employed in the Group). For individuals who are non-employees in own workforce, general legal provisions apply. Regulatory issues relating to a group of non-employees in own workforce are discussed when the disclosure directly refers to them.

Employee development is at the core of our ESG Strategy. By fostering diversity, encouraging open communication, and maintaining ongoing dialogue, we create an attractive and inclusive workplace that enhances job satisfaction and employee engagement. Our values – #prosto (straightforward), #razem (together), #odważnie (boldly), and #odpowiedzialnie (responsibly) – are the pillars of our organisational culture, shaping both our approach to business and preferred working style. Similarly, the 10 Key Principles of Team Management, designed for the Bank’s managerial staff, define our leadership ethos.

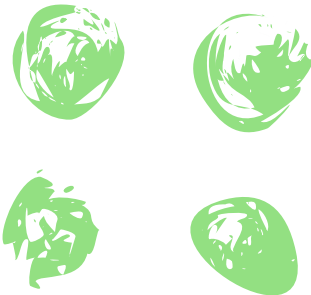
We are committed to being an employer of choice, as evidenced by receiving the Top Employer award for the 14th consecutive year in 2024. Our goal is to operate as one strong team, supporting each other

and sharing knowledge and experience. We aspire to build a dynamic and responsible Bank that evolves with the times and actively influences its environment. Our priority is to attract top talent with the right professional profile and retain the Bank’s best employees – those who are collaborative, entrepreneurial, and innovative – who will drive transformation and shape the Bank’s future growth. Our actions are rooted in ensuring appropriate working conditions that foster motivation, satisfaction, and employee engagement

Our workforce comprises:  
Employees who are significantly impacted by the Bank: those employed under an employment contract (both fixed-term and indefinite);

Individuals working under civil law contracts (e.g., contracts for specific work or contracts of mandate); Non-employees providing services under B2B agreements or contracts.

Through our double materiality assessment, we have identified material impacts related to our own workforce, which are outlined in section [Description of the Process for Identifying and Assessing Material Impacts, Risks, and Opportunities](#) of this Report



# Management of Impacts, Risks, and Opportunities

## Policies Related to Own Workforce [S1-1]

The Bank operates under labour law regulations aligned with applicable legislation, ensuring equality before the law and nondiscrimination in employment. These regulations, in the form of policies, procedures, guidelines, and internal rules, primarily apply to employees under employment contracts and those engaged under civil law contracts (e.g., contracts for specific work and contracts of mandate). These regulatory frameworks are designed to support effective organisational management and oversee material impacts, risks, and opportunities associated with our workforce. The President of the Management Board is responsible for implementing these policies and supervises the Human Resources Division.

### Human Rights

As a public trust institution, we conduct our business in compliance with applicable laws, supervisory recommendations, and best market practices. While the Bank’s internal policies and regulations do not explicitly reference prohibitions on human trafficking, forced labour, or child labour, we do not tolerate or permit any such practices within our organisation. The Pekao Group Code of Conduct (hereinafter: the “Code of Conduct”) is our key human rights policy. It serves as a comprehensive document outlining the core values and principles governing all areas of the Bank’s operations, subsidiaries, organisational culture, and value system.

All Pekao Group employees, regardless of position, tenure, location, or working hours, are expected to respect human rights. We promote this commitment by:

- Raising employee awareness and continuously improving our approach to human rights protection in both internal and external relations; fostering a workplace free from practices that violate human rights;
- Maintaining open dialogue (in the form of internal communication, training, employee surveys, notifications, requests, communication on social media channels, business and intra-organizational meetings in various types of councils, committees, workshops etc.) with all stakeholders, enabling us to optimise our activities, including those related to human rights.

The Bank is not able to disclose all MDR requirements due to the fact that policies, activities and objectives were prepared before the CSRD/ESRS came into effect.

Our ethical and responsible business standards extend to intermediaries, counterparties, and suppliers, ensuring a sustainable

and fair value chain. Each employee is responsible for maintaining a cooperative and ethical workplace atmosphere. We actively promote openness and direct communication.

The Code of Conduct of Pekao Group indirectly implements the UN Guiding Principles, emphasising: accountability, human rights compliance, integrity in employee relations, ethical conduct, dignity and respect for others, grievance mechanisms and access to remedies, as well as sustainable development initiatives and continuous dialogue with stakeholders

For more details on the Code of Conduct, refer to section [Business Conduct Policies and Corporate Culture \[G1-1\]](#) of this Report.

Additionally, as a member of the United Nations Global Compact, we fully embrace its 10 Principles, supporting its initiatives in human rights protection, improving labour conditions, environmental sustainability, and anti-corruption.

### The 10 Principles of the UN Global Compact:

- 

Businesses should support and respect the protection of internationally proclaimed human rights,
- 

Make sure that they are not complicit in human rights abuses,
- 

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining,
- 

The elimination of all forms of forced and compulsory labour,
- 

The effective abolition of child labour,
- 

The elimination of discrimination in respect of employment and occupation,
- 

Businesses should support a precautionary approach to environmental challenges,
- 

Undertake initiatives to promote greater environmental responsibility,
- 

Encourage the development and diffusion of environmentally friendly technologies,
- 

Businesses should work against corruption in all its forms, including extortion and bribery.



Secure Employment Conditions

The Bank’s working conditions are governed by procedures defining employee and employer rights and obligations, ensuring compliance with regulations on remuneration, working hours, and employee benefits. The Human Resources Division is responsible for developing and implementing these internal social policies, procedures, and guidelines, upon approval by the President of the Management Board. The Bank’s regulations in this area do not directly address the minimum disclosure requirements (MDR-P) under the CSRD Directive. We do not disclose of third-party standards or initiatives that are respected through implementation of the policies described in this chapter. Due to the extensiveness of the materials, their number, or the availability of data, we do not fully describe how the policies are made available to potentially affected stakeholders and stakeholders who need to help implement it, nor the scope of the documents and their exclusions. Instead, descriptions of the key content of individual policies have been limited for the clarity of the report and because of new reporting standards.

The primary document governing employment rules at the Bank is the Work Regulations (hereinafter: “Regulations”), which serve as an internal source of labour law. The Regulations define the organisation and order of work processes, as well as the rights and obligations of both the employer and employees employed under an employment contract, irrespective of their role or position.

We regularly update the Regulations, in consultation with trade unions and in compliance with applicable legal requirements, ensuring that the risk of non-compliance with prevailing labour laws is minimised. All employees are required to acknowledge their familiarity with the content of these Regulations.

We apply notice periods in line with the Labour Code or as stipulated in employment contracts, ensuring that they are no less favourable than those set out by labour law. Employment termination consultations are conducted in accordance with Polish legal provisions. In 2024, notice periods were predominantly one to three months.

As an employer, we positively contribute to employment security, as reflected in our low employee turnover rate (6.9%) and an average tenure of 17 years among employees with employment contracts. This demonstrates a high level of employee satisfaction and long-term commitment to the Bank

Working Hours

The Bank’s working hours are regulated in accordance with the Labour Code, using defined working time systems and specific start and end times. Work schedules and timekeeping principles are established on a monthly basis within designated settlement periods. Employees are informed of their annual leave entitlements when signing their employment contract, while parental leave entitlements are communicated on an ongoing basis, in line with applicable legal regulations. In response to amendments to the Labour Code, the Bank signed an Agreement with Trade Unions outlining remote work rules, including work organisation, procedures, and the rights and responsibilities of both the Bank and employees. Additionally, in order to meet employee needs, requests for non-standard working hours or changes in remote work location are assessed on an individual basis, with flexibility applied to accommodate employee circumstances. Parents of children under the age of 8 are offered greater flexibility in working remotely.

Fair Employee Remuneration

We ensure fair remuneration for employees, guaranteeing equitable treatment through a coherent remuneration system, which also includes non-wage benefits. The Bank’s remuneration strategy, developed in line with industry standards, is reflected in internal regulations, forming a key component in building and safeguarding the Bank’s reputation.

The Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: the “Remuneration Policy”) is the key regulation governing this area; it is available on the Bank’s intranet. This Policy reflects the Bank’s mission and values in its approach to remuneration systems, specifically:



Defining the pillars of remuneration, structure management, corporate processes, and organisational frameworks;  
Ensuring compliance of the remuneration systems with applicable legal requirements;  
Outlining the principles for monitoring market practices and the Bank’s approach to remuneration systems that support its long-term stability.

The remuneration structure establishes a direct link between remuneration and performance, ensuring: financial stability and variable remuneration levels aligned with the Bank’s financial capacity, performance-based remuneration caps, incentive schemes that include minimum performance thresholds, below which bonuses are not paid. Variable remuneration encompasses all performance-linked remuneration components, with payments directly tied to individual achievements, the Bank’s overall performance, and risk-adjusted results.

Base salary is a fixed component of remuneration, paid for the role performed, the scope of duties, and responsibilities held. It reflects the level of experience, skills, and competencies required for the role, as well as the

employee’s contribution to the Bank’s performance. The fixed component constitutes a significant proportion of total remuneration, allowing for a flexible remuneration policy.

To ensure competitive remuneration structures, transparency, and an effective and fair remuneration system, the Bank monitors market trends in terms of both remuneration levels and forms of remuneration. Decisions regarding the Bank’s remuneration system take into account market remuneration trends and incentive schemes, with data sourced from consulting firms conducting financial sector analyses. We also produce an annual report on the implementation of the Remuneration Policy, comprising two internal regulations: the Remuneration Policy of Bank Polska Kasa Opieki Spółka Akcyjna and the Remuneration Policy for Members of the Supervisory Board and Management Board of Bank Polska Kasa Opieki Spółka Akcyjna.

The annual assessment report on the implementation of the Remuneration Policy is prepared by the Nomination and Remuneration Committee, based on the Bank Management Board’s report on the functioning of the Remuneration Policy for the given year. Following approval by the Supervisory Board, the report is submitted to the General Meeting of Shareholders (GMS) for evaluation.

Social Dialogue with Employees

We engage in an open dialogue with employees through various internal communication channels, such as the intranet, live chats, discussion forums, and regular meetings with the Management Board. In our daily communications with employees, we emphasise ESG-related issues, underscoring the importance of high corporate governance standards, ethical business practices, social and environmental responsibility, and the development of human capital in building a sustainable organisation.

Freedom of Association, Works Councils, and Employees’ Right to Information, Consultation, and Participation

We respect employees’ freedom of association and uphold transparent dialogue with all trade unions operating within the Bank and with the Works Council.

In 2024, cooperation between the Bank and trade unions in terms of consultations, negotiations, and agreements was conducted in accordance with labour law, with respect for both parties’ interests and in line with principles of social dialogue. When dealing with the Trade Unions, the Bank adheres to the principle of good faith in developing the best possible solutions in collective labour law, benefiting both employees and the Bank.

In 2024, a total of 17 one- or two-day meetings were held, covering topics such as:

- Remuneration increase budgets for 2024;
- Allocation of the previous year’s incentive award fund;
- Distribution of quarterly bonus funds;
- Budget planning for the Employee Social Benefits Fund and amendments to its regulations;
- Meetings with Management Board members;
- Consultation on the Bank Pekao S.A. Whistleblowing Procedure;
- Updates to the Procedure for Counteracting Mobbing, Discrimination, Harassment, or Other Undesirable Behaviour at Bank Polska Kasa Opieki Spółka Akcyjna;
- Presentation of the Bank’s employee psychophysical resilience study;
- Review of the Voluntary Redundancy Programme launched in 2024.

Dodatkowo, 23 października 2024 r. Bank wraz z czterema ORGANISATIONnami związkowymi, będącymi stronami ZUZP, w wyniku przeprowadzonych rokowań, podpisał Protokół dodatkowy do ZUZP w zakresie zasad premiowania pracowników sieci sprzedaży Pionu Bankowości Detalicznej. Protokół ten został zarejestrowany przez Okręgowego Inspektora Pracy w Warszawie 18 listopada 2024 r.

Additionally, on 23 October 2024, following negotiations, the Bank and four trade unions that are parties to the Collective Labour Agreement (CLA) signed a Supplementary Protocol to the CLA, outlining the bonus principles for employees of the Retail Banking Division’s sales network. This protocol was registered by the Regional Labour Inspector in Warsaw on 18 November 2024.

The Bank documents its social dialogue activities and provides dedicated intranet pages for trade unions to facilitate communication with employees. Trade unions have the ability to publish bulletins and share information on these designated intranet pages, including updates on employee matters and ongoing dialogue with the employer.



The Works Council is an independent employee representation body, with its election process, objectives, and powers defined by the Act of 7 April 2006 on Information and Consultation of Employees. The Council consists of seven members, elected in general elections open to all Bank employees.

In accordance with this Act, the employer provides the Works Council with information regarding:

- The Bank’s activities and financial standing, including anticipated changes;
- The employment situation, workforce structure, and planned changes, as well as measures to maintain employment levels;
- Actions that may result in significant changes to work organisation or employment conditions.

Additionally, in compliance with the Act, the employer regularly informs the Works Council about the state, structure, and anticipated changes in employment and any actions that may significantly affect work organisation or employment terms. Upon request, the Bank consults with the Works Council on matters specified in the Act

The Works Council has a dedicated intranet page, where it publishes communications addressed to Bank employees. In 2024, three meetings were held with the Works Council of Bank Pekao S.A., with key topics including:

- Consultation on the Voluntary Redundancy Programme, launched in 2024;
- Meeting with the Director of the Corporate Services and Operations Centre;
- Discussion on the division of responsibilities among the Bank’s Management Board members.

Collective Agreements, Including the Share of Employees Covered by Collective Agreements

The Collective Labour Agreement (hereinafter: “CLA”) defines the Bank’s human resources and remuneration policy, including the rules and conditions of employee remuneration. It provides detailed guidelines on the allocation of all remuneration components and work-related benefits, such as: base salary, quarterly bonuses, performance incentives, and holiday bonuses. Additionally, it specifies overtime pay rules and other entitlements, such as retirement, disability, and death benefits, as well as compensation for workplace accidents.

Any amendments to the CLA are made through negotiations with trade unions that are parties to the agreement. Changes are formalised through supplementary protocols, which require registration with the Regional Labour Inspector. The CLA is accessible to all employees via the Bank’s intranet, and newly hired employees receive information about it as part of their employment contract.

In 2024, 77% of Bank Pekao employees were covered by the collective agreement. No collective agreements were concluded within Pekao Group subsidiaries.

Work-Life Balance

We promote work-life balance by leveraging legally available measures and offering part-time employment, flexible working hours, and remote work options. These initiatives help employees better align their professional duties with their personal lives. Additionally, we invest in health and well-being initiatives, including mental health programmes, physical activity support, and health education, all of which contribute to enhancing employee well-being.



Occupational Health and Safety

We place great importance on occupational health and safety (hereinafter: “OHS”), ensuring a safe and comfortable working environment by applying scientific and technological advancements. In compliance with legal regulations, we provide employee training and inform them about all aspects of their working environment. In terms of preventive medical examinations, we collaborate with occupational health specialists to optimise medical check-up requirements.

OHS activities are governed by the Regulation of the Council of Ministers of 2 September 1997 on Occupational Health and Safety Services, which sets out the required qualifications for OHS Office employees and the scope of their responsibilities. The implementation of these provisions is carried out, among other things, through systematic inspections of working conditions, taking into account the organisation of processes and their impact on working conditions, the technical condition of facilities, and submitted requests related to OHS requirements. The OHS Service monitors compliance with occupational health and safety regulations and principles, while also regularly informing employees about occupational hazards and methods for their elimination. Furthermore, it plays a key role in conducting occupational risk assessments to ensure effective protection for employees against hazards present in the work environment. The occupational risk assessment process at the Bank is fully digitised, with all its stages conducted through a dedicated application.

The primary regulatory framework for OHS at the Bank consists of the Occupational Health, Safety, and Fire Protection Rules and the Pekao

Group Occupational Health and Safety Policy. The preparation and implementation of these documents is the responsibility of the Health and Safety Office in the Logistics and Cash Handling Department, whose substantive activities are supervised by the Vice President of the Bank’s Technology and Operations Division. Selected OHS-related matters are also regulated under the Work Regulations. These regulations form the basis for internal instructions and employee conduct guidelines.

To enhance employee awareness of OHS, we conduct introductory and periodic training. Introductory training consists of general instruction delivered by an OHS Service employee and on-the-job instruction provided by direct supervisors. While periodic training is conducted entirely through the e-learning platform. The training content is aligned with the framework programme set out in the Regulation of the Minister of Economy and Labour on OHS Training. We also organise regular first aid training, delivered by certified paramedics.

The main source of OHS-related information is a dedicated intranet page, where we publish current rules, instructions, and guidelines. Employees can also report potential hazards via a dedicated OHS email inbox.

The Bank’s OHS Committee consists of employer representatives, including the occupational health physician responsible for employee health monitoring, OHS Service employees, and employee representatives. During quarterly meetings, the OHS Committee discusses current issues and initiatives related to OHS, including hazards subject to occupational risk assessment.





Gender Equality, Equal Pay for Work of Equal Value, and Workplace Diversity

We have implemented the Gender Equality and Diversity Policy, which applies to all Bank employees, including Supervisory Board members, Management Board members, and key function holders at Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: the “Gender Equality and Diversity Policy”). This policy aims to promote gender equality and prevent discrimination in the workplace. The policy outlines guidelines to ensure that all employees have the opportunity to manage their careers, achieve professional success, and be evaluated based on their individual performance, regardless of gender. Additionally, as part of the Bank’s commitment to inclusion and targeted support for employees from vulnerable groups, Chapter III of the Policy includes provisions on supporting employees returning to work after an extended absence, such as parental leave.

The Bank’s Diversity Strategy, as defined in the Gender Equality and Diversity Policy, aims to ensure high-quality task execution by employees and to select competent individuals for positions within the Supervisory Board, Management Board, and key functions. The selection process prioritises objective, merit-based criteria while recognising the benefits of a diverse workforce.

The Bank’s gender equality guidelines apply to all HR processes and establish the following principles::

Ensuring gender representation in external recruitment by including at least one male and one female candidate on recommended candidate lists; Ensuring gender representation in internal recruitment by including at least one male and one female candidate on candidate lists for each position; Eliminating gender-discriminatory criteria in job descriptions and role specifications; Informing external recruitment and training partners (e.g., temporary work agencies, recruitment firms, public employment agencies, and headhunting firms) about the Bank’s Gender Equality and Diversity Policy and its commitment to its objectives; Providing equal professional development opportunities (including training, coaching, and mentoring, and other development actions at work) to all employees, regardless of gender, based on business needs, job performance, and professional potential, in line with the Bank’s internal regulations; Ensuring equal treatment in pay and benefits, regardless of gender, in compliance with the Bank’s Remuneration Policy and applicable labour laws; Promoting work-life balance for employees by leveraging available legal provisions and offering benefits and flexible arrangements, such as:

- Offering flexible work arrangements (e.g., part-time employment) in compliance with applicable laws, particularly labour and social security regulations, as well as internal policies, while considering business and organisational needs;
- Supporting employees during and after extended absences (e.g., parental leave, unpaid leave, illness,

or any other long-term leave) by enabling them to stay connected with the company during their absence and facilitating a smooth return to work, in accordance with labour and social security laws as well as the Bank’s internal regulations;

- Integrating gender equality considerations into training programmes, including leadership training, onboarding programmes, and other professional development initiatives;

In 2024, the unadjusted gender pay gap at the Bank was 31.9%, marking a decrease from 37.9% in 2021 (detailed data is presented in Table 35). Additionally, the Bank calculates the adjusted gender pay gap, which is measured as a weighted average across employee subgroups, considering job levels, job families, and business units. The adjusted pay gap was 2.6%. This reduction is a result of systematic efforts aligned with the Gender Equality and Diversity Policy, including pay structure analysis and monitoring to verify that employees receive equal pay for work of equal value. Ensuring fairness and equality in remuneration is key to maintaining a just and inclusive workplace. Furthermore, we strive to ensure gender balance in senior management succession planning (senior management includes Management Board members and Directors of Divisions, Centres, and Departments reporting directly to the Management Board), We are committed to providing equal opportunities for promotion and career development, regardless of gender, contributing to a more balanced and sustainable work environment.

As part of the numerous development initiatives we highlight below, we actively implement diversity-focused initiatives and encourage employees to propose and engage in projects that support inclusivity. Our goal is to create a workplace where every employee feels

valued and empowered to reach their full potential. Additionally, we provide diversity management training for managers based on the Insight Discovery methodology. These workshops focus on: raising awareness of diverse employee needs, developing effective motivation strategies tailored to employees’ age, experience, skills, and competencies.

Employee Training and Skills Development

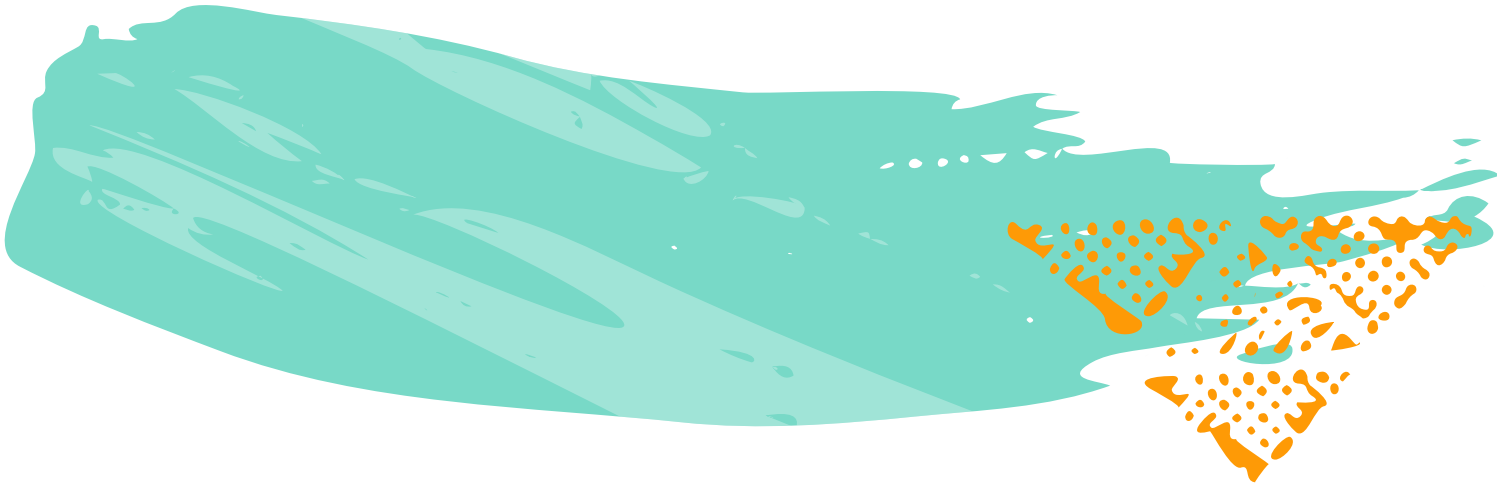
Providing employees with access to diverse training opportunities is a key priority for the Bank. Through a comprehensive training offering, we enable employees to develop their professional skills and advance their careers. The Bank’s educational programmes include:

- Local training sessions and general development webinars;
- International training and programmes;
- Mentoring and group/team coaching;
- Internal and external individual coaching;
- Certification training programmes (e.g., CFA, ACCA, CIA).

The Training, Professional Qualification Development, and Employee Growth Policy defines the processes related to employee participation in various forms of professional development. It includes procedures for:

- Group training sessions, including classroom-based, remote, and e-learning training;
- Individual training programmes, including domestic and international courses, certification programmes, language courses, postgraduate studies, and MBA programmes;
- Assessment of training needs.

As part of individual training, we organise workshops and courses focused on specialist banking knowledge, led by internal and external trainers as well as industry experts (moderators, coaches, and facilitators). These workshops provide employees with the knowledge and skills necessary to perform their professional duties. The Bank fully covers the costs of individual training programmes to which employees



are assigned, while training courses initiated by employees themselves are either partially reimbursed or taken as part of a granted training leave.

Participation in individual training programmes that lead to professional qualifications, licences, or international certifications (where the Bank fully or partially covers the costs) requires a training agreement between the Bank and the employee. This agreement defines the rights and obligations of both parties regarding the employee’s professional qualification development and specifies the conditions for the reimbursement of training costs by the employee.

To support employees in enhancing their language skills, we offer language courses, particularly for: managers, employees with high development potential, and employees who require foreign language proficiency for their daily responsibilities. Individual language courses are provided by external language schools under framework agreements with the Bank. The Bank fully or partially covers the costs of these courses.

Under the individual training programme, employees can also develop their skills abroad, following the same rules as domestic training. International training participation is subject to separate approval, including travel and accommodation arrangements.

We also support employees in pursuing postgraduate and MBA studies, through:

- Approval for employees to undertake postgraduate or MBA studies in fields relevant to the Bank’s business, initiated at their own request;
- Assigning employees to postgraduate studies when acquiring specific qualifications or certifications is required by external regulations;

Directing key function holders within the Bank to postgraduate or MBA programmes as part of their individual career development plans.

In 2024 (first and second half of the year), we launched several professional development initiatives, including:

- Academy of the Future** – focused on developing key future competencies (more on this initiative in the section on S1-4);
- Leadership Academy and Retail Manager Academy** – pilot training programmes dedicated to managerial staff. In 2024, we piloted a new edition of the program.
- Managerial Shots** – a development programme for managers, enhancing leadership and management skills. The program was created for managers who do not have time to attend full-day training sessions, they receive concrete knowledge in a nutshell in 45 minutes. In 2024, 3 more editions of the program were held, including 36 workshops, attended by a total of 3,500 managers. Examples of topics implemented: A leader close to the people; Effective management of the work of virtual teams; Building authority based on trust and respect; How to support an employee when his tasks are not being carried out, and many others.
- Development Snacks** – a series of short thematic workshops focused on specific personal and professional skill development areas, available to all employees;. In 2024, 3 editions of the program were held, covering 28 workshops, with more than 9,000 participants. Sample workshop topics: Team Cooperation, Building Mental Resilience, Competencies of the Future.
- Mission: Growth** – a programme for employees where participants work on real business challenges in cross- organisational teams, allowing them to discover and develop their skills and potential. The second edition of the program was held in 2024.

**Without Sugar** – a programme for women designed to: activate the female workforce, foster engagement and mutual support among women in the workplace, and inspire and encourage professional development.

As a result of the program’s strategic goals, a total of 56 development and educational activities were implemented in 2024. The program’s thematic offerings were constantly supplemented and updated and included: development of professional, personal and parenting competencies implemented through training, workshops, webinars. Development programs (Conscious Leader, Excelentni); development activities in the field of promotion and education on the subject of new technologies carried out through webinars, technical training and programs, e.g. “Closer to Technology”, “emPower Women”. An important event was the annual women’s meeting (Birthday of the program), which was attended by 660 participants in 2024. We were also succeed in conducting 2 campaigns to build health awareness among employees: Pink October (4,000 participants) and Blue November (2,200 participants). In addition, we launched the 2nd edition of the Development Program for Local Women Leaders, building leadership and project competencies. In total, more than 6600 women participated in the activities, more than 4,000 in the 2nd half of the year.

**Measures to Prevent Workplace Violence and Harassment**  
We have implemented the *Procedure for Counteracting Mobbing, Discrimination, Harassment, or Other Undesirable Behaviour* at Bank Polska Kasa Opieki Spółka Akcyjna, which serves as a mechanism for handling employee complaints, including issues related to workplace violence and harassment. We have a zero-tolerance policy towards discrimination based on: ethnic origin, age, gender skin colour, sexual orientation, disability, political beliefs, or religion. Additionally, we are committed to preventing discrimination in all aspects of employment, including hiring, termination, working conditions, promotions, and access to professional training and development opportunities. To combat mobbing, discrimination, harassment, and other inappropriate behaviours, we provide dedicated communication channels through which employees can report unethical practices, including violence and harassment.

Further details about this procedure can be found in section [Business Conduct Policies and Corporate Culture \[G1-1\]](#) of this Report.



Employee Privacy

We apply the same organisational and technical measures to protect the personal data of employees as we do for all individuals performing work for the Bank. Our data protection principles include: minimisation, transparency (information obligations), adequacy, data retention policies, and purpose of data (need-to-know principle, privacy by design, privacy by default) The Bank has implemented a series of procedures to ensure compliance with these principles, including initial and periodic training sessions for personnel responsible for data processing.



Procedures for Cooperation with Employees and Employee Representatives on Impact Issue [S1-2]

The organisational culture we foster is based on collaboration, openness to diversity, and adherence to the Bank’s values. To ensure a positive and inclusive work environment, in 2024, we conducted:

- Employee engagement and satisfaction surveys;
- Collaboration surveys;
- Psychophysical well-being surveys;
- Other forms of effective dialogue with employees, aimed at continuously improving working conditions, communication, and employee relations.

Employees are informed about participation opportunities and survey results through various internal communication channels, such as newsletters, announcements, the intranet, and direct team meetings, ensuring broad accessibility to all employees. Participation in these surveys is anonymous, allowing employees to freely express their opinions. The results are cascaded through the organisational structure and shared with employee representatives, including the Works Council and trade unions.

Based on survey findings on employee needs and workplace conditions, we develop dedicated initiatives and projects for both the entire organisation and individual teams.

Employee Needs and Workplace Condition Surveys at Bank Pekao S.A.

Survey 2024	Frequency	Period	Participation rate 2024
Psychophysical Well-being Survey	Annually	15 July – 15 August	34%
Collaboration Survey	Annually	29 August – 19 September	93%
Employee Engagement and Satisfaction Survey	Annually	22 October – 13 November	89%

The level of engagement of Bank Pekao’s employees compared to other organizations in the Polish market is in the high performance zone. The consolidated results of these surveys are presented to the Bank’s Management Board, serving as the basis for planning key organisational priorities. Additionally, as in previous years, each unit receiving an individual survey report (in line with the survey methodology) will implement its own action plan according to an established schedule. Both the survey results and action plans are discussed at all levels of the organisational structure, starting from the President of the Management Board and its Members down to each employee level.

One of the surveys conducted at the Bank is the Team Climate Survey, which is carried out within selected teams (rather than across the entire organisation). It consists of an anonymous questionnaire, assessing: workplace atmosphere, employee engagement, and recommendations for improving team operations. This survey is conducted with full confidentiality, and the collected responses form the basis for implementing improvements in the identified areas.

Additionally, we conduct exit interviews with employees who voluntarily leave the Bank. Departing employees can fill out an Exit Interview Questionnaire, where they indicate their reasons for leaving. The collected data is

analysed and used to develop strategies to enhance employee retention.

In 2024, we organised the World Values Day for the second time – a full-day event for employees, featuring workshops and inspirational sessions aimed at reinforcing alignment with the Bank’s core values. This year’s edition was attended by over 300 employees from various departments, with more than half coming from the sales network.

Details on the Bank’s cooperation with trade unions and its scope are provided in section [Policies Related to Own Workforce \[S1-1\]](#) of this Report.



## Processes for Addressing Negative Impacts and Employee Reporting Channels [S1-3]

We respect employees’ rights to freedom of association as well as their rights to information and consultation. The Bank has nine trade union organisations, with 53.8% of employees being union members as of 31 December 2024. Under labour law provisions, trade unions represent all employees with an employment contract in negotiations and collective bargaining with the Bank regarding internal employment regulations. In individual employment-related matters, trade unions represent their members or any employee who requests their representation in discussions with the employer.

Trade unions are also granted access to the Bank’s intranet, where they can publish bulletins and provide updates on important employee matters, including ongoing social dialogue with the employer.

The Bank’s Works Council represents employees in information and consultation processes, as outlined in the Act of 7 April 2006 on Information and Consultation of Employees. More details about the Works Council can be found in section [Policies Related to Own Workforce \[S1-1\]](#) of this Report.

Two key documents related to employee rights that express our approach to mitigating negative impacts and providing remedies if they are caused are: the Procedure for Counteracting Mobbing, Discrimination, Harassment, or Other Undesirable Behaviour at Bank Polska Kasa Opieki Spółka Akcyjna and the Whistleblowing Procedure at Bank Pekao S.A. These procedures, along with their scope, are described in section on Mechanisms for reporting violations

and protecting whistleblowers of this Report. They outline the internal reporting channels through which employees can report irregularities and describe the actions taken when reports are received, once they have been reviewed and processed. However, the Bank has not yet implemented systematic assessments of employee trust in these reporting processes and channels, nor has it formally evaluated their effectiveness. Nevertheless, all employees are required to familiarise themselves with these procedures and confirm their understanding by signing a dedicated statement.



## Managing Material Impacts on Employees, Addressing Key Risks, and Leveraging Opportunities [S1-4]

The implementation of AI-driven solutions has enabled the automation of many banking operations. The digitalisation of services, automation, and robotics also impact customer service functions, where chatbots now provide quick and precise responses to customer inquiries. The use of AI directly impacts job security for employees in customer service departments, including those working in bank branches, business centres, corporate banking centres, private banking outlets, and, most notably, call centres. These employees, especially those in physical outlets, are most at risk of job displacement due to digital transformation. This applies to both employees with employment contracts and those under civil law contracts. Many in this group have specialised skills gained through direct customer service experience, which may limit their opportunities in more automated and digitised banking sectors.

To mitigate the negative impact on job stability that may arise from the implementation of AI solutions, one of the key objectives of the Bank’s HR policy is to invest in skills development, with a strong focus on future competencies. Key Initiatives for employees in 2024:

**The Academy of the Future** – a comprehensive training programme focused on developing key competencies essential for success in the modern work environment. The latest edition, designed by an experienced team of experts, includes a series of webinars, workshops, and dedicated learning materials, enabling participants to expand their future-oriented skills. The programme emphasises both cognitive and technological competencies, balancing the development of creativity and adaptability with the ability to effectively utilise modern technologies, including artificial intelligence. It provides in-depth knowledge on AI applications as well as practical skills to ensure its efficient implementation. The third edition of the program is scheduled for the turn of 2024/2025. In the fourth quarter of 2024, five webinars were held as part of this project focused on topics related to artificial intelligence, quantum finance, cognitive resilience and agility, strategic prospecting, and working with a sense of purpose.

**The #AI Ambassador Programme** – as part of the COPILOT pilot for M365 launched in Q3, we conducted a series of dedicated trainings for #AI Ambassadors, as well as other employees. In connection with the pilot, we established the AI Ambassador Program , which aims to engage employees in the process of adopting and developing AI skills, sharing knowledge and building a community focused on developing competence in the use of AI through the dissemination of a tool based on the use of artificial intelligence. The project is being implemented in collaboration with external partners, who will support the deployment, testing, and evaluation of Copilot’s capabilities within the Bank.

As part of the programme, AI Ambassadors have been appointed, whose mission is to:

- Explore – research and test #AI technologies and Copilot capabilities
- Promote – advocate for #AI adoption within the Bank
- Communicate – act as an information channel between the Copilot implementation team and employees
- Engage – encourage employees to embrace tools, challenge old habits, and experiment with new solutions.

We also engaged a significant number of employees who do not serve as AI Ambassadors to learn about how COPILOT can be used in their daily work. More than 300 employees attended training sessions in dedicated areas: for sales, finance, legal and HR. A total of more than 500 people took part in all AI training courses.

**The Robotics Academy** is a continuation of a programme designed to develop digital competencies, integrate automation into daily tasks, and teach employees how to build their own robotic solutions. This proprietary training programme has been developed and is delivered by our in-house experts in collaboration with the world’s leading provider of automation solutions. The Academy consists of a series of 6 workshop meetings with the participation of 10 people – selected participants. Each workshop lasts 4 hours and is held online on the MS Teams platform. The seventh edition of the program was held in December 2024.

Additionally, as part of a training cycle launched in 2024 to mitigate risks related to the physical safety of employees engaged in direct customer service, a total of 73 training sessions were conducted in this area.

As part of the Bank’s initiatives to address material workforce impacts, several internal regulations have been implemented, including the Procedure for Counteracting Mobbing, the Whistleblowing Procedure at Bank Pekao S.A., and the Anti-Corruption Policy. These regulations and their scope are described in sections [Business Conduct Policies and Corporate Culture \[G1-1\]](#) and [Preventing and Detecting Corruption and Bribery \[G1-3\]](#)

The types of surveys conducted by the Bank and the use of result analyses are described in section Procedures for Cooperation with Employees and Employee Representatives on Impact Issue [S1-2] of this Report.

Within the organisational structure, the Bank has dedicated HR Business Partner (“HRBP”) resources responsible for managing significant workforce-related impacts. As of 1 November 2024, these resources

comprised 41 active full-time positions. The role of HRBP units includes identifying, analysing, and assessing risks related to workforce policies, reporting these risks, and initiating actions to mitigate or eliminate them.

The Bank also encourages employees to participate in social initiatives, allowing them to contribute to positive social impact. Through charitable, educational, and health-related activities, employees not only represent the Bank externally but also strengthen their sense of belonging and engagement by fulfilling their natural drive to help others. The spirit of volunteering and social involvement has become an integral part of the Bank’s corporate culture and strategic activities. One of the key

components of our ESG Strategy for 2021–2024 is the Employee Volunteering Programme, which aligns with the fourth pillar of the Bank’s Business Strategy, “Responsibility”, particularly in the area of “Society”. It also corresponds with the second pillar of the ESG Strategy, “Social Responsibility”.

The participation of Bank Pekao employees in volunteering initiatives is governed by the Employee Volunteering Programme Participation Rules (hereinafter: the “Volunteering Regulations”). The Volunteering Team in the Human Resources Division is responsible for managing volunteer activities at the central level. Every Bank employee, regardless of unit or outlet, is eligible to participate in the volunteering programme and is entitled to 16 hours of paid volunteering leave per calendar year. Providing employees with the opportunity to engage in volunteering during working hours benefits both the organisation and the employees, enabling them to pursue personal goals and passions. This initiative allows employees to engage in meaningful activities that matter to them, fostering a sense of fulfilment beyond their professional duties.





For each volunteering initiative, a dedicated leader is appointed to oversee the project and ensure its successful execution. Each initiative is fully documented, and leaders are required to submit a detailed report to the Bank, including:

- Photos,
- Video footage of the event,
- Details on the number of volunteers involved and the beneficiaries supported,
- Total hours spent on the volunteering project.

The Bank’s intranet features a dedicated Volunteering Platform providing information on charitable initiatives and support actions. Volunteer leaders participate in preparatory meetings to equip them for their roles. Each year, we observe a steady increase in employee engagement in volunteering activities, reflecting a growing commitment to social responsibility.

In 2024, the Bank’s volunteer initiatives focused on:

- Education, particularly in financial literacy and environmental awareness, targeted at children, young people, and seniors,
- Providing assistance, promoting equal opportunities, and preventing social exclusion,
- Preserving and promoting national traditions and cultural heritage.

Main Forms of volunteering organised by the Bank:

- Volunteering initiatives in collaboration with selected social partners,
- The *We Are Close* grant competition,
- Initiatives organised by employees.

The Bank’s management team is also actively engaged in volunteering efforts. Key initiatives are summarised in reports and updates on the Bank’s website, highlighting the impact of employee volunteering. The *We Are Close*

grant competition is designed for employees who identify and respond to the needs of local communities. Its direct beneficiaries include members of organisations receiving assistance, residents of care and educational institutions, participants in workshops and educational programmes, patients in medical facilities, members of sports and music clubs, and animals in shelters. In 2024, volunteers completed 140 projects under the grant competition, supporting initiatives such as children’s education, refugee assistance, combating exclusion (including digital and educational exclusion), healthcare and life-saving support, promoting culture and the arts, encouraging literacy, advancing sports and healthy lifestyles, animal welfare, or environmental protection, etc.

As part of the 10th edition of the competition, an additional 20 projects were specifically allocated to flood relief efforts within the crisis volunteering programme.

Beyond the grant competition, the Bank actively engages in numerous long-standing employee volunteering initiatives. Examples include a long-running blood donation campaign involving employees, first aid training workshops to equip volunteers with the skills to respond effectively in emergency situations, and environmental workshops held at the Bank’s urban beekeeping site, aimed at educating employees on urban ecosystems and sustainability.

In the next year, in addition to cyclical volunteer activities, such as the *We Are Close* grant competition and cooperation with selected Bank’s social partners in Volunteerism, with the full involvement of our employees and in accordance with their needs, we plan to initiate activities as part of the operationalization of the Bank’s new Strategy to manage the significant impacts, risks and opportunities associated with our own employee resources. Work on the new Strategy is currently underway, within the framework of which the assumptions, goals and measures of the above-mentioned Activities will be defined.

The activities related to IRO described in this chapter refer to the Bank’s own workforce and have no reference to the value chain.





# Metrics and Targets

## Goals for Managing Material Negative Impacts, Increasing Positive Impacts, and Managing Material Risks and Opportunities [S1-5]

Due to the implementation of the CSRD Directive in the reporting year, the definition and implementation of goals related to managing impacts, risks, and opportunities (IRO), including employee involvement or representation, cannot yet be reported. Work in this area has been planned for the following year.

Currently, in line with the Bank’s ESG Strategy, the priority is to integrate ESG factors into the incentive system for key management personnel and to strengthen gender equality. To achieve this, the Bank incorporates ESG factors into the incentive system for the Management Board, key management personnel, and other individuals engaged in ESG-related regulatory projects. Performance evaluations include annual goal achievement assessments, gender pay gap analysis, succession planning, and career development programmes supporting women’s professional growth.

Indicators monitoring the gender pay gap reduction are provided monthly to unit managers, enabling individual managerial decisions regarding remuneration while ensuring compliance with the goal of achieving full gender pay equality within their teams. This approach has successfully reduced the gender pay gap from 37.9% in 2021 to 31.9% in 2024, exceeding initial targets.

The Bank continues to develop networking initiatives and implement development and mentoring programmes for women while maintaining efforts

to narrow the gender pay gap. As part of the Bank’s Strategy, it is essential to sustain a balanced representation of men and women in managerial positions and to support employee well-being by offering flexible work arrangements and promoting work-life balance.

A key qualitative element of the annual individual objectives set for the Bank’s management team includes the implementation of ESG Strategy goals, particularly in the social aspect, focusing on reducing the gender pay gap, engaging employees, and encouraging volunteer activities.



## Characteristics o the Entity’s Employees [S1-6]

### Number of Employees in Pekao Group (Full-Time Equivalent and Head Count) by Gender at the End of the Reporting Period

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
HC	10,110	5,102	15,212	8,555	4,071	12,626
FTEs***	10,043.61	5,057.50	15,101.11	8,541.42	4,060.25	12,601.67

\* In the Pekao Group Activity Report, the number of employees counted as individuals is presented for the Group in section 1 and for the Bank in section 2, while the number of employees measured in full-time equivalents (FTEs) is provided in section 10.

\*\* In the Pekao Group, no individuals have been identified with a gender other than female or male, nor have any individuals chosen not to disclose their gender. For clarity, the data is presented only with a breakdown by female and male employees.

\*\*\* The calculation includes employees employed under an employment contract as of 31 December, both active and non-active, excluding those with ≤0.1 FTE, presented in full-time equivalents.

### Number of Employees (Full-Time Equivalent) in Pekao Group by Employment Period and Gender at the End of the Reporting Period

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Fixed period	1,334.31	930.65	2,265.96	885.105	546.78	1,431.83
Indefinite period	8,709.30	4,126.80	12,836.10	7,656.37	3,513.48	11,169.84
Total	10,043.61	5,057.45	15,101.06	8,541.42	4,060.25	12,601.67

### Number of Employees Employed Under an Employment Contract by Employment Scope and Gender at the End of the Reporting Period

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Full-time	9,772.00	4,914.00	14,686.00	8,507.00	4,037.00	12,544.00
Part-time	271.61	143.50	415.11	34.42	23.35	57.67
Total	10,043.61	5,057.50	15,101.11	8,541.42	4,060.25	12,601.67

Number of Employees Without Guaranteed Working Hours

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Number of employees without guaranteed working hours	0	0	0	0	0	0

Staff Turnover

2024	Pekao Group	BANK
Total Number of Employees Who Left the Entity During the Reporting Period	1497.61	877.58
Staff Turnover Rate*	9.92%	6.96%

\* When calculating the staff turnover rate, the numerator includes employees who left during the period from 31.12.2023 to 30.12.2024, regardless of the reason for termination of employment, excluding interns and employees working 0.1 FTE or less (so-called technical FTEs). The denominator includes all employees employed under an employment contract (both active and inactive) as of 31.12.2024, excluding those working 0.1 FTE or less (so-called technical FTEs).

Characteristics of Non-Employee Workers Classified as the Entity’s Own Workforce [S1-7]

Number of Contractors by Type of Contract and Gender at the End of the Reporting Period

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Employed under Contracts with Entities Engaged in “Employment-Related Activities” (*)	16	7	23	0	0	0
Self-employed (**)	40	86	126	0	0	0
Contract for specific work	68	40	108	7	7	14
Total	124	133	257	7	7	14

\* Job placement agencies.

\*\* Self-employed are contractors (with an active contract at the end of the reported year) who run their own business.

Scope of Collective Bargaining and Social Dialogue [S1-8]

Information on Trade Unions and Social Dialogue at Bank Pekao S.A.

2024	
Number of trade unions operating within Bank Pekao	9
Number of members of the Bank Pekao Employee Council	7
Percentage of employees covered by collective agreements	77%
Number of workdays lost due to strikes	0
Percentage of employees represented by employee representatives	100%

The Bank does not operate outlets within the EU outside Poland; therefore, no agreements have been concluded with employees regarding representation by a European Works Council, a European Company Works Council, or a European Cooperative Society Works Council.



Scope of Collective Bargaining and Social Dialogue

Coverage rate	Collective bargaining coverage		Social dialogue
	employees – EEA	employees – non-EEA	Workplace representation (EEA only)
0–19%	–	–	–
20–39%	–	–	–
40–59%	–	–	–
60–79%	Poland	–	–
80–100%	–	–	Poland

Diversity Metrics [S1–9]

Number of Employees by Employment Structure and Diversity (Full-Time Equivalent)

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Senior Management	48.00	84.50	132.50	11.00	37.50	48.50

Percentage of Employees by Employment Structure and Diversity

2024	Pekao Group		BANK	
	WOMEN	MEN	WOMEN	MEN
Senior Management	36.23%	63.77%	22.68%	77.32%

Number of Employees by Age Category and Diversity at the End of the Reporting Period (Full-Time Equivalent)

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
<30	857.38	735.23	1592.61	430.65	360.83	791.48
30–50	5250.42	2954.63	8205.05	4381.47	2475.93	6857.39
>50	3935.81	1367.65	5303.46	3729.30	1223.50	4952.80
Total	10043.61	5057.50	15101.11	8541.42	4060.25	12601.67

Adequate Pay [S1–10]

Number of Employees Receiving Below the Adequate Remuneration Benchmark\*

2024	Pekao Group	BANK
Number of employees	0.00	0.00
Percentage of employees	0	0

\* The adequate remuneration benchmark is defined as the statutory minimum wage in 2024.

All employees receive remuneration in line with established job classifications and national labour laws. The Bank implements continuous monitoring and control of remuneration systems and practices.

Social Protection [S1–11]

Under applicable national legislation, all employees with an employment contract are covered by pension, disability, accident, sickness, and health insurance. This ensures social protection in cases of incapacity for work due to illness, occupational accidents, disability, parental leave, and retirement. The percentage of employees eligible for social protection is 100%.

Training and Skills Development Metrics [S1–13]

Professional skills development is a core employer responsibility under the Labour Code. The legal foundations for skills development and training participation are detailed in Paragraph 10 of the Bank Pekao S.A. Training, Professional Qualification Development, and Employee Development Policy.

Number of Performance and Career Development Reviews (FTE)

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Employees participating in regular performance and career development reviews	8,709.43	4,378.68	13,088.10	7,557.62	3,567.28	11,124.89
Percentage of employees participating in regular reviews	86.72%	86.58%	86.67%	88.48%	87.86%	88.28%



Number of Training Hours by Gender

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Total number of training hours	531,845.99	199,423.22	731,269.21	459,429.99	143,583.22	603,013.21
Average number of training hours per employee	52.28	38.27	47.54	53.78	35.34	47.84

Number of Training Hours by Employee Category

2024	Pekao Group	BANK
Management Board Members	784.66	144.66
Managers	85,971.59	77,287.59
Others	644,512.96	525,580.96
All employees	731,269.21	603,013.21

Average Number of Training Hours per Employee by Employee Category

2024	Pekao Group	BANK
Management Board Members	37.36	24.11
Managers	49.63	53.44
Others	47.70	47.05
All employees	47.54	47.84

Occupational Health and Safety Metrics [S1-14]

Percentage of Own Workforce Covered by Occupational Health and Safety (OHS) Systems

2024	Pekao Group	BANK
Percentage of workforce covered by OHS systems	100%	100%

Number of occupational accidents

2024	Pekao Group	BANK
Number of occupational accidents	38	38
Occupational accident rate	1.55	1.86
Number of cases of ill health	0	0
Number of lost workdays due to work-related injuries, fatalities from occupational accidents, work-related ill health, and fatalities due to work-related ill health	1,596	1,596

Number of Fatal Occupational Accidents

2024	Pekao Group	BANK
Total number of fatal occupational accidents resulting from:		
Work-related injuries	0	0
Work-related ill health (occupational disease)	0	0
Total number of fatal accidents	0	0

In the above table, data for individuals who are not employees within the Bank’s own workforce is not presented.

Work-Life Balance Metrics **[S1-15]**

Details on our approach to work-life balance are provided in section [Policies Related to Own Workforce \[S1-1\]](#) of this Report. Below, we present quantitative data on this matter.

Percentage of Employees Eligible for Parental Leave and Employees Who Took Parental Leave in 2024

2024	Pekao Group			BANK		
	WOMEN	MEN	TOTAL	WOMEN	MEN	TOTAL
Percentage of company's employees eligible for parental leave			100%			100%
Percentage of company's eligible employees who took parental leave	3.59%	3.68%	3.62%	3.10%	3.52%	3.24%

Remuneration Metrics (Pay Gap and Total Remuneration) **[S1-16]**

ESG Strategy Pillar GOVERNANCE Implementation Index

	2022	2023	2024	Bank Pekao target fr 2024
Gender Pay Gap Pekao Group**			29.2%	
Gender Pay Gap Bank Pekao S.A.	35.90%	34.80%	31.90%	<35% (-5%)
Maintaining a balanced ratio of men and women in managerial positions	46% (men)	46% (men)	45% (men)	50% (men)

\* The unadjusted gender pay gap is presented as the difference between the average remuneration of men and that of women, expressed as a percentage of the average remuneration of men, based on employment data as of 31 December 2024, in accordance with EBA guidelines on employee exclusions. The ratio is calculated based on total remuneration, which is defined as personnel costs incurred by the Bank, including base salary, sick pay, overtime, bonuses, allowances, and employee incentives. It does not include employer contributions. Additionally, remuneration does not cover any payments related to employee departures, such as severance pay, holiday equivalents, or non-compete compensation. The Bank also calculates an adjusted gender pay gap index, determined as a weighted average across employee subgroups, taking into account job grading levels, job families, and business divisions. **This ratio is also calculated based on total remuneration, and the adjusted gender pay gap stands at 2.6%.**

\*\* The gender pay gap within the Pekao Group was calculated on the basis of consolidated data for the following companies: Bank Pekao S.A., Pekao Direct S.A., Pekao Financial Services sp. z o.o. and Pekao Leasing sp. z o.o.

Pay Ratio concerning the top earner

2024	Pekao Group	BANK
Ratio of the annual total remuneration of the highest-paid employee to the median annual total remuneration of all employees (excluding the highest-paid employee)	19.3	18.5
Ratio of the percentage increase in the annual total remuneration of the highest-paid employee to the percentage increase in the median total remuneration of all employees (excluding the highest-paid employee)	1.66	1.62

\* The ratios for the Pekao Group were calculated on the basis of consolidated data for the following companies: Bank Pekao S.A., Pekao Direct S.A., Pekao Financial Services sp. z o.o. and Pekao Leasing sp. z o.o

Incidents, Complaints, And Material Impacts On Human Rights Compliance **[S1-17]**

Incidents, complaints, and material impacts on human rights compliance

2024	Pekao Group	BANK
Number of reported cases of discrimination, including harassment	0	0
Number of complaints submitted through reporting channels	21	20
Total fines, penalties, and damages resulting from incidents exceeding	30,000	0
Number of human rights violations	0	0
Including violations of the UN Guiding Principles on Business and Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, or OECD Guidelines	0	0
Total fines, penalties, and compensation for damages resulting from incidents	0	0

# Consumers and End-Users [ESRS S4]

Customer relationships are the foundation of our operations. Every day, we strive to ensure that our cooperation is built on trust, respect, and professionalism. We foster an environment where every customer, regardless of age or life circumstances, is treated fairly and with full understanding of their needs. We pay particular attention to children, young people, the elderly, and individuals with disabilities, ensuring they have access to services and products tailored to their expectations and requirements.

A responsible approach to offering products is our priority. We always act ethically and transparently, preventing misselling and ensuring that our products align with customers’ needs. Our offering is broad, fair, and designed with customer satisfaction and financial security in mind. To promote financial stability, we actively counter excessive debt by providing solutions that support sound budget management.

The security of our customers is paramount – both in terms of cybersecurity and financial safety. We continuously develop tools and procedures to provide full protection of customer data and funds. At the same time, we safeguard their privacy by adhering to the highest standards in personal data processing.

Our communication and marketing activities are based on honesty, reliability, and responsibility. We avoid messages that could mislead customers, prioritising transparency and clarity in presenting information about our products and services. We build customer relationships on the values that have long been the foundation of our success – trust, ethics, and a commitment to the well-being of every customer.



## Management of Impacts, Risks, and Opportunities

### Policies Related to Consumers and End-Users [S4-1]

As part of our double materiality assessment, we asked ourselves which aspects of our operations impact our customers, both positively and negatively. This analysis led us to identify six key areas that shape our customers’ experience: nondiscrimination, access to information, access to products, personal and financial security, consumer privacy (including data protection), and marketing communication with responsible marketing practices. Understanding these areas enables us to refine our approach, enhancing service quality and fostering long-term trust.

At our Bank, the foundation of our daily operations, as well as our core values and standards, is the Pekao Group Code of Conduct (hereinafter: the “Code of Conduct”). It ensures transparency and alignment with best practices, serving as a guiding framework for all our activities – both internal and external – conducted in accordance with ethical and professional standards. The Code of Conduct plays a key role in shaping trust, service quality, and accountability in our relationships with customers and business partners.

#### Non-Discrimination

Any form of discrimination, harassment, or lack of respect is strictly unacceptable and not tolerated – whether within the Bank or across other entities of Pekao Group. The Code of Conduct explicitly outlines examples of prohibited behaviours, including those related to, among other things, discrimination against the elderly and individuals with disabilities.

We strive to ensure that our communication is inclusive, accessible, and easy to understand, regardless of age, experience, or other factors. Special attention is given to senior customers, who can find guidance on how to start using online banking on our website at [www.pekao.com.pl/strefaseniora](http://www.pekao.com.pl/strefaseniora). For younger users, we offer age-appropriate banking products, including the PeoPay Kids app for teenagers, which features a parental control panel to help them learn financial management in a safe environment. We also promote positive financial habits, such as saving, through the “piggy bank” function and an educational game within the PeoPay app. Additionally, we have published a proprietary report on financial education for children aged 6–13.

We adhere to the right to information as outlined in the General Data Protection Regulation (GDPR), ensuring transparency regarding the principles, purposes, and methods of data processing. The Bank implements tailored information clauses directed at specific customer groups. The Data Protection Officer (DPO) pays particular attention to clauses aimed at children, recognising their unique needs and vulnerabilities. Any procedure related to selling products to children (e.g., “piggy bank” products) requires providing them with clear, age-appropriate information. Additionally, broad marketing consents must be confirmed by legal guardians on behalf of minors. The DPO reviews all initiatives involving the use of personal data, with special consideration given to minors and individuals with disabilities.



Our goal is to ensure that all customers have equal access to our products and services. To this end, in September 2024, we launched the Pekao Without Barriers programme, aimed at aligning the Bank with the requirements of the Act of 26 April 2024 on Ensuring Accessibility of Certain Products and Services by Economic Operators, which will come into force on 28 June 2025. The programme focuses on:

- Delivering the highest standard of service, regardless of the customer’s point of contact with the Bank, while addressing specific needs;
- Reducing barriers to accessing banking services;
- Enhancing the availability of our services;
- Raising awareness and educating employees on accessibility to better serve individuals with specific needs;

This initiative supports individuals who, due to personal circumstances or external factors, require additional efforts or special accommodations to overcome barriers and participate equally in various aspects of life. It includes individuals with disabilities, elderly customers, pregnant women, and those travelling with young children. When designing our branches, we ensure full compliance with the technical requirements outlined in applicable regulations.

Key accessibility standards include:

- Fully equipped accessible restrooms with emergency call systems;
- Unrestricted access to all areas, eliminating single steps or other obstacles;
- Doorways and corridors meeting the required width specifications;
- Step-free access to branches; where stairs are present at the entrance, we provide ramps, lifts, or other assistive mechanisms.

In 2024, we modernised 12 branches to enhance accessibility for individuals with disabilities. Each new branch is equipped with two ATMs featuring cash deposit functions, and in larger branches, we have introduced dedicated kids’ zones, coffee corners, and community engagement areas.

We uphold the highest market standards and legal requirements in ensuring human rights are respected. At Pekao Group, all human rights-related concerns are thoroughly reviewed and addressed in accordance with established procedures. However, due to the nature of human rights incidents, we do not quantify or assess their materiality. Further details on this topic can be found in section [Policies Related to Own Workforce \[S1-1\]](#) of this Report.

Access to Information

As Pekao Group, we are committed to delivering services with professionalism and expertise. The solutions we offer are designed to meet our customers’ needs while complying with consumer protection regulations. Therefore, we do not engage in practices that could infringe on collective consumer interests, such as:

- Failing to provide consumers with accurate, truthful, and complete information – for example, by omitting or withholding essential details needed to make an informed decision (such as product pricing or functionality);
- Using unfair contractual terms, engaging in unfair market practices, or participating in acts of unfair competition;
- Misselling, i.e., offering consumers financial services that do not align with their needs or promoting such services in an inappropriate manner.

All Bank contract templates and Annual Percentage Rate (APR) calculations are aligned with the Consumer Credit Act, minimising the risk of customers invoking the free credit sanction (Article 45 of the Consumer Credit Act – in cases where a lender violates consumer rights by omitting or incorrectly stating legally required contractual provisions, the borrower may, upon request, repay the credit without interest or other costs). We also take various measures to mitigate this risk in the future.

The most frequently raised concerns regarding consumer credit relate to:

- Violation of Article 30(1)(7) of the Consumer Credit Act – indicating an incorrect total amount payable by the consumer as determined on the date of conclusion of the consumer credit agreement and an incorrect annual percentage rate (APR), arising from the unauthorised (in the consumers’ view) charging of interest by the Bank on the financed commission for granting the credit (i.e., financing and applying interest on the commission for granting the credit) or on other financed costs,
- Violation of Article 30(1)(10) of the Consumer Credit Act – failure to specify the condition determining a change in the cost of credit resulting from early repayment or the application of the free credit sanction.

On February 13, 2025, the Court of Justice of the European Union (“CJEU”) issued its judgment in Case C-472/23 concerning aspects of the application of free credit sanctions. The CJEU left a wide margin of discretion to national courts hearing individual cases. The Group will monitor the development of the CJEU’s and national courts’ case law on free credit sanctions and analyze the impact of these rulings on the Group’s position in pending litigation.

To better understand how our customers may be exposed to increased risks – particularly financial risks – we conduct extensive market research and analyse external reports on consumer attitudes and behaviours. These include studies such as Maison & Partners’ Money Track on Poles’ financial habits, IRC Center’s Young Adults report, Women in Advertising by the Visual & Narrative Institute, and Generation Power by Atena Research & Consulting, which focuses on the financial behaviour of individuals over 50. Insights from these studies allow us to tailor our products and innovative solutions to different age groups.

We also ensure a proper implementation of the MiFID process. MiFID is a sales procedure that begins with the customer completing an investment questionnaire. This questionnaire gathers information about the customer’s preferences, financial needs, investment approach, and ESG-related preferences. Based on the responses, we assess which products fall within the customer’s target market and which do not. Customers may choose from the products that match their profile or, if they opt for a product outside their target market, they receive a clear risk warning from the Bank. This mechanism helps prevent the misuse of financial products.

The operational coordination of MiFID-related processes is managed primarily by the Business Process Team at Pekao Brokerage House and the Investment Process Support Office at the Bank. Oversight of these processes is the responsibility of the Bank’s Management Board. MiFID procedures are reviewed annually or as needed if regulatory changes require updates. Customers must also update their MiFID profile at least once every 12 months.

To ensure compliance, MiFID processes at Pekao Brokerage House are governed by internal policies, including:

- Assessment of the Adequacy of Financial Instruments and Brokerage Services, Investment Advisory Suitability, and Customer Preferences and Needs (MiFID Assessment);
- Information Package: Details on Savings Treasury Bonds;
- Investment Product Distribution Principles at Pekao Brokerage House;
- Procedures for Customer Service Points and Brokerage Service Points, covering customer identification, service standards, meeting documentation, telephone transaction authorisation, compliance checks, and granting of customer authorisations.

For sole proprietors, we ensure that products and services are tailored to their business needs, while meeting key criteria such as financial, income, and accounting standards, financial and credit risk assessment, industry-specific considerations, and age criteria – only adults are eligible for our services.



Access to Products

When developing new products and services, we prioritise their ethical impact. Our employees provide customers with clear, comprehensive, and transparent information about available products, explaining contract terms and associated risks.

In line with applicable laws, both the Bank and Pekao Group companies involved in offering financial products and services operate under strict regulatory frameworks. These frameworks define industry standards, establish guidelines to protect consumer interests, and mitigate compliance and reputational risks in product and service sales.

In 2024, the Bank launched an extensive training programme, increasing by approximately 1,000 the number of employees certified to offer investment funds. This initiative ensures that customers in every retail branch have access to Pekao TFI investment solutions.

Our Bank has a process for the introduction, modification, and discontinuation of products offered to customers. This process establishes a framework that all new and modified products must comply with. It is governed by the Policy for the Introduction of New Products at Bank Pekao S.A. (hereinafter: the “New Product Introduction Policy”), which applies to all products, including insurance products. The policy also defines risk assessment areas, ensuring that all offerings align with our strategy, regulatory requirements, legal framework, and internal policies. According to the provisions of the New Product Introduction Policy, the introduction or modification of any product requires approval from the Bank’s Management Board. The process involves multiple units within the Bank, with the responsible unit conducting a comprehensive analysis to ensure that the product:

- Aligns with the Bank’s strategy, including ESG principles;
- Positively impacts customer experience, as assessed through customer impact evaluations and targeted user testing;
- Meets internal financial, capital, profitability, and accounting criteria;

Undergoes risk assessment, covering legal, compliance, reputational, operational (including complaints handling), credit, and financial risks; Is supported by secure systems, ensuring data protection and business continuity; Is compliant with FATCA and CRS requirements.

Additionally, under EBA guidelines, before:

- Launching a new product,
- Expanding an existing product to a new target market, or
- Modifying an existing product,

the implementing unit must conduct product testing to assess its impact on customers. These tests cover a range of scenarios, including stress testing, helping supervisory bodies identify and mitigate potential weaknesses while safeguarding customer interests.

As part of our marketing efforts, we systematically measure customer experience and expectations by conducting research at the design stage of new products and services. This enables us to create solutions that are both appealing and easy to understand. We also test our offline and online campaigns regularly, gathering customer feedback to refine our messaging. In 2024, we published the Customer Experience Management Model, which focuses on:

- A customer service model leveraging the latest technologies to respond to evolving needs and reduce barriers;
- A new approach to customer experience management, based on four key pillars: strategy, measurement, improvement, and customer-centric culture;
- Digitisation and personalisation, increasing the number of products and services available via online and mobile channels, while incorporating AI and data analytics;
- Building trust-based relationships, ensuring transparency in communication and increasing customer confidence in digital banking channels;
- Flexibility and responsiveness, offering a fully omnichannel customer journey.

Personal and Financial Security

Customer security is a top priority for us. As custodians of our customers’ financial assets and personal data, we bear a significant responsibility for protecting their interests.

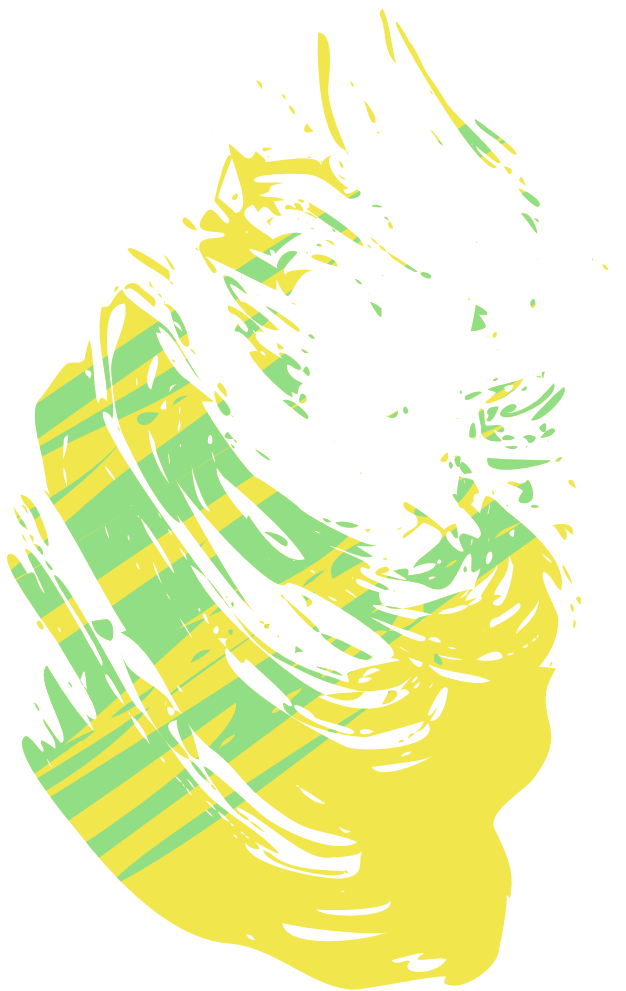
We define customer security in two key areas:

- Enhancing financial security, through various measures to protect customer data and funds.
- Preventing the misuse of Bank-offered products, achieved through various mechanisms as described in this Report. In line with our Code of Conduct, all our offerings comply with consumer protection requirements.

To strengthen customer security and reduce unauthorised transactions in 2024, the Bank introduced several technological, systemic, and organisational enhancements, including:

- Educational campaigns to inform customers about fraud risks, scams, and prevention strategies;
- Advanced transaction monitoring features within anti-fraud systems and module;
- Enhanced numerous security measures in banking platforms, including: instant blocking of cards and online banking access in suspected fraud cases, or two-factor authentication using the PeoPay app or hardware security keys;
- Increased staffing for anti-fraud alert monitoring.

Recognising emerging regulatory trends in the banking sector, by the end of 2024, we updated our internal regulations in line with the position of the President of the Office of Competition and Consumer Protection regarding unauthorised transactions, as stated in the decision of 16 November 2022.





Consumer Privacy and Data Protection

In the era of digitalisation and the increasing threats to cybersecurity, responsible management of customer data is a top priority. Privacy is not merely a matter of regulatory compliance but also a fundamental aspect of the Bank’s reputation. Every employee is obligated to maintain the confidentiality of legally protected information concerning the Bank, other entities within Pekao Group, customers, transactions, contractors, and fellow employees that they gain access to in the course of their work at Pekao Group.

At our Bank, we strictly adhere to applicable legal regulations, including the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC – the General Data Protection Regulation (hereinafter the “GDPR”).

We process personal data in full compliance with the law and with particular diligence to safeguard the interests of data subjects. The Bank acts both as a data controller and a data processor within the meaning of GDPR and bears full responsibility for compliance with data protection regulations, particularly by adhering to the following principles of personal data processing set out in GDPR:

- Lawfulness, fairness, transparency, and accuracy – ensuring that personal data is processed lawfully, fairly, and in a transparent manner for the data subject (Article 5(1)(a) and (d) of the GDPR);
- Purpose limitation – personal data is collected for specified, explicit, and legitimate purposes (Article 5(1)(b) of the GDPR);
- Data minimisation – ensuring that the scope of processed data is adequate and limited to what is necessary to achieve the specified purpose (Article 5(1)(c) of the GDPR);
- Integrity and confidentiality – implementing appropriate technical and organisational measures to ensure data security (Article 5(1)(f) of the GDPR).

We take all necessary precautions to prevent unauthorised access to legally protected information. In particular, we maintain the confidentiality of information classified with appropriate confidentiality clauses and use it strictly for the performance of official duties.

The Bank has implemented a range of internal regulations covering various operational areas to ensure the security of customers and their data.

These include:  
Information Security Policy, along with supporting security documentation,  
Risk Management Methodology for Violations of Rights or Freedoms of Natural Persons at Bank Pekao S.A. (PIA Methodology),

Personal Data Protection Principles and Rules for Obtaining Consent for Direct Marketing Activities at Bank Polska Kasa Opieki Spółka Akcyjna, Register of Processing Activities and Register of Categories of Processing Activities maintained by Bank Polska Kasa Opieki Spółka Akcyjna, Rules for Granting Authorisations to Process Personal Data and Access Bank Information, Procedure for Handling Data Subject Requests under GDPR at Bank Polska Kasa Opieki Spółka Akcyjna, Personal Data Retention Policy at Bank Polska Kasa Opieki Spółka Akcyjna, Procedure for Managing Personal Data Breaches at Bank Pekao S.A., Rules and Procedures for Commissioning Services Involving the Processing of Personal Data at Bank Polska Kasa Opieki Spółka Akcyjna,

Rules for Protecting and Handling Information at Bank Polska Kasa Opieki Spółka Akcyjna, Electronic Information Security at Bank Polska Kasa Opieki S.A.

The implementation of internal regulations related to consumer privacy is the responsibility of the data controller (the Bank’s Management Board), while their ongoing updates fall under the responsibility of their designated supervisors. The Bank continuously updates various operational procedures related to personal data.

The directors of the Bank’s organisational units bear full responsibility for organising, securing, and processing personal data within their respective areas. Employees, on the other hand, are required to process personal data strictly within the scope of the authorisation granted to them based on their job responsibilities. To this end, we develop and implement mandatory training programmes on personal data protection for employees, systematically monitoring training completion rates.

The aspect of personal data protection is also embedded in the day-to-day operations of the Data Protection Officer’s Department, which reviews new processes, projects, and initiatives, as well as internal regulations and contracts entered into by the Bank from a data protection perspective. The DPO, DPO Department, and the Bank’s Security Centre assess new technological solutions to ensure compliance with GDPR requirements and maintain the highest level of personal data security.





**Marketing Communication and Responsible Marketing Practices**

Responsible promotion is based on accurate and transparent knowledge of our products, including any potential risks arising from changing macroeconomic conditions or regulatory developments. The marketing and advertising activities conducted within Pekao Group comply with applicable legal regulations, supervisory guidelines, financial market integrity standards, and ethical business practices, while respecting customers’ preferences regarding such activities.

A key regulation in this area is the Rules for Creating Marketing Communications at Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: the Rules for Creating Marketing Communications), which govern the Bank’s marketing communications and outline the overarching principles, including: compliance of all marketing activities with applicable laws, adherence to the Bank’s internal guidelines and industry organisation recommendations, and alignment with the Bank’s core values.

Our marketing communication is designed for all consumer groups and end-users, and any form of discrimination – especially on the basis of race, religion, or gender – is prohibited. The Rules for Creating Marketing Communications explicitly state that marketing communications must not imply that the Bank’s products or services are entirely risk-free or that the level of risk is lower than it actually is. As a credible and transparent institution, we are committed to fair disclosure of the terms of our services. We specify the mandatory information to be included in marketing materials and refrain from actively marketing to customers over the age of 69, recognising their need for special consideration. To ensure the accuracy of our messaging, all advertisements and promotional content undergo consultation with the Compliance Department, which assesses the risk of non-compliance.

For investment products, in accordance with the Rules for Creating Marketing Communications, any information disseminated by the Bank – including advertising or promotional materials – must be presented accurately and explicitly state the risks associated with investments, including the potential loss of capital. Risk disclosures must be displayed using a font size at least equal to that used for highlighting potential benefits, with a layout that ensures visibility. Furthermore, marketing materials are distributed only to customers who, based on their responses to the MiFID questionnaire, fall within the target group for a given investment product, thereby minimising the risk of offering unsuitable products.

**Financial education**

Financial education is activities implemented to increase the financial knowledge and awareness of the public, including the Bank’s customers, including initiatives such as: educational programs, seminars, workshops and information campaigns.

These are tasks centered around topics related to managing personal finances and household budgets, as well as around issues of investing, saving, using bank products and applications (e.g. PeoPay) and issues of financial risk.

Financial education is carried out, among other things, in cooperation with the Bank’s social partners in volunteering, based on the documents in force in the organization The rules of participation of employees of Bank Pekao S.A. in employee volunteering or the Regulations of the grant competition We are Close. These are key documents addressed to the Bank’s employees, approved by the Bank’s Management Board or relevant departments. In the process of preparing the documents, the needs of the local communities in which the Bank’s branches are located, as defined by the social partners or the employees themselves representing these communities, were taken into account.



## Processes for Engagement with Consumers and End-Users Regarding Impacts [S4-2]

We ensure that our business activities are conducted in compliance with applicable laws, external and internal regulations, and the highest standards of conduct. Our objective is to instil a sense of shared responsibility among employees for the proper functioning of the Bank, ensuring adherence to established procedures while fostering continuous improvement in customer satisfaction.

### Responsible Sales and Quality Management

With our customers in mind, we have developed a modern customer experience management model that encompasses all business segments. This model defines the strategic direction for our development, aiming to enhance customer satisfaction with our services, increase appreciation of our product offering and service quality, and encourage customers to recommend our Bank.

We continuously expand our knowledge of customer expectations to better tailor our solutions to their needs. We actively seek customer feedback on our planned initiatives. In 2024, we expanded the scope of our customer research to include new processes and customer segments. The increased volume of collected feedback enables us to conduct more comprehensive analyses, integrating multiple data sources to swiftly address potential issues. We regularly assess customer satisfaction regarding interactions with relationship managers, remote service channels, self-service solutions, branch-based support, and completed service processes.

For customers engaging with our branch services, we are developing new conversation standards for selected products. We actively promote a culture of customer feedback collection to refine service quality and build lasting relationships. Since 2023, our customers have been able to provide more effective evaluations of our branches through Google Business Profile, allowing us to receive real-time feedback on their experiences. We respond to all customer feedback.

In 2024, we also intensified our efforts to enhance the quality of telephone interactions with customers. We conduct daily monitoring to ensure that our employees:

- Uphold security and confidentiality standards by correctly identifying customers and adhering to banking and professional secrecy regulations;
- Provide clear, accurate, and comprehensive information that is easy to understand, truthful, and not misleading;
- Offer products suited to customer needs, ensuring that product presentations align with the nature and characteristics of the respective offerings.

We provide training for both new and experienced advisors to enhance their skills in delivering high-quality customer service and conducting effective sales conversations. This training is available both online and in-person. Additionally, we regularly develop “knowledge capsules” for all frontline employees. These initiatives have yielded positive results, with consistent quarterly improvements in service quality metrics since early 2023.

We are committed to fostering a culture of clear and straightforward communication within our Bank. The initiatives undertaken in 2024 form part of an ongoing effort to simplify language, ensuring that our communications are customer-friendly and easily comprehensible. Our goal is to eliminate unnecessary formalities and establish a communication style that resonates with all customers.

To improve service quality in 2024, we:

- Initiated the standardisation of banking document layouts;
- Expanded our team of plain language consultants, incorporating additional specialists from key organisational units to support customer experience improvements. These consultants assist employees in simplifying documents, letters, informational materials, and internal communications;
- Trained hundreds of new employees on the fundamentals of writing clear and precise texts. Conducted numerous workshops for those responsible for drafting customer regulations and agreements.

Launched an internal knowledge hub on plain language as part of the “Prosto po polsku”; Simplified long-standing customer documents and adopted a legal design approach to the creation of new materials;

Actively participated in the Plain Language Working Group at the Polish Bank Association (Związek Banków Polskich).

Within this group, we share experience and co-create standards for banking communication.

### Driving Innovation in Business Operations

To maximise our positive impact on customers, we continuously drive innovation in our business operations by leveraging technology, employee expertise, and a customer-centric approach. The Bank Pekao Innovation Lab plays a key role in this process, focusing on solutions that support the Bank’s digital transformation, the acceleration of digitalisation, and the adaptation of services and products to customer needs. To achieve these objectives, the Innovation Lab operates across four strategic areas:

- Innovation design;
- Customer needs research;
- Innovation partnerships;
- Fostering a culture of innovation among employees.

In 2024, the Innovation Lab continued to support our strategic objectives through research and analysis using design thinking, service design, and lean startup methodologies. A strong emphasis was placed on involving both customers and employees in the development of new products and services. The Innovation Lab conducted numerous studies across various Bank departments, identifying and testing solutions tailored to customer needs, including: ESG-supporting tools, technological solutions for micro-enterprises, investment and insurance products, and development of a parental control panel for children’s banking services, enabling parents to monitor and manage their children’s finances Customers actively participated in these research efforts through interviews

and surveys, ensuring that solutions were optimally designed to meet their needs and expectations, ultimately leading to higher satisfaction levels.

Additionally, in 2024, we continued the Innovation Factory initiative, a process for generating product and service innovations aligned with our strategy. Successive research phases, including both qualitative and quantitative studies with customers, are essential for refining ideas and implementing optimal solutions that balance banking, customer, and environmental considerations.

The Innovation Lab also collaborates with external partners, startups, and industry leaders, allowing us to explore and validate cutting-edge concepts against business requirements.

We are actively engaged in advancing ESG initiatives. A key milestone in 2024 was the pilot launch of carbon footprint calculators for business customers. A total of 32 customers participated in the pilot phase, using the tool and providing valuable feedback. This project facilitated further cooperation with a calculator provider, enabling us to integrate the solution into our service offering.





Market Research and Customer Satisfaction Surveys

We regularly undertake research initiatives to gain insights into customer needs and evaluate both new and existing banking solutions (products and services). These studies help us refine our offering and align it with customer expectations. Research is conducted at various touchpoints in the customer journey, including: initial stages of product development, implementation of new solutions, or validation of hypotheses. Our research covers:

- Existing and planned banking products and services (concepts),
- Offline and online communication, including pre- and post-testing of messaging effectiveness,
- Customer satisfaction, assessed through a loyalty assessment tool.

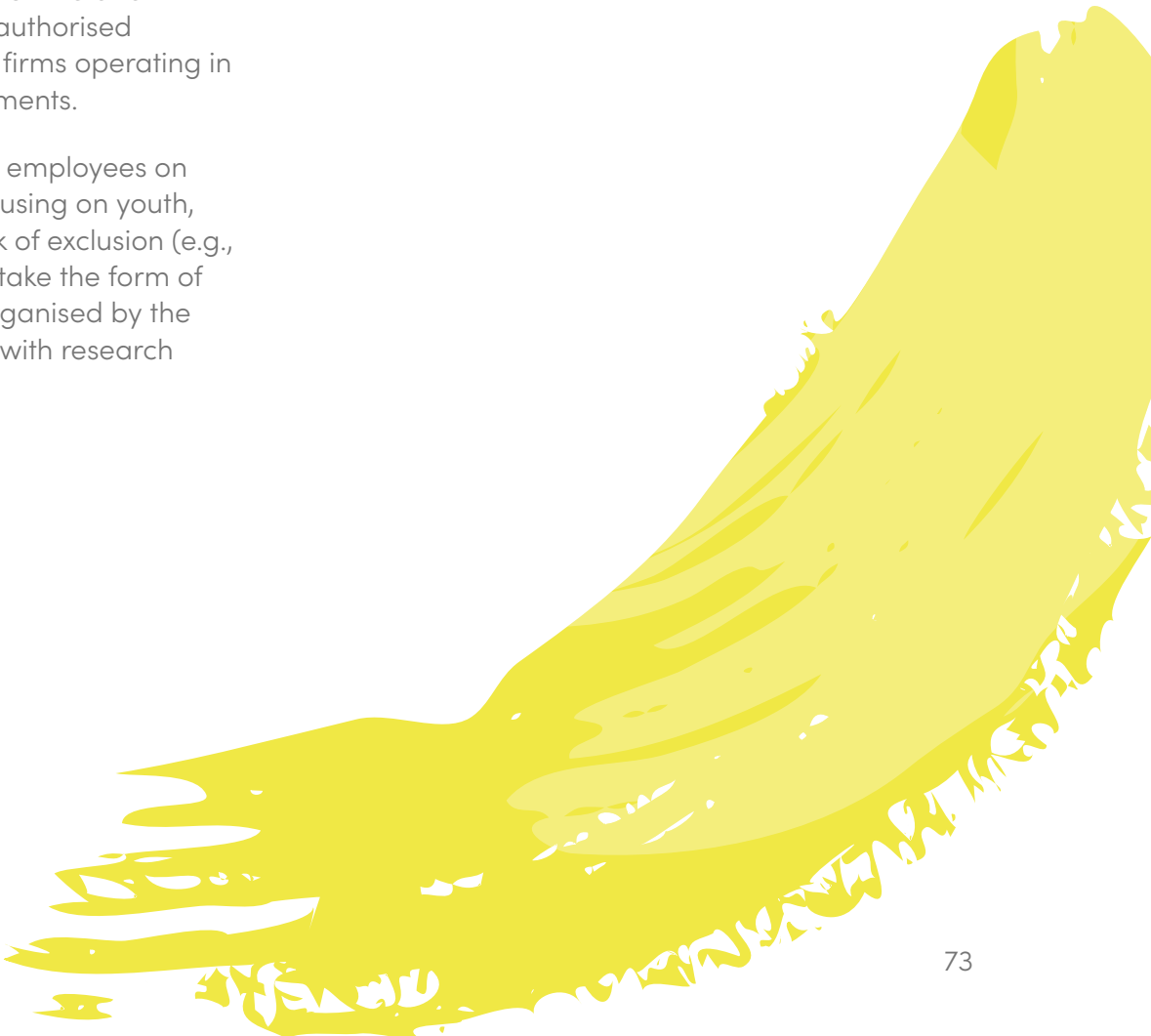
Consumer feedback is gathered on an ongoing basis, adapting to current business and marketing needs. We employ both qualitative and quantitative research methods, conducted through online and offline channels, in collaboration with authorised representatives of renowned research firms operating in Poland, engaged under formal agreements.

We also provide internal education for employees on the latest market research insights, focusing on youth, senior citizens, and other groups at risk of exclusion (e.g., women). These educational initiatives take the form of lectures and expert-led discussions, organised by the Marketing Department in partnership with research firms and academic institutions.

Based on ongoing brand awareness research, we know that Bank Pekao remains one of the most recognisable banking brands in Poland among individual customers aged 18–64. In Q3 2024, we secured 2nd place (12%) in the Top of Mind brand awareness survey. Among younger customers, we ranked 3rd (13%), and in the SME segment, we maintained 2nd place (15%).

We also conduct dedicated research for specific customer segments. In 2024, the Retail Banking and Savings Products Department continued its Premium Customer Offer Evaluation, aimed at gathering insights from Premium segment customers to guide the future development of our offerings. The study covered:

- Account and card offerings;
- Savings products;
- Credit card offerings;
- Loyalty programmes;
- Loan products;
- Preferred communication channels;
- Customer service model.





## Processes for Addressing Negative Impacts and Consumer and End-User Complaint Channels [S4-3]

We prioritise open communication and collaboration, offering multiple channels for customers to provide feedback and submit complaints. Our goal is to continuously refine processes and services to enhance customer satisfaction.

### Complaints

We operate in accordance with the Act on Complaints Handling by Financial Market Entities, the Financial Ombudsman, and the Financial Education Fund. Customers can submit complaints in person at a branch, in writing, via the helpline, through online banking, or via e-Delivery. Full details on available complaint channels are provided in the Complaints Policy, which is shared at the time of agreement signing and is also available on the Bank’s website under the document Information on the Rules and Deadlines for Filing and Reviewing Complaints at Bank Polska Kasa Opieki Spółka Akcyjna, intended for individual customers.

These channels are continuously developed in response to customer and regulatory feedback, as well as through internal collaboration with various Bank departments. This ensures that complaints and responses are handled in line with customer expectations.

Additionally, customers have the right to submit complaints via an authorised representative. However, the Bank will respond to the representative only if the authorisation explicitly waives banking secrecy.

All complaints must include the customer’s details, while as anonymous complaints cannot be processed due to the inability to verify facts and link the case to a specific customer.

Customers can also seek assistance from the Customer Ombudsman, who handles complex and exceptional cases requiring individualised attention and additional legal opinions. Consumers may also opt for out-of-court dispute resolution by applying to the Banking Ombudsman at the Polish Bank Association or the Financial Ombudsman.

If a customer disagrees with a complaint resolution, they have the right to appeal through the same channels used for submitting complaints. Customers may also lodge their appeal internally to the Bank’s Management Board or Supervisory Board or externally to the Financial Ombudsman, the Polish Financial Supervision Authority (KNF), or local consumer protection offices.

All complaints and appeals are processed with strict confidentiality and data protection in accordance with the GDPR. When sending personal data outside the Bank, we ensure encryption, with the password transmitted via a separate communication channel.

Customer satisfaction with the complaint resolution process directly impacts the Bank’s reputation. Customers who experience professional and effective complaint handling are more likely to remain with the Bank and recommend its services to others. Therefore, ongoing monitoring of customer satisfaction with the complaints process is essential. We regularly analyse customer feedback and implement necessary improvements to maintain high service standards. A quarterly customer survey assesses the usability and satisfaction levels of available complaint channels. In the Q4 2024 survey, the most frequently used channels for lodging complaints were digital platforms (36% via PeoPay, 18% via Pekao24), followed by the helpline (29%), while only 15% of customers opted to visit a branch. In 2024, a total of 205,803 complaints were submitted in the retail banking, private banking, and sole proprietorship (JDG) segments. The Q4 results also showed an increase in the likelihood of customers recommending Bank Pekao after filing a complaint. Compared to Q3, the share of promoters increased to 36%, while the share of detractors fell to 36%, resulting in an NPS score of 0 (+13 points).

### Personal Data Breaches

Customers can report potential personal data breaches to the Data Protection Officer (DPO) via the following channels:

- Helpline
- In person at a branch
- In writing
- By email to [iod@pekao.com.pl](mailto:iod@pekao.com.pl),
- Through online banking.

Information on these reporting channels is available on the Bank’s website. Additionally, all branch employees may inform customers about their right to submit a data breach report and accept that report. All are directed to the Data Protection Officer (DPO), who maintains records of submitted reports, the number of incidents (including data breaches), and complaints filed with the Data Protection Office (UODO).

Most data breach-related correspondence is received electronically, followed by telephone and paper submissions. All responses are issued within the GDPR-mandated deadlines. To date, no complaints have been registered regarding failure to respond. Information about the privacy clause, which outlines all available communication channels, is included in every process involving data processing – both for external customers and internal – and is incorporated into all employee regulations and policies.



Actions Taken Regarding Material Impacts on Consumers and End-Users and Approaches to Managing Material Risks and Leveraging Material Opportunities Related to Consumers and End- Users, as well as the Effectiveness of Such Actions

[S4-4]

We implement a range of measures to prevent material negative impacts on our customers’ financial security and safety. We regularly assess the threat landscape, particularly in the area of cybersecurity, gather data from our customers, and exchange information within the financial sector. We conduct various consumer protection initiatives through educational campaigns, website communications, and social media engagement, raising consumer awareness about online threats, cybercriminal tactics, and protection methods, while also contributing to broader social resilience against cyber threats.

More details on our approach to cybersecurity and data security can be found in section [Goals for Managing Material Negative Impacts, Increasing Positive Impacts, and Managing Material Risks and Opportunities](#) of this Report.

To mitigate the risk of misleading customers, all informational materials are reviewed by the Legal Department and the Compliance Department. Similarly, the New Product Implementation Process follows internal regulations, including customer documentation approval within the legislative process, ensuring Compliance with Appropriate Banking Practices.

In 2024, we introduced a new technological solution for individual customers to enhance security in financial services – an automated verification of whether a customer’s PESEL number is restricted. This solution applies to all consumers. When opening an account or applying for a loan, as well as when withdrawing significant cash amounts at a branch, we check whether the customer has flagged their PESEL number as restricted. If they have, no new agreements or cash withdrawals exceeding three times the minimum wage will be processed. This measure provides additional protection against identity theft. The Vice President

of the Management Board, responsible for Retail Banking, oversees the implementation and application of this solution.

We prioritise security for both customers and employees during phone interactions, ensuring that our customers feel safe when engaging with the Bank over the phone. In 2024, we introduced and promoted a new security feature – digital business cards – to both customers and employees. The “Send Business Card / Customer Assistance” feature, available within the Bank’s mobile apps, allows to:

- verify an employee’s identity if the customer has doubts about whether they are speaking to a legitimate Bank representative;
- identify and confirm the customer’s identity securely.

We work on improving the customer experience in telephone banking at our branches. Since 2024, all branches within our network operate under one centralised contact number, ensuring a high call answer rate and a unified standard for telephone service. This centralised call handling system aims to resolve customer needs remotely, minimising the necessity for branch visits. At the same time, all landline phones have been removed from retail branches, and branch employees have been equipped with recorded mobile phones, significantly enhancing security for both customers and staff. This recorded-call functionality played a crucial role in protecting our customers in 2024 against spoofing attacks, in which fraudsters impersonate Bank employees to manipulate customers into fraudulent scenarios. To further raise awareness, we published an educational video on our website titled “How to Protect Yourself from Fraudsters Impersonating the Bank?”

We remain committed to educational efforts and cybersecurity communication. The Bank’s official information security policy – Security Education – outlines the approach to educational initiatives and cybersecurity

communications, particularly targeting customers. We also conduct the #CYBERczujni (Be #CYBERAware) educational campaign, continuously monitoring its effectiveness by analysing reach and engagement metrics.

In 2024, the Bank actively promoted insurance products designed to provide customers with financial security in situations where unexpected adverse events could impact their ability to repay loans or credit obligations. These products include CPI PEX, CPI KH, Life Insurance, and Property Insurance. We place particular emphasis on monitoring the quality of offered insurance products, regularly analysing complaint trends, claim rejection rates, and loss ratios. The Bank collaborates closely with Insurance Undertakings in this regard.

In 2024, we successfully implemented Recommendation U and aligned with Best Practices for CPI Insurance. As a result, we now offer higher-quality insurance products with improved loss ratios and lower rejection rates, delivering greater value to customers and supporting them throughout the claims process. Additionally, we have refined our approach to identifying customer needs more precisely, ensuring that we offer tailored insurance solutions.

A key element of our customer and consumer risk management framework is personal data protection. We have robust processes in place to inform Data Subjects (i.e., individuals to whom the data pertains) about potential data breaches, providing them with guidance on minimising negative consequences and preventing future incidents. In our correspondence regarding complaints, we inform Data Subjects about how their personal data is processed by the Bank or, where applicable, by Credit Information Bureau (BIK). Furthermore, the Bank’s Information Security Section analyses feedback from the Polish Data Protection Office (UODO) regarding personal data breaches and complaints filed by Data Subjects.

The primary method for assessing the effectiveness of the Bank’s consumer privacy initiatives involves reviewing feedback from the Polish Data Protection Office (UODO) regarding:

- Data breach incidents reported by the Bank and the measures taken to mitigate their impact;
- Complaints filed by Data Subjects and the Bank’s responses to these complaints.

Additionally, we conduct awareness campaigns to educate customers about fraud prevention, including common scams such as online fraud and phishing attacks. The DPO reviews all customer communications designed to increase awareness and vigilance against cyber threats.

All initiatives undertaken by Pekao Group require substantial resource investments, including dedicated staff time or infrastructure maintenance. However, it is currently not feasible to provide detailed financial data on each specific initiative.

# Metrics and Targets

## Goals for Managing Material Negative Impacts, Increasing Positive Impacts, and Managing Material Risks and Opportunities [S4-5]

Strategic goals, including those that relate to activities carried out towards customers, are set as part of the strategic planning process. The process is based on macroeconomic assumptions and expectations for the development of the banking sector, as a result of which the Strategic Directions of the Bank and the Group are set, and a Strategy is developed that reflects the expectations and ambitions of the Bank's development over a multi-year horizon, within the framework of the risk profile defined by the Bank's Statutory Bodies. All major organizational units participate in the process of developing the Strategy.

The development of the Strategy for the next few years is preceded by an analysis of the internal and external environment, including an analysis of the Bank's market position, strengths and weaknesses, opportunities and threats, an analysis of the available development potential and the extent to which it is used, an analysis of trends in the banking sector and trends of a macroeconomic nature affecting the Bank's market position, as well as an assessment of the level of risk in the Bank's operations and a diagnosis of the key areas of the Bank's activities (including an analysis of the extent to which the strategic objectives from the previous Strategy have been achieved).

Under our 2021–2024 ESG Strategy, Pillar 2: Social Responsibility, we have established objectives aimed at maximising our positive social impact, including our impact on customers. Our priorities include equal opportunity promotion, social inclusion prevention, and expanding financial access for underserved groups. The ESG Strategy also incorporates objectives related to customer satisfaction, digitalisation growth, and strengthening the Bank's reputation.

While customers are not directly involved in strategic planning, we rely on customer insights gathered through periodic satisfaction surveys, complaint analysis, and brand perception studies when formulating objectives.

In 2024, we achieved the following objectives:

### Service accessibility and removal of barriers for individuals with special needs

We ensure that our services are accessible to the broadest possible group of customers, including those with diverse needs. Details of our initiatives in this area are described in [Policies Related to Consumers and End-Users](#) of this Report.

### Enhancing the Bank's reputation in reputation surveys and rankings

As part of our ESG Strategy, we conduct a Bank Pekao reputation survey every two years. The 2022 study confirmed that the Pekao brand enjoys a strong reputation among individual customers. This reputation is assessed based on five key dimensions: trust, brand advocacy, CSR, media sentiment, and employer brand perception. We also continuously monitor all core brand indicators and competitive positioning across all customer segments. The latest reputation study is currently underway.

In Q3 2024, we ranked among the top banks in terms of trust, stability, and security, alongside PKO BP and ING Bank Śląski. These indicators are monitored quarterly based on the Pekao brand study against competitors, conducted by GfK Polonia on behalf of Pekao. This quantitative study, conducted over several years on a representative sample of Poles aged 18–64, ensures comparability and long-term trend monitoring. Additionally, this survey enables us to track other brand performance indicators, such as brand awareness, consideration, conversion, and perception.

Reputation improvement is implemented through regular monitoring of Pekao Bank's reputation against its competitors.

### Increase in customer satisfaction

Our ambition is to be among the leaders in customer experience, so in December 2022 we adopted targets for increasing customer satisfaction, the implementation of which began in 2023 and continued in 2024. We have set NPS targets for specific areas, but due to the confidentiality of the aforementioned data, it is impossible to describe them in detail in this document. The setting of targets related to indicators is the result of internal findings, but the basis for their determination is customer feedback collected during NPS surveys.

We monitor NPS indicators using two sources of data:

- external benchmarks;
- surveys conducted on behalf of the bank;

NPS is calculated according to standard methodology, i.e. NPS is equal to the difference of the promoters' index to the critics' index.

In 2024, we focused on improving customer satisfaction, identifying key priorities and an action plan. These initiatives have led to greater customer appreciation for the Bank and its efforts to enhance their experience, reflected in significant increases in the Net Promoter Score (NPS):

- +3 points in the individual customer survey in Q4 2024 compared to Q4 2023;
- +14 points in the sole proprietorship (JDG) customer survey in 2024 compared to 2023;
- +3 points in the SME customer survey in 2024 compared to 2023;
- +15 points in the MID customer survey in 2024 compared to 2023.

### Increase in digitalisation index

We continue to expand digital banking channels, mobile payments, and various remote services. Through digitalisation, we ensure easy access to banking services.

### Educational activities

One of our goals as an organization is to engage in educational activities and activities aimed at equalizing opportunities for people in communities at risk of social exclusion or in extremely difficult financial or life situations. These goals also include activities in the area of financial education, which primarily involve the education of children, young people and seniors, especially from local communities.

A new strategy for Bank Pekao will be announced in 2025, which will set strategic directions for development and the resulting key initiatives and activities planned for future years.





# Corporate Governance Information



# Business Conduct [ESRS G1]

## Business Conduct

### Role of Administrative, Supervisory, and Management Bodies [ESRS 2 – GOV-1]

Information on the role of administrative, supervisory, and management bodies, as well as their expertise, is provided in section [Role of Administrative, Management, and Supervisory Bodies \[GOV-1\]](#) of this Report.



## Management of Impacts, Risks, and Opportunities

### Business Conduct Policies and Corporate Culture [GOV-1]

A key element of our operations is the development of a stable organisational culture. In 2021, we defined four core values: *#prosto* (straightforward), *#razem* (together), *#odważnie* (boldly), and *#odpowiedzialnie* (responsibly), which set the standards for employee conduct and foster engagement around shared objectives. We actively promote behaviours aligned with these values, thereby creating an increasingly positive and secure work environment. Our ESG Strategy serves as the primary governance framework for corporate governance, facilitating the integration of social responsibility principles and ethical standards. Our commitment is reflected in the policies and procedures we implement.

The effective promotion of our corporate culture is reinforced through daily practices and regular training, covering key areas such as:

- Corporate governance,
- Ethical standards and the Pekao Group Code of Conduct,
- Whistleblowing procedures,
- Anti-corruption measures,
- Compliance.

These mandatory training sessions are an integral part of the onboarding process for new employees, ensuring that from their very first day, they are aligned with the values and principles of Pekao Group.

The Management Board of Bank Pekao and the management boards of other Pekao Group entities conduct an annual review and assessment of compliance with ethical standards, as outlined in the Pekao Group Code of Conduct (hereinafter: the “Code

of Conduct”). This Code serves as a fundamental set of principles and norms that support the creation of a transparent and responsible organisation, including:

- Conducting business in compliance with legal regulations, internal policies, supervisory recommendations, and widely accepted market standards;
- Striving for continuous improvement in work quality and standards;
- Building long-term relationships with customers based on mutual trust and transparent cooperation principles;
- Understanding the risk culture, including risk limits applicable to specific activities, as defined by the Bank and other Pekao Group entities.

Every employee of the Group is required to familiarise themselves with the Code of Conduct as part of their mandatory training, which is available via the e-learning platform, and must confirm their acknowledgment in writing or through the Bank’s IT system. In 2024, a total of 1,151 employees completed the Code of Conduct training.

The Code of Conduct is published on the intranet, on the page dedicated to the Compliance Department, under the Compliance Culture tab. It is also available to the public on the Bank’s website, in the About the Bank / Corporate Governance section.

The Management Board of the Bank has also adopted the Banking Ethics Code of the Polish Bank Association (hereinafter: the “Banking Ethics Code”) at the request of the Compliance Department. The principles outlined in this document apply to banks, employees, and entities or individuals acting on behalf of banks. The Banking Ethics Code serves as a guiding framework for ethical banking practices, adherence to best market practices,

and the reinforcement of trust and reputation within the banking sector. The Code of Banking Ethics (Principles of Good Banking Practice) consists of following sections:

- General Principles
- Relationships with clients
- Relations with employees
- Relations between banks and relations with other financial institutions and business partners
- Responsible banking
- Innovation and new technologies.

The Code was developed by the Banking Ethics Committee of the Polish Bank Association (ZBP), of which, as Bank Pekao, we are a member and in whose work we participated. The document is available on the website of the ZBP and the Bank.

As an active participant in the Polish banking system, we have representatives who take an active role in the work of the Banking Ethics Committee at the Polish Bank Association.

Whistleblowing Mechanisms and Whistleblower Protection

The Bank accounts for 83% of the Group’s total workforce and, being the parent company, sets the standard in the area of mechanisms for reporting any violations. Other Group entities have an approach in this regard similar to the one we present below based on the Bank’s policies.

The rules for reporting violations and protecting whistleblowers are outlined in two documents: the Procedure for Counteracting Mobbing, Discrimination, Harassment, or Other Undesirable Behaviour at Bank Polska Kasa Opieki Spółka Akcyjna (hereinafter: the “Anti-Mobbing Procedure”) and the Whistleblowing Procedure at Bank Pekao S.A. (hereinafter: the “Whistleblowing Procedure”). The updated version of the Whistleblowing Procedure, aligned with the Whistleblower Protection Act, came into effect on 25 September 2024, replacing the previous regulation. These documents are published on dedicated intranet pages, providing employees with information on how to report observed irregularities. Additionally, all employees are required to confirm their awareness of these procedures by submitting a formal declaration. This ensures that all staff members are familiar with the available reporting mechanisms and dedicated whistleblowing channels.

The Anti-Mobbing Procedure obligates us to prevent and report any unethical behaviour, including mobbing, discrimination, or harassment. In the event of misconduct, the employee submits a written complaint, either personally signed via traditional mail or electronically to a dedicated email inbox. To review the complaint, the employer appoints a commission, responsible for determining whether a violation occurred. If misconduct is confirmed, the employer decides on the appropriate disciplinary measures against the perpetrator, in compliance with labour law regulations. If a sanctioned employee does not accept the penalty, the Bank may initiate legal proceedings against them. However, the Bank aims to resolve disputes amicably by seeking out-of-court settlements with employees whenever possible. In cases where a dispute escalates to legal proceedings, the Bank strives for mediation and conciliation before a mediator.

The Anti-Mobbing Procedure includes provisions prohibiting retaliatory actions, whether direct or indirect, including acts of reprisal, omissions of a repressive nature, or actions that worsen the legal or factual situation of the complainant, as well as threats related to the complaint. Such actions are strictly forbidden if they violate or may violate rights or cause or may causeunjustified harm, including the unwarranted initiation of legal proceedings.

The Whistleblowing Procedure establishes the rules and procedures for reporting legal violations, breaches of internal Bank procedures, and ethical misconduct. The availability of a whistleblowing mechanism is a key component of risk management, helping to maintain the Bank’s integrity and reputation while mitigating legal, financial, and reputational risks. This procedure applies to individuals who have obtained knowledge of a violation in a work-related context, meaning a whistleblower may include:

- Employees,
- Temporary workers,
- Individuals performing work under civil law contracts,
- Entrepreneurs,
- Proxy holders,
- Shareholders,
- Members of statutory bodies,
- Individuals working under the supervision of a contractor, subcontractor, or supplier,
- Interns,
- Volunteers,
- Trainees,
- Any other individual performing tasks for the Bank,
- Individuals who became aware of violations before starting their employment or contract with the Bank, or after their contract ended,
- Trade union board members operating within the Bank.

Whistleblowing reports can be submitted anonymously or with full disclosure of identity via the following channels:

- By email to a dedicated mailbox: ZglosNaruszenie@pekao.com.pl
- By post to the Bank’s headquarters at ul. Żubra 1, 01-066 Warsaw, addressed to the “Management Board Member designated to receive whistleblowing reports”, with the notation “Whistleblowing Report – Bank Pekao S.A. – Confidential”,
- By post (for reports concerning Management Board Members) to the Chairman of the Supervisory Board, at ul. Żubra 1, 01-066 Warsaw, with the notation “Whistleblowing Report – Bank Pekao S.A. – Confidential”,
- By telephone via a recorded line: (22) 524 52 98,
- In person, through a direct meeting with a designated Compliance Department employee.

A face-to-face meeting with a Compliance Department representative is scheduled within 14 days of the request, using one of the channels mentioned above. Meetings take place at the Bank’s headquarters, except in exceptional cases where an alternative location is agreed upon with the whistleblower. With the whistleblower’s consent, a written protocol of the meeting is prepared. The whistleblower has the right to review, amend, and sign the protocol, with any written submission attached as an annex.

For telephone reports, the whistleblower is informed that continuing the call constitutes consent to recording. The Compliance Department then prepares a full transcript of the conversation.

The verification process concludes with a final report, which is approved by the designated Management Board Member responsible for the whistleblowing procedure. This report includes recommendations for corrective or disciplinary actions against the individual involved, as well as preventive measures to mitigate future violations. The investigator collaborates with relevant departments to implement and oversee the corrective action plan.

We provide whistleblowers with full protection against retaliation, attempted retaliation, or threats of retaliation, even if the report is ultimately found to be unsubstantiated, provided it was made in good faith. Protection extends not only to the whistleblower but also to those assisting in the reporting process and individuals connected to the whistleblower. We guarantee whistleblowers:

- Consideration of every report, including anonymous submission,
- Confidentiality of their personal data, ensuring that their identity cannot be directly or indirectly revealed,
- A fair, impartial, and comprehensive verification process, conducted promptly and objectively,
- Acknowledgment of receipt of the report and feedback on the outcome of the investigation.

To further encourage whistleblowing, the Whistleblowing Procedure includes incentives for whistleblowers, offering:

- Psychological support to help manage the stress associated with reporting;
- Temporary reassignment to another position;
- Full remote work arrangements for a mutually agreed period;
- Paid leave, exempting the whistleblower from work obligations for the duration of the investigation;
- Reassignment to a different organisational unit of the Bank (in cases where the report is substantiated).

As part of the Bank’s Training Policy, we conduct regular introductory and ongoing training for Banks` employees on whistleblowing procedures and receive confirmation of familiarization with the contents of the Procedure. This means that every new employee of the Bank, within three months of starting work, is trained on the Whistleblowing Procedure. All employees receive information about the Procedure through internal communications (twice in 2024). In connection with the entry of the revised content of the Procedure, we have engaged an external company to develop a new online training format, which is currently being prepared. As for the group of



employees who are to handle the process of reporting violations – they can use publicly available training courses and webinars; there is no dedicated internal training for this group of employees. Other entities in the Group have their own internal procedures and regulations. Non-employees in own workforce are informed about the Procedure in force at the Bank, which is available on the website, along with the following appendices: no. 1 – Scope of data to be included in the breach notification and no. 4 – Information on processing of the whistleblower’s personal data.”

The implementation of the Whistleblowing Procedure is not designed to achieve quantifiable sustainability targets for tracking progress. Instead, its primary objective is to ensure a transparent, ethical, and legally compliant work environment.

The objectives of the regulations, including policies that operate in the area of corporate governance and business conduct, were defined before the reporting obligation and do not directly address the requirements of the CSRD Directive. In terms of the minimum disclosure requirements – Policies (MDR-P), we do not disclose standards or initiatives that are respected through implementation of policies. Instead, we present: a description of the key content of individual policies (procedures, rules), their scope, how the interests of key stakeholders affected by the documents are addressed, how they are made available, the organizational units responsible for implementation. In the case of targets (MDR-T), we take the current reporting period to which the target applies as the base year and disclose a description of the scope of the targets; we do not have information with regard to measurability, methodology and scientific evidence on which the targets were defined, stakeholder involvement in target setting, milestones or any changes and performance against disclosed target.

Supplier Relationship Management  
[G1-2]

We place great importance on partnership-based relationships with our suppliers, regardless of the size of their businesses. Our approach focuses on building long-term relationships based on mutual trust and equality. Suppliers are selected on equal terms, in accordance with internal procedures, best practices, and applicable Polish law.

The course of the Bank’s purchasing processes is defined by three key regulations: the Procurement Policy of Bank Polska Kasa Opieki Spółka Akcyjna, the Rules for Procurement by the Procurement Department at Bank Polska Kasa Opieki Spółka Akcyjna, and the Rules for Procurement Without the Involvement of the Procurement Department at Bank Polska Kasa Opieki Spółka Akcyjna. These documents are regularly reviewed to ensure they remain up to date. In December 2024, an amendment to the Procurement Policy came into force, incorporating ESG factors and provisions addressing greenwashing concerns. However, these policies do not define specific sustainability-related objectives based on measurable outcomes.

In all procurement procedures, the scope of the contract is defined uniformly for all bidders, ensuring fair competition principles are upheld. Any company may be invited to participate in the procurement process and submit an offer, provided it meets the Bank’s internal requirements. All eligible bidders are registered in our supplier database and invited to participate in procurement proceedings. Information regarding the outcome of a given procurement procedure is shared with all participating bidders.

Until December 2024, suppliers involved in procurement processes exceeding PLN 1 million (net) were required to complete a Corporate Social Responsibility (CSR) Questionnaire (hereinafter: the “Questionnaire”). From December 2024, this ESG Questionnaire applies regardless of the contract value and applies to all businesses, including large, medium, small, and microenterprises. The Questionnaire includes a set of questions on environmental regulations and human rights compliance in the supplier’s or contractor’s daily operations, its completion is a criterion for allowing the supplier to participate in the purchasing procedure.

By requiring the completion of the Questionnaire for all procurement processes at the Bank, regardless of contract value or supplier size, we demonstrate the importance of sustainability, environmental protection, and human rights compliance within our supply chain and among our business partners. By enforcing this requirement, we do not identify value chain risks in this area.



**Bank Pekao S.A. Supplier Code of Ethics**

We are committed to ensuring that our activities reflect our core values: #together and #responsibly. We welcome collaboration with suppliers who integrate ESG criteria into their business operations. To reinforce this commitment, we introduced the Bank Pekao S.A. Supplier Code of Ethics, adopted by the Bank’s Management Board in 2023 as an integral part of our procurement processes.

The Code of Ethics serves two primary objectives:

- Promoting our values while clearly outlining the expectations, principles, and standards that govern our relationships with business partners;
- Defining rules for conducting business responsibly, transparently, and sustainably, incorporating ESG criteria that all suppliers and subcontractors are expected to comply with.

As part of the Code of Ethics, we require our suppliers to meet specific ESG criteria across three key areas:



**Environmental Responsibility:**

- Holding valid permits, licences, declarations, contracts, and decisions related to environmental protection;
- Timely payment of environmental fees for the use of natural resources;
- Compliance with environmental reporting requirements;
- Minimising negative environmental impacts;
- Efficient resource management;
- Reducing material and raw material consumption;
- Waste management in accordance with applicable legal regulations;
- Implementing measures to reduce greenhouse gas emissions within their organisation and supply chain and ensuring transparency in emissions reporting;
- Promoting environmental protection initiatives.



**Social Responsibility:**

- Prohibition of forced labour, child labour, and workplace discrimination;
- Right to terminate employment at any time;
- Timely salary payments and compliance with wage deduction regulations;
- Prevention of workplace mobbing;
- Right to freely associate, engage in collective bargaining, and elect representatives in accordance with the law;
- Monitoring and assessing employee exposure to health and safety risks, including exposure to hazardous chemicals, biological agents, physical factors, and ergonomic risks;
- Providing personal protective equipment and informing employees about occupational health and safety (OHS) risks and fire safety regulations.



**Corporate Governance**

- Protection of legally protected information;
- Timely fulfilment of financial obligations;
- Anti-corruption compliance;
- Prevention of money laundering, terrorist financing, and criminal activities;
- Consumer protection;
- Confidentiality of business and trade secrets;
- Personal data protection;
- Antitrust prevention;
- Ensuring fair competition;
- Avoiding conflicts of interest;
- Intellectual property protection, technology transfers, and know-how management.

It should be emphasized that Bank Pekao S.A. Supplier Code of Ethics is a guiding document; we use the ESG Form to verify sustainability criteria. By establishing clear supplier requirements and expectations in the ESG Questionnaire, we actively manage and reduce our exposure to climate-related risks, including Scope 3 greenhouse gas emissions within our supply chain.

In line with the Code of Ethics, we expect suppliers to comply with environmental protection regulations and take proactive steps to mitigate their environmental impact. The Procurement Department (Finance Division) is responsible for managing the Code of Ethics, as outlined in the Bank’s internal regulations. External stakeholders are not involved in shaping these regulatory frameworks. Relevant sections of the Supplier Code of Ethics are publicly available on the Bank’s website.

Tax transparency

In its day-to-day role the Bank undertakes activities that contribute to global efforts to work against tax avoidance and money laundering by working with tax authorities to exchange information and comply with international tax information exchange regulations such as the Common Reporting Standard (hereinafter “CRS”) and the Foreign Account Tax Compliance Act (hereinafter “FATCA”). These activities are called tax transparency.

Issues around the FATCA and CRS are regulated in the Bank on the basis of the Order Exercising by the Bank of Certain Obligations Resulting from the Provisions on Exchange of Tax Information between the Republic of Poland and other countries, which is published in the organizational portal of regulations and is addressed in particular to employees responsible for establishing and maintaining customer relations (in terms of due diligence obligations related to the proper identification of the customer from the FATCA/ CRS side - including collection of statements) and persons responsible for the process of classifying customers in terms of FATCA/CRS and reporting data to the Head of the National Tax Administration (employees of the Tax Department).

Cybersecurity (and data security)

For our Bank, cybersecurity (including data security) is a process aimed at: enhancing the resilience of information systems against threats to confidentiality, integrity, availability, and authenticity of data; supporting the organisation by ensuring the required level of cybersecurity; raising awareness about safe and responsible use of the internet, both in the workplace and in personal life.

The Bank’s primary unit responsible for cybersecurity is the Bank Security Centre (Centrum Bezpieczeństwa Banku, hereinafter: the “CBB”). The CBB has implemented and oversees the ICT Security Strategy at Bank Pekao S.A., which forms the foundation for policies such as the Information Security Policy and related information security documentation. Additionally, the CBB has introduced internal regulations focused on protecting information, including electronic data security. These policies comply with legal requirements applicable to financial institutions and the recommendations of supervisory authorities.

They have been adopted and published in line with internal Bank procedures. All Bank employees are subject to these regulations, while specific information security policies target designated employee groups. Any new or updated security documents are communicated via internal channels to relevant employee groups.

In our policies, rules, we do not have specific targets and metrics in line with the minimum reporting requirements in accordance with the CSRD.

Preventing and Detecting Corruption and Bribery [G1-3]

Within the Pekao Group, we take a zero-tolerance approach to corruption and bribery, including any circumstances that could facilitate corrupt practices. We do not tolerate corrupt activities by our employees or any individuals or entities associated with us, nor do we permit the offering, promising, soliciting, giving, or accepting of facilitation payments by employees or any third parties interacting with the Bank. Employees who refuse to participate in corrupt activities or report corruption attempts or incidents are fully protected under our policies.

The main regulatory document governing anti-corruption procedures, detection, and response is the Anti-Corruption Policy of Pekao Group (hereinafter: the “Anti-Corruption Policy”). This policy establishes guidelines for:

- Preventing corruption,
- Identifying areas of corruption risk,
- Defining procedures for handling violations.

The Anti-Corruption Policy is approved by the Management Board and applies to all Bank employees and all areas of our operations. It is published in the internal regulatory database, ensuring accessibility to all employees.

The Anti-Corruption Policy includes the Anti-Corruption Programme, which comprises the following elements:

- Development of rules and procedures to eliminate corruption risks in key processes, including:
  - Gifts and entertainment,
  - Engagement with intermediaries,
  - Contractor relationships,
  - Recruitment processes,
  - Donations and sponsorships,
  - Bank’s participation in public procurement procedures,
  - Mergers and acquisitions (M&A),
  - Major investments;
- Development of training programmes for Bank’s employees on anti-corruption practices;
- Design, supervision, and implementation of control mechanisms for preventing corruption, ensuring their independent application and monitoring compliance across other organisational units of the Bank, in accordance with internal regulations;
- Assessment of corruption risk within the Anti-Corruption process, as part of the broader Compliance Risk Management macro-process;
- Provision of secure and easily accessible communication channels through which Bank employees or other individuals can openly or confidentially report corruption attempts or incidents with corruption-related characteristics;
- Quarterly reporting to the Bank’s Management Board as part of the Compliance Department’s activity report;
- Accurate and transparent recording of all transactions in the Bank’s books and records, ensuring the avoidance of undisclosed or unregistered accounts, funds, assets, or transactions;



The primary operational role in the Bank’s anti-corruption efforts is held by the Anti-Corruption Officer (hereinafter: the “Officer”), who ensures independence and objectivity. The Officer must have appropriate professional qualifications and be a member of the Compliance Department, which, in accordance with Recommendation 12 of the Polish Financial Supervision Authority’s Recommendation H on internal control systems in banks, operates with full independence and a high status within the Bank.

The Officer is responsible for analysing and verifying reports of potential corruption and issuing recommendations for risk management actions. The Officer has the right to:

- Access necessary information to perform their duties;
- Request assistance from relevant Bank departments;
- Request additional clarifications or documents from the reporting party, who is obligated to provide them.

All reports and requests are registered in the Bank’s IT system, which centralises anti-corruption data and facilitates management reporting.

The Officer’s remuneration is not linked to the Bank’s financial performance, ensuring unbiased decision-making.

As part of the Anti-Corruption Programme, the Compliance Department assesses corruption risk within the Compliance Risk Management Framework and provides quarterly reports on corruption risk management. The key areas of corruption risk identified include:

- Giving and receiving gifts,
- Engagement with intermediaries,
- Contractor relationships,
- Recruitment processes,
- Donations and sponsorships,
- Participation in public procurement,
- Mergers and acquisitions (M&A),
- Major investments.

For each identified risk area, the Anti-Corruption Policy mandates that specific corruption risk analyses be conducted. Employees are expected to continuously assess activities they participate in to identify corruption risks. Anyone who becomes aware of corruption attempts or incidents is required to report the issue to the Officer.

Upon identifying a corruption risk, the Officer issues recommendations or instructions on how to manage the risk. The recipient of these recommendations must report back to the Officer on their implementation.

Individuals responsible for reviewing anti-corruption reports or conducting investigations into potential corruption-related incidents are separate from those submitting such reports or raising concerns. The identification of incidents takes place within the relevant business units responsible for the specific processes, while investigations are conducted by the Officer (or, in some cases, the Bank’s Security Centre). This ensures a clear separation between the identification and verification functions for potential corruption risks. In addition to internal regulations outlining anti-corruption guidelines, we also conduct regular monitoring activities in this area.

All Bank employees participate in a standardised anti-corruption training programme, which covers key concepts related to corruption risk, financial benefits, and bribery. It also provides guidance on appropriate behaviour in corruption-related situations, prevention strategies, procedures for reporting corruption risks, and potential consequences of corruption. A total of 12,869 employees have been trained in anti-corruption and anti-bribery measures. We do not differentiate job positions based on

their exposure to corruption risks, meaning that 100% of employees hold roles potentially exposed to corruption and bribery risks.

The anti-corruption training covers the following key topics:

- Introduction (e.g., definition of corruption, corruption perception index, examples of corrupt practices, core principles of corruption risk management, and Pekao Group’s most at-risk business areas),
- Use of intermediaries,
- Gifts and entertainment,
- Recruitment processes,
- Cooperation with contractors,
- Donations and sponsorships,
- Mergers, acquisitions (M&A), and major investments,
- Public procurement procedures,
- Procedures to follow when public authorities initiate investigative actions at Pekao Group premises,
- Criminal liability for corruption-related offences,
- Standards and best practices,
- Knowledge test.

The training is delivered as a one-time e-learning module during the onboarding process for new employees. Employees working in risk-related roles and Management Board members undergo training annually, while all other employees complete the training every two years. We also plan to extend this training to the Supervisory Board members. Additionally, tailored training sessions on specific anti-corruption topics are conducted as needed, based on requests from Bank departments.

The Bank’s financial resources allocated to anti-corruption efforts include:

- Remuneration for employees serving as Anti-Corruption Officers,
- Costs of maintaining and developing IT systems used for processing anti-corruption reports,
- Expenses related to the preparation and delivery of anti-corruption training.

As these costs are embedded within broader operational expenses, their precise allocation cannot be determined.

The Bank does not plan any changes to the current level of financial resources allocated to anti-corruption initiatives.

# Metrics and Targets

## Corruption or Bribery Incidents [G1-4]

In 2024, no criminal proceedings were identified concerning corruption or bribery-related offences committed by own workforce. However, we recorded one unsuccessful attempt to bribe a Bank employee.

To date, we have not kept statistics related to dismissals or the punishment of employees for bribery because we have not identified such cases.

We also did not record incidents involving contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery. The amount of fines for violations of anti-corruption and anti-bribery laws in 2024 was PLN 0.

## Payment Practices [G1-6]

Favourable commercial terms, timely payments, and transparent, fair business relationships are our top priorities. While we do not currently have a formalised, unified payment policy across Pekao Group, we adhere to the contractual provisions outlined in individual agreements with our suppliers. The average invoice processing time, from receipt to payment, in 2024 was 17.92 days, based on calculations from our IT systems covering the entire year. At the same time, we do not collect data on standard payment terms in days or the percentage of payments made within standard terms by key supplier categories.

Considering subsidiaries with a material impact on the Group’s operations, the average invoice processing time from receipt to payment is 14 days for Pekao Faktoring Sp. z o.o., while Pekao Leasing Sp. z o.o. processes all payments in accordance with the due date specified on the invoice by the issuer.

In 2024, we identified one legal proceeding related to payment delays. The case is currently in first-instance court and concerns the untimely payment of lease rent on a property whose right of use was transferred by the Bank.

## Tax Transparency

Tax transparency activities are carried out in line with the Regulation on the Implementation of Certain Obligations Arising from Tax Information Exchange Laws Between the Republic of Poland and Other Countries. These activities include:

- The onboarding process, which ensures the collection of FATCA/CRS declarations from customers opening a financial account as defined under FATCA/CRS regulations;
- The development of IT systems to support customer identification processes under FATCA/CRS, including business applications for customer onboarding and dedicated functionalities enabling online declaration submission and updates;
- The customer classification process, conducted based on submitted FATCA/CRS declarations as well as personal and contact information provided by the customer;
- The enhancement of IT systems supporting customer classification and data reporting to the Head of the National Revenue Administration, via the IFT application, which includes Residency, FATCA, and CRS modules;
- The monitoring of changes in customer circumstances that may impact their FATCA/CRS classification;
- Annual reviews of high-balance customers;
- Communication campaigns targeting customers whose data requires updating or where discrepancies in previously submitted declarations have been identified;
- Planning and conducting internal control tests within the Internal Control System, verifying FATCA/CRS compliance on a sample basis;
- Annual data reporting to the Head of the National Revenue Administration, with submission deadlines set for 30 June each year for the previous fiscal year.

The Regulation on the Implementation of Certain Obligations Arising from Tax Information Exchange Laws Between the Republic of Poland and Other Countries also establishes the Bank’s objectives in managing tax transparency. These include:

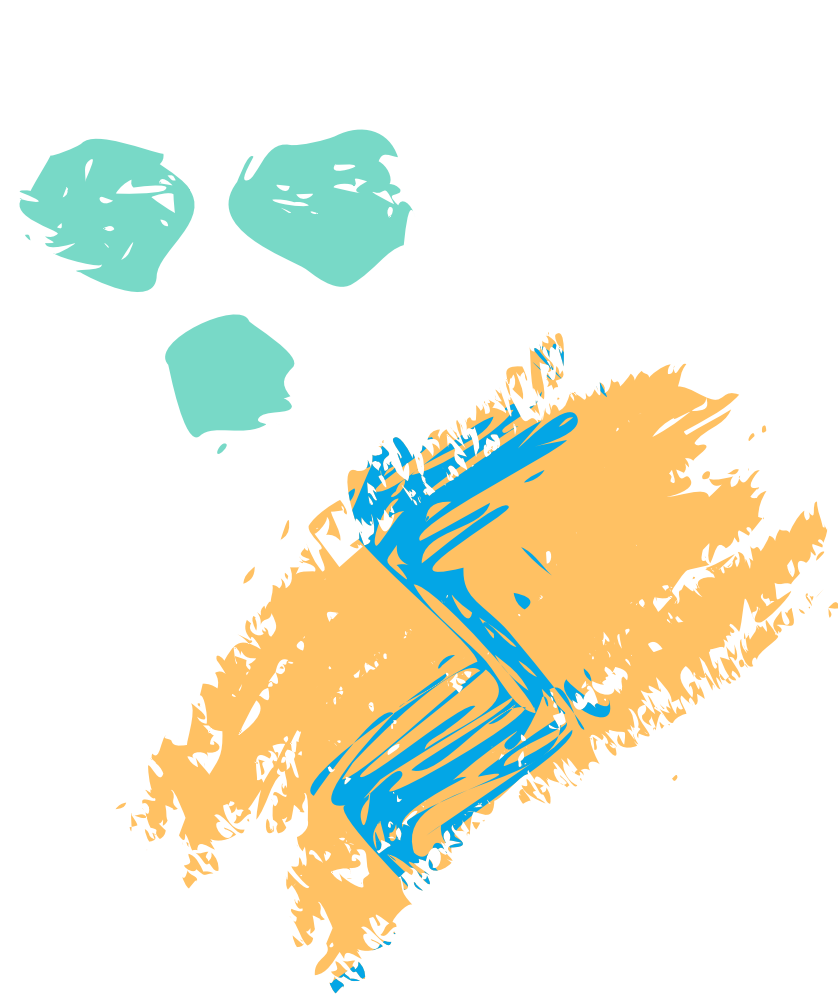
- Timely submission of FAT-1/CRS-1 reports to the Head of the National Revenue Administration by 30 June each year for the preceding fiscal year;
- Regular customer communication campaigns for individuals identified as having potential classification changes or missing data, conducted at least once per quarter;
- Annual high-balance customer reviews;
- Preparation and execution of an internal control plan, ensuring all scheduled audits are completed within the planned timeframe.

An essential aspect of tax transparency management is the establishment and monitoring of key performance indicators that assess the effectiveness of tax compliance processes. Within the Capital Group, this assessment takes place across several areas:

- Internal Control System, which includes an annual FATCA/CRS testing plan specifying the timelines for various audit activities. Test results and related documentation are recorded in a dedicated application (Compeo) administered by the Compliance Department and reported semi-annually to the Vice President responsible for the Financial Division;
- Periodic audits conducted by the Internal Audit Department, with the most recent FATCA audit completed in Q1 2024 and the most recent CRS audit in Q3 2022. All recommendations were implemented, and ongoing monitoring is conducted through the dedicated Gaudi IT tool;
- Register of Due Diligence Activities, maintaining a record of all due diligence activities performed for individual Bank customers within the customer classification system (IFT-Residency module);

Data governance quality indicators within the Data Governance System, which assess whether FATCA/CRS-related data generated in business processes meet completeness and quality standards. These indicators are maintained in the Data Governance Platform (Platforma Zarządzania Danyimi, PZD);

Official confirmations of submission (Urzędowe Poświadczenia, UPO) for FAT-1/CRS-1 reports.



Cybersecurity (and data security)

The projects undertaken by the CBB as part of cybersecurity and data security efforts are aligned with the ICT Security Strategy at Bank Pekao S.A. Their primary objectives include enhancing information security levels and strengthening the ICT environment (e.g., by investing in security solutions and running educational campaigns targeted at both employees and customers). These initiatives are implemented through:

- The cyberPEKAO educational programme, which includes training sessions for employees and webinars for customers;
- Cybersecurity-related events, such as: the #StayCYBERAware campaign or CRM campaigns;
- Participation in the Polish Bank Association’s (Związek Banków Polskich) cybersecurity awareness campaign: Do Not Help Thieves;
- Internal communication efforts (including: Security portal updates; news bulletins; email alerts sent to employees);
- External communication efforts (including: CRM, the Bank’s official website; social media posts; mobile app notifications; radio broadcasts).

Additionally, we organise and co-host cybersecurity events and collaborate with CyberDefence24, a specialised portal covering cybersecurity topics, which features a dedicated Bank Pekao section.

The Bank also participates in cybersecurity awareness and educational campaigns organised by the Polish Bank Association. The funding for these initiatives is covered through both Capex and Opex budgets.

- To implement the ICT Security Strategy at Bank Pekao S.A., the CBB initiates and oversees projects:
- Vulnerability scanner replacement\
- Security of the Bank’s data and applications in the cloud
- Protection of Databases
- Implementation of advanced testing tools.

The aforementioned solutions were preceded by an analysis of changing risks, risk analysis and market analysis. These projects carried out the tasks arising from the aforementioned Strategy and were monitored periodically to determine the degree of goals achievement. The implementation of advanced test tools was implemented in mid-2022, and the remaining tools were implemented in various quarters of 2023. All solutions were implemented before the end of 2024, which is the assumed time of completion of the Strategy.

By implementing of the above solutions, newly emerging risks have been mitigated and remain under constant monitoring.

As part of its responsibilities, the CBB conducts regular reviews of information security documents, which form an integral part of the Information Security Policy. Additionally, the CBB submits periodic security reports on the Bank’s ICT environment, which are included in the Bank’s management information system. These reports – quarterly and annual – are presented to: the Bank’s Management Board, the Risk Committee of the Bank’s Supervisory Board, and the Bank’s Supervisory Board. To ensure compliance, the Bank also undergoes cybersecurity maturity assessments as part of audits conducted in line with the Act of 5 July 2018 on the National Cybersecurity System. Furthermore, the CBB carries out internal security controls within the Bank’s internal control system, which helps enhance the effectiveness and quality of cybersecurity measures, thereby strengthening data protection.





# Contact Information

Sustainability-related data for 2024 was provided by the following entities: Bank Pekao, Pekao Bank Hipoteczny S.A.; Centrum Kart S.A.; Pekao Direct Sp. z o.o.; Pekao Faktoring Sp. z o.o.; Pekao Financial Services Sp. z o.o.; Pekao Investment Banking S.A.; Pekao Investment Management S.A. (including: Pekao TFI S.A.) and Pekao Leasing Sp. z o.o. (including PEUF Sp. z o.o.).

For inquiries regarding this Report, please contact:

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Disclosures Based on the Counterparty’s Key Performance Indicator for Turnover (KPI Turnover)

Template 0: Summary of Key Performance Indicators to Be Disclosed by Credit Institutions in Accordance with Article 8 of the Taxonomy Regulation [EUR million]

		Total environmentally sustainable assets	Key Performance Indicator KPI - Turnover	Key Performance Indicator KPI - Capex	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	2,092	0,88%	1.34%	69.62%	40.09%	30.38%
		Total environmentally sustainable assets	Key Performance Indicator KPI - Turnover	Key Performance Indicator KPI - Capex	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	609	0.74%	1.51%	83.02%	55.54%	16.98%
	Financial guarantees	48	0.15%	0.75%			
	Assets under management	114	2.77%	15.97%			

Template 1: Assets for Green Asset Ratio Calculation Part 1 [PLN million]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	
mIn PLN		Total (gross) carrying amount	31.12.2024													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR – Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	100 499	63 935	2 052	0	2	390	60	41	0	28	0	0	0	0	
2	Financial undertakings	1 111	157	4	0	2	1	1	0	0	0	0	0	0	0	
3	Credit institutions	1 110	157	4	0	2	1	1	0	0	0	0	0	0	0	
4	Loans and advances	1 110	157	4	0	2	1	1	0	0	0	0	0	0	0	
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
12	Of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
20	Non-financial undertakings	8 817	1 459	519	0	0	388	59	41	0	27	0	0	0	0	
21	Loans and advances	7 429	1 059	325	0	0	224	29	12	0	12	0	0	0	0	
22	Debt securities, including UoP	1 365	386	187	0	0	161	30	28	0	15	0	0	0	0	
23	Equity instruments	23	14	7	0	0	3	0	0	0	0	0	0	0	0	
24	Households	88 912	61 233	1 528	0	0	0	0	0	0	0	0	0	0	0	



		a	b	c	d	e	f	g	h	i	j	k	l	m	n
mIn PLN		Total (gross) carrying amount	31.12.2024												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
25	of which loans collateralised by residential immovable property	61 236	61 233	1 528	0	0	0	0	0	0	0	0	0	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	Local governments financing	1 659	1 087	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	1 659	1 087	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	136 456													
33	Non-financial undertakings	87 797													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	86 675													
35	Loans and advances	77 835													
36	of which loans collateralised by commercial immovable property	22 019													
37	of which building renovation loans	0													
38	Debt securities	8 407													
39	Equity instruments	434													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 122													
41	Loans and advances	741													
42	Debt securities	109													
43	Equity instruments	272													
44	Derivatives	448													
45	On demand interbank loans	493													
46	Cash and cash-related assets	4 461													
47	Other categories of assets (e.g. Goodwill, commodities etc.)	43 257													
48	Total GAR assets	236 955	63 935	2 052	0	2	390	60	41	0	28	0	0	0	0
49	Assets not covered for GAR calculation	103 416													
50	Central governments and Supranational issuers	64 146													
51	Central banks exposure	33 632													
52	Trading book	5 639													
53	Total assets	340 371	63 935	2 052	0	2	390	60	41	0	28	0	0	0	0
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	31 701	49	48	0	0	41	0	0	0	0	0	0	0	0
55	Assets under management	4 114	358	70	0	0	45	272	44	0	4	0	0	0	0
56	Of which debt securities	2 202	60	2	0	0	0	61	0	0	0	0	0	0	0
57	Of which equity instruments	1 912	297	68	0	0	45	210	44	0	4	0	0	0	0

Template 1: Assets for Green Asset Ratio Calculation Part 2 [PLN million]

mIn PLN		a	g	h	i	j	k	l	m	n
		31.12.2024								
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
<b>GAR – Covered assets in both numerator and denominator</b>										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	100 499	15	0	0	0	0	0	0	0
2	<b>Financial undertakings</b>	1 111	0	0	0	0	0	0	0	0
3	Credit institutions	1 110	0	0	0	0	0	0	0	0
4	Loans and advances	1 110	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0	0	0	0	0	0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0	0	0	0	0	0	0
12	Of which management companies	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0	0	0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0	0	0	0	0	0	0
20	<b>Non-financial undertakings</b>	8 817	15	0	0	0	0	0	0	0
21	Loans and advances	7 429	15	0	0	0	0	0	0	0
22	Debt securities, including UoP	1 365	0	0	0	0	0	0	0	0
23	Equity instruments	23	0	0	0	0	0	0	0	0
24	<b>Households</b>	88 912	0	0	0	0	0	0	0	0
25	of which loans collateralised by residential immovable property	61 236	0	0	0	0	0	0	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	0	0	0	0	0	0	0	0	0
28	<b>Local governments financing</b>	1 659	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0
30	Other local government financing	1 659	0	0	0	0	0	0	0	0
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	0	0	0	0	0	0	0	0	0
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	136 456								
33	<b>Non-financial undertakings</b>	87 797								
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	86 675								
35	Loans and advances	77 835								
36	of which loans collateralised by commercial immovable property	22 019								
37	of which building renovation loans	0								
38	Debt securities	8 407								
39	Equity instruments	434								
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 122								
41	Loans and advances	741								
42	Debt securities	109								
43	Equity instruments	272								
44	<b>Derivatives</b>	448								

mIn PLN		a	g	h	i	j	k	l	m	n
		31.12.2024								
		Total (gross) carrying amount	Circular economy (CE)				Pollution (PPC)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
45	<b>On demand interbank loans</b>	493								
46	<b>Cash and cash-related assets</b>	4 461								
47	<b>Other categories of assets (e.g. Goodwill, commodities etc.)</b>	43 257								
48	<b>Total GAR assets</b>	236 955	15	0	0	0	0	0	0	0
49	<b>Assets not covered for GAR calculation</b>	103 416								
50	<b>Central governments and Supranational issuers</b>	64 146								
51	<b>Central banks exposure</b>	33 632								
52	<b>Trading book</b>	5 639								
53	<b>Total assets</b>	340 371	0	0	0	0	0	0	0	0
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>										
54	Financial guarantees	31 701	0	0	0	0	0	0	0	0
55	Assets under management	4 114	52	0	0	0	0	0	0	0
56	Of which debt securities	2 202	40	0	0	0	0	0	0	0
57	Of which equity instruments	1 912	12	0	0	0	0	0	0	0

Template 1: Assets for Green Asset Ratio Calculation Part 3 [PLN million]

		a	w	x	z	aa	ab	ac	ad	ae	af	
mIn PLN		31.12.2024										
		Total (gross) carrying amount	Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	100 499	1	0	0	0	64 011	2 092	0	2	417	
2	Financial undertakings	1 111	0	0	0	0	157	4	0	2	2	
3	Credit institutions	1 110	0	0	0	0	157	4	0	2	2	
4	Loans and advances	1 110	0	0	0	0	157	4	0	2	2	
5	UoP Debt securities, including	0	0	0	0	0	0	0	0	0	0	
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	
10	UoP Debt securities, including	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	0	0	0	0	0	0	0	0	0	0	
12	Of which management companies	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	
14	UoP Debt securities, including	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0	0	0	0	0	0	0	0	
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	
18	UoP Debt securities, including	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	0	0	0	0	0	0	0	0	0	0	
20	Non-financial undertakings	8 817	1	0	0	0	1 534	560	0	0	415	
21	Loans and advances	7 429	0	0	0	0	1 104	338	0	0	236	
22	UoP Debt securities, including	1 365	0	0	0	0	416	215	0	0	176	
23	Equity instruments	23	0	0	0	0	15	7	0	0	3	
24	Households	88 912	0	0	0	0	61 233	1 528	0	0	0	
25	of which loans collateralised by residential immovable property	61 236	0	0	0	0	61 233	1 528	0	0	0	
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	
27	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	
28	Local governments financing	1 659	0	0	0	0	1 087	0	0	0	0	
29	Housing financing	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing	1 659	0	0	0	0	1 087	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	136 456										
33	Non-financial undertakings	87 797										

		a	w	x	z	aa	ab	ac	ad	ae	af
mIn PLN	Total (gross) carrying amount	31.12.2024									
		Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	86 675									
35	Loans and advances	77 835									
36	of which loans collateralised by commercial immovable property	22 019									
37	of which building renovation loans	0									
38	Debt securities	8 407									
39	Equity instruments	434									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 122									
41	Loans and advances	741									
42	Debt securities	109									
43	Equity instruments	272									
44	Derivatives	448									
45	On demand interbank loans	493									
46	Cash and cash-related assets	4 461									
47	Other categories of assets (e.g. Goodwill, commodities etc.)	43 257									
48	Total GAR assets	236 955	1	0	0	0	64 011	2 092	0	2	417
49	Assets not covered for GAR calculation	103 416									
50	Central governments and Supranational issuers	64 146									
51	Central banks exposure	33 632									
52	Trading book	5 639									
53	Total assets	340 371	0	0	0	0	64 011	2 092	0	2	417
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations											
54	Financial guarantees	31 701	0	0	0	0	49	48	0	0	41
55	Assets under management	4 114	0	0	0	0	682	114	0	40	49
56	Of which debt securities	2 202	0	0	0	0	162	2	0	0	0
57	Of which equity instruments	1 912	0	0	0	0	520	112	0	40	49



Template 1: Assets for Green Asset Ratio Calculation Part 4 [PLN million]

		a	w	x	z	aa	ab	ac	ad	ae	af	aq	ar	as	at	au
mIn PLN		31.12.2024														
		Total (gross) carrying amount	Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
					Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
GAR – Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	96 194	60 480	1 007	0	11	196	2 469	23	0	22	60 480	1 030	0	12	219
2	Financial undertakings	949	147	0	0	0	0	147	0	0	0	147	0	0	0	0
3	Credit institutions	949	147	0	0	0	0	147	0	0	0	147	0	0	0	0
4	Loans and advances	949	147	0	0	0	0	147	0	0	0	147	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0
20	Non-financial undertakings	9 064	1 225	350	0	11	196	1 225	23	0	22	1 225	373	0	12	219
21	Loans and advances	7 582	1 067	230	0	11	112	1 067	22	0	22	1 067	251	0	11	134
22	Debt securities, including UoP	1 473	153	120	0	0	83	153	0	0	0	153	120	0	0	83
23	Equity instruments	9	6	1		0	1	6	1		1	6	2		1	1
24	Households	84 634	58 011	657	0	0	0	0	0	0	0	58 011	657	0	0	0
25	of which loans collateralised by residential immovable property	58 015	58 011	657	0	0	0	0	0	0	0	58 011	657	0	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	Local governments financing	1 547	1 097	0	0	0	0	1 097	0	0	0	1 097	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	1 547	1 097	0	0	0	0	1 097	0	0	0	1 097	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)															
33	Financial and Non-financial undertakings															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations															
35	Loans and advances															
36	of which loans collateralised by commercial immovable property															
37	of which building renovation loans															
38	Debt securities															
39	Equity instruments															

		a	w	x	z	aa	ab	ac	ad	ae	af	aq	ar	as	at	au
mIn PLN	31.12.2024															
	Total (gross) carrying amount	Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
40	Non-EU country counterparties not subject to NFRD disclosure obligations															
41	Loans and advances															
42	Debt securities															
43	Equity instruments															
44	Derivatives															
45	On demand interbank loans															
46	Cash and cash-related assets															
47	Other categories of assets (e.g. Goodwill, commodities etc.)															
48	Total GAR assets	217 274	60 480	1 007	0	11	196	2 469	23	0	22	60 480	1 030	0	12	219
49	Assets not covered for GAR calculation															
50	Central governments and Supranational issuers															
51	Central banks exposure															
52	Trading book															
53	Total assets	313 976	60 480	1 007	0	11	196	2 469	23	0	22	60 480	1 030	0	12	219
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	30 727	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	1 699	166	48	0	0	25	142	5	0	0	308	54	0	5	25
56	Of which debt securities	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which equity instruments	1 691	166	48	0	0	25	142	5	0	0	169	0	0	1	25

Template 2: Sectoral Information on the Green Asset Ratio Part 1 [PLN million]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Breakdown by sector - NACE 4 digits level (code and label)		Climate Change Mitigation (CCM)				Adaptacja do klimatu (CCA)				Water and marine resources (WMR)				Circular economy (CE)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		mIn PLN	Of which environmentally sustainable (CCM)	mIn PLN	Of which environmentally sustainable (CCM)	mIn PLN	Of which environmentally sustainable (CCA)	mIn PLN	Of which environmentally sustainable (CCA)	mIn PLN	Of which environmentally sustainable (WMR)	mIn PLN	Of which environmentally sustainable (WMR)	mIn PLN	Of which environmentally sustainable (CE)	mIn PLN	Of which environmentally sustainable (CE)
1	B05.10	270	0			270	0			270	0			270	0		
2	B07.29	1 720	15			1 720	0			1 720	0			1 720	0		
3	C10.11	68	0			68	0			68	0			68	0		
4	C10.13	17	0			17	0			17	0			17	0		
5	C11.05	0	0			0	0			0	0			0	0		
6	C15.20	0	0			0	0			0	0			0	0		
7	C16.10	13	0			13	0			13	0			13	0		
8	C17.12	20	0			20	0			20	0			20	0		
9	C19.20	695	13			695	0			695	0			695	0		
10	C20.15	481	2			481	0			481	0			481	0		
11	C20.16	0	0			0	0			0	0			0	0		
12	C20.30	35	0			35	0			35	0			35	0		
13	C20.42	0	0			0	0			0	0			0	0		
14	C22.11	4	0			4	0			4	0			4	0		
15	C23.20	18	0			18	0			18	0			18	0		
16	C24.42	115	35			115	0			115	0			115	0		
17	C25.93	42	0			42	0			42	0			42	0		
18	C27.12	5	1			5	0			5	0			5	0		
19	C28.41	0	0			0	0			0	0			0	0		
20	C28.92	180	46			180	0			180	0			180	0		
21	C29.20	0	0			0	0			0	0			0	0		
22	C33.20	9	0			9	0			9	0			9	0		
23	D35.11	816	114			816	0			816	0			816	0		
24	D35.14	1 209	43			1 209	0			1 209	0			1 209	0		
25	D35.30	0	0			0	0			0	0			0	0		
26	F41.10	22	5			22	0			22	0			22	0		
27	F41.20	20	1			20	0			20	0			20	0		
28	F42.11	4	0			4	0			4	0			4	0		
29	F42.12	8	0			8	0			8	0			8	0		
30	F43.39	16	1			16	0			16	0			16	0		
31	F43.99	0	0			0	0			0	0			0	0		
32	G45.31	612	0			612	0			612	0			612	0		
33	G46.32	2	0			2	0			2	0			2	0		
34	G46.46	296	0			296	0			296	0			296	0		
35	G46.72	3	0			3	0			3	0			3	0		
36	G46.90	191	0			191	0			191	0			191	0		
37	G47.11	190	0			190	0			190	0			190	0		



		a		b		c		d		e		f		g		h		i		j		k		l		m		n		o		p	
Breakdown by sector – NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)								Adaptacja do klimatu (CCA)								Water and marine resources (WMR)								Circular economy (CE)								
	Non-Financial corporates (Subject to NFRD)				SMEs and other NFC not subject				Non-Financial corporates (Subject to NFRD)				SMEs and other NFC not subject				Non-Financial corporates (Subject to NFRD)				SMEs and other NFC not subject				Non-Financial corporates (Subject to NFRD)				SMEs and other NFC not subject				
	[Gross] carrying amount				[Gross] carrying amount				[Gross] carrying amount				[Gross] carrying amount				[Gross] carrying amount				[Gross] carrying amount				[Gross] carrying amount				[Gross] carrying amount				
	mIn PLN		Of which environmentally sustainable (CCM)		mIn PLN		Of which environmentally sustainable (CCM)		mIn PLN		Of which environmentally sustainable (CCA)		mIn PLN		Of which environmentally sustainable (CCA)		mIn PLN		Of which environmentally sustainable (WMR)		mIn PLN		Of which environmentally sustainable (WMR)		mIn PLN		Of which environmentally sustainable (CE)		mIn PLN		Of which environmentally sustainable (CE)		
38	G47.41	5	0					5	0									5	0							5	0						
39	G47.71	271	0					271	0									271	0							271	0						
40	G47.72	1	0					1	0									1	0							1	0						
41	G47.91	1	0					1	0									1	0							1	0						
42	H49.20	242	61					242	0									242	0							242	0						
43	H53.20	76	28					76	0									76	0							76	0						
44	I56.10	320	0					320	0									320	0							320	0						
45	J61.10	0	0					0	0									0	0							0	0						
46	J61.30	208	7					208	27									208	0							208	0						
47	J62.01	1	0					1	0									1	0							1	0						
48	J63.12	3	0					3	0									3	0							3	0						
49	K64.20	392	142					392	13									392	0							392	0						
50	M70.10	68	4					68	0									68	0							68	0						
51	M72.11	109	0					109	0									109	0							109	0						
52	N77.40	0	0					0	0									0	0							0	0						
53	N82.91	16	0					16	0									16	0							16	0						
54	Q86.22	17	0					17	0									17	0							17	0						
55	S96.09	0	0					0	0									0	0							0	0						

Template 2: Sectoral Information on the Green Asset Ratio Part 2 [PLN million]

		q	r	s	t	u	v	w	x	y	z	aa	ab
Breakdown by sector – NACE 4 digits level (code and label)	Pollution (PPC)					Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)			SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject	
	[Gross] carrying amount			[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	mIn PLN		Of which environmentally sustainable (PPC)	mIn PLN	Of which environmentally sustainable (PPC)	mIn PLN	Of which environmentally sustainable (BIO)	mIn PLN	Of which environmentally sustainable (BIO)	mIn PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	mIn PLN	Of which environmentally sustainable (BIO)
1	B05.10	270	0			270	0			270	0		
2	B07.29	1 720	0			1 720	0			1 720	15		
3	C10.11	68	0			68	0			68	0		
4	C10.13	17	0			17	0			17	0		
5	C11.05	0	0			0	0			0	0		
6	C15.20	0	0			0	0			0	0		
7	C16.10	13	0			13	0			13	0		
8	C17.12	20	0			20	0			20	0		
9	C19.20	695	0			695	0			695	13		
10	C20.15	481	0			481	0			481	2		
11	C20.16	0	0			0	0			0	0		
12	C20.30	35	0			35	0			35	0		
13	C20.42	0	0			0	0			0	0		
14	C22.11	4	0			4	0			4	0		
15	C23.20	18	0			18	0			18	0		
16	C24.42	115	0			115	0			115	35		
17	C25.93	42	0			42	0			42	0		
18	C27.12	5	0			5	0			5	1		
19	C28.41	0	0			0	0			0	0		
20	C28.92	180	0			180	0			180	46		
21	C29.20	0	0			0	0			0	0		
22	C33.20	9	0			9	0			9	0		
23	D35.11	816	0			816	0			816	114		
24	D35.14	1 209	0			1 209	0			1 209	43		
25	D35.30	0	0			0	0			0	0		
26	F41.10	22	0			22	0			22	5		
27	F41.20	20	0			20	0			20	1		
28	F42.11	4	0			4	0			4	0		
29	F42.12	8	0			8	0			8	0		
30	F43.39	16	0			16	0			16	1		
31	F43.99	0	0			0	0			0	0		
32	G45.31	612	0			612	0			612	0		
33	G46.32	2	0			2	0			2	0		
34	G46.46	296	0			296	0			296	0		
35	G46.72	3	0			3	0			3	0		
36	G46.90	191	0			191	0			191	0		
37	G47.11	190	0			190	0			190	0		
38	G47.41	5	0			5	0			5	0		

		q	r	s	t	u	v	w	x	y	z	aa	ab
Breakdown by sector – NACE 4 digits level (code and label)	Pollution (PPC)					Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)			SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject	
	[Gross] carrying amount			[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	mln PLN		Of which environmentally sustainable (PPC)	mln PLN	Of which environmentally sustainable (PPC)	mln PLN	Of which environmentally sustainable (BIO)	mln PLN	Of which environmentally sustainable (BIO)	mln PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	mln PLN	Of which environmentally sustainable (BIO)
39	G47.71	271	0			271	0			271	0		
40	G47.72	1	0			1	0			1	0		
41	G47.91	1	0			1	0			1	0		
42	H49.20	242	0			242	0			242	61		
43	H53.20	76	0			76	0			76	28		
44	I56.10	320	0			320	0			320	0		
45	J61.10	0	0			0	0			0	0		
46	J61.30	208	0			208	0			208	34		
47	J62.01	1	0			1	0			1	0		
48	J63.12	3	0			3	0			3	0		
49	K64.20	392	0			392	0			392	155		
50	M70.10	68	0			68	0			68	4		
51	M72.11	109	0			109	0			109	0		
52	N77.40	0	0			0	0			0	0		
53	N82.91	16	0			16	0			16	0		
54	Q86.22	17	0			17	0			17	0		
55	S96.09	0	0			0	0			0	0		



Template 3: Key Performance Indicator for the Green Asset Ratio in Relation to Stock Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total covered assets in the denominator)		31.12.2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds	Of which transitional	Of which enabling		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds	Of which enabling		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	26,98%	0,87%	0,00%	0,00%	0,16%	0,03%	0,02%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and advances	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
7	Other financial corporations, of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
11	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
15	Of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
19	Non-financial undertakings	0,62%	0,22%	0,00%	0,00%	0,16%	0,02%	0,02%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%
20	Loans and advances	0,45%	0,14%	0,00%	0,00%	0,09%	0,01%	0,01%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%
21	Debt securities, including UoP	0,16%	0,08%	0,00%	0,00%	0,07%	0,01%	0,01%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%
22	Equity instruments	0,01%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
23	Households	25,84%	0,64%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
24	of which loans collateralised by residential immovable property	25,84%	0,64%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	Local governments financing	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Other local government financing	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Total GAR assets	26,98%	0,87%	0,00%	0,00%	0,16%	0,03%	0,02%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%
32														

Template 3: Key Performance Indicator for the Green Asset Ratio in Relation to Stock Part 2 [%]

		31.12.2024																	
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to total covered assets in the denominator)			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	Proportion of total assets covered		
GAR – Covered assets in both numerator and denominator																			
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	27,01%	0,88%	0,00%	0,00%	29,53%	
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,33%	
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,33%	
4	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,33%	
5	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
6	UoP Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	UoP Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	UoP Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	UoP Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
20	Non-financial undertakings	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,65%	0,24%	0,00%	0,00%	2,59%	
21	Loans and advances	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,47%	0,14%	0,00%	0,00%	2,18%	
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,18%	0,09%	0,00%	0,00%	0,40%	
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,01%	
24	Households	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	25,84%	0,64%	0,00%	0,00%	26,12%	
25	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	25,84%	0,64%	0,00%	0,00%	17,99%	
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,46%	0,00%	0,00%	0,00%	0,49%	
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,46%	0,00%	0,00%	0,00%	0,49%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	Total GAR assets	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	27,01%	0,88%	0,00%	0,00%	69,62%	

Template 3: Key Performance Indicator for the Green Asset Ratio in Relation to Stock Part 3 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	
% (compared to total covered assets in the denominator)		31.12.2024															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
					Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	28,37%	0,46%	0,00%	0,01%	0,09%	1,13%	0,01%	0,00%	0,01%	28,37%	0,47%	0,00%	0,01%	0,10%	31,00%	
2	Financial undertakings	0,07%	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,30%	
3	Credit institutions	0,07%	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,30%	
4	Loans and advances	0,07%	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,30%	
5	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
20	Non-financial undertakings	0,56%	0,16%	0,00%	0,01%	0,09%	0,56%	0,01%	0,00%	0,01%	0,56%	0,17%	0,00%	0,01%	0,10%	2,87%	
21	Loans and advances	0,49%	0,10%	0,00%	0,00%	0,05%	0,49%	0,01%	0,00%	0,01%	0,49%	0,11%	0,00%	0,00%	0,06%	2,40%	
22	UoP Debt securities, including	0,07%	0,05%	0,00%	0,00%	0,04%	0,07%	0,00%	0,00%	0,00%	0,07%	0,05%	0,00%	0,00%	0,04%	0,47%	
23	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
24	Households	27,24%	0,30%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	27,24%	0,30%	0,00%	0,00%	0,00%	27,34%	
25	of which loans collateralised by residential immovable property	27,24%	0,30%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	27,24%	0,30%	0,00%	0,00%	0,00%	18,90%	
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
28	Local governments financing	0,50%	0,00%	0,00%	0,00%	0,00%	0,50%	0,00%	0,00%	0,00%	0,50%	0,00%	0,00%	0,00%	0,00%	0,49%	
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
30	Other local government financing	0,50%	0,00%	0,00%	0,00%	0,00%	0,50%	0,00%	0,00%	0,00%	0,50%	0,00%	0,00%	0,00%	0,00%	0,49%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	Total GAR assets	28,37%	0,46%	0,00%	0,01%	0,09%	1,13%	0,01%	0,00%	0,01%	28,37%	0,47%	0,00%	0,01%	0,10%	69,36%	



Template 4: Key Performance Indicator for the Green Asset Ratio in Relation to Flow Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to flow of total eligible assets)		31.12.2024												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	10,00%	0,72%	0,00%	0,00%	0,21%	0,03%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,19%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,19%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and advances	0,19%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	UoP Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	UoP Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	UoP Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	UoP Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%
20	Non-financial undertakings	0,50%	0,26%	0,00%	0,00%	0,21%	0,03%	0,02%		0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and advances	0,41%	0,24%	0,00%	0,00%	0,21%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including	0,07%	0,01%	0,00%	0,00%	0,00%	0,02%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
23	UoP Equity instruments	0,02%	0,01%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%
24	Households	8,92%	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which loans collateralised by residential immovable property	8,30%	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Local governments financing	0,38%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Other local government financing	0,38%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	10,00%	0,72%	0,00%	0,00%	0,21%	0,03%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

Template 4: Key Performance Indicator for the Green Asset Ratio in Relation to Flow Part 2 [%]

		n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae			
% (compared to flow of total eligible assets)		31.12.2024																				
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)								Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)								
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling						
GAR – Covered assets in both numerator and denominator																						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	10,04%	0,74%	0,00%	0,00%	0,21%	27,49%			
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,19%	0,01%	0,00%	0,00%	0,00%	0,75%			
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,19%	0,01%	0,00%	0,00%	0,00%	0,75%			
4	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,19%	0,01%	0,00%	0,00%	0,00%	0,75%			
5	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%			
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
10	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
11	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%			
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
14	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
15	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%			
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
18	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
19	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%			
20	Non-financial undertakings	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,55%	0,27%	0,00%	0,00%	0,21%	3,81%			
21	Loans and advances	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,44%	0,24%	0,00%	0,00%	0,21%	3,16%			
22	UoP Debt securities, including	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,09%	0,02%	0,00%	0,00%	0,00%	0,63%			
23	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,02%	0,01%		0,00%	0,00%	0,02%			
24	Households	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,92%	0,46%	0,00%	0,00%	0,00%	22,29%			
25	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,30%	0,46%	0,00%	0,00%	0,00%	6,89%			
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,38%	0,00%	0,00%	0,00%	0,00%	0,63%			
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,38%	0,00%	0,00%	0,00%	0,00%	0,63%			
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%			
32	Total GAR assets	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	10,04%	0,74%	0,00%	0,00%	0,21%	83,02%			

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Stock Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
% (compared to total eligible off-balance sheet assets)		31.12.2024																	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WMR)				Circular economy (CE)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds			Of which enabling					
1	Financial guarantees (FinGuar KPI)	0,16%	0,15%	0,00%	0,00%	0,13%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
2	Assets under management (AuM KPI)	8,69%	1,71%	0,00%	0,00%	1,10%	6,61%	1,07%	0,00%	0,09%	0,01%	0,00%	0,00%	0,00%	1,26%	0,00%	0,00%	0,00%	

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Stock Part 2 [%]

		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		31.12.2024												
% (compared to total eligible off-balance sheet assets)		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds		Of which enabling
1	Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,16%	0,15%	0,00%	0,00%	0,13%
2	Assets under management (AuM KPI)	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	16,57%	2,77%	0,00%	0,98%	1,19%



Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Flow Part 3 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
% (w porównaniu z przepływem pozabilansowych aktywów kwalifikowanych TOTAL)		31.12.2024																	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WMR)				Circular economy (CE)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional
1	Financial guarantees (FinGuar KPI)	0,27%	0,27%	0,00%	0,00%	0,23%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (AuM KPI)	18,17%	6,05%	0,00%	0,00%	3,35%	16,48%	3,66%	0,00%	0,03%	0,00%	0,00%	0,00%	0,00%	0,17%	0,00%	0,00%	0,00%	0,00%

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Flow Part 4 [%]

% (w porównaniu z przepływem pozabilansowych aktywów kwalifikowanych TOTAL)		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		31.12.2024												
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,27%	0,27%	0,00%	0,00%	0,23%
2	Assets under management (AuM KPI)	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	34,86%	9,71%	0,00%	3,63%	3,38%

Disclosures Based on Counterparty Key Performance Indicator in Relation to Capital Expenditures (KPI Capex)

Template 0: Summary of Key Performance Indicators to Be Disclosed by Credit Institutions in Accordance with Article 8 of the Taxonomy Regulation [PLN million]

		Total environmentally sustainable assets	Key Performance Indicator KPI – Turnover	Key Performance Indicator KPI – Capex	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	3 173	0.88%	1.34%	69.62%	40.09%	30.38%
		Total environmentally sustainable activities	Key Performance Indicator KPI – Turnover	Key Performance Indicator KPI – Capex	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	1 250	0.74%	1.51%	83.02%	55.54%	16.98%
	Financial guarantees	239	0.15%	0.75%			
	Assets under management	648	2.77%	15.97%			

Template 1: Assets for Green Asset Ratio Calculation Part 1 [PLN million]

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q		
mIn PLN	31.12.2024																		
	Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
										Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR – Covered assets in both numerator and denominator																			
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	100 499	65 778	3 147	0	76	1 116	109	26	0	4	2	0	0	0	18	0	0	0
2	Financial undertakings	1 111	157	8	0	4	2	0	0	0	0	0	0	0	0	0	0	0	0
3	Credit institutions	1 110	157	8	0	4	2	0	0	0	0	0	0	0	0	0	0	0	0
4	Loans and advances	1 110	157	8	0	4	2	0	0	0	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q		
mIn PLN			31.12.2024																		
			Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)			
				Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling							Of which Use of Proceeds	Of which enabling				Of which Use of Proceeds		Of which enabling		
10	including UoP	Debt securities,	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
11		Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
12		Of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
13	advances	Loans and	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
14	including UoP	Debt securities,	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
15		Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
16		of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
17	advances	Loans and	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
18	including UoP	Debt securities,	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
19		Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
20	Non-financial undertakings		8 817	3 300	1 610	0	73	1 113	109	26	0	3	2	0	0	0	18	0	0	0	
21	Loans and advances		7 429	2 429	1 159	0	70	741	90	9	0	2	2	0	0	0	17	0	0	0	
22	including UoP	Debt securities,	1 365	861	442	0	3	367	17	16	0	2	0	0	0	0	0	0	0	0	
23	Equity instruments		23	10	9	0	0	5	2	1	0	0	0	0	0	0	0	0	0	0	
24	Households		88 912	61 233	1 528	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
25	of which loans collateralised by residential immovable property		61 236	61 233	1 528	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
26	of which building renovation loans		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
27	of which motor vehicle loans		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
28	Local governments financing		1 659	1 087	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
29	Housing financing		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing		1 659	1 087	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)		136 456																		
33	Non-financial undertakings		87 797																		
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations		86 675																		
35	Loans and advances		77 835																		
36	of which loans collateralised by commercial immovable property		22 019																		
37	of which building renovation loans		0																		
38	Debt securities		8 407																		



		a	b	c	d	e	f	g	h	i	j	j	k	l	m	n	o	p	q
mIn PLN		31.12.2024																	
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)			
39	Equity instruments	434																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 122																	
41	Loans and advances	741																	
42	Debt securities	109																	
43	Equity instruments	272																	
44	Derivatives	448																	
45	On demand interbank loans	493																	
46	Cash and cash-related assets	4 461																	
47	Other categories of assets (e.g. Goodwill, commodities etc.)	43 257																	
48	Total GAR assets	236 955	65 778	3 147	0	76	1 116	109	26	0	4	2	0	0	0	18	0	0	0
49	Assets not covered for GAR calculation	103 416																	
50	Central governments and Supranational issuers	64 146																	
51	Central banks exposure	33 632																	
52	Trading book	5 639																	
53	Total assets	340 371	65 778	3 147	0	76	1 116	109	26	0	4	2	0	0	0	18	0	0	0
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations																			
54	Financial guarantees	31 701	242	239	0	0	194	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	4 060	1 529	582	0	97	377	807	66	0	3	3	0	0	0	84	0	0	0
56	Of which debt securities	1 424	999	397	0	64	276	452	1	0	0	3	0	0	0	26	0	0	0
57	Of which equity instruments	2 636	530	185	0	33	101	355	65	0	3	0	0	0	0	58	0	0	0

Template 1: Assets for Green Asset Ratio Calculation Part 2 [PLN million]

		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
mIn PLN		31.12.2024													
		Total (gross) carrying amount	Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling			
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	100 499	1	0	0	0	1	0	0	0	65 907	3 173	0	76	1 120
2	Financial undertakings	1 111	0	0	0	0	0	0	0	0	158	8	0	4	3
3	Credit institutions	1 110	0	0	0	0	0	0	0	0	158	8	0	4	3
4	Loans and advances	1 110	0	0	0	0	0	0	0	0	158	8	0	4	3
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Non-financial undertakings	8 817	1	0	0	0	1	0	0	0	3 430	1 636	0	73	1 117
21	Loans and advances	7 429	1	0	0	0	0	0	0	0	2 539	1 168	0	70	743
22	Debt securities, including UoP	1 365	0	0	0	0	0	0	0	0	878	458	0	3	369
23	Equity instruments	23	0	0	0	0	0	0	0	0	13	10	0	0	5
24	Households	88 912	0	0	0	0	0	0	0	0	61 233	1 528	0	0	0
25	of which loans collateralised by residential immovable property	61 236	0	0	0	0	0	0	0	0	61 233	1 528	0	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	Local governments financing	1 659	0	0	0	0	0	0	0	0	1 087	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0

		r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		31.12.2024													
mIn PLN		Total (gross) carrying amount	Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
30	Other local government financing	1 659	0	0	0	0	0	0	0	0	1 087	0	0	0	0
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	136 456													
33	<b>Non-financial undertakings</b>	87 797													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	86 675													
35	Loans and advances of which loans	77 835													
36	collateralised by commercial immovable property	22 019													
37	of which building renovation loans	0													
38	Debt securities	8 407													
39	Equity instruments	434													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 122													
41	Loans and advances	741													
42	Debt securities	109													
43	Equity instruments	272													
44	<b>Derivatives</b>	448													
45	<b>On demand interbank loans</b>	493													
46	<b>Cash and cash-related assets</b>	4 461													
47	<b>Other categories of assets (e.g. Goodwill, commodities etc.)</b>	43 257													
48	<b>Total GAR assets</b>	236 955	1	0	0	0	1	0	0	0	65 907	3 173	0	76	1 120
49	<b>Assets not covered for GAR calculation</b>	103 416													
50	<b>Central governments and Supranational issuers</b>	64 146													
51	<b>Central banks exposure</b>	33 632													
52	<b>Trading book</b>	5 639													
53	<b>Total assets</b>	340 371					1	0	0	0	65 907	3 173	0	76	1 120
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>															
54	Financial guarantees	31 701					0	0	0	0	242	239	0	0	194
55	Assets under management	4 060					0	0	0	0	2 424	648	0	97	380
56	Of which debt securities	1 424					0	0	0	0	1 481	398	0	64	277
57	Of which equity instruments	2 636					0	0	0	0	943	250	0	33	103



Template 1: Assets for Green Asset Ratio Calculation Part 3 [PLN million]

	ak	al.	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	az	
mIn PLN	31.12.2024															
	Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional/adaptacja	Of which enabling				
GAR – Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	96 194	62 185	1 887	0	20	824	4 174	173	0	172	62 185	2 060	0	20	996
2	Financial undertakings	949	131	0	0	0	0	131	0	0	0	131	0	0	0	0
3	Credit institutions	949	131	0	0	0	0	131	0	0	0	131	0	0	0	0
4	Loans and advances	949	131	0	0	0	0	131	0	0	0	131	0	0	0	0
5	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	0	0	0		0	0	0	0	0	0	0	0		0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0		0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

		ak	al.	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	az	
mIn PLN		31.12.2024															
		Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds		Of which enabling			Of which Use of Proceeds	Of which transitional/adaptacja	Of which enabling
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
12	Of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	0	
20	Non-financial undertakings	9 064	2 947	1 230	0	20	824	2 947	173	0	172	2 947	1 403	0	20	996	
21	Loans and advances	7 582	2 385	779	0	19	448	2 385	172	0	172	2 385	951	0	19	620	
22	Debt securities, including UoP	1 473	558	451	0	1	375	558	0	0	0	558	451	0	1	375	
23	Equity instruments	9	4	1	0	0	1	4	1		0	4	2		0	1	
24	Households	84 634	58 011	657	0	0	0	0	0	0	0	58 011	657	0	0	0	
25	of which loans collateralised by residential immovable property	58 015	58 011	657	0	0	0	0	0	0	0	58 011	657	0	0	0	
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
27	of which motor vehicle loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
28	Local governments financing	1 547	1 097	0	0	0	0	1 097	0	0	0	1 097	0	0	0	0	
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing	1 547	1 097	0	0	0	0	1 097	0	0	0	1 097	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	121 081															
33	Non-financial undertakings	86 942															
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	85 590															
35	Loans and advances	73 178															
36	of which loans collateralised by commercial immovable property	19 348															
37	of which building renovation loans	0															
38	Debt securities	11 902															
39	Equity instruments	511															

		ak	al.	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	az
mIn PLN		31.12.2024														
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)		
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 352														
41	Loans and advances	1 031														
42	Debt securities	111														
43	Equity instruments	210														
44	Derivatives	805														
45	On demand interbank loans	565														
46	Cash and cash-related assets	3 990														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	28 778														
48	Total GAR assets	217 274	62 185	1 887	0	20	824	4 174	173	0	172	62 185	2 060	0	20	996
49	Assets not covered for GAR calculation	96 702														
50	Central governments and Supranational issuers	57 962														
51	Central banks exposure	27 961														
52	Trading book	10 779														
53	Total assets	313 976	62 185	1 887	0	20	824	4 174	173	0	172	62 185	2 060	0	20	996
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	30 727	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	1 699	238	101	0	1	36	215	15	0	2	453	115	0	1	38
56	Of which debt securities	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which equity instruments	1 691	238	101	0	1	36	215	15	0	2	240	0	0	2	38



Template 2: Sectoral Information on the Green Asset Ratio Part 1 [PLN million]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Breakdown by sector - NACE 4 digits level (code and label)		Climate Change Mitigation (CCM)				Adaptacja do klimatu (CCA)				Water and marine resources (WMR)				Circular economy (CE)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		mln PLN	Of which environmentally sustainable (CCM)	mln PLN	Of which environmentally sustainable (CCM)	mln PLN	Of which environmentally sustainable (CCA)	mln PLN	Of which environmentally sustainable (CCA)	mln PLN	Of which environmentally sustainable (WMR)	mln PLN	Of which environmentally sustainable (WMR)	mln PLN	Of which environmentally sustainable (CE)	mln PLN	Of which environmentally sustainable (CE)
1	B05.10	270	3			270	0			270	0			270	0		
2	B07.29	1 720	10			1 720	0			1 720	0			1 720	0		
3	C10.11	68	0			68	0			68	0			68	0		
4	C10.13	17	0			17	0			17	0			17	0		
5	C11.05	0	0			0	0			0	0			0	0		
6	C15.20	0	0			0	0			0	0			0	0		
7	C16.10	13	0			13	0			13	0			13	0		
8	C17.12	20	4			20	0			20	0			20	0		
9	C19.20	695	117			695	2			695	0			695	0		
10	C20.15	481	9			481	3			481	0			481	0		
11	C20.16	0	0			0	0			0	0			0	0		
12	C20.30	35	0			35	0			35	0			35	0		
13	C20.42	0	0			0	0			0	0			0	0		
14	C22.11	4	0			4	0			4	0			4	0		
15	C23.20	18	1			18	0			18	0			18	0		
16	C24.42	115	21			115	0			115	0			115	0		
17	C25.93	42	0			42	0			42	0			42	0		
18	C27.12	5	1			5	0			5	0			5	0		
19	C28.41	0	0			0	0			0	0			0	0		
20	C28.92	180	110			180	0			180	0			180	0		
21	C29.20	0	0			0	0			0	0			0	0		
22	C33.20	9	0			9	0			9	0			9	0		
23	D35.11	816	581			816	0			816	0			816	0		
24	D35.14	1 209	205			1 209	0			1 209	0			1 209	0		
25	D35.30	0	0			0	0			0	0			0	0		
26	F41.10	22	8			22	1			22	0			22	0		
27	F41.20	20	1			20	0			20	0			20	0		
28	F42.11	4	0			4	0			4	0			4	0		
29	F42.12	8	0			8	0			8	0			8	0		
30	F43.39	16	1			16	0			16	0			16	0		
31	F43.99	0	0			0	0			0	0			0	0		
32	G45.31	612	159			612	0			612	0			612	0		
33	G46.32	2	0			2	0			2	0			2	0		
34	G46.46	296	2			296	0			296	0			296	0		
35	G46.72	3	0			3	0			3	0			3	0		
36	G46.90	191	0			191	0			191	0			191	0		
37	G47.11	190	1			190	0			190	0			190	0		
38	G47.41	5	0			5	0			5	0			5	0		
39	G47.71	271	5			271	0			271	0			271	0		
40	G47.72	1	0			1	0			1	0			1	0		
41	G47.91	1	0			1	0			1	0			1	0		
42	H49.20	242	46			242	0			242	0			242	0		
43	H53.20	76	46			76	0			76	0			76	0		
44	I56.10	320	0			320	0			320	0			320	0		
45	J61.10	0	0			0	0			0	0			0	0		
46	J61.30	208	27			208	3			208	0			208	0		
47	J62.01	1	0			1	0			1	0			1	0		
48	J63.12	3	0			3	2			3	0			3	0		
49	K64.20	392	229			392	14			392	0			392	0		
50	M70.10	68	22			68	0			68	0			68	0		
51	M72.11	109	0			109	0			109	0			109	0		
52	N77.40	0	0			0	0			0	0			0	0		
53	N82.91	16	0			16	0			16	0			16	0		
54	Q86.22	17	0			17	0			17	0			17	0		
55	S96.09	0	0			0	0			0	0			0	0		

Template 2: Sectoral Information on the Green Asset Ratio Part 2 [PLN million]

		q	r	s	t	u	v	w	x	y	z	aa	ab
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Breakdown by sector - NACE 4 digits level (code and label)		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		mln PLN	Of which environmentally sustainable (PPC)	mln PLN	Of which environmentally sustainable (PPC)	mln PLN	Of which environmentally sustainable (BIO)	mln PLN	Of which environmentally sustainable (BIO)	mln PLN	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	mln PLN	Of which environmentally sustainable (BIO)
1	B05.10	270	0			270	0			270	3		
2	B07.29	1 720	0			1 720	0			1 720	10		
3	C10.11	68	0			68	0			68	0		
4	C10.13	17	0			17	0			17	0		
5	C11.05	0	0			0	0			0	0		
6	C15.20	0	0			0	0			0	0		
7	C16.10	13	0			13	0			13	0		
8	C17.12	20	0			20	0			20	4		
9	C19.20	695	0			695	0			695	119		
10	C20.15	481	0			481	0			481	12		
11	C20.16	0	0			0	0			0	0		
12	C20.30	35	0			35	0			35	0		
13	C20.42	0	0			0	0			0	0		
14	C22.11	4	0			4	0			4	0		
15	C23.20	18	0			18	0			18	1		
16	C24.42	115	0			115	0			115	21		
17	C25.93	42	0			42	0			42	0		
18	C27.12	5	0			5	0			5	1		
19	C28.41	0	0			0	0			0	0		
20	C28.92	180	0			180	0			180	110		
21	C29.20	0	0			0	0			0	0		
22	C33.20	9	0			9	0			9	0		
23	D35.11	816	0			816	0			816	581		
24	D35.14	1 209	0			1 209	0			1 209	205		
25	D35.30	0	0			0	0			0	0		
26	F41.10	22	0			22	0			22	9		
27	F41.20	20	0			20	0			20	1		
28	F42.11	4	0			4	0			4	0		
29	F42.12	8	0			8	0			8	0		
30	F43.39	16	0			16	0			16	1		
31	F43.99	0	0			0	0			0	0		
32	G45.31	612	0			612	0			612	159		
33	G46.32	2	0			2	0			2	0		
34	G46.46	296	0			296	0			296	2		
35	G46.72	3	0			3	0			3	0		
36	G46.90	191	0			191	0			191	0		
37	G47.11	190	0			190	0			190	1		
38	G47.41	5	0			5	0			5	0		
39	G47.71	271	0			271	0			271	5		
40	G47.72	1	0			1	0			1	0		
41	G47.91	1	0			1	0			1	0		
42	H49.20	242	0			242	0			242	46		
43	H53.20	76	0			76	0			76	46		
44	I56.10	320	0			320	0			320	0		
45	J61.10	0	0			0	0			0	0		
46	J61.30	208	0			208	0			208	30		
47	J62.01	1	0			1	0			1	0		
48	J63.12	3	0			3	0			3	2		
49	K64.20	392	0			392	0			392	243		
50	M70.10	68	0			68	0			68	22		
51	M72.11	109	0			109	0			109	0		
52	N77.40	0	0			0	0			0	0		
53	N82.91	16	0			16	0			16	0		
54	Q86.22	17	0			17	0			17	0		
55	S96.09	0	0			0	0			0	0		

Template 3: Key Performance Indicator for the Green Asset Ratio in Relation to Stock Part 1 [%]

% (compared to total covered assets in the denominator)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR – Covered assets in both numerator and denominator																						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	27,76%	1,33%	0,00%	0,03%	0,47%	0,05%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and advances	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
20	Non-financial undertakings	1,39%	0,68%	0,00%	0,03%	0,47%	0,05%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and advances	1,03%	0,49%	0,00%	0,03%	0,31%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including UoP	0,36%	0,19%	0,00%	0,00%	0,15%	0,01%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
23	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%
24	Households	25,84%	0,64%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
	of which loans collateralised by residential immovable property	25,84%	0,64%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Local governments financing	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Other local government financing	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	27,76%	1,33%	0,00%	0,03%	0,47%	0,05%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%



Template 3: Key Performance Indicator for the Green Asset Ratio in Relation to Stock Part 2 [%]

% (compared to total covered assets in the denominator)		v	w	x	z	aa	ab	ac	ad	ae	af	ag	ah	ai	aj	ak	al	am	an	ao		
		31.12.2024										Proportion of total assets covered	31.12.2024									
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling		
GAR - Covered assets in both numerator and denominator																						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	27,81%	1,34%	0,00%	0,03%	0,47%	29,53%	29,15%	0,86%	0,00%	0,01%	0,38%	1,91%	0,08%	0,00%	0,08%		
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%	0,06%	0,00%	0,00%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%		
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%	0,06%	0,00%	0,00%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%		
4	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	0,33%	0,06%	0,00%	0,00%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%		
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%		
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
11	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%		
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
15	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%		
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
19	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%		
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	1,45%	0,69%	0,00%	0,03%	0,47%	2,59%	1,35%	0,56%	0,00%	0,01%	0,38%	1,35%	0,08%	0,00%	0,08%		
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	1,07%	0,49%	0,00%	0,03%	0,31%	2,18%	1,09%	0,36%	0,00%	0,01%	0,20%	1,09%	0,08%	0,00%	0,08%		
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,37%	0,19%	0,00%	0,00%	0,16%	0,40%	0,25%	0,21%	0,00%	0,00%	0,17%	0,25%	0,00%	0,00%	0,00%		
23	Equity instruments	0,00%	0,00%		0,00%	0,01%	0,00%		0,00%	0,00%	0,01%	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%		
24	Households	0,00%	0,00%	0,00%	0,00%	25,84%	0,64%	0,00%	0,00%	0,00%	26,12%	27,24%	0,30%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
25	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	25,84%	0,64%	0,00%	0,00%	0,00%	17,99%	27,24%	0,30%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,46%	0,00%	0,00%	0,00%	0,00%	0,49%	0,50%	0,00%	0,00%	0,00%	0,00%	0,50%	0,00%	0,00%	0,00%		
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,46%	0,00%	0,00%	0,00%	0,00%	0,49%	0,50%	0,00%	0,00%	0,00%	0,00%	0,50%	0,00%	0,00%	0,00%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	27,81%	1,34%	0,00%	0,03%	0,47%	69,62%	29,15%	0,86%	0,00%	0,01%	0,38%	1,91%	0,08%	0,00%	0,08%		

Template 3: Key Performance Indicator for the Green Asset Ratio in Relation to Stock Part 3 [%]

% (compared to total covered assets in the denominator)		ap	aq	ar	as	at	au
		31.12.2024					Proportion of total assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR – Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0,00%	0,01%	0,45%	31,00%	0,47%	29,53%
2	Financial undertakings	0,00%	0,00%	0,00%	0,30%	0,00%	0,33%
3	Credit institutions	0,00%	0,00%	0,00%	0,30%	0,00%	0,33%
4	Loans and advances	0,00%	0,00%	0,00%	0,30%	0,00%	0,33%
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Equity instruments		0,00%	0,00%	0,00%	0,00%	0,00%
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Equity instruments		0,00%	0,00%	0,00%	0,00%	0,00%
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Equity instruments		0,00%	0,00%	0,00%	0,00%	0,00%
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Equity instruments		0,00%	0,00%	0,00%	0,00%	0,00%
20	Non-financial undertakings	0,00%	0,01%	0,45%	2,87%	0,47%	2,59%
21	Loans and advances	0,00%	0,01%	0,28%	2,40%	0,31%	2,18%
22	Debt securities, including UoP	0,00%	0,00%	0,17%	0,47%	0,16%	0,40%
23	Equity instruments		0,00%	0,00%	0,00%	0,00%	0,01%
24	Households	0,00%	0,00%	0,00%	27,34%	0,00%	26,12%
25	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	18,90%	0,00%	17,99%
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Local governments financing	0,00%	0,00%	0,00%	0,49%	0,00%	0,49%
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Other local government financing	0,00%	0,00%	0,00%	0,49%	0,00%	0,49%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,01%	0,45%	69,36%	0,47%	69,62%

Template 4: Key Performance Indicator for the Green Asset Ratio in Relation to Flow Part 1 [%]

% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u
	31.12.2024																				
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both numerator and denominator																					
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	11,28%	1,49%	0,00%	0,08%	0,75%	0,08%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,19%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,19%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and advances	0,19%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%
20	Non-financial undertakings	1,79%	1,02%	0,00%	0,08%	0,75%	0,08%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and advances	1,46%	0,99%	0,00%	0,08%	0,74%	0,06%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including UoP	0,31%	0,02%	0,00%	0,00%	0,00%	0,02%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
23	Equity instruments	0,02%	0,01%		0,00%	0,01%	0,00%	0,00%		0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%
24	Households	8,92%	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which loans collateralised by residential immovable property	8,30%	0,46%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Local governments financing	0,38%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Other local government financing	0,38%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	11,28%	1,49%	0,00%	0,08%	0,75%	0,08%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%



Template 4: Key Performance Indicator for the Green Asset Ratio in Relation to Flow Part 2 [%]

		v	w	x	z	aa	ab	ac	ad	ae	af	
% (compared to total covered assets in the denominator)		31.12.2024										
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)						Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling					
GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0,00%	0,00%	0,00%	0,00%	11,43%	1,51%	0,00%	0,08%	0,75%	27,49%	
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,19%	0,01%	0,00%	0,00%	0,00%	0,75%	
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,19%	0,01%	0,00%	0,00%	0,00%	0,75%	
4	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,19%	0,01%	0,00%	0,00%	0,00%	0,75%	
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
6	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	Equity instruments	0,00%	0,00%		0,00%	0,00%	0,00%		0,00%	0,00%	0,00%	
20	Non-financial undertakings	0,00%	0,00%	0,00%	0,00%	1,93%	1,04%	0,00%	0,08%	0,75%	3,81%	
21	Loans and advances	0,00%	0,00%	0,00%	0,00%	1,59%	0,99%	0,00%	0,08%	0,74%	3,16%	
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,33%	0,04%	0,00%	0,00%	0,00%	0,63%	
23	Equity instruments	0,00%	0,00%		0,00%	0,02%	0,01%		0,00%	0,01%	0,02%	
24	Households	0,00%	0,00%	0,00%	0,00%	8,92%	0,46%	0,00%	0,00%	0,00%	22,29%	
25	of which loans collateralised by residential immovable property	0,00%	0,00%	0,00%	0,00%	8,30%	0,46%	0,00%	0,00%	0,00%	6,89%	
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,38%	0,00%	0,00%	0,00%	0,00%	0,63%	
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,38%	0,00%	0,00%	0,00%	0,00%	0,63%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	11,43%	1,51%	0,00%	0,08%	0,75%	83,02%	

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Stock Part 1 [%]

% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u
	31.12.2024																				
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	1 Financial guarantees (FinGuar KPI)	0,76%	0,75%	0,00%	0,00%	0,61%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (AuM KPI)	37,66%	14,34%	0,00%	2,40%	9,29%	19,88%	1,63%	0,00%	0,08%	0,08%	0,00%	0,00%	0,00%	2,06%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Stock Part 2 [%]

		v	w	x	z	aa	ab	ac	ad	ae
% (compared to total covered assets in the denominator)		31.12.2024								
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	1 Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,76%	0,75%	0,00%	0,00%	0,61%
2	Assets under management (AuM KPI)	0,00%	0,00%	0,00%	0,00%	59,69%	15,97%	0,00%	2,40%	9,37%

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Flow Part 1 [%]

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		31.12.2024																				
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	1 Financial guarantees (FinGuar KPI)	0,27%	0,27%	0,00%	0,00%	0,23%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (AuM KPI)	30,85%	11,36%	0,00%	0,86%	6,82%	26,60%	4,12%	0,00%	0,05%	0,00%	0,00%	0,00%	0,00%	5,50%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

Template 5: Key Performance Indicator for Off-Balance Sheet Exposures in Relation to Flow Part 2 [%]

		v	w	x	z	aa	ab	ac	ad	ae
		31.12.2024								
% (compared to total covered assets in the denominator)		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling	
1	1 Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,27%	0,27%	0,00%	0,00%	0,23%
2	Assets under management (AuM KPI)	0,00%	0,00%	0,00%	0,00%	62,96%	15,48%	0,00%	0,86%	6,87%



Disclosures of Indicators Related to Nuclear Energy and Natural Gas Activities in Accordance with Annex XII to Regulation 2021/2178

Below, the Group presents disclosures of the amount and share of activities that are eligible and taxonomy-aligned in both the numerator and denominator of its key performance indicators, as well as non-eligible activities in the denominator of its key performance indicators. These disclosures pertain to activities described in sections 4.26 – 4.31 of Annexes I and II to

Delegated Regulation (EU) 2021/2139, in accordance with the scope defined in Templates 1-5 of Annex XII to Regulation 2021/2178.

Disclosures related to gas and nuclear activities have been made concerning exposures to non-financial corporations that are subject to non-financial reporting requirements under the Non-Financial Reporting Directive (NFRD). They have been prepared based on data published by the Group’s customers within their taxonomy disclosures for the year 2023.

The disclosures are presented on a consolidated basis, in accordance with the prudential consolidation scope of the Group.

Disclosures Based on Counterparty Key Performance Indicator by Turnover (KPI Turnover) – Green Asset Ratio as of 31.12.2024

Template 1: Activities Related to Nuclear Energy and Natural Gas

No.	Nuclear Energy Activities	
1.	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them.	NO
2.	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safety oriented modernisation using best available technologies, finances such activities, or has exposure to them.	NO
3.	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	NO
Natural Gas Activities		
4.	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
5.	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
6.	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	YES

Template 2: Taxonomy-Aligned Business Activities (Denominator) [PLN million]

		Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
No.	Type of Business Activity	Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	<b>Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator</b>	<b>2 092</b>	<b>0,88%</b>	<b>2 052</b>	<b>0,87%</b>	<b>41</b>	<b>0,02%</b>
8.	<b>Total applicable key performance indicator</b>	<b>2 092</b>	<b>0,88%</b>	<b>2 052</b>	<b>0,8%</b>	<b>41</b>	<b>0,02%</b>

Template 3: Taxonomy-Aligned Business Activities (Numerator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	<b>Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the numerator of the applicable key performance indicator</b>	<b>2 092</b>	<b>100%</b>	<b>2 052</b>	<b>98,06%</b>	<b>41</b>	<b>1,95%</b>
8.	<b>Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator</b>	<b>2 092</b>	<b>100%</b>	<b>2 052</b>	<b>98,06%</b>	<b>41</b>	<b>1,95%</b>

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-eligible but not taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1	0,00%	1	0,00%	0	0,00%
5.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	488	0,21%	487	0,21%	1	0,00%
6.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	18	0,01%	18	0,01%	0	0,00%
7.	Amount and share of other taxonomy-eligible but not taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator	61 396	25,91%	61 378	25,90%	18	0,01%
8.	Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator	61 903	26,12%	61 884	26,12%	19	0,01%

Template 5: Non-Taxonomy-Eligible Business Activities [PLN million]

No.	Type of Business Activity	Amount	Percentage Share
1.	Amount and share of business activities referred to in row 1 of Template 1 that are non-taxonomy-eligible according to section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
2.	Amount and share of business activities referred to in row 2 of Template 1 that are non-taxonomy-eligible according to section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
3.	Amount and share of business activities referred to in row 3 of Template 1 that are non-taxonomy-eligible according to section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
4.	Amount and share of business activities referred to in row 4 of Template 1 that are non-taxonomy-eligible according to section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
5.	Amount and share of business activities referred to in row 5 of Template 1 that are non-taxonomy-eligible according to section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
6.	Amount and share of business activities referred to in row 6 of Template 1 that are non-taxonomy-eligible according to section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
7.	Amount and share of other non-taxonomy-eligible business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator	36 504	15,41%
8.	Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator	36 504	15,41%

Disclosures Based on Counterparty Key Performance Indicator by Capital Expenditures (KPI Capex) – Green Asset Ratio as of 31.12.2024

Template 1: Activities Related to Nuclear Energy and Natural Gas

No.	Nuclear Energy Activities	
1.	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them.	NO
2.	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safety oriented modernisation using best available technologies, finances such activities, or has exposure to them.	NO
3.	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	NO
Natural Gas Activities		
4.	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
5.	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
6.	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	YES

Template 2: Taxonomy-Aligned Business Activities (Denominator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator	3 173	1,34%	3 147	1,33%	26	0,01%
8.	Total applicable key performance indicator	3 173	1,34%	3 147	1,33%	26	0,01%



Template 3: Taxonomy-Aligned Business Activities (Numerator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the numerator of the applicable key performance indicator	3 173	100%	3 147	99,18%	26	0,82%
8.	Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator	3 173	100%	3 147	99,18%	26	0,82%

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	248	0,11%	248	0,11%	0	0,00%
5.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	271	0,12%	271	0,12%	0	0,00%
6.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	73	0,03%	73	0,03%	0	0,00%
7.	Amount and share of other taxonomy-eligible but not taxonomy-aligned business activities not listed in rows 1- 6 above in the denominator of the applicable key performance indicator	62 121	26,22%	62 038	26,18%	83	0,04%
8.	Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator	62 714	26,47%	62 631	26,43%	83	0,04%

Template 5: Non-Taxonomy-Eligible Business Activities [PLN million]

No.	Type of Business Activity	Amount	Percentage Share
1.	Amount and share of business activities referred to in row 1 of Template 1 that are non-taxonomy-eligible according to section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
2.	Amount and share of business activities referred to in row 2 of Template 1 that are non-taxonomy-eligible according to section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
3.	Amount and share of business activities referred to in row 3 of Template 1 that are non-taxonomy-eligible according to section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
4.	Amount and share of business activities referred to in row 4 of Template 1 that are non-taxonomy-eligible according to section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
5.	Amount and share of business activities referred to in row 5 of Template 1 that are non-taxonomy-eligible according to section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
6.	Amount and share of business activities referred to in row 6 of Template 1 that are non-taxonomy-eligible according to section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0%
7.	Amount and share of other non-taxonomy-eligible business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator	34 612	14,61%
8.	Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator	34 612	14,61%

Disclosures Based on Counterparty Key Performance Indicator by Turnover (KPI Turnover) – Green Asset Ratio in Relation to Flow in 2024

Template 1: Activities Related to Nuclear Energy and Natural Gas

No.	Nuclear Energy Activities	
1.	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them.	NO
2.	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safety oriented modernisation using best available technologies, finances such activities, or has exposure to them.	NO
3.	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	NO
Natural Gas Activities		
4.	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
5.	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
6.	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	YES

Template 2: Taxonomy–Aligned Business Activities (Denominator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	Amount and share of other taxonomy-aligned business activities not listed in rows 1–6 above in the denominator of the applicable key performance indicator	609	0,74%	596	0,72%	13	0,02%
8.	Total applicable key performance indicator	609	0,74%	696	0,72%	13	0,02%

Template 3: Taxonomy–Aligned Business Activities (Numerator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	Amount and share of other taxonomy-aligned business activities not listed in rows 1–6 above in the numerator of the applicable key performance indicator	609	100%	596	97,80%	13	2,20%
8.	Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator	609	100%	596	97,80%	13	2,20%

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	1	0,00%	1	0,00%	0	0,00%
5.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	450	0,54%	449	0,54%	1	0,00%
6.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	16	0,02%	16	0,02%	0	0,00%
7.	Amount and share of other taxonomy-eligible but not taxonomy-aligned business activities not listed in rows 1- 6 above in the denominator of the applicable key performance indicator	7 230	8,73%	7 220	8,71%	10	0,01%
8.	Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator	7 696	9,29%	7 685	9,28%	10	0,01%

Template 5: Non-Taxonomy-Eligible Business Activities [PLN million]

No.	Type of Business Activity	Amount	Percentage Share
1.	Amount and share of business activities referred to in row 1 of Template 1 that are non-taxonomy-eligible according to section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
2.	Amount and share of business activities referred to in row 2 of Template 1 that are non-taxonomy-eligible according to section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
3.	Amount and share of business activities referred to in row 3 of Template 1 that are non-taxonomy-eligible according to section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
4.	Amount and share of business activities referred to in row 4 of Template 1 that are non-taxonomy-eligible according to section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
5.	Amount and share of business activities referred to in row 5 of Template 1 that are non-taxonomy-eligible according to section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
6.	Amount and share of business activities referred to in row 6 of Template 1 that are non-taxonomy-eligible according to section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
7.	Amount and share of other non-taxonomy-eligible business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator	19 123	23,08%
8.	Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator	19 123	23,08%



Disclosures Based on Counterparty Key Performance Indicator by Capital Expenditures (KPI Capex) – Green Asset Ratio in Relation to Flow in 2024

Template 1: Activities Related to Nuclear Energy and Natural Gas

No.	Nuclear Energy Activities	
1.	The company conducts research, development, demonstration, and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste, finances such activities, or has exposure to them.	NO
2.	The company engages in the construction and safe operation of new nuclear facilities for electricity or industrial heat production, including district heating systems or processes such as hydrogen production, as well as their safety oriented modernisation using best available technologies, finances such activities, or has exposure to them.	NO
3.	The company engages in the safe operation of existing nuclear facilities generating electricity or industrial heat, including district heating systems or processes such as hydrogen production from nuclear energy, as well as their safety-oriented modernisation, finances such activities, or has exposure to them.	NO
Natural Gas Activities		
4.	The company engages in the construction or operation of power generation facilities using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
5.	The company engages in the construction, modernisation, and operation of cogeneration plants producing heat/cooling and electricity using gaseous fossil fuels, finances such activities, or has exposure to them.	YES
6.	The company engages in the construction, modernisation, and operation of heat production facilities generating thermal/cooling energy using gaseous fossil fuels, finances such activities, or has exposure to them.	YES

Template 2: Taxonomy-Aligned Business Activities (Denominator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator	1 250	1,51%	1 231	1,49%	19	0,02%
8.	Total applicable key performance indicator	1 250	1,51%	1 231	1,49%	19	0,02%

Template 3: Taxonomy-Aligned Business Activities (Numerator) [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-aligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-aligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-aligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-aligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
5.	Amount and share of taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
6.	Amount and share of taxonomy-aligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
7.	Amount and share of other taxonomy-aligned business activities not listed in rows 1-6 above in the numerator of the applicable key performance indicator	1 250	100,00%	1 231	98,47%	19	1,53%
8.	Total amount and total share of taxonomy-aligned business activities in the numerator of the applicable key performance indicator	1 250	100,00%	1 231	98,47%	19	1,53%

Template 4: Taxonomy-Eligible but Not Taxonomy-Aligned Business Activities [PLN million]

No.	Type of Business Activity	Amount and Share					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
2.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
3.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%	0	0,00%	0	0,00%
4.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	228	0,27%	228	0,27%	0	0,00%
5.	Amount and share of taxonomy-eligible but not taxonomy-aligned business activities referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	238	0,29%	238	0,29%	0	0,00%
6.	Amount and share of taxonomy-eligible but not taxonomyaligned business activities referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	65	0,08%	65	0,08%	0	0,00%
7.	Amount and share of other taxonomy-eligible but not taxonomy-aligned business activities not listed in rows 1- 6 above in the denominator of the applicable key performance indicator	7 634	9,21%	7 587	9,16%	47	0,06%
8.	Total amount and total share of taxonomy-eligible but not taxonomy-aligned business activities in the denominator of the applicable key performance indicator	8 164	9,85%	8 118	9,80%	47	0,06%

Template 5: Non-Taxonomy-Eligible Business Activities [PLN million]

No.	Type of Business Activity	Amount	Percentage Share
1.	Amount and share of business activities referred to in row 1 of Template 1 that are non-taxonomy-eligible according to section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
2.	Amount and share of business activities referred to in row 2 of Template 1 that are non-taxonomy-eligible according to section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
3.	Amount and share of business activities referred to in row 3 of Template 1 that are non-taxonomy-eligible according to section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
4.	Amount and share of business activities referred to in row 4 of Template 1 that are non-taxonomy-eligible according to section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
5.	Amount and share of business activities referred to in row 5 of Template 1 that are non-taxonomy-eligible according to section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
6.	Amount and share of business activities referred to in row 6 of Template 1 that are non-taxonomy-eligible according to section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0	0,00%
7.	<b>Amount and share of other non-taxonomy-eligible business activities not listed in rows 1-6 above in the denominator of the applicable key performance indicator</b>	<b>18 014</b>	<b>21,74%</b>
8.	<b>Total amount and total share of non-taxonomy-eligible business activities in the denominator of the applicable key performance indicator</b>	<b>18 014</b>	<b>21,74%</b>

**Explanations Regarding the Nature and Objectives of Taxonomy-Aligned Business Activities and Their Development Over Time, Starting from the Second Year of Implementation, with a Distinction Between Business-Related, Methodological, and Data-Related Elements**

The highest share of the Green Asset Ratio (GAR) was attributed to the Group’s exposures towards non-financial corporations, particularly in general-purpose financing and household mortgage lending. The sustainable activities identified within the Group’s portfolio, involving non-financial corporations covered by NFRD, primarily contributed to the CCM (Climate Change Mitigation) objective.

The highest gross carrying amount of environmentally sustainable activities was found among Group companies operating in the electricity generation, distribution, and trade sectors.

A significant growth of key performance indicators’ values both regarding to turnover (KPI Turnover) and capital expenditures (KPI Capex) is observed compared to the Group’s 2023 disclosures.

While the value of total green assets (included in the denominator) remained comparable year to year the Group observed a material growth in sustainable exposures’ worth (taxonomy-aligned) as regards:

- General financing for financial and non-financial undertakings identified based on key performance indicators disclosed by the Group’s clients as part of their own taxonomy disclosures,
- Household financing – mortgage-backed loans.

As regards general financing, there have been no changes in the methodology used to assess taxonomy alignment or data sources, for which clients’ taxonomy disclosures were used analogous to the assessment conducted in 2023.

In the case of household financing, changes in demand for primary energy in buildings (and consequently changes in energy demand reflecting 15% of the most energy efficient buildings – this indicator is published by the Ministry of Economic Development and Technology and in 2024 it increased relative to 2023) impacted the value of taxonomy-aligned exposures. implemented in 2024 did affect the total gross carrying amount of mortgage-backed loans granted to households, but the impact of these changes on the gross carrying amount of loans in accordance with the taxonomy was negligible and not reflected in the value of the key indicator of green assets. The Group analysed its activity related to household financing and referred to changes introduced in the accounting policy related to recognition of the impact of legal risk arising from court proceedings related to CHF mortgage loans. The changes

**Compliance with Regulation (EU) 2020/852 in Business Strategy, Product Design, and Collaboration with Customers and Counterparties**

In line with its ESG Strategy, Bank Pekao supports customers in their energy transition and climate adaptation, finances the development of renewable energy sources (RES), and invests in new technologies. Supporting the green economic transition, the Bank focuses its financing of environmental investments on activities related to:

- Low-emission construction,
- Low-emission transportation,
- Photovoltaic installations,
- Photovoltaic installations,
- Biogas plants,

These activities support the first two environmental objectives of the Taxonomy, namely Climate Change Mitigation (CCM) and Climate Change Adaptation (CCA).

When structuring its credit offerings, the Bank engages in dialogue with customers to tailor solutions that support their environmental and climate transition plans, enabling them to achieve the environmental and climate goals set out in their business strategies.

In line with its Credit Risk Policy, the ESG risk assessment, including climate-related risks, is an integral part of the credit risk evaluation process for business transactions. In addition to assessing creditworthiness and credit risk in the strict sense, the Group carefully evaluates transaction-specific risks, including legal, reputational, and political risks, as well as ESG risks – including climate and environmental risks – money laundering and terrorist financing risks, and conflict of interest risks.

**Additional or Supplementary Information Regarding the Bank’s Strategy and the Significance of Financing Taxonomy- Aligned Business Activities Within the Overall Business Operations**

In 2021, the Bank adopted and published its ESG Strategy for 2021–2024, titled “A Responsible Bank Supporting Sustainable Development”, defining objectives related to environmental protection, economic and social development, and the sustainable growth of the Bank itself. The ESG Strategy is built on three pillars: “Environment”, “Social Responsibility”, and “Governance”. Each pillar includes specific KPIs set for each year of the strategy’s implementation.

As part of the “Environment” pillar, the Bank has committed to achieving the following goals<sup>1</sup> by the end of 2024:

- A share of high-emission financing in the total loan portfolio below 1.0%,
- Financing over PLN 8 billion in sustainable projects between 2021–2024,
- Supporting ESG bond issuances by customers worth over PLN 22 billion between 2021–2024,
- Achieving a green financing share above 4.0% in the total loan portfolio.

The Bank classifies green, social, and brown exposures in accordance with definitions outlined in its ESG Strategy, further refined in internal documentation.

In 2024, the Bank significantly exceeded the 4% green financing target set in the ESG Strategy and continues efforts to increase this share further. The difference between the green financing share and the reported GAR results from differences in the definition of green assets and variations in the treatment of specific asset categories. The GAR applies only to companies

subject to NFRD, households, and public sector financing (JST), excluding a large portion of other business activities. In contrast, the green financing share refers to the Bank’s entire loan portfolio, encompassing a broader range of financed customers and sectors.